

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

RICHARD ROE, ET AL.,

PLAINTIFFS,

v.

LLOYD AUSTIN, ET AL.,  
DEFENDANTS.

CIVIL ACTION NO. 1:18-cv-01565

NICHOLAS HARRISON, ET AL.,

PLAINTIFFS,

v.

LLOYD AUSTIN, ET AL.,  
DEFENDANTS.

CIVIL ACTION NO. 1:18-CV-00641

**MEMORANDUM IN SUPPORT OF PLAINTIFFS'  
MOTIONS FOR ATTORNEY'S FEES AND COSTS**

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In April 2022, this Court granted summary judgment for plaintiffs Nicholas Harrison, Richard Roe, Victor Voe, and the Modern Military Association of America (MMAA) in these related cases. *Harrison v. Austin*, ECF 308; *Roe v. Austin*, ECF 320.<sup>1</sup> In ruling for Plaintiffs, the Court struck down policies and decisions of defendants the Department of Defense (DOD), Army, and Air Force that prevented Plaintiffs and other service members living with HIV from deploying anywhere in the world—and, consequently, from commissioning as officers or continuing to serve their country. The Court correctly concluded that Defendants’ actions lacked a rational basis in violation of the Fifth Amendment’s equal protection guarantee (in both cases) and the Administrative Procedure Act (APA) (in *Roe*).

Because Defendants have now abandoned their appeals of the summary judgment rulings, Plaintiffs are indisputably a “prevailing party” under the Equal Access to Justice Act (EAJA), which requires that “a court shall award to a prevailing party . . . fees and other expenses.” 28 U.S.C. § 2412(a)(1), (d)(1)(A). For the following reasons, Plaintiffs are entitled to an EAJA fee award of \$2,408,567.70—a mere fraction of the \$3,733,856.25 their counsel at Winston & Strawn alone would have charged for their work on this case at their standard rates. *See* Ex. 1 ¶ 12 (declaration of J. Harding on behalf of Winston & Strawn personnel); Ex. 1–A (Winston bills).

## **BACKGROUND**

### **A. Plaintiffs’ Claims**

Sergeant Nicholas Harrison is a twice-deployed member of the National Guard whose application to commission as a JAG officer in the Army was denied because he is living with HIV. Plaintiffs Roe and Voe are also service members living with HIV and served in the Air Force for more than a decade. *Roe*, ECF 268 at 7, ECF 268-2 at 19, ECF 321 at 19. In 2018, in “near-

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<sup>1</sup> The orders were later amended to correct an inadvertent omission. *See Harrison*, ECF 314; *Roe*, ECF 328.

identical three-page decisions,” the Air Force found that, while Roe and Voe could perform all of their duties, passed their fitness assessments, and were recommended for retention by their commanding officers, their HIV diagnoses prevented them from deploying to CENTCOM and so they should be discharged from the Air Force. *Roe*, ECF 321 (summary judgment opinion) at 19.<sup>2</sup>

In May and December 2018, Harrison and Roe and Voe sued the DoD and their respective branches. *Harrison*, ECF 1; *Roe*, ECF 1. Joining them as a co-plaintiff in both suits was MMAA, a non-profit organization that promotes the interests of LGBTQ+ and HIV-positive service members, veterans, and their families. *Harrison*, ECF 168 at 1, 255-8 at 25–26. MMAA identified other service members living with HIV, including at least 11 airmen, who were referred to DES and found unfit in the same way as Roe and Voe. *Roe*, ECF 321 at 19.

Harrison alleged that DoD and the Army had violated his Fifth Amendment right to equal protection by barring him from accession based solely on his HIV status. *Harrison*, ECF 1. Roe and Voe alleged that their discharges from the Air Force based solely on their HIV status violated their Fifth Amendment equal protection rights and were arbitrary and capricious in violation of the APA. *Roe*, ECF 1. Both lawsuits alleged that the restrictions on accession and retention of service members living with HIV were “grounded in the same underlying policy, which is an essentially categorical ban on the worldwide deployment of any service member who is HIV-positive, regardless of whether the service member has been successfully treated such that his is asymptomatic and has an undetectable viral load.” *Roe*, ECF 321 at 3.

### **B. The Hard-Fought Litigation to Vindicate Plaintiffs’ Rights**

*Harrison* and *Roe* were hard fought from the outset. *See* Ex. 2 ¶ 18 (expert declaration of Charles B. Molster, III) (table summarizing relevant timelines for both cases). Preliminary

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<sup>2</sup> When the documents filed in these related cases are identical, a the citation to the docket of only one of the cases is provided.

motions included Plaintiffs' motions for a preliminary injunction (*Harrison*, ECF 25; *Roe*, ECF 33), and two motions to dismiss by Defendants in each case (*Harrison*, ECF 51–52; *Roe*, ECF 48–49). After the Court denied these motions in *Harrison*, discovery began. *Harrison*, ECF 59–60.

Discovery was contentious. Even after being told by the Court that there needed to be a “fulsome record,” Defendants initially attempted to limit discovery in *Harrison* to only documents related to the Army's commissioning policy. *Harrison*, ECF 73, 73-1 at 16 (Sept. 14, 2018 Hr'g Tr.). *Harrison* moved to compel, and for the most part prevailed. *Harrison*, ECF 72, 81. Defendants would, however, object to Magistrate Judge Davis's order granting *Harrison* discovery (*Harrison*, ECF 83)<sup>3</sup> leading this Court to state, “quite frankly, I'm not sure the defense truly understands what's at issue in this case. The evidence that Judge Davis found is relevant to plaintiffs' case is in this court's view absolutely relevant” (*Harrison*, ECF 97 (Dec. 21, 2018 Hr'g Tr. 4:1-12)). The objections were overruled. *Harrison*, ECF 98. This was followed by a drawn-out dispute over the scope and applicability of the deliberative process privilege, which led to three court appearances and numerous discussions based on Judge Davis's guidance and an in camera review. *Harrison*, ECF 113, 117, 123; *Roe*, ECF 95, 100, 101. Plaintiffs' motion to compel was granted there as well. *Harrison*, ECF 128. Defendants obtained a stay of Judge Davis's order while they objected to it. *Harrison*, ECF 137. Defendants' objections were sustained-in-part and overruled-in-part. *Harrison*, ECF 176. Judge Davis subsequently applied the Court's ruling on the deliberative process privilege from *Harrison* to the documents produced in *Roe* and granted in part and denied in part Plaintiffs' motion to compel in that case. *Roe*, ECF 158.

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<sup>3</sup> Before Defendants could object, another discovery dispute emerged, and Plaintiffs filed another motion to compel. *Harrison*, ECF 82. The parties would reach an agreement rendering that motion moot. *Harrison*, ECF 101.

Around the same time as the deliberate process privilege dispute was occurring, this Court ruled on Roe and Voe's motion for a preliminary injunction. *Roe*, ECF 72. The record on that motion alone "included over 1,500 pages of materials." *Roe*, ECF 321 at 4. Based on that extensive record, the Court concluded that Plaintiffs "have made a strong showing that defendants' policies are irrational, based on a flawed understanding of HIV epidemiology, and inconsistently applied." *Id.* at 25. Defendants appealed that decision to the Fourth Circuit while continuing to litigate the case in this Court. *Roe*, ECF 112. Only months later, after significant additional litigation and with a looming trial date, would Defendants seek and obtain a stay of the litigation.

Despite losing four earlier motions to dismiss, Defendants filed new motions to dismiss MMAA for lack of jurisdiction. *Harrison*, ECF 154; *Roe*, ECF 118. The Court ordered limited discovery on certain issues the motions raised, and additional briefs were filed before Defendants' motions were denied. *Harrison*, ECF 183, 205, 210, 227, 251; *Roe*, ECF 192, 222, 261. Just over five weeks before trial was scheduled to begin, and after the parties had made their Rule 26 pre-trial disclosures, served objections to those disclosures, and started briefing partial summary judgment (*e.g.*, *Harrison*, ECF 187–91, 200, 230), the cases were stayed pending resolution of Defendants' appeal of the preliminary injunction order.<sup>4</sup> *Harrison*, ECF 241; *Roe*, ECF 244.

### **C. Fourth Circuit Appeal**

In the Fourth Circuit, Roe and Voe prevailed against Defendants' appeal of this Court's preliminary injunction "after over 300 pages of additional briefing and the submission of several

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<sup>4</sup> Defendants could have, but did not, seek a stay when they appealed in April. Defendants instead filed their motion to stay months after appealing, and only after this Court ordered additional discovery and briefing on their motion to dismiss Plaintiff MMAA. It appears Defendants were hoping that this Court would dismiss MMAA, and that they would be able to use that to their benefit on appeal. When that did not occur, they filed a motion to stay about five weeks before trial was scheduled to begin. Defendants' timing caused Plaintiffs to expend significant resources taking additional discovery, briefing summary judgment, and preparing for trial.

amicus briefs—including an amicus brief submitted by former Secretaries of the Army, Air Force, and Navy, among other former high-ranking military officials, in support of plaintiffs.” *Roe*, ECF 321 at 5. The Fourth Circuit panel unanimously affirmed the preliminary injunction. *Roe v. Austin*, 947 F.3d 207, 234 (4th Cir. 2020). The court agreed with this Court that Defendants’ policies “rel[ie]d] on assumptions and categorial determinations” and were “unsupported by the record or contradicted by scientific evidence” and “at odds with modern science.” *Id.* at 222–23, 225.

#### **D. Summary Judgment (Again)**

After the Fourth Circuit affirmed this Court’s preliminary injunction, the parties began anew in briefing cross-motions for summary judgment, and the Court heard argument in September 2020. *Harrison*, ECF 251, 298.

In April 2022—after almost *four years* of litigation—this Court granted Plaintiffs’ motion for summary judgment and denied Defendants’. *Roe*, ECF 321. The Court found that the bar to deployment for service members living with HIV “on which the challenged accession and retention policies are based” is effectively categorical, and that Defendants’ asserted justifications for it were “either contradicted by medical evidence or unsupported by the record.” *Roe*, ECF 321 at 20–21. “[T]he military’s categorical bar . . . is [therefore] not rational and [the] individual discharge decisions based on that deployment bar were arbitrary and capricious” in violation of the APA. *Id.* at 46. The Court concluded that the categorical bar also violated the Equal Protection Clause by “irrationally treat[ing] HIV-positive service members who are asymptomatic with undetectable viral loads differently than service members with other chronic but manageable conditions.” *Id.*

Importantly, the Court explained:

Although the record has since been supplemented through additional discovery, *the government offers essentially the same explanations for its policies* in its summary judgment briefing. Accordingly, at oral argument, the first question the government was asked was what new evidence it had adduced. None of the evidence described in the government’s answer to that question, and none of the limited evidence

identified as new in the government's summary judgment briefing, justifies reaching a different conclusion than that reached by the Fourth Circuit in *Roe*.

*Id.* at 33 (emphasis added). This Court enjoined Defendants from “denying the application of . . . Harrison and any other asymptomatic HIV-positive service member with an undetectable viral load to commission as officers,” and from “separating or discharging Richard Roe, Victor Voe, and any other asymptomatic HIV-positive service member with an undetectable viral load,” on the basis of their HIV status. *Harrison*, ECF 314 (amended order); *Roe*, ECF 328 (same).

In all, between the two cases, Plaintiffs filed two preliminary injunction motions, opposed several motions to dismiss, moved for summary judgment twice, opposed summary judgment in each case, filed numerous motions to compel, took or defended 31 fact depositions, worked with 3 experts, deposed 2 experts and multiple doctors, and appeared before this Court or the Fourth Circuit 14 times. Ex. 3 ¶ 22 (declaration of K. Ingelhart on behalf of Lambda Legal); *see Harrison*, ECF 59, 80, 96, 113, 117, 123, 140, 148, 166, 186, 249 298 (various hearings); *Roe*, ECF 71 (preliminary injunction hearing); *Roe*, 4th Cir. No. 19-1410, ECF 64 (oral argument). The work Plaintiffs’ counsel invested in these cases was both important and extensive.

### **LEGAL STANDARD**

The EAJA provides that “a court shall award to a prevailing party . . . fees and other expenses . . . incurred by that party in any civil action . . . including proceedings for judicial review of agency action . . . against the United States . . . unless the court finds that the position of the United States was substantially justified or that special circumstances make an award unjust.” 28 U.S.C. § 2412(d)(1)(A). “[E]ligibility for a fee award in any civil action requires: (1) that the claimant be a ‘prevailing party’; (2) that the Government’s position was not ‘substantially justified’; (3) that no ‘special circumstances make an award unjust’; and, (4) . . . that any fee application be submitted to the court within 30 days of final judgment in the action and be

supported by an itemized statement.” *Commissioner, INS v. Jean*, 496 U.S. 154, 158 (1990). An individual plaintiff requesting attorney’s fees must also show that their “net worth did not exceed \$2,000,000 at the time the civil action was filed.” 28 U.S.C. § 2412(d)(2)(B). Once these factors are satisfied, “[t]he award is mandatory unless the government can demonstrate that its position was ‘substantially justified.’” *EEOC v. Clay Printing Co.*, 13 F.3d 813, 815 (4th Cir. 1994).

## **ARGUMENT**

Because Plaintiffs meet these criteria, they are entitled to the fee award calculated below.

### **I. All of the statutory criteria are satisfied.**

Plaintiffs meet all of the criteria required for an award of attorney’s fees under the EAJA. Defendants have dismissed their appeal of the permanent injunction enjoining Defendants’ illegal policies. Those policies and Defendants’ decisions applying them were not substantially justified—they denied equal treatment to similarly situated parties in disregard for decades’ worth of scientific advances and, in *Roe*, were contrary to Defendants’ own policies. No special circumstances make this timely application for an award of fees inappropriate here.

#### **A. There can be no dispute that Plaintiffs are “prevailing parties.”**

“A prevailing party is one who succeeds on any significant issue and thereby achieves some of the benefit he sought in commencing the litigation.” *Abernathy v. Clarke*, 857 F.2d 237, 239 (4th Cir. 1988). Plaintiffs here were granted summary judgment on all claims, and the policies and decisions they challenged have been enjoined. *Harrison*, ECF 308; *Roe*, ECF 320. The Government previously argued that Plaintiffs could not be a prevailing party until Defendants decided whether to appeal and, if so, until the appeal was resolved. *Roe*, ECF 323 at 2. Now that the appeals have been dismissed, that argument is moot. By the Government’s own logic, Plaintiffs are “prevailing parties” within the meaning of the EAJA.

**B. The Government’s position was not “substantially justified.”**

“The Government bears the burden of showing that its position was substantially justified.” *Nken v. Holder*, 385 F. App’x 299, 301 (4th Cir. 2010). To be substantially justified, the Government’s position must have had a “reasonable basis both in law and fact.” *Id.* (quoting *Pierce v. Underwood*, 487 U.S. 522, 565 (1988)). Not only must its litigation position be reasonable, the action or policy that *gave rise* to the litigation must also have been reasonable. 28 U.S.C. § 2412(d)(2)(D); *Roanoke River Basin Ass’n v. Hudson*, 991 F.2d 132, 139 (4th Cir. 1993) (courts look to the “totality of the circumstances” to determine “whether the Government acted reasonably”). “[W]hen the government’s unjustified prelitigation position forces a lawsuit, the petitioner may recover fees under the EAJA for the entire suit, even if the government’s litigation position was reasonable.” *Nken*, 385 F. App’x at 316.

A government agency’s position is not substantially justified when it (1) “acted arbitrarily and capriciously by denying equal treatment to similarly situated parties” (*F.J. Vollmer Co. v. Magaw*, 102 F.3d 591, 595 (D.C. Cir. 1996)), or (2) “was based on violations of the Constitution, federal statute or the agency’s own regulations” (*Mendenhall v. NTSB*, 92 F.3d 871, 874 (9th Cir. 1996)). Defendants’ policies and decisions at issue in these cases (and the Government’s litigation positions in defense of them) fit comfortably into both categories.

**1. Defendants denied equal treatment to similarly situated parties.**

Defendants’ discriminatory HIV policies and the adverse accession/retention decisions made on that basis were not substantially justified because they denied equal treatment to similarly situated parties. *See F.J. Vollmer*, 102 F.3d at 595. As this Court found, service members with other “various chronic but manageable conditions” were allowed to obtain waivers to the same DOD instructions based on individualized assessments of the severity of their conditions. *Roe*, ECF 321 at 28. For example, service members with chronic illnesses such as dyslipidemia, Gastro-

Esophageal Reflux Disease, and asthma are given individualized assessments to determine if they can receive a waiver—despite requiring medication regimens that are more difficult to administer than the one or two pills a day required to treat HIV. *Id.* at 28–29. Indeed, since 2015, CENTCOM has granted 70–80% of 30,000+ applications for medical waivers allowing service members to deploy despite medical conditions that would otherwise disqualify them under the text of the regulations. *Id.* at 30. And yet service members with HIV were categorically denied such waivers despite the absence of any medical basis for treating them differently (and worse). *Id.*

The Government’s defense of the categorical bar in this litigation offered nothing more than outdated, scientifically unsupported justifications. Its only argument for why individuals living with HIV are not similarly situated to those with other chronic conditions is that HIV is infectious. *Id.* But as both this Court and the Fourth Circuit rightly recognized, this position fails to account for “the overwhelming medical evidence demonstrat[ing] that HIV *is not* easily transmitted”; in fact, “there is only a fraction-of-a-percent exposure risk of transmitting even untreated HIV.” *Id.* at 31 (emphasis added) (quoting *Roe*, 947 F.3d at 212–13) (internal quotations omitted). At summary judgment, the Government offered no new evidence that would undermine the Fourth Circuit’s conclusion that “even under a deferential standard of review and even according to appropriate deference to the military’s professional judgments,” limitations on deployment on the basis of HIV status alone lacked a rational basis because “any understanding of HIV that could justify this ban is outmoded and at odds with current science.” *Roe*, 947 F.3d at 228; *Roe*, ECF 321 at 40.

## **2. Defendants’ discharge decisions violated their own regulations.**

Defendants’ position with respect to *Roe* and *Voe* was not substantially justified for another, independent reason: the Air Force violated its own regulations when it attempted to discharge them. *See Mendenhall*, 92 F.3d at 874 (9th Cir. 1996) (finding of substantial justification

was an abuse of discretion where challenged agency action “was based on violations of . . . the agency’s own regulations[.]”); *Impresa Costruzioni Geom. Domenico Garufi v. United States*, 100 Fed. Cl. 750, 762–63 (2011) (“The Government’s position will not be found to be reasonable or substantially justified when explicit, unambiguous regulations directly contradict [it].”).

Under DoDI 1332.18, a determination through the DES that a service member is not fit for duty must be based on “the individual service member’s physical abilities, fitness, and deployability.” *Roe*, 947 F.3d at 222. But as to *Roe* and *Voe*, “the Air Force did not perform such an individualized determination,” instead issuing nearly identical determinations—which contravened earlier, contrary determinations—based on *Roe* and *Voe*’s HIV-positive status after the enactment of the policy categorically barring service members living with HIV from deploying worldwide without limitation. *Id.*

And “[t]he conclusion that HIV renders a servicemember ineligible for deployment is inconsistent with Modification 13, which allows HIV-positive servicemembers to seek a waiver to deploy to CENTCOM’s area of responsibility.” *Id.* at 223. Air Force Instruction 44-178 similarly states that “HIV seropositivity is alone is not grounds for medical separation or retirement,” and that “[m]embers with laboratory evidence of HIV infection who are able to perform the duties of their office, grade, rank and/or rating, may not be separated solely on the basis of laboratory evidence of HIV infection.” AFI 44-178 §§ 2.4.1, A9.1. This Court was correct when it found that “*Roe*, *Voe*, and the other similarly situated active-duty Air Force members were ordered to be discharged based solely on their HIV-positive status, and because those discharge decisions do not ‘comport with’ Air Force Instruction 44-178, they are not ‘in accordance with law.’” *Roe*, ECF 321 at 40 (quoting *J.E.C.M. v. Lloyd*, 352 F. Supp. 3d 559, 583 (E.D. Va. 2019)). Because the challenged discharge decisions were in contravention of the military’s own policy—and the Court

concluded in granting summary judgment for Plaintiffs—they cannot be found to have been substantially justified.

The summary judgment itself—“and more critically the[] rationale[]—are the most powerful available indicators of the strength, hence reasonableness, of the ultimately rejected position.” *United States v. Paisely*, 957 F.2d 1161, 1166–68 (4th Cir. 1992). “When summary judgment rests on the government’s inadequate *factual* showing,” the procedural setting “assumes added prominence [as an indicator] in the ‘substantially justified’ inquiry, because the burden on the party resisting a summary judgment motion is so minimal.” *Clay Printing*, 13 F.3d at 815 (emphasis added) (at summary judgment, evidence is assessed “in the light most favorable to non-moving party” (citing *Miller v. FDIC*, 906 F.2d 972, 974 (4th Cir. 1990))).

Here, the summary judgment in favor of Plaintiffs reinforces that the Government’s position was not substantially justified. Even on its third bite at the same apple—Roe and Voe had secured a preliminary injunction against the categorical ban on deployment, and the unanimous Fourth Circuit panel “readily came to the same conclusion” (*see Clay Printing*, 13 F.3d at 816)—the Government’s arguments gained no purchase. After thousands of pages of documents exchanges, 31 fact-witness depositions, and testimony from 5 experts (Ex. 3 ¶ 22), this Court found that “the evidence, viewed in the light most favorable to the [Government]” was not “sufficient to allow a reasonable [trier of fact] to return a verdict in [the Government’s] favor” as to whether there was any rational basis for discriminatory treatment of service members living with HIV. *Roe*, ECF 321 at 21. In light of this decision in both *Harrison and Roe*, the Government simply cannot show that “a reasonable person could think [its litigation position] correct, that is, if it has a reasonable basis in law and fact.” *Pierce*, 487 U.S. at 566 n.2; *see Crawford v. Sullivan*, 935 F.2d 655, 658 (4th Cir. 1991) (government has burden to prove substantial justification).

**C. No special circumstances preclude a fee award here.**

No “special circumstances” would “make an award unjust” in these cases. *See* 28 U.S.C. § 2412(d)(1)(A). “[C]ourts have generally held that the statutory [‘special circumstances’] language expresses a congressional directive for courts ‘to apply traditional equitable principles’ in determining whether a prevailing party should receive a fee award under EAJA.” *Air Transp. Ass’n of Can. v. FAA*, 156 F.3d 1329, 1333 (D.C. Cir. 1998). The Fourth Circuit has pointed to two circumstances in which this “safety valve” might be appropriately exercised: “novel but credible extensions and interpretations of law . . . underl[ying] vigorous enforcement efforts,” and “where equitable considerations dictate an award should not be made.” *Nken*, 385 F. App’x at 302 (4th Cir. 2010) (quoting H.R. Rep. No. 96-1418, at 11 (1980)). For example, in *Nken*, an immigration-enforcement case, fees were not appropriate because the Government had “defended [existing Fourth Circuit] precedent” before the Supreme Court but lost. Fees have also been denied where the petitioner had “unclean hands.” *See, e.g., Oguachuba v. INS*, 706 F.2d 93, 98–99 (2d Cir. 1983) (petitioner who prevailed on habeas would not have been jailed in the first place if he had not violated the law in an effort to “cause a technical error by the INS” and evade deportation).

Neither equitable consideration is present here. Unlike in *Nken*, this was not a situation where “[t]he Government . . . pressed its position only as long as controlling law clearly supported it.” 385 F. App’x at 303. Here, the Government lost in this Court and the Fourth Circuit, and yet continued to fight both cases through to summary judgment—and even filed its own motion for summary judgment despite adverse Fourth Circuit precedent. The Government advanced no “novel but credible extensions and interpretations of law” (*see id.* at 302) and instead largely relied on prison cases that are not analogous to these facts. *Roe*, ECF 321 at 31 (distinguishing cases).

Nor have there been (or could possibly be) any allegations of unclean hands. Harrison was denied a commission and Roe and Voe were discharged not because of anything they did—to the

contrary, all were recommended for accession/retention by their doctors and commanding officers (*Roe*, ECF 321 at 16–19)—but because of the discrimination this Court rightly found unlawful.

**D. Plaintiffs’ fee application is timely.**

Under the EAJA, an application for attorneys’ fees must be filed “within thirty days of final judgment.” 28 U.S.C. § 2412(d)(1)(B). The Government has dismissed its appeals to the Fourth Circuit and “has determined not to seek further review in this matter.” *Roe v. DOD*, No. 22-01626 (4th Cir.), ECF 4; *see Roe*, ECF 323 at 3 (Government defining finality in terms of whether “appellate proceedings have run their course”); *Hunter v. Crocetti*, 2000 WL 33249939, at \*2 (D. Md. Sept. 28, 2000) (EAJA’s 30-day timing provision sets a “filing deadline,” not “a starting point”); *cf. Jacobs v. Colvin*, 107 F. Supp. 3d 494, 497 (E.D. Va. 2014) (EAJA motion for fees timely when filed after Fourth Circuit’s 42(b) dismissal, but before deadline seek certiorari).

Thirty days from July 7, the earlier of the two dismissal dates, is Saturday, August 6, extended by the time-counting rules to Monday, August 8. *See Harrison*, ECF 322–23; *Roe*, 336–37; Fed. R. Civ. P. 6(a)(1)(C); *see also Scarborough v. Principi*, 541 U.S. 401, 414 (2004) (EAJA deadline is non-jurisdictional). This motion is therefore timely.

**E. Plaintiffs’ net worth is under the applicable limit.**

Finally, Plaintiffs’ net worth is within the statutory limits. The individual plaintiffs’ net worth did not exceed \$2,000,000 at the time of the filing of these actions. Exs. 4, 5, 6 (N. Harrison, R. Roe, and V. Voe declarations). MMAA, a 501(c)(3) non-profit organization, is exempt from this limitation. Ex. 7 ¶ 23 (P. Perkowski declaration).

**II. The amount of attorney’s fees requested is reasonable.**

Once the EAJA’s statutory requirements are met, and where, as here, “the position of the United States was not substantially justified” (28 U.S.C. § 2412(d)(1)(B); *see supra* § I.B), an award of attorney’s fees “is mandatory.” *Clay Printing*, 13 F.3d at 815. The next step is to

“determin[e] what fee is reasonable.” *Abusamhadaneh v. Taylor*, 2013 WL 193778, at \*13 (E.D. Va. Jan. 17, 2013) (citing *Jean*, 496 U.S. at 161).

Plaintiffs seek an award of **\$2,408,567.70**, as supported by “itemized statement[s] from [each] attorney . . . representing or appearing in [sic] behalf of the party stating the actual time expended and the rate at which fees and other expenses were computed.” 28 U.S.C. § 2412(d)(1)(B); *see* Ex. 1 ¶¶ 6–7 (describing personal and firm billing practices), Ex. 8 ¶¶ 5–7 (J. Bauer declaration) (same); Ex. 9 ¶ 7 (A. Sommer declaration) (describing personal billing practices), Ex. 3 ¶ 7 (same), Ex. 10 ¶ 12 (S. Schoettes declaration) (same), Ex. 7 ¶¶ 28–36 (same).

#### Attorney’s Fees

Attorney/firm/organization	Year	Hours requested	Rate requested	Fees requested
<b>Winston &amp; Strawn LLP</b>				
Attorneys	2018	1,140	\$201.60	\$229,824.00
	2019	2,987.70	\$205.25	\$613,225.43
	2020	356.4	\$207.78	\$74,052.79
	2021	31.4	\$217.54	\$6,830.76
	2022	160.5	\$231.49	\$37,154.15
	Total	4,676	---	\$961,087.12
Law clerks	2018	14	\$201.60	\$2,822
	2019	156.7	\$205.25	\$32,163
	2020	0	\$207.78	\$0
	2021	0	\$217.54	\$0
	2022	55.6	\$231.49	\$12,871
	Total	226.3	---	\$47,855.92
Paralegals	2018	87.5	\$201.60	\$17,640
	2019	270.8	\$205.25	\$55,582
	2020	162.8	\$207.78	\$33,827
	2021	6.2	\$217.54	\$1,349
	2022	30.6	\$231.49	\$7,084
	Total	557.9	---	\$115,480.63
Law librarians and litigation practice support staff	2018	2.6	\$100.00	\$260
	2019	20.3	\$100.00	\$2,030
	2020	0.3	\$100.00	\$30
	2021	0	\$100.00	\$0
	2022	0	\$100.00	\$0
	Total	23.2	\$100.00	\$2,320.00
<b>All Winston personnel</b>	<b>Total</b>	<b>5,483.4</b>	<b>---</b>	<b>\$1,126,743.66</b>

Greenberg Traurig, LLP				
A. Sommer	2019	178.4	\$205.25	\$36,616.60
	2020	26.6	\$207.78	\$5,526.95
	2021	1.5	\$217.54	\$326.31
	2022	7.0	\$231.49	\$1,620.43
	<b>Total</b>	<b>213.5</b>	<b>---</b>	<b>\$44,090.29</b>
Lambda Legal Defense and Education Fund				
K. Ingelhart	2018	25.5	\$345	\$8,797.50
	2019	176.6	\$455	\$81,718.00
	2020	21.2	\$455	\$9,646.00
	2021	7.4	\$455	\$3,367.00
	2022	28.1	\$455	\$12,785.50
	<b>Total</b>	<b>258.8</b>	<b>---</b>	<b>\$114,949.00</b>
Scott Schoettes, Esq.				
S. Schoettes	2017	1.7	\$625	\$1,063
	2018	227.4	\$625	\$142,125
	2019	572.1	\$625	\$357,563
	2020	205.33	\$625	\$128,331
	2021	0.9	\$625	\$563
	2022	24.1	\$625	\$15,063
	<b>Total</b>	<b>1,031.5</b>	<b>---</b>	<b>\$644,706.25</b>
Peter Perkowski (OutServe-SLDN/MMAA; Perkowski Legal, PC)				
P. Perkowski	2017	2.5	\$625	\$1,562.50
	2018	124.8	\$625	\$78,000.00
	2019	502.3	\$670	\$336,541.00
	2020	32.75	\$670	\$21,942.50
	2021	8	\$670	\$5,360.00
	2022	51.75	\$670	\$34,672.50
	<b>Total</b>	<b>722.1</b>	<b>---</b>	<b>\$478,078.50</b>
<b>GRAND TOTAL</b>		<b>7,709.3</b>	<b>---</b>	<b>\$2,408,567.70</b>

The Court has “substantial discretion in fixing the amount of an EAJA award.” *Hyatt v. N.C. Dep’t of Human Res.*, 315 F.3d 239, 254 (4th Cir. 2002). It should exercise that discretion to award the full amount requested.

**A. Plaintiffs’ rates are reasonable.**

The EAJA limits the amount of attorney’s fees that can be recovered to “\$125 per hour unless the court determines that an increase in the cost of living or a special factor, such as the

limited availability of qualified attorneys for the proceedings involved, justifies a higher fee.” 28 U.S.C. § 2412(d)(2)(A). As discussed below, both exceptions to the cap apply here.

Fees for the services of law clerks, paralegals, and librarians are also recoverable “at prevailing market rates.” See *Richlin Sec. Serv. Co. v. Chertoff*, 553 U.S. 571, 590 (2008) (“attorney’s fees” includes paralegal fees for legal work that would be chargeable to clients); *Missouri v. Jenkins*, 491 U.S. 274, 285 (1989) (suggesting time of “librarians . . . and others whose labor contributes to the work product for which an attorney bills her client” is recoverable); *United States v. 269 Acres*, 2020 WL 219792, at \*8 (D.S.C. Jan. 15, 2020) (law clerk work recoverable under EAJA), *rev’d in part on other grounds*, 995 F.3d 152 (4th Cir. 2021). The standard rate for law librarians and other litigation-support professionals in Northern Virginia is \$100 per hour. Ex. 2 ¶ 16 (expert decl.). Because the prevailing rates for the services of paralegals and law clerks are higher in this market than the EAJA’s statutory maximum, those rates have been calculated in the same manner as the standard attorney rates. *Id.* ¶¶14–16; see, e.g., *Abusamhadaneh*, 2013 WL 193778, at \*17–18 (awarding statutory maximum plus cost-of-living increase for paralegal time yielded “a fair result”).

### **1. The EAJA’s statutory fee cap should be adjusted for inflation.**

Courts in this district have recognized that, because the cost of living has increased significantly since the last time the statutory cap was raised (to \$125) in 1996, an upward adjustment to counsel’s rates for cost of living may be appropriate. See, e.g., *Abusamhadaneh*, 2013 WL 193778, at \*16. Using the date the \$125 amount was adopted—March 29, 1996—as the base point (*Dairy Maid Dairy v. United States*, 837 F. Supp. 1370, 1385 (E.D. Va. 1993), see Contract with America Advancement Act, P.L. 104-121, 110 Stat. 847, 863), a general cost of living index like the U.S. Department of Labor’s Consumer Price Index–Urban (CPI-U) has been

used as the appropriate measure for calculating the cost-of-living enhancement. *See Sullivan v. Sullivan*, 958 F.2d 574, 577 n.6, 578 (4th Cir. 1992).

The Ninth Circuit maintains a chart that “multipl[ies] the \$125 statutory rate by the annual average [CPI-U] for the years in which counsel’s work was performed, . . . divid[ed] by the CPI-U figure for March 1996.” *Thangaraja v. Gonzales*, 428 F.3d 870, 876–77 (9th Cir. 2005). The relevant enhanced statutory rates are:

Year	EAJA Statutory Maximum Rate
2022 (first half)	\$231.49
2021	\$217.54
2020	\$207.78
2019	\$205.25
2018	\$201.60

U.S. Courts for the Ninth Circuit, *Statutory Maximum Rates Under the Equal Access to Justice Act*, <https://www.ca9.uscourts.gov/attorneys/statutory-maximum-rates/> (citing *Thangaraja*, 428 F.3d at 876–77). The Court is within its discretion to apply these reasonable rates to the work performed by Plaintiffs’ pro bono lawyers at Winston & Strawn and Greenberg Traurig.

**2. The specialized experience of some of Plaintiffs’ lawyers justifies a higher fee.**

The “special factor” for attorneys with particular qualifications refers to “some distinctive knowledge or specialized skill”—such as “an identifiable practice specialty”—that is “needful for the litigation in question.” *Pierce*, 487 U.S. at 572. “[T]he appropriate inquiry is whether the individual case presents such an unusual situation that it *requires* someone of specialized training and expertise unattainable by a competent attorney through a diligent study of the governing legal principles.” *Hyatt*, 315 F.3d at 250 (quotation omitted).

These cases lie at the confluence of three highly specialized subject-matter areas that demand knowledge and skill beyond that which the typical litigator could be expected to acquire

without years of experience: the rights of people living with HIV, LGBTQIA rights, and how those rights apply in the context of military service. Three of Plaintiffs' attorneys—Scott Schoettes, Peter Perkowski, and Kara Ingelhart—have this experience and therefore request higher rates that are within the *Vienna Metro* Matrix customarily used in this District to determine reasonable fee rates (*see* Ex. 2 ¶¶ 13–14 (expert decl.)):

Attorney (grad year)	2017 rate	2018 rate	2019 rate	2020 rate	2021 rate	2022 rate
Perkowski (1998)	\$625	\$625	\$670	\$670	\$670	\$670
Schoettes (2002)	\$625	\$625	\$625	\$625	\$625	\$625
Ingelhart (2015)	---	\$345	\$455	\$455	\$455	\$455

**Scott Schoettes** has litigated more cases involving the rights of people living with HIV than any other attorney in the country and enjoys a national reputation as the leading attorney on these issues. Ex. 10 ¶ 7 (Schoettes decl.). Schoettes has been advocating for people living with HIV through litigation, public policy work and educational campaigns since joining Lambda Legal in 2007 as a staff attorney with the HIV Project (becoming HIV Project Director in 2010). *Id.* ¶ 4. The very first case on which Schoettes was staffed at Lambda Legal was *Taylor v. Rice*, 451 F.3d 898 (D.C. Cir. 2006), a challenge to the U.S. State Department's policy of refusing to employ foreign service officers living with HIV, primarily because the State Department's belief that such individuals were not world-wide deployable. *Id.* ¶ 5. Over the following thirteen years, Schoettes successfully litigated multiple important cases on behalf of people living with HIV. *Id.* (citing, *e.g.*, *East v. Blue Cross and Blue Shield of La.*, No. 14-115 (M.D. La.); *Pierce v. Ackal*, No. 17-1365 (W.D. La.); *Moore v. Air Evac EMS, Inc.*, No. 15-1395 (E.D. Mo.); *Rhoades v. State*, 848 N.W.2d 22 (Iowa 2014)). Schoettes also authored or co-authored multiple amicus briefs in

cases involving issues of import to people living with HIV, including for each of the three challenges to the Affordable Care Act to reach the U.S. Supreme Court. *Id.*

In addition to his litigation work, Schoettes spent a significant portion of his time at Lambda Legal on policy and legislative matters. *Id.* ¶ 6. He was Lambda Legal's point person for the repeal of the HIV travel and immigration ban (which required all U.S. visitors living with HIV to secure a special waiver before entering the country), worked in multiple states to reform laws criminalizing conduct that is otherwise legal if not for the person's HIV-positive status, and is considered a leading voice in advocacy to eliminate the bar to blood donation for gay and bisexual men. *Id.* In 2014, President Obama appointed Schoettes to the Presidential Advisory Council on HIV/AIDS, where he served as the co-chair of the Disparities Committee until leading a group resignation in protest shortly after President Trump took office. Schoettes was recently honored by the ABA HIV/AIDS Impact Project for his years of advocacy and impact work. *Id.*

As a person living with HIV since 1999, Schoettes's personal experience made him uniquely qualified to litigate these cases on behalf of Nicholas Harrison, MMAA, and the pseudonymous plaintiffs in *Roe/Voe*. *Id.* ¶ 7.

**Peter Perkowski** has specialized knowledge and experience at the intersection of all three of the important subject-matter areas at issue in these cases: military law and policy as it relates to discrimination based on LGBTQIA+ identity and HIV status. Ex. 7 ¶¶ 10–27, 37–38; Ex. 7–A (Perkowski CV); *see, e.g., Karnoski v. Trump*, No. 17-1297 (W.D. Wash.) (challenging Trump administration's ban on transgender individuals serving in the military). Perkowski has 24 years of experience as a litigator, over 15 of which were at large, multi-national law firms (including Winston & Strawn). Ex. 7 ¶ 4. During his time at those firms, he participated in some of the highest-profile LGBTQIA+ civil-rights matters of the time. *Id.* ¶¶ 4, 10–13.

Perkowski also has a decade of knowledge and experience gained as an advocate and lawyer for the LGBTQIA/HIV military and veteran community. *Id.* ¶¶ 10–27. He began serving on the Board of Directors of OutServe-SLDN (f/k/a Servicemembers Legal Defense Network) in 2012, just as lesbian, gay, and bisexual people were starting to serve openly, and the organization shifted focus to issues of discrimination, equal treatment and equal opportunity. *Id.* ¶ 17. In 2014, Perkowski moved from the Board to the office, taking on (as a volunteer) some of the responsibilities of OutServe’s legal services function. *Id.* By the end of 2015, Perkowski was on OutServe-SLDN’s staff, serving as Legal and Policy Director of the nation’s largest non-profit organization for the LGBTQ and HIV+ military and veteran community. *Id.* ¶ 18. He left OutServe-SLDN (now known as MMAA) in 2021. *Id.* ¶ 23.

As extensively detailed in his affidavit, during his seven years of directing the organization’s legal function, Perkowski’s work included advocacy to Congress, the Defense and Veterans Affairs Departments, and state governments on behalf of the LGBTQ/HIV+ military community; facilitating the organization’s participation in impact litigation and amicus briefs in matters implicating the interests of LGBTQ+ military and veterans and their families; and directly assisting LGBTQ/HIV+ service members and veterans, including preparing discharge upgrade applications and waivers and exceptions to policy, and providing representation in disciplinary actions, administrative separations, and courts martial. *Id.* ¶¶ 19–20. Under his leadership, OutServe-SLDN’s mission expanded to discriminatory policies affecting service members with HIV—issues no other organization was addressing. *Id.* ¶¶ 21–22. Accordingly, at the time these actions were filed, there was no other person had the same level of knowledge and experience with the specific issues of these cases—namely, military regulations concerning HIV, their history, and their effect on service members with HIV and people with HIV who want to serve. *Id.* ¶ 38.

Perkowski also serves on the Boards of several health, wellness, and civil rights organizations (including as Chair) with a primary focus on the LGBTQ+ community and people living with or at risk of acquiring HIV. *Id.* ¶ 27. He is a recognized subject-matter expert: Perkowski is frequently invited to speak and present on these issues (*id.* ¶¶ 14, 24), and he has engaged in advocacy at the highest levels, as when he testified before the House Committee on Veterans Affairs’ Subcommittee on Oversight and Investigations about the long-term harms inflicted upon LGBTQ servicemembers by VA policies like “Don’t Ask Don’t Tell.” *Id.* ¶ 24.

**Kara Ingelhart** has been involved in impact litigation, public policy, and education on issues involving the rights of LGBT people and people living with HIV as an attorney at Lambda Legal since 2015. Ex. 3 ¶ 5. She has extensive experience with impact litigation challenging policies that discriminate against LGBT people by, for example, barring transgender individuals from military service (*Karnoski, supra*) and from correcting the gender marker on their birth certificates (*Ray v. McCloud*, No. 18-272 (S.D. Ohio); *Foster v. Andersen*, No. 18-2552 (D. Kansas); *Arroyo González v. Rosselló*, No. 17-1457 (D.P.R.); *F.V. v. Jeppesen*, No. 17-170 (D. Idaho)), or from using the restroom that aligns with their gender identity (*Evancho v. Pine Richland Sch. Dist.*, 237 F. Supp. 3d 267 (W.D. Pa. 2017)). *See also* Ex. 3 ¶ 17. Ingelhart also has significant experience litigating cases and filing amicus briefs that focus on the rights of people living with HIV. *See id.* ¶ 18 (citing *Doe v. AJ Boggs & Co.*, No. 565456 (Cal. Super. Ct., S.F. Cnty.) (party counsel for settlement class of plaintiffs whose HIV statuses were compromised in data breach); *Stinson v. Florida*, No. 1D18-3506 (Fla. Cir. Ct.) (party counsel in challenge to disproportionate punishment due to HIV status); *Dorn v. Mich. Dep’t of Corr.*, No. 15-359 (W.D. Mich.) (same); *Doe v. Kink.com*, No. A 155384 (Cal. Ct. App.) (amicus counsel for brief re medical privacy

implications of HIV testing); *Erotic Serv. Provider Legal, Educ. and Rsch. Project v. Gascón*, No. 16-15927 (9th Cir.) (amicus counsel for brief re criminal prostitution and solicitation laws)).

In addition to their litigation and advocacy experience, Schoettes, Perkowski, and Ingelhart have acquired specialized training and continuing education in relevant subjects. Schoettes, for example, attended Lambda Legal’s annual LGBTQ Litigators Roundtable—an intensive three-day conference—in each of his 14 years with the organization. Ex. 10 ¶ 9. Schoettes frequently attended (and usually presented at) Lavender Law, the annual conference of the National LGBTQ Bar Association. *Id.* He also attended the Public Health Boot Camp sponsored by Northwestern University and AIDS Foundation Chicago, and has been an instructor/speaker for it ever since. *Id.*

Schoettes, Perkowski, and Ingelhart belong to numerous professional organizations related to LGBTQIA and HIV rights issues and frequently attend and speak at conferences and symposia. *See* 10–A (Schoettes CV), Ex. 3–C (Ingelhart CV) (listing engagements); *see, e.g.*, Kara Ingelhart, *Discrimination Against Members of the Military Who Are HIV-Positive*, Connecticut Bar Association (2021); Scott Schoettes, *The Affordable Care Act and HIV: How Ensuring Access to Nondiscriminatory Care, Treatment, and Prevention (Including PrEP) Could Pave the Way to an AIDS-Free Generation*, National LGBTQ Bar Association Annual Conference (2015); Aaron Belkin & Peter Perkowski, *LGBT and the Military Challenges and Opportunities*, Battlemind to Home V Symposium, Perdue Univ. (2014).

These attorneys’ specialized experience justifies a higher hourly rate.

**B. Plaintiffs’ attorneys’ hours are also reasonable.**

“The most useful starting point for determining the amount of a reasonable fee is the number of hours reasonably expended on the litigation”—with “evidence supporting the hours worked”—“multiplied by a reasonable hourly rate.” *Hensley v. Eckerhart*, 461 U.S. 424, 433, (1983). This “lodestar” calculation “[s]ubsume[s] . . . several factors” for analyzing

reasonableness, including, as relevant here: “(1) the time and labor required; (2) the novelty and difficulty of the questions; (3) the skill requisite to perform the legal service properly; . . . (5) the customary fee; . . . (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; . . . and (12) awards in similar cases.” *Abusamhadaneh*, 2013 WL 193778, at \*18 (citing *Johnson v. Ga. Highway Express, Inc.*, 488 F.2d 714, 717–19 (5th Cir. 1974)); see *Barber v. Kimbrell’s, Inc.*, 577 F.2d 216, 226 (4th Cir. 1978) (adopting *Johnson* factors); *Signature Flight Support Corp. v. Lindow Aviation Ltd. P’ship*, 730 F. Supp. 2d 513, 520 (E.D. Va. 2010) (court need not address every factor), *aff’d*, 442 F. App’x 776 (4th Cir. 2011). There are no unrelated, unsuccessful claims to subtract from the lodestar amount, as Plaintiffs ultimately prevailed on all of their claims, and any “unsuccessful” stage was merely “a temporary setback on the way to a complete victory.” *Cf. Cabrales v. County of Los Angeles*, 935 F.2d 1050, 1053 (9th Cir. 1991) (award under § 1988).

**Factor 1: These cases required considerable time and labor.** This important and substantial litigation has been going on since May 2018 and includes two related cases. *Harrison*, ECF 1; *Roe*, ECF 1. Each case entailed a separate preliminary injunction proceeding (*Harrison*, ECF 25; *Roe*, ECF 33) and multiple motions to dismiss (*Harrison*, ECF 41; *Roe*, ECF 48–49) before being consolidated for discovery (*Roe*, ECF 32). The discovery process was extensive, spanning 31 fact-witness depositions (with witnesses spread across the country, from Miami to Texas to Detroit and DC), 316 written discovery requests, and 5 expert witnesses. Ex. 3 ¶ 22. Defendants later (unsuccessfully) renewed their motion to dismiss organizational plaintiff MMAA (*Harrison*, ECF 154; *Roe*, ECF 118) and, due to Defendants’ last-minute motion to stay, proceeded through two rounds of summary judgment briefing (*Harrison*, ECF 256, 263; *Roe*, ECF 230, 269, 275)—one of which occurred after Defendants lost on appeal in the Fourth Circuit. *Roe*, 947 F.3d

at 234. Defendants appealed again when the Court ruled against them at summary judgment, but voluntarily dismissed those appeals prior to briefing. *Harrison*, ECF 322; *Roe*, ECF 336.

A case with this many moving parts requires a large number of lawyers—here, more than 30—to expend significant time. Ex. 2 (expert decl.) (“The detailed time records submitted by counsel for Plaintiffs demonstrate that counsel spent a reasonable and appropriate amount of time addressing the issues in this case, and staffed various workstreams efficiently, given the multiple tasks being performed simultaneously under this Court’s rigorous schedule.”). “[H]ours claimed or spent on a case,” though “not . . . the sole basis for determining a fee, . . . are a necessary ingredient to be considered.” *Johnson*, 488 F.2d at 717. To assist the Court’s examination of “the possibility of duplication of effort along with the proper utilization of time,” detailed contemporaneous billing records are attached, as well as affidavits attesting to Plaintiffs’ attorneys’ billing practices. *See* Exs. 1 & 1–A, 8 (Harding decl. & Winston bills, Bauer decl.), 9 & 9–A (Sommer decl. & Greenberg Traurig bills), 3 & 3–A (Ingelhart decl. & Lambda bills), 10 & 10–B (Schoettes decl. and bills), 7 & 7B (Perkowski decl. & bills).

**Factor 2: The case was novel and complex.** Although the Defendants’ policies and actions were patently unconstitutional, arbitrary, and capricious, these cases presented a variety of issues that needed to be resolved. Because of the number of parties involved and the importance of the issues, this impact litigation “require[d] more time and effort” for “research and preparation” than a typical case. *See Johnson*, 488 F.2d at 718. “The sheer volume of work necessitated by the schedule, Defendants’ resistance to discovery, motions and renewed motions, and the number of depositions from various service branches, required intense effort on multiple fronts.” Ex. 2 ¶ 21 (expert decl.).

**Factor 3: These cases required significant skill.** For similar reasons, this litigation required a greater degree of skill than usual, much of it specialized. *See supra* § II.A.2. This skill is reflected in the attorneys’ “work product, [] preparation, and general ability before the court,” which this Court is well-equipped with the “expertise” and “past experience” to judge. *Johnson*, 488 F.2d at 718. In the expert’s opinion, “[t]he work simply could not have been accomplished by a leaner-staffed or less-experienced team in the time-frame set for this case.” Ex. 2 ¶ 21.

**Factor 5: The customary fee for like work is much higher.** “The customary fee for similar work in the community should be considered.” *Id.* Litigators in large firms like Winston & Strawn and Greenberg Traurig in major markets such as Chicago and Washington, DC, where Plaintiffs’ attorneys are largely based, typically charge several hundred to over a thousand dollars per hour for their services, depending on their experience. *See, e.g.*, Ex. 1 ¶ 12. Even the lowest rates on the prevailing pay scale are considerably higher than the EAJA’s statutory maximum rate of \$125, even adjusted for inflation. *See* 28 U.S.C. § 2412(d)(2)(A); Ex. 2 ¶¶ 13–15 (expert decl.) (*Vienna Metro* matrix is “reasonable and *conservative* estimate of the prevailing market rate”).

**Factor 7: These cases entailed strict time limitations.** “Priority work that delays the lawyer’s other legal work is entitled to some premium.” *Johnson*, 488 F.2d at 718. This factor is relevant here, as this district is well known for its “rocket docket,” which has ranked among “the nation’s fastest civil trial court[s]” for decades. Robert Tata, *How the “Rocket Docket” Continues To Roar Through COVID*, Law360 (Aug. 24, 2021, 12:53 PM); *see* Ex. 2 ¶ 23 (expert decl.) (noting “this Court’s rigorous schedule”). And in addition to the speed at which litigation unfolds in this Court, Defendants requested and were granted an accelerated argument date in the Fourth Circuit appeal of the preliminary injunction. *Roe*, 4th Cir. No. 19-1410, ECF 26.

**Factor 8: The results obtained.** Although damages were not sought here, “the attorney’s fee award should reflect the relief granted” when “the decision corrects across-the-board discrimination affecting a large class.” *Johnson*, 488 F.2d at 718. This was the case here, where Plaintiffs secured a nationwide injunction enjoining the application of Defendants’ discriminatory policies to all similarly situated service members. *Harrison*, ECF 308; *Roe*, ECF 320. “[T]he excellent result obtained on summary judgment . . . avoid[ed] a trial which would have cost even more time and money.” Ex. 2 ¶ 17 (expert decl.).

**Factor 9: Plaintiffs’ attorneys are experienced and capable.** The attorneys in this litigation have significant “experience, reputation, and ability.” *Johnson*, 488 F.2d at 718. Many have practiced at large, prestigious, well-respected law firms, some of them for decades. *See, e.g.*, Ex. 10 ¶ 4 (Schoettes), 7 ¶ 4 (Perkowski); *Andrew R. Sommer*, GTlaw.com, <https://www.gtlaw.com/en/professionals/s/sommer-andrew-r>; *Julie A. Bauer*, Winston.com., <https://www.winston.com/en/who-we-are/professionals/bauer-julie-a.html>.<sup>5</sup> And while “more experienced attorneys receiv[e] larger compensation,” “young attorney[s who] demonstrate[] the skill and ability . . . should not be penalized for only recently being admitted to the bar.” *Johnson*, 488 F.2d at 719; *see, e.g.*, Ex. 3–C (Ingelhart CV); *Lauren Gailey*, Winston.com, <https://www.winston.com/en/who-we-are/professionals/gailey-lauren-k.html>; *John W.H. Harding*, Winston.com, <https://www.winston.com/en/who-we-are/professionals/harding-john-w-h.html>. The “attorney[s] specializing in civil rights cases may [also] enjoy a higher rate for [their] expertise than others, providing [their]

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<sup>5</sup> *See Jeandron v. Bd. of Regents of Univ. Sys. of Md.*, 510 F. App’x 223, 227 (4th Cir. 2013) (“A court may take judicial notice of information publicly announced on a party’s web site, so long as the web site’s authenticity is not in dispute and ‘it is capable of accurate and ready determination.’” (quoting Fed. R. Evid. 201(b))).

ability corresponds with [their] experience.” *See* Exs. 7–A (Perkowski CV), 10–A (Schoettes CV), Ex. 3–C (Ingelhart CV).

**Factor 12: Awards in similar matters are comparable.** “The reasonableness of a fee may also be considered in the light of awards made in similar litigation within and without the court's circuit.” *Johnson*, 488 F.2d at 719. Although a direct comparator is difficult to find—few LGBTQIA/HIV rights matters are of the scope and scale of the present cases, and many settle, thus reducing the amount of the fee award—the fee awards in two cases that were also litigated to final judgment are illustrative:

- *Grimm v. Gloucester County School Board*, No. 15-54 (E.D. Va. 2021), ECF 257: \$1,284,735 in attorney’s fees and \$27,467.85 in non-taxable litigation expenses
- *Obergefell v. Hodges*, No. 13-501 (S.D. Ohio 2015), ECF 90: \$1,300,000 in attorney’s fees and expenses

Although the total amount of fees sought in these cases is greater than in either of the cases identified above, it is consistent with the principles underlying those fee awards. In both *Grimm* and *Obergefell*, expert LGBTQ-rights impact litigators successfully achieved class-wide relief in complex civil constitutional matters challenging discriminatory government conduct and moved for attorney’s fees, but the fee motions in those cases reveal that they were significantly less time-intensive than the cases here. *Compare Grimm*, ECF 253 (seeking \$1,284,735 in attorney’s fees and \$27,467.85 in non-taxable litigation expenses for 2,078.43 hours of work), *and Obergefell*, ECF 87 (seeking \$1,096,142.50 in attorney fees, plus a 50% enhancement and expenses in the amount of \$51,360.12 for 3,046.89 hours of work), *with* Ex. 2 ¶¶ 19–21 (expert decl.) (noting “[t]he sheer volume of work”—more than 7,700 hours, *see supra* § II.A—and the “significant time and effort” necessitated by “Defendants’ approach to discovery”). *Grimm* and *Obergefell* settled before the motions could be adjudicated—and in both, the government settled for the exact or nearly the entire amount of fees sought. *See Grimm*, ECF 257 (granting unopposed fee motion

pursuant to stipulation); *Obergefell*, ECF 90 (ordering, as agreed to by the parties, \$1,300,000.00 in fees and costs). The methodology Plaintiffs apply here and the rates and hours they request are consistent with that of fee awards sought in these other similar civil rights cases.

### III. Plaintiffs are entitled to an award of costs.

The EAJA also entitles a prevailing party to “a judgment for costs, as enumerated in [28 U.S.C. § 1920].” 28 U.S.C. § 2412(a)(1). These include, as relevant here, “[f]ees of the clerk and marshal,” transcript fees, “[f]ees and disbursements for printing and witnesses,” “the costs of making copies of any materials where the copies are necessarily obtained for use in the case,” and “[c]ompensation of court appointed experts.” 28 U.S.C. § 1920(a). Here, Plaintiffs seek:

#### Litigation Costs

Attorney/firm/organization	Amount requested
Winston & Strawn LLP	\$116,246.33 <sup>6</sup>
Greenberg Traurig, LLP	\$0
Lambda Legal Defense and Education Fund	\$44,221.99
Scott Schoettes, Esq.	\$0
OutServe-SLDN/MMAA	\$454.90
Perkowski Legal, PC	\$6,333.87
<b>TOTAL</b>	<b>\$167,257.09</b>

See Ex. 1–B (Winston); Ex. 3–B (Lambda); Ex. 7–B (Perkowski).

These costs include “filing fees, postage, telephone calls and delivery charges,” plus “fees for printing” and “costs of computerized legal research,” all of which have been held recoverable under the EAJA. See, e.g., *Tchemkou v. Mukasey*, 517 F.3d 506, 512–13 (7th Cir. 2008); accord, e.g., *Jean v. Nelson*, 863 F.2d 759, 778 (11th Cir. 1988) (rejecting “government’s argument that telephone, reasonable travel, postage, and computerized research expenses are not compensable under the EAJA”); *aff’d on other grounds, Jean*, 496 U.S. 154; *Abusamhadaneh*, 2013 WL

<sup>6</sup> This includes the costs included in Mr. Harding’s declaration (Ex. 1–B) and the additional costs of Mr. Molster’s time (Ex. 2 ¶ 23).

193778, at \*43 (awarding costs for duplication); *Rehab. Ass'n v. Metcalf*, 8 F. Supp. 2d 520, 530 (E.D. Va. 1998) (costs awarded for “reasonable” “computerized legal research on Lexis and Westlaw, word processing, photocopying, out of town travel expenses, postage, and overnight courier charges”). The cost of transcripts is expressly provided for under the statute and may be recovered as long as “(1) the transcripts are necessarily obtained for use in the case”—here, they have been frequently cited, including in this motion—“and (2) the cost is reasonable.” *Dalles Irrigation Dist. v. United States*, 91 Fed. Cl. 689, 711–12 (2010). Some courts also permit recovery of process-server fees. *Alflex Corp. v. Underwriters Labs., Inc.*, 914 F.2d 175, 177–78 (9th Cir. 1990) (per curiam). And expert-witness fees and expenses are also recoverable in this District. *E.g., Olympic Marine Servs., Inc. v. United States*, 792 F. Supp. 461, 471–72 (E.D. Va. 1992). The Court should exercise its discretion to award Plaintiffs the full amount of fees sought.

### CONCLUSION

Plaintiffs’ hourly rates and hours worked are reasonable and well supported, and the Court should exercise its discretion to award them the attorney’s fees they seek. For the reasons discussed above, Plaintiffs respectfully request that their motions for attorney’s fees (in the amount of \$2,408,567.70) and costs (in the amount of \$167,257.09) be granted.

Dated: August 5, 2022

Scott A. Schoettes\*  
sschoettes@gmail.com  
SCOTT SCHOETTES, ESQ.  
4728 N Malden St. #2 South  
Chicago, IL 60640  
T: (773) 474-9250

Kara Ingelhart\*  
KIngelhart@lambdalegal.org  
LAMBDA LEGAL DEFENSE AND  
EDUCATION FUND, INC.

Respectfully submitted,  
/s/ John W. H. Harding  
John W.H. Harding  
Virginia State Bar No. 87602  
JWHarding@winston.com  
Lauren Gailey\*  
LGailey@winston.com  
WINSTON & STRAWN LLP  
1901 L St., NW  
Washington, DC 20036  
T: (202) 282-5000

Julie A. Bauer\*

65 E Wacker Pl., Suite 2000  
Chicago, IL 60601  
T: (312) 663-4413

Gregory R. Nevins\*  
GNevins@lambdalegal.org  
LAMBDA LEGAL DEFENSE AND  
EDUCATION FUND, INC.  
1 West Court Square, Ste. 105  
Decatur, GA 30030  
T: (404) 897-1800

Peter Perkowski\*  
pperkowski@perkowskilegal.com  
PERKOWSKI LEGAL, PC  
515 S. Flower St., Suite 1800  
Los Angeles, CA 90071  
T: (213) 340-5796

*\*pro hac vice*

JBauer@winston.com  
WINSTON & STRAWN LLP  
35 W. Wacker Dr.  
Chicago, IL 60601  
T: (312) 558-560

Andrew R. Sommer  
Virginia State Bar No. 70304  
Sommera@gtlaw.com  
GREENBERG TRAUERIG, LLP  
1750 Tysons Boulevard  
Suite 1000  
McLean, VA 22102  
T: (703) 749-1370

**CERTIFICATE OF SERVICE**

I certify that, on August 5, 2022, I caused this document to be filed electronically through the Court's CM/ECF system, which automatically sent a notice of electronic filing to all counsel of record.

Dated: August 5, 2022

Respectfully submitted,

/s/ John W. H. Harding  
John W.H. Harding

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

RICHARD ROE, ET AL.,

PLAINTIFFS,

v.

LLOYD AUSTIN, ET AL.,  
DEFENDANTS.

CIVIL ACTION NO. 1:18-cv-01565

NICHOLAS HARRISON, ET AL.,

PLAINTIFFS,

v.

LLOYD AUSTIN, ET AL.,  
DEFENDANTS.

CIVIL ACTION NO. 1:18-CV-00641

**DECLARATION OF JOHN W. H. HARDING**

I, John W. H. Harding, hereby declare as follows:

1. I am an attorney licensed to practice in the State of Virginia, the District of Columbia and in various federal courts, including the Eastern District of Virginia. If called upon to testify about this declaration, I can and will do so.

2. I have personal knowledge of the statements contained herein. The statements are true and correct to the best of my knowledge, information, and belief.

3. I submit this declaration in support of Plaintiffs Nicholas Harrison, Richard Roe, and Victor Voe's motion for attorneys' fees as prevailing parties in these actions. Richard Roe and Victor Voe are aliases for two of my clients.

4. I am currently a Senior Associate with the law firm of Winston & Strawn LLP ("Winston"), attorneys for Plaintiffs in the actions identified in the caption. Winston is a law firm

with ten offices in the United States and six offices internationally. Winston is ranked 43<sup>rd</sup> on the American Lawyer's 2022 Am Law 200 ranking.

5. I graduated from the University of Virginia School of Law in 2014. I joined Winston immediately after graduation and have focused my practice on complex commercial litigation and white collar, regulatory defense & investigations. I have significant experience handling many aspects of the litigation process, including managing discovery, conducting investigations, drafting critical motions, arguing motions, preparing witnesses, and trial.

6. Winston uses a computer software program to record its timekeeping. This program includes a timer feature where I can click on a matter when I start working on it and stop working on it and the program tracks my daily time for each matter. I use this timer feature daily. It is my regular practice to enter a description of the work performed for each day on a matter shortly after the time is recorded. My time entries reflect time I actually spent working on this matter. In some instances, I did not enter small amounts of time spent on these matters, such as, in the review of email correspondence or brief phone calls. I exercised reasonable billing judgment consistent with my ethical duties in determining whether time I spent warranted being entered.

7. Winston uses a computer software program for billing. Winston's regular business practice is for each attorney to enter his or her time into the timekeeping program identifying the client, time spent, and a brief description of the services provided. The billing program then collects the time from each timekeeper working on a matter to create a bill. Attached as Exhibit A are true and complete copies of the outputs from this software program related to these cases.

8. Winston also uses a computer software program to record costs associated with particular matters. These costs are recorded at or around the time of payment. Attached as Exhibit B is a true and correct copy of the outputs from this software program for *Roe* and *Harrison*.

9. I began working on these matters from their inception in May of 2018. Over the course of this litigation, I worked with and supervised numerous associates, paralegals, summer associates and other timekeepers who worked on these cases. This includes Cyrus Frelinghuysen, Eric Goldstein, Paul Harold, Laura Cooley, Chanslor Gallenstein, Allie Hemmings, Lauren Gailey, Greg Skogg, Gordon Coffee, Nathan Garg, Jerome Grant, Rebecca Miller, Esthy Rodriguez, Geoff Eaton, Jack Cartwright, and Michael Hill.

10. In preparation for this fee petition, Lauren Gailey and I carefully reviewed all the bills associated with these cases as well as a related case that Winston attorneys work on, *Deese et al. v. Austin III, et al.*, CA No. RDB-18-2669. In some instances, attorneys identified their time as related to *Roe* or *Harrison*, but inadvertently used the *Deese* matter number (and vice versa). In those instances where it was abundantly clear, we moved the time to the proper matter number. We also fixed typos and other nits in the time descriptions.

11. In reviewing the bills, the time entries for the attorneys I worked closely with appear to be consistent with the tasks they performed on these cases.

12. Winston’s 2022 rates are as follows:

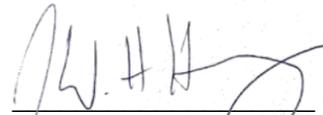
	<b>Partner</b>	<b>Of Counsel</b>	<b>Associate</b>	<b>Paralegal</b>	<b>Practice Support</b>
<b>CY2022</b>	\$890 - \$1,945	\$795 - \$1,370	\$640 - \$1,045	\$230 - \$400	\$165 - \$985

13. The Law Clerk / Summer Associate rate is \$640.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: August 5, 2022

By:



John W. H. Harding

# Exhibit A

**WINSTON & STRAWN LLP**

35 West Wacker Drive  
 Chicago, IL 60601-9703  
 TAX ID NO. 36-1975990

Winston & Strawn (Pro Bono)  
 Nicholas Harrison

**2018 Fee Summary**

Date 08/03/22  
 Client Matter No. 999997.05556

For Legal Services Rendered Through December 31, 2018 In Connection With:  
**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
03/21/18	A. Sommer	1.00	Attend telephone conference with Lamba Legal and N. Harrison re Harrison case
04/09/18	A. Sommer	0.60	Harrison pro bono matter -- Analyze client retainer letter and co-counsel agreement and correspond with team re same
04/12/18	A. Sommer	0.20	Harrison: Analyze and revise draft co-counsel agreement and correspond with G. McConnell and B. Cooper re same
04/19/18	A. Sommer	0.50	Harrison pro bono matter -- Office conference with C. Frelinghuysen re status of Harrison case and factual background
05/07/18	A. Sommer	0.60	Harrison - Analyze comments re draft co-counsel agreement, analyze email correspondence from Lambda legal, and confer with G. McConnell re same
05/08/18	A. Sommer	1.30	Harrison - Attend telephone conference re case status and strategy with Lambda and OutServe
05/10/18	C. Frelinghuysen	3.50	Confer with A. Sommer re Harrison complaint; review memorandum re equal protection claim and research re same; review draft complaint; research re Department of Defense and Army regulations related to HIV positive service members
05/10/18	A. Sommer	0.40	HARRISON: Analyze Doe engagement letter and correspond with Lambda re same; confer with G. McConnell re status of co-counsel agreement for Harrison case; confer with C. Frelinghuysen re status of complaint and research re same

**WINSTON & STRAWN LLP**

Winston &amp; Strawn (Pro Bono)

**2018 Fee Summary**Invoice Date 08/03/22  
Page No. 2**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
05/11/18	C. Frelinghuysen	4.00	Research re Department of Defense and Army regulations related to HIV positive service members and equal protection claim; review and analyze draft complaint and research re actual harm and exhaustion of administrative remedies
05/14/18	C. Frelinghuysen	5.50	Research re Department of Defense and Army regulations related to HIV; review and revise draft complaint and confer with team members re same
05/15/18	C. Frelinghuysen	4.00	Research re waiver of medical standard for enlistment or appointment and exhaustion of administrative remedies prior to district court action; confer with team members re waiver and exhaustion of administrative remedies; review and revise updated engagement letter and confer with co-counsel re same
05/16/18	C. Frelinghuysen	2.80	Review and analyze revised complaint and confer with team members re same; research re mooted of lawsuit by agency action; teleconference with co-counsel re filing of complaint and motion for preliminary injunction
05/16/18	A. Sommer	2.30	Harrison - Attend telephone conference re status and strategy for filing of complaint, venue, etc.; analyze draft complaint and send comments to Lambda and Out-Serve
05/17/18	C. Frelinghuysen	1.00	Confer with team members re engagement letter, co-counsel agreement, and motion for preliminary injunction
05/18/18	C. Frelinghuysen	2.50	Confer with team members re engagement letter and correspondence with N. Harrison re same; review documents from N. Harrison re appointment and waiver and confer with team members re same
05/18/18	J. Harding	0.40	Call with A. Sommer re new matter

**WINSTON & STRAWN LLP**

Winston &amp; Strawn (Pro Bono)

**2018 Fee Summary**Invoice Date 08/03/22  
Page No. 3**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
05/21/18	C. Frelinghuysen	3.00	Confer with team members re draft complaint and motion for preliminary injunction; review regulations re service members with HIV and review requirements for standing
05/22/18	C. Frelinghuysen	2.00	Review and research re standing requirements and exception to policy process and appeals
05/23/18	C. Frelinghuysen	4.00	Research re mootness issue, standing requirements, and exception to policy process and appeals; confer with team members re same; research re briefing from challenge to transgender service ban
05/23/18	J. Harding	2.80	Review key documents and complaint
05/24/18	C. Frelinghuysen	4.50	Research re standing requirements for organization and prepare summary re same; confer with team members re complaint filing and preparation of motion for preliminary injunction; review and analyze materials from litigation re transgender service ban
05/24/18	J. Harding	2.50	Research mootness issues
05/24/18	A. Sommer	0.90	Analyze engagement letter for Outserve and Harrison and correspond with G. McConnell re same; confer with J. Harding and C. Frelinghuysen re preparation for preliminary injunction and for filing of complaint
05/25/18	C. Frelinghuysen	3.30	Confer with team members re complaint filing and preparation of motion for preliminary injunction; prepare outline for motion for preliminary injunction; confer with co-counsel re filing of complaint and motion for preliminary injunction
05/25/18	J. Harding	2.70	Research filing procedures for EDVA and participate in team call
05/25/18	A. Sommer	0.50	HARRISON - Correspond with J. Harding and C. Frelinghuysen re research needed on mootness

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2018 Fee Summary**

Invoice Date 08/03/22  
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**05556 Nicholas Harrison - HIV deployment claim**

<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			issue; correspond with S. Schoettes re mootness issue and research re same
05/29/18	C. Frelinghuysen	6.20	Review and revise draft Harrison complaint and confer with team members re same; teleconference with co-counsel re complaint, filing, financial disclosure, and motion for preliminary injunction; confer with Mr. Harrison re engagement letter; prepare materials for filing of complaint and confer with team members re same
05/29/18	J. Harding	5.30	Prepare for and finalize documents for filing
05/29/18	A. Sommer	1.00	Telephone conference with team re filing of complaints and finalization of same; correspond with C. Frelinghuysen and J. Harding re submissions to accompany complaint and various related items
05/30/18	C. Frelinghuysen	6.00	Review and revise final version of complaint for filing; confer with team members re filing of complaint and other materials; supervise filing of complaint; confer with team members re motion for preliminary injunction; research re same
05/30/18	J. Harding	2.40	Review local rules, prepare for filing, and file additional documents required for the case
05/30/18	A. Sommer	1.40	Review and revise final draft of complaint; confer with C. Frelinghuysen re filing same; review ECF notices and correspond with team re same
05/31/18	C. Frelinghuysen	5.00	Confer with team members re motion for preliminary injunction, pro hac vice applications, summonses; research re equal protection claim standard of review for HIV positive service members; confer with team members re outline for motion for preliminary injunction
05/31/18	J. Harding	1.20	Strategize re preliminary injunction
06/01/18	C. Frelinghuysen	3.50	Confer with team members re motion for

**WINSTON & STRAWN LLP**

Winston &amp; Strawn (Pro Bono)

**2018 Fee Summary**

Invoice Date 08/03/22

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**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			preliminary injunction and outline re same; confer with co-counsel re motion for preliminary injunction and experts; research re military's HIV policies
06/01/18	J. Harding	4.20	Draft outline for preliminary injunction and participate in call re same
06/01/18	A. Sommer	1.00	Confer Lambda, Outserve, and with C. Frelinghuysen and J. Harding re strategy for preliminary injunction motion
06/04/18	C. Frelinghuysen	3.00	Prepare outline of issues for medical military expert and confer with team members re same; confer with Dr. C. Hendrix re potential retention as expert; research re background on Dr. Hendrix and confer with team members re same
06/04/18	J. Harding	2.40	Research and prepare materials for Declaration of N. Harrison
06/05/18	C. Frelinghuysen	1.00	Prepare retainer agreement for Dr. Hendrix and confer with team members and Dr. Hendrix re same
06/05/18	J. Harding	5.10	Research and assist N. Harrison Declaration
06/06/18	C. Frelinghuysen	0.50	Confer with team members re outline for Harrison declaration and Hendrix declaration in support of motion for preliminary injunction
06/06/18	J. Harding	2.40	Meeting with N. Harrison re Declaration
06/07/18	C. Frelinghuysen	2.50	Confer with team members re Hendrix declaration; confer with Dr. Hendrix re engagement letter and declaration; review and revise Harrison declaration and confer with team members re same
06/08/18	C. Frelinghuysen	3.30	Confer with team members re service of summonses and complaint; prepare additional summons; confer with team members re declarations in support of motion for preliminary

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2018 Fee Summary**

Invoice Date 08/03/22  
Page No. 6

**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			injunction; prepare Hendrix declaration
06/11/18	C. Frelinghuysen	3.00	Confer with team members re service of summons and complaint; research re military HIV policies and prepare outline for Hendrix declaration in support of motion for preliminary injunction
06/12/18	C. Frelinghuysen	4.00	Research re HIV treatment and transmission; prepare outline of Dr. Hendrix declaration in support of preliminary injunction
06/12/18	J. Harding	5.10	Review supporting materials for N. Harrison declaration
06/13/18	C. Frelinghuysen	5.50	Research re HIV treatment and transmission and military HIV policies; prepare outline of Dr. Hendrix declaration in support of preliminary injunction
06/13/18	D. Gallenstein	0.30	Meet with J. Harding to discuss project on preliminary injunctions
06/13/18	J. Harding	0.30	Email from N. Harrison re discovery and discussion re same
06/14/18	C. Frelinghuysen	6.00	Confer with co-counsel re declarations in support of motion for preliminary injunction; research re military HIV monitoring and policies and walking blood bank; prepare outline for declaration of C. Hendrix in support of motion for preliminary injunction
06/14/18	J. Harding	0.40	Assist N. Harrison declaration
06/15/18	C. Frelinghuysen	4.30	Research re military deployment policies and medical fitness standards and confer with co-counsel re same; prepare C. Hendrix declaration and confer with team members re same; teleconference with co-counsel re strategy and timing of motion for preliminary injunction
06/15/18	D. Gallenstein	1.80	Research preliminary injunctions in E.D. VA

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
06/15/18	J. Harding	1.50	Prepare for and participate in team call re preliminary injunction
06/18/18	D. Gallenstein	1.40	Research preliminary injunctions in Eastern District of Virginia
06/19/18	C. Frelinghuysen	5.70	Research re military policies on HIV, readiness, blood supplies, and prepare outline of Hendrix declaration; confer with team members re same
06/19/18	D. Gallenstein	0.80	Research timing of preliminary injunction in ED VA
06/20/18	C. Frelinghuysen	2.00	Research re medical readiness and walking blood bank; prepare outline of Hendrix declaration
06/20/18	D. Gallenstein	0.20	Research preliminary injunction in ED Va.
06/21/18	C. Frelinghuysen	6.50	Research re HIV antiretroviral therapy medicines, single tablet regimens, and exacerbation of HIV condition; prepare outline of Hendrix declaration; confer with co-counsel re declaration, motion for preliminary injunction, and research re Judge Brinkema; confer with Dr. Hendrix re declaration
06/21/18	D. Gallenstein	2.00	Research irreparable harm for preliminary injunction
06/22/18	C. Frelinghuysen	4.00	Research re emergency blood transfusions, infection of health care workers, and viral load testing; review and revise outline of Hendrix declaration; teleconference with co-counsel and Dr. Hendrix re declaration; confer with co-counsel re declarations and motion for preliminary injunction
06/22/18	D. Gallenstein	2.00	Research irreparable harm for preliminary injunction
06/22/18	J. Harding	0.70	Participate in call with Dr. Hendrix

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06/24/18	C. Frelinghuysen	0.50	Review and analyze materials from Dr. Hendrix and confer with team members re same
06/25/18	C. Frelinghuysen	5.00	Review and analyze updated outline for motion for preliminary injunction and confer with team members re same; research re heightened scrutiny and rational basis review in Fourth Circuit case law; review Harrison declaration and confer with team members re same; prepare memorandum in support of motion for preliminary injunction
06/25/18	D. Gallenstein	5.50	Draft section of motion for preliminary injunction
06/26/18	C. Frelinghuysen	2.20	Review and revise section of memorandum prepared by C. Gallenstein and confer with team members re same; review and analyze revisions to outline of Dr. Hendrix declaration and confer with team members re same
06/27/18	C. Frelinghuysen	1.50	Confer with team members re drafting memorandum in support of motion for preliminary injunction; review and analyze revisions to Hendrix declaration outline and confer with team members re same; research re emergency blood transfusion and military blood supplies
06/27/18	J. Harding	0.70	Research P.I. issues
06/28/18	C. Frelinghuysen	3.50	Review and analyze edits to Hendrix declaration outline and confer with team members re same; prepare memorandum in support of motion for preliminary injunction; confer with team members re materials in support of declarations and motion for preliminary injunction; office conference with team members re case status
06/28/18	J. Harding	1.10	Draft P.I. motion
06/29/18	C. Frelinghuysen	6.50	Review and analyze Hendrix and Del Rio declaration outlines and confer with team members re same; prepare sections for memorandum in support of motion for preliminary injunction and

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			confer with co-counsel re same; confer with co-counsel re potential amendment of complaint to add plaintiffs
06/29/18	J. Harding	2.40	Draft P.I. motion
06/29/18	A. Sommer	1.80	Analyze and revise draft declarations of medical experts and correspond with team re same; analyze comments re potential witness from Lambda and respond to same
06/29/18	N. Wertheimer	2.00	Review Hendrix Declaration and prepare documents cited; prepare index of same
07/02/18	C. Frelinghuysen	2.40	Confer with co-counsel re timing to amend complaint and file motion for preliminary injunction; review and analyze rules for amending of pleadings; review and analyze revised Hendrix declaration and confer with team members re materials cited in same
07/02/18	N. Wertheimer	2.60	Review and update exhibits and missing links to the Hendrix Declaration
07/03/18	C. Frelinghuysen	1.00	Teleconference with co-counsel re amendment of complaint and motion for preliminary injunction; confer with Dr. Hendrix re declaration
07/03/18	J. Harding	0.70	Call re preliminary injunction
07/03/18	N. Wertheimer	0.80	Review and update exhibits and missing links to the Hendrix Declaration
07/05/18	C. Frelinghuysen	0.50	Confer with co-counsel re Dr. Hendrix declaration and materials for same; review Hendrix declaration and materials cited therein
07/11/18	J. Harding	0.30	Review declaration
07/12/18	J. Harding	0.20	Respond to emails re case status
07/14/18	C. Frelinghuysen	0.50	Confer with co-counsel re memorandum in support

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			of motion for preliminary injunction
07/16/18	C. Frelinghuysen	0.80	Review and analyze draft memorandum in support of motion for preliminary injunction and confer with team members re same
07/17/18	J. Harding	1.50	Prepare Motion to Seal
07/17/18	A. Sommer	4.40	Analyze draft motion for preliminary injunction and provide comments re same to team; review declarations and provide suggested edits to same; confer with team re strategy for filing a motion for preliminary injunction
07/18/18	C. Frelinghuysen	1.00	Review and analyze draft memorandum in support of motion for preliminary injunction and confer with team members re readiness issue, memorandum citations, and filing issues
07/18/18	J. Harding	7.00	Prepare, finalize, and file Motion for Preliminary Injunction and supporting documents
07/18/18	A. Sommer	2.40	Correspond with team re status and timing for motion for preliminary injunction; confer with J. Harding re same; analyze and comment on motion to seal and supporting papers; analyze and propose revisions to memorandum in support of motion for preliminary injunction
07/18/18	N. Wertheimer	7.00	Assist team cite check Plaintiffs' Motion for a Preliminary Injunction; draft motion for a preliminary injunction
07/19/18	C. Frelinghuysen	0.50	Confer with team members re filing motion for preliminary injunction
07/19/18	J. Harding	3.50	Prepare, finalize, and file Motion for Preliminary Injunction and supporting documents
07/19/18	A. Sommer	2.30	Analyze, revise, finalize and coordinate re filing of motion for preliminary injunction; confer with J. Harding re same

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07/19/18	N. Wertheimer	1.80	Assist team cite check Plaintiffs' Motion for a Preliminary Injunction
07/23/18	A. Sommer	0.20	Respond to counsel for Defendants re briefing schedule and confer with Lambda Legal re same
07/24/18	J. Harding	0.50	Draft and file hearing notice
07/24/18	N. Wertheimer	0.30	Prepare distribution of case filings
07/25/18	J. Harding	0.90	Research implications of government's proposed briefing schedule
07/31/18	J. Harding	0.20	Review Motion to Alter Briefing Schedule
07/31/18	A. Sommer	0.50	Review government's motion to consolidate briefing and correspond with team re same
07/31/18	N. Wertheimer	1.50	Prepare distribution of today's filing; update pleadings electronic files and index
08/01/18	J. Harding	3.00	Draft Opposition to Motion to Consolidate
08/01/18	A. Sommer	2.50	Analyze and revise draft opposition to motion to consolidate briefing; attend telephone conference with team re case status and strategy; correspond with team re draft briefing
08/01/18	N. Wertheimer	0.50	Prepare court notice for team distribution; update case electronic pleadings files and index
08/02/18	J. Harding	1.00	Revise opposition to consolidate
08/02/18	A. Sommer	0.50	Review and revise final draft of opposition to motion to consolidate briefing and correspond with J. Harding re finalizing same
08/02/18	N. Wertheimer	0.70	Follow up communications with LAMBDA re word documents for filings; update files with requested native files

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08/03/18	J. Harding	0.50	File opposition
08/03/18	A. Sommer	0.10	Final review of opposition to motion to adjust briefing schedule and order of briefing
08/03/18	N. Wertheimer	0.50	Prepare filing distribution to team; update case electronic files and index
08/15/18	A. Sommer	0.30	Attend telephone conference re matter status and strategy
08/17/18	J. Harding	2.50	Review opposition to P.I. and MTD
08/17/18	A. Sommer	2.90	Circulate government's filings to team; analyze and consider government's motion to dismiss and opposition to motion for preliminary injunction and evidence submitted to support same; attend team telephone conference re case status and strategy for responding to government's brief opposing summary judgment and moving to dismiss
08/17/18	N. Wertheimer	2.00	Review and update case electronic files with recent filings
08/20/18	J. Harding	4.10	Draft outline to Opposition to Motion to Dismiss and Reply in Support of Preliminary Injunction
08/20/18	A. Sommer	0.30	Telephone conference with J. Harding re outline of response to motion to dismiss and reply in support of motion for preliminary injunction
08/22/18	J. Harding	0.50	Team call re Motion to Dismiss
08/22/18	A. Sommer	2.50	Research re response to motion to dismiss and reply in support of preliminary injunction; telephone conference with Lambda team re same
08/23/18	V. Gianino	0.50	Discuss research assignment with A. Sommer re voluntary cessation
08/23/18	J. Harding	5.90	Research justiciability issues

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08/23/18	A. Sommer	4.60	Consider opposition to motion for preliminary injunction; analyze issues and prepare for responding to same; analyze case law; discuss same with V. Gianiano
08/24/18	V. Gianino	6.30	Conduct research re voluntary cessation doctrine; compose email summarizing research findings and case law
08/24/18	J. Harding	5.40	Draft opposition to Motion to Dismiss
08/24/18	A. Sommer	0.20	Confer with J. Harding re strategy for responding to opposition to motion for preliminary injunction
08/25/18	V. Gianino	2.00	Conduct research re voluntary cessation doctrine and summarize the recent cases with transgender plaintiffs in the military; compose email summarizing findings
08/26/18	J. Harding	1.90	Draft opposition to Motion to Dismiss
08/27/18	V. Gianino	2.80	Conduct research re arguments made by plaintiffs in the recent cases involving transgender service members and the President Trump Memorandum; compose emails summarizing research findings
08/27/18	J. Harding	2.10	Draft justiciability arguments and emails to D. Sommer re same
08/27/18	A. Sommer	8.50	Analyze issues related to motion to dismiss and justiciability and research re same; confer with J. Harding re same
08/28/18	J. Harding	1.70	Review and revise Motion and calls with D. Sommer re same
08/28/18	A. Sommer	1.00	Revise draft opposition to motion to dismiss and reply in support of motion for preliminary injunction
08/29/18	J. Harding	1.00	Call re motion to dismiss and preliminary

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			injunction
08/29/18	A. Sommer	7.80	Analyze and revise draft response to motion to dismiss and reply in support of motion for preliminary injunction and research re same; attend telephone conference re status and strategy
08/30/18	J. Harding	2.50	Finalize and file opposition to motion to dismiss
08/30/18	A. Sommer	4.40	Analyze and revise draft response to motion to dismiss and reply in support of motion for preliminary injunction; coordinate filing with J. Harding and Lambda legal
08/30/18	N. Wertheimer	0.50	Update case electronic files
08/31/18	N. Wertheimer	0.50	Update case electronic files
09/04/18	J. Harding	0.20	Emails re argument
09/04/18	A. Sommer	0.80	Attend team telephone conference re strategy for oral argument on motion to dismiss and for preliminary injunction
09/04/18	A. Sommer	0.70	Analyze email from S. Schottes re upcoming oral argument preparations and reply to same
09/05/18	J. Harding	0.90	Call to discuss oral argument
09/05/18	A. Sommer	0.50	Confer with team re case status and strategy; preparations for oral argument
09/06/18	A. Sommer	0.50	Confer with DOJ counsel re preliminary injunction hearing
09/07/18	J. Harding	0.90	Review government's reply
09/07/18	A. Sommer	0.70	Coordinate logistics re moot arguments for preliminary injunction hearing and motion to dismiss hearing
09/09/18	J. Harding	2.80	Prepare for oral argument

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09/10/18	C. Frelinghuysen	0.50	Review motion for leave to reply and confer with team members re same
09/10/18	J. Harding	6.10	Prepare for oral argument
09/10/18	P. Harold	0.20	Prepare binder for moot court
09/10/18	A. Sommer	4.70	Analyze reply brief and correspond with team re potential continuance, sur-reply and other matters telephone conference with team re sur-reply and oral argument strategy; meet and confer with defense counsel re motion for sur-reply; prepare for moot argument; moot J. Harding to prepare for hearing; attend court-ordered telephone conference
09/11/18	C. Frelinghuysen	4.50	Review briefing materials and participate in moot preparation with team members and co-counsel; review and revise motion for leave to file a sur-reply
09/11/18	E. Goldstein	2.50	Review materials re moot argument
09/11/18	J. Harding	5.00	Prepare for and participate in moot; revise sur-reply
09/11/18	A. Sommer	5.00	Draft motion for leave to file sur-reply and circulate same to team; correspond with team
09/11/18	A. Sommer	0.50	Analyze and propose revisions to draft sur-reply and correspond with team re same
09/11/18	N. Wertheimer	0.50	Update case electronic files with recent filings
09/12/18	C. Frelinghuysen	2.60	Review and revise motion for leave to file sur-reply, memorandum in support, and sur-reply and confer with team members re same; review and analyze briefing materials for moot preparation
09/12/18	E. Goldstein	3.50	Review materials re moot argument
09/12/18	J. Harding	2.30	Revise and file sur-reply and supporting

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			documentation
09/12/18	P. Harold	4.50	Prepare for moot court
09/12/18	A. Sommer	0.60	Revise draft sur-reply and correspond with team re same
09/12/18	A. Sommer	0.70	Attend team telephone conference re case status and strategy and preparation for hearing
09/13/18	C. Frelinghuysen	3.50	Review briefing materials for motion for preliminary injunction and motion to dismiss; participate in moot discussion with team members and co-counsel
09/13/18	E. Goldstein	4.00	Participate in moot argument and strategy session
09/13/18	J. Harding	4.40	Prepare for and participate in moot on motion for P.I. and motion to dismiss
09/13/18	P. Harold	3.10	Participate in moot court
09/13/18	P. Harold	1.30	Prepare for moot court
09/13/18	A. Sommer	3.60	Make preparations for second moot argument for Harrison motion to dismiss and motion for preliminary injunction; prepare for and participate in moot hearing
09/13/18	N. Wertheimer	1.00	Update electronic files for team review
09/14/18	C. Frelinghuysen	3.30	Review briefing materials; confer with team members re hearing; attend hearing on motion for preliminary injunction and motion to dismiss and confer with team members re same
09/14/18	J. Harding	4.60	Prepare for and attend hearing on Motion to Dismiss and Motion for P.I.
09/14/18	A. Sommer	3.90	Appear for an attend hearing on motion to dismiss and motion for preliminary injunction and travel to and from courthouse

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09/14/18	N. Wertheimer	1.00	Update electronic files for team review; communication with Lambda re final word filing documents
09/19/18	C. Frelinghuysen	0.50	Teleconference with team members and co-counsel re case status and management
09/19/18	J. Harding	0.60	Participate in weekly call
09/26/18	N. Wertheimer	0.50	Review and prepare preliminary injunction hearing filings for B. Cooper review
10/01/18	J. Harding	0.50	Review answer
10/01/18	A. Hemmings	1.00	Meet with J. Harding and C. Frelinghuysen; review answer
10/03/18	J. Harding	0.40	Participate in weekly call
10/03/18	A. Hemmings	0.30	Weekly case call
10/04/18	A. Sommer	0.30	Analyze scheduling order and correspond with team re same
10/05/18	C. Frelinghuysen	1.00	Confer with team members re discovery issues and document requests; review and revise list of proposed document requests
10/05/18	J. Harding	0.90	Meeting with D. Sommer, A. Hemmings, and C. Frelinghuysen re next steps
10/05/18	A. Hemmings	1.60	Met with case team to discuss discovery; draft initial discovery request list
10/05/18	A. Sommer	1.20	Office conference with team re preparation of discovery and preparation for Rule 26(f) conference; analyze draft discovery topics and send comments to team
10/08/18	C. Frelinghuysen	0.30	Confer with team members re document requests and correspondence with C. Hendrix re same

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10/08/18	A. Hemmings	0.90	Research additional initial document disclosure requests; review previous initial disclosures
10/08/18	A. Sommer	0.20	Correspond with team re outstanding discovery related tasks and status of same
10/09/18	J. Harding	1.20	Meeting with D. Sommer re next steps and research discovery rules
10/10/18	J. Harding	0.90	Research Rule 26(f) and email to opposing counsel re same
10/10/18	A. Hemmings	0.60	Weekly status call
10/10/18	A. Sommer	0.80	Confer with P. Perkowski re discovery issues related to OutServe and preparation for document collection and Rule 26(f) conference and correspond with team re same
10/10/18	A. Sommer	0.80	Confer with case team re discovery strategy and strategy for Rule 26(f) conference
10/15/18	C. Frelinghuysen	1.00	Review documents from Mr. Harrison and confer with team members re same
10/16/18	C. Frelinghuysen	2.60	Confer with C. Hendrix re case schedule and potential discovery and confer with team members re same; research re extent of discovery for equal protection claims; review and revise motion for extension and confer with team members re same
10/16/18	J. Harding	0.50	Correspondence with opposing counsel re scheduling order
10/16/18	A. Hemmings	4.10	Draft motion to extend; update outline of discovery requests; research issue of APA discovery
10/17/18	C. Frelinghuysen	2.20	Confer with team members re extension, discovery plan, and research on privileges and scope of discovery; research re applicable privileges;

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			participate in weekly team call
10/17/18	J. Harding	1.90	Participate in weekly team call and call with government
10/17/18	A. Hemmings	1.50	Weekly team call; call with opposing counsel
10/18/18	C. Frelinghuysen	2.00	Review government briefing re applicability of APA and prepare response to same, confer with team members re same; research re applicability of APA for constitutional claims
10/18/18	J. Harding	0.70	Revise joint schedule
10/18/18	A. Hemmings	4.90	Research and draft argument about applicability of APA to discovery
10/19/18	J. Harding	1.10	Prepare and file joint scheduling plan
10/19/18	A. Hemmings	0.50	Incorporate edits in discovery plan document
10/19/18	N. Wertheimer	0.50	Update case electronic files
10/22/18	C. Frelinghuysen	1.80	Review scheduling order, hearing transcript, and confer with team members re same; research re transgender ban cases and confer with team members re discovery requests
10/22/18	J. Harding	0.40	Emails re scheduling order
10/22/18	A. Hemmings	0.30	Organize upcoming discovery deadlines
10/22/18	N. Wertheimer	0.50	Update case electronic files
10/23/18	C. Frelinghuysen	4.50	Office conference with team members re discovery preparation and case management; research re document requests for transgender ban cases and equal protection claims; prepare draft interrogatories and requests for document production and confer with team members and co-counsel re same; confer with C. Hendrix re schedule and expert report

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10/23/18	J. Harding	0.80	Call re scheduling order and discovery
10/23/18	A. Hemmings	2.40	Team meeting; draft initial disclosures
10/23/18	A. Sommer	1.00	Analyze scheduling order and consider discovery strategy and email team re same
10/24/18	C. Frelinghuysen	3.00	Confer with team members re discovery requests and review and revise same; office conference with team members re same; teleconference with co-counsel re case management and discovery; review and revise initial disclosures and confer with team members re same
10/24/18	J. Harding	0.80	Participate in strategy call and emails to team re relativity
10/24/18	A. Hemmings	3.60	Incorporate edits in initial discovery requests and interrogatories; attend weekly team meeting
10/24/18	A. Sommer	2.70	Analyze draft discovery; send discovery planning email to team; confer with C. Frelinghuysen and A. Hemmings re revisions to draft discovery requests; attend telephone conference re case status and strategy
10/25/18	C. Frelinghuysen	1.20	Confer with team members re discovery requests, document review, and initial disclosures; review and revise initial disclosures
10/25/18	J. Harding	0.20	Meeting with A. Hemmings re discovery review
10/25/18	A. Hemmings	0.20	Incorporate edits in interrogatories
10/26/18	C. Frelinghuysen	1.00	Confer with team members re discovery responses, expert reports, and non-infringement positions; confer with counsel for digiLED re same
10/29/18	C. Frelinghuysen	2.50	Confer with team members re discovery requests, document production, initial disclosures, protective order, and ESI agreement; review

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			documents for potential production and confer with team members re same
10/29/18	J. Harding	1.40	Set up relativity
10/29/18	A. Hemmings	2.30	Review documents for privilege
10/29/18	A. Sommer	0.50	Consider discovery issues and confer with J. Harding re protective order and ESI stipulation
10/30/18	C. Frelinghuysen	1.80	Confer with team members re document production, initial disclosures, and standing issue; research re standing and confer with team members re same
10/30/18	J. Harding	1.70	Draft protective order
10/30/18	A. Hemmings	1.50	Review documents for privilege
10/31/18	C. Frelinghuysen	2.70	Review and analyze documents for potential production and confer with team members re same; confer with team members re digiLED counsel and non-infringement expert; teleconference with team members and co-counsel re case status; review and revise initial disclosures and confer with co-counsel re same
10/31/18	A. Hemmings	3.50	Review documents for privilege; weekly team strategy call
10/31/18	A. Sommer	0.30	Attend telephone conference re case status and strategy
11/01/18	C. Frelinghuysen	2.30	Confer with team members re initial disclosures and review and revise same; confer with team members re document review and production; confer with co-counsel re initial disclosures
11/01/18	J. Harding	1.00	Review and revise PO
11/01/18	A. Hemmings	0.60	Review documents for privilege; weekly team strategy call

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
11/01/18	A. Sommer	0.30	Attend team meeting re case status and strategy
11/02/18	C. Frelinghuysen	2.50	Confer with team members and N. Harrison re initial disclosures; review and revise same; review and analyze protective order and electronically stored information order and prepare motion for leave to file same; confer with team members re document production
11/02/18	J. Harding	2.70	Finalize and file motion for PO and ESI Order
11/02/18	A. Hemmings	0.90	Edit initial disclosures
11/03/18	C. Frelinghuysen	0.50	Review and analyze Defendants' initial disclosures and confer with team members re same
11/03/18	A. Hemmings	1.00	Research appellate procedure
11/03/18	A. Sommer	0.40	Confer with team re upcoming deadlines and tasks, notice of appeal from denial of preliminary injunction, and strategy re potential objections to discovery from government
11/05/18	A. Hemmings	0.50	Review documents for privilege
11/06/18	C. Frelinghuysen	0.30	Review Dr. Hendrix declaration and confer with C. Hendrix re expert report and scheduling
11/07/18	C. Frelinghuysen	3.30	Review document requests, briefing, DoD regulations, DoD Report to Congress, and additional materials; prepare draft interrogatories and confer with team members re same; review and analyze initial disclosures and confer with team members re collection of materials cited therein
11/07/18	A. Hemmings	0.50	Review documents for privilege
11/07/18	N. Wertheimer	2.00	Prepare articles cited in initial disclosures and Department of Defense Personnel Policies for attorney and expert review

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11/07/18	T. Woodward	1.00	Work to locate and obtain articles, reports, studies, on HIV in the military as well as articles on neurocognitive impairment with HIV, for N. Wertheimer
11/08/18	C. Frelinghuysen	0.50	Review Defendants' objections and confer with team members re same
11/08/18	J. Harding	0.70	Review objections and draft response to the Government
11/09/18	C. Frelinghuysen	1.00	Confer with team members re Defendants' objections to document requests and possible motion to compel; research re meet and confer requirement in E.D. Virginia
11/09/18	J. Harding	0.10	Draft email to government
11/09/18	T. Woodward	0.30	Additional research on Military paper regarding qualification standards for HIV , for N. Wertheimer
11/11/18	N. Wertheimer	1.00	Update electronic files; review and prepare literature cited in disclosures for team review
11/12/18	C. Frelinghuysen	3.80	Confer with team members re Defendants' objections to document requests and prepare response to opposing counsel; research re motion to compel; confer with team members re discovery; confer with C. Hendrix re scheduling and expert report
11/12/18	J. Harding	0.20	Emails re meet and confer
11/12/18	C. Lundin	0.80	Factual research various medical articles using Sprinter, outside resource for N. Wertheimer
11/13/18	C. Frelinghuysen	5.00	Teleconference with opposing counsel, confer with team members and co-counsel re motion to compel; research re motion to compel; review case materials and prepare draft motion to compel

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
11/13/18	J. Harding	2.50	Prepare for and participate in meet and confer call
11/13/18	A. Hemmings	2.00	Research deliberative process; meet and confer call
11/14/18	C. Frelinghuysen	6.00	Review case materials and prepare motion to compel and confer with team members re same
11/14/18	J. Harding	0.60	Participate in weekly call
11/14/18	A. Hemmings	3.50	Research Local Rule 26 and FRCP 34(b)(2)(B); weekly team call
11/14/18	A. Sommer	1.20	Attend team telephone conference re case status and strategy and confer with G. McConnell re case strategy and staffing issues
11/15/18	C. Frelinghuysen	4.00	Confer with co-counsel re discovery issues; review case materials and prepare motion to compel document production and confer with team members and co-counsel re same
11/15/18	J. Harding	0.20	Emails re motion to compel
11/15/18	A. Hemmings	2.40	Review and summarize DoDI 6490.07 and 6130.03
11/16/18	C. Frelinghuysen	3.30	Confer with team members re discovery and motion to compel; prepare interrogatories and confer with team members and co-counsel re same; review expert declaration and confer with team members re expert declaration and supporting documents; research re implementation of retention policy
11/16/18	N. Wertheimer	1.50	Prepare articles cited in disclosures and exhibit 3 to Defendants Reply memo for team and expert review
11/17/18	C. Frelinghuysen	0.50	Review and analyze case plan and confer with co-counsel re same

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
11/19/18	C. Frelinghuysen	4.60	Review and revise motion to compel and confer with team members re same; research re award of fees for motion to compel; confer with co-counsel re motion to compel and review and revise same; confer with team members and co-counsel re remaining discovery requests; review and revise motion to amend scheduling order and confer with team members re same
11/19/18	A. Hemmings	0.50	Draft Joint Motion to Modify Schedule
11/19/18	C. Man	1.50	Review new military judgment and discuss with HIV teams
11/19/18	N. Wertheimer	1.50	Assist team prepare exhibits to motion to compel; update electronic pleadings file and other electronic documents
11/20/18	C. Frelinghuysen	3.80	Research re award of fees for motion to compel and confer with team members re same; review and revise motion to compel, memorandum in support, proposed order, and exhibits and confer with team members and co-counsel re same; confer with co-counsel re discovery requests
11/20/18	L. Gailey	3.80	Review papers; attend conference call discussing strategy and timeline; research admission process for Virginia Bar
11/20/18	J. Harding	0.30	File unopposed motion to extend deadlines
11/20/18	A. Hemmings	0.80	Research attorney's fees
11/20/18	C. Man	0.40	Review new military litigation
11/20/18	A. Sommer	1.20	Analyze and revise draft motion to compel discovery
11/20/18	N. Wertheimer	1.50	Update case electronic files
11/21/18	C. Frelinghuysen	2.00	Teleconference with team members and co-counsel re case status, discovery, motion to

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			compel, and strategy; research re binding nature of relief on military departments and confer with team members re same; review and revise motion to modify scheduling order and confer with team members re same
11/21/18	L. Gailey	7.20	Attend conference call discussing strategy and timeline; review papers
11/21/18	J. Harding	0.90	Participate in weekly call
11/21/18	A. Hemmings	1.00	Weekly status call
11/21/18	A. Sommer	0.80	Attend team telephone conference re case status and strategy
11/21/18	A. Sommer	0.30	Confer with team re renewing preliminary injunction motion
11/23/18	C. Frelinghuysen	0.30	Review proposed narrowing of discovery requests and confer with team members re same
11/23/18	J. Harding	1.30	Draft potential tailoring steps for requests
11/23/18	A. Hemmings	3.30	Research preliminary injunctions in EDVA
11/25/18	C. Frelinghuysen	1.00	Research re standard for preliminary injunction and prepare summary re same
11/26/18	C. Frelinghuysen	3.80	Review and revise discovery requests and confer with team members and co-counsel re same; research re standard for preliminary injunction and confer with team members re same
11/26/18	L. Gailey	3.60	Review papers; attend conference call with client re declaration; draft declaration
11/27/18	C. Frelinghuysen	6.80	Review and revise discovery requests; confer with team members re discovery and renewed motion for preliminary injunction; review discovery responses and prepare deficiency letter and confer with team members re same; review document

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			production and confer with team members re same
11/27/18	L. Gailey	6.20	Review papers; attend conference call with client re declaration; draft same
11/27/18	J. Harding	1.40	Review written objections and meeting with C. Frelinghuysen re same
11/27/18	A. Sommer	5.90	Draft renewed motion for preliminary injunction and research re same
11/27/18	A. Sommer	0.60	Analyze and revise draft notice of deposition of Defendants, requests for admission, and requests for production
11/28/18	C. Frelinghuysen	8.50	Review and revise deficiency letter and confer with co-counsel and team members re same; confer with team members re discovery requests; confer with team members and C. Hendrix re schedule for expert report; review and analyze opposition to motion to compel and prepare reply re same; research for reply to opposition
11/28/18	L. Gailey	5.40	Attend conference calls with legal teams; revise declaration; review motion in related case
11/28/18	J. Harding	1.60	Review Opposition
11/28/18	A. Hemmings	1.80	Review government productions
11/28/18	A. Sommer	1.30	Attend team telephone conference re case status and strategy and confer with C. Frelinghuysen re reply in support of motion to compel
11/28/18	N. Wertheimer	3.30	Update case electronic files; prepare produced documents for team review
11/29/18	C. Frelinghuysen	7.50	Review and revise reply for motion to compel; confer with team members and co-counsel re Blevins declaration and prepare same; confer with team members re reply and finalize reply for filing; review summary of government document

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			production and confer with team members re same; review and revise deposition notice to Defendants and confer with team members re same; office conference with team members re hearing on motion to compel
11/29/18	L. Gailey	1.40	Review draft motion; communicate with legal team re declarations
11/29/18	J. Harding	5.50	Prepare for oral argument on Motion to Compel
11/29/18	A. Hemmings	4.30	Review government productions; update motion to seal documents
11/29/18	A. Sommer	3.10	Analyze draft reply in support of motion to compel and correspond with team re same; prepare for hearing with J. Harding and C. Frelinghuysen
11/29/18	N. Wertheimer	3.50	Update case electronic files; prepare case extranet; prepare documents produced for team review
11/30/18	C. Frelinghuysen	6.00	Confer with team members re hearing on motion to compel; participate in hearing on motion to compel; prepare summary re hearing and confer with team members re same; review and revise deposition notice to defendants and confer with team members re same
11/30/18	L. Gailey	0.20	Communicate with L. Cooley re status and legal issues
11/30/18	L. Gailey	6.60	Communicate with Doe/Dietz team re Administrative Procedure Act issues; review papers and memoranda in related cases; communicate with L. Cooley re declarations and complaint; revise declarations
11/30/18	J. Harding	5.70	Prepare for and attend hearing on Motion to compel; call with team re same
11/30/18	A. Sommer	3.50	Prepare for and attend hearing re motion to compel discovery; confer with J. Harding and C.

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			Frelinghuysen re same; de-brief team on hearing
11/30/18	N. Wertheimer	3.50	Update case electronic files; prepare documents produced for team review
12/01/18	J. Harding	0.20	Research how to request a transcript from a magistrate hearing
12/03/18	C. Frelinghuysen	4.00	Review and analyze government document production and privilege log and confer with team members re same; prepare deficiency letter re same; research re deliberative process privilege
12/03/18	L. Gailey	6.30	Review comments from co-counsel on declarations; revise same accordingly; draft complaint
12/03/18	J. Harding	0.10	Request transcript from Motion to Compel
12/03/18	A. Hemmings	0.30	Assist in drafting expert witness report
12/03/18	N. Wertheimer	3.50	Update case electronic case files
12/04/18	C. Frelinghuysen	3.00	Review and analyze interrogatory responses and research re interrogatory subparts; confer with team members and co-counsel re deposition notice and discovery requests and scope of order on motion to compel; confer with team members re Hendrix expert report
12/04/18	A. Hemmings	3.70	Assist in drafting expert witness report; review government's production
12/04/18	N. Wertheimer	4.50	Update case files and extranet
12/05/18	C. Frelinghuysen	5.00	Confer with team members re interrogatory objections and research re interrogatory subparts and deliberative process privilege; teleconference with co-counsel and team members re litigation status; review and revise deposition notice and finalize for service; review and revise deficiency letter and finalize for service; review and analyze

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			draft outline of Hendrix report
12/05/18	J. Harding	0.90	Participate in weekly call
12/05/18	A. Hemmings	3.20	Assist in drafting expert witness report; review government's production; weekly call
12/05/18	A. Sommer	1.10	Attend telephone conference with team re case status and strategy; confer with C. Frelinghuysen re discovery
12/05/18	N. Wertheimer	3.00	Update case extranet
12/06/18	C. Frelinghuysen	5.00	Confer with team members re discovery order and review transcript re same; confer with team members re government's interrogatory objections; confer with opposing counsel re meet and confer; confer with team members and co-counsel re expert report; review and analyze draft expert report and review and revise same
12/06/18	J. Harding	1.50	Review transcript and email to team re same
12/06/18	A. Hemmings	0.50	Review hearing transcript
12/07/18	C. Frelinghuysen	5.30	Research re government justifications for policies; review and analyze government document production; review and revise outline for expert report; confer with team members re expert report; confer with team members re document production issue
12/07/18	J. Harding	0.80	Review 2018 congressional report
12/10/18	C. Frelinghuysen	3.50	Review and analyze defendants' objections to interrogatories and confer with team members re same and meet and confer with Defendants; participate in meet and confer with Defendants; confer with team members re letter re meet and confer
12/10/18	J. Harding	1.70	Prepare for and participate in meet and confer with

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			the Government
12/10/18	A. Hemmings	2.70	Meet and confer call; draft letter to send defendants re: meet and confer
12/10/18	N. Wertheimer	3.80	Review Hendrix Declaration and update documents cited in final draft
12/11/18	C. Frelinghuysen	2.50	Confer with team members re letter to opposing counsel and review and revise same; confer with co-counsel re same; confer with co-counsel re Hendrix expert report; confer with team members re deliberative process privilege and potential motion to compel
12/11/18	J. Harding	2.40	Draft letter re meet and confer
12/11/18	A. Hemmings	0.20	Review AR 600-110 changes; research military costs
12/11/18	N. Wertheimer	0.50	Communications with e-discovery and S. Schoettes re electronic access to the Relativity project; update case electronic files
12/12/18	C. Frelinghuysen	1.80	Confer with team members re motion to compel, document production issues, deposition notices, and expert reports
12/12/18	J. Harding	1.30	Emails with Gouvernement re interrogatory objections
12/12/18	A. Hemmings	2.20	Review Karnoski and Stone cases
12/12/18	M. Mascolo	0.50	Search and set up daily alert to monitor news articles discussing case Karnoski v. Trump for C. Frelinghuysen and A. Hemmings
12/12/18	A. Sommer	0.80	Confer with team re strategy for obtaining discovery and time lines for completing expert reports and discovery
12/13/18	C. Frelinghuysen	7.50	Confer with team members re Hendrix report;

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			potential motion to compel, deposition notices, and defendants' objections to discovery requests; review case materials and prepare motion to compel interrogatory responses
12/13/18	J. Harding	0.90	Communications with government re load file
12/13/18	N. Wertheimer	5.90	Draft deposition notices; review Hendrix declaration regarding documents cited
12/14/18	C. Frelinghuysen	5.50	Review and revise memorandum in support of motion to compel interrogatory responses and confer with team members re same; prepare motion and notice of hearing; review and analyze defendants' objections to magistrate judge ruling and confer with team members re same
12/14/18	J. Harding	1.40	Review and revise motion to compel and review Military Branch's objection to magistrate order
12/14/18	A. Sommer	2.60	Analyze and revise draft motion to compel interrogatory responses; confer with C. Frelinghuysen re same; confer with S. Schottes re planning for hearing on Friday 12/21; confer with team re responding to government's objections to magistrate's recommendations on discovery
12/14/18	N. Wertheimer	5.00	Assist team prepare exhibits to motion to answer interrogatories; update case electronic files; review Hendrix declaration re exhibits cited
12/15/18	C. Frelinghuysen	1.30	Review and prepare responses to co-counsel comments re Hendrix report and confer with co-counsel re same
12/16/18	C. Frelinghuysen	1.00	Review and revise outline of draft expert report and correspondence with C. Hendrix re same; confer with team members re materials for expert report
12/17/18	C. Frelinghuysen	7.80	Confer with team members re response to objections to magistrate judge's ruling; review and

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			analyze objections to ruling and prepare response re same; prepare motion for extension of expert discovery deadlines and confer with team members re same
12/17/18	A. Sommer	6.20	Analyze government's objections to magistrate's report and recommendation, research re response to same, draft portions of response to same, telephone conferences re responding to same
12/17/18	N. Wertheimer	6.00	Review draft Hendrix expert report and prepare documents cited in report; review final Hendrix declaration and prepare documents cited; post electronic copies of exhibits for Hendrix review
12/18/18	C. Frelinghuysen	10.20	Review and revise motion for extension of expert discovery deadlines and confer with team members and opposing counsel re same; review case materials and prepare response to objections to magistrate judge's ruling; confer with C. Hendrix re expert report; review and revise response and confer with team members re same; confer with team members re loading document production; prepare opposed motion for extension
12/18/18	J. Harding	2.60	Review and revise Opposition to Defendants' Objections
12/18/18	N. Wertheimer	3.20	Review prior documents produced and compare same to documents cited in Hendrix report; update document production fiels and case electronic files
12/19/18	C. Frelinghuysen	11.00	Confer with team members re response to objections to magistrate judge's ruling and review and revise same; confer with team members re document review and expert report; review and analyze interrogatory responses and prepare summary re same; review and revise notice of related cases and confer with team members re same; review and analyze response to motion to compel interrogatory responses and confer with team members re same; prepare reply in support of

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			motion to compel
12/19/18	J. Harding	1.30	Review and revise Opposition
12/19/18	J. Harding	0.20	Call re strategy for arguments
12/19/18	A. Hemmings	2.00	Review govt. doc production
12/19/18	N. Wertheimer	3.50	Assist team prepare exhibits for upcoming filing; review documents for production; update case electronic files
12/20/18	C. Frelinghuysen	8.50	Prepare reply in support of motion to compel and confer with team members re same; review and revise same; confer with C. Hendrix and team members re expert reports; confer with team members re document production and document review memo; office conference with co-counsel re reply and preparation for hearing on Defendants' objections to magistrate judge's ruling
12/20/18	J. Harding	1.20	Prepare review materials and plan document review; strategy meeting re argument
12/20/18	A. Hemmings	3.40	Review govt. doc production
12/20/18	A. Sommer	5.60	Analyze and revise draft reply brief in support of motion to compel; confer with Judge Davis's chambers re rescheduling the hearing; confer with opposing counsel; discuss strategy for hearing on objections to Magistrate's order on motion to compel discovery and preparation for hearing re same; confer with team re document review strategy
12/20/18	A. Sommer	1.00	Factual research into handling deployment of service members living with diabetes and correspond with team re same
12/20/18	N. Wertheimer	2.40	Prepare documents cited in Hendrix expert report for production; draft production correspondence; update case electronic files

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12/21/18	J. Bryant	3.10	Online document review
12/21/18	C. Frelinghuysen	6.50	Review materials re hearing on objections to magistrate judge's ruling and confer with team members re same; attend hearing; confer with team members re document review; review and analyze document production and confer with team members re same
12/21/18	J. Harding	2.80	Prepare for and participate in hearing before Judge Brinkema
12/21/18	A. Sommer	3.00	Prepare for, attend, and debrief re hearing on government's objections to Judge Davis's discovery order on motion to compel
12/21/18	N. Wertheimer	2.00	Finalize documents for production and distribution; update Hendrix expert report exhibits; prepare draft Hendrix materials considered list
12/22/18	C. Frelinghuysen	0.50	Review expert report of C. Hendrix and comments re same; confer with team members re expert reports
12/22/18	A. Hemmings	0.80	Review govt. doc production
12/23/18	A. Hemmings	1.00	Review govt. doc production
12/23/18	M. Walker	4.10	Review documents in relativity
12/24/18	J. Harding	1.00	Review document production
12/24/18	G. Morrissey	0.20	Review memorandum and relativity re document review preparation
12/26/18	N. Agin	2.70	Review materials for document review; review and analyze documents for "hot document" and privilege issues; telephone conference with C. Frelinghuysen regarding review
12/26/18	J. Bryant	6.10	On-line document review

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12/26/18	C. Frelinghuysen	8.30	Review and analyze expert report and comments re same and confer with team members and co-counsel re same; review and analyze Defendants' objections to deposition notice, prepare summary re same, and confer with team members and co-counsel re same; confer with team members re document review; review and analyze documents; review and analyze privilege logs and confer with team members re same; participate in meet and confer with opposing counsel
12/26/18	J. Harding	4.20	Prepare for and participate in meet and confer; draft motion for consolidated discovery
12/26/18	A. Hemmings	1.70	Review govt. doc production; team call; meet and confer call
12/26/18	J. Moore	4.50	Analyze documents for possible relevance and abuse of privilege designations, and confer with J. Harding concerning challenges to DOD privilege designations
12/26/18	G. Morrissey	2.80	Review outside counsel batch documents
12/26/18	G. Skogg	0.40	Research re documents cited in expert reports and documents posted to website database for review by case experts; correspondence with team attorney re service of upcoming expert reports
12/26/18	A. Sommer	1.80	Confer with government re outstanding discovery issues; review draft motion to extend deadlines; attend team telephone conference re case status and strategy
12/26/18	M. Walker	4.60	Review documents in relativity for expert report
12/26/18	M. Walker	0.20	Review documents in relativity for expert report
12/27/18	J. Bryant	1.60	On line document review
12/27/18	C. Frelinghuysen	7.70	Review and analyze objections to deposition topics

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			and confer with team members and co-counsel re same; participate in meet and confer with opposing counsel; confer with team members re document production, privilege logs, and expert reports; confer with team members re motion to compel re deliberative process privilege; confer with C. Hendrix re expert report and extension of time re same; prepare letter re motion to compel
12/27/18	J. Harding	0.40	Emails re filing a motion to compel re deliberative process
12/27/18	A. Hemmings	2.50	Review govt. doc production; draft MTC; meet and confer call
12/27/18	J. Moore	2.40	Analyze documents for possible relevance and abuse of privilege designations, and confer with J. Harding concerning challenges to DOD privilege designations
12/27/18	A. Sommer	0.60	Coordinate with team and government re coordination of case schedules; preparation and filing motion re same
12/31/18	A. Hemmings	2.00	Draft MTC
	<b>Total Hours</b>	<b>962.10</b>	

**Total for Legal Services \$668,753.55**

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2018 Fee Summary**  
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**05556 Nicholas Harrison - HIV deployment claim**

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**Timekeeper Summary**

<u>Attorney/Other Prof</u>	<u>Rank</u>	<u>Hours</u>
G. Morrissey	Partner	3.00
A. Sommer	Partner	130.20
N. Agin	Partner	2.70
C. Man	Partner	1.90
J. Bryant	Of Counsel	10.80
E. Goldstein	Associate	10.00
C. Frelinghuysen	Associate	363.70
J. Harding	Associate	181.30
P. Harold	Associate	9.10
V. Gianino	Associate	11.60
L. Gailey	Associate	40.70
D. Gallenstein	Associate	14.00
A. Hemmings	Associate	78.50
N. Wertheimer	Paralegal	85.80
G. Skogg	Paralegal	0.40
T. Woodward	Library	1.30
C. Lundin	Library	0.80
M. Mascolo	Library	0.50
J. Moore	Staff Attorney	6.90
M. Walker	Staff Attorney	8.90
<b>Total Attorney/Other Prof</b>		<b>962.10</b>

**WINSTON & STRAWN LLP**

35 West Wacker Drive  
Chicago, IL 60601-9703  
TAX ID NO. 36-1975990

Winston & Strawn (Pro Bono)  
Richard Roe and Victor Voe

**2018 Fee Summary**

Date 08/03/22  
Client Matter No. 999997.06131

For Legal Services Rendered Through December 31, 2018 In Connection With:  
**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
11/19/18	L. Cooley	0.50	Attend introductory meeting with G. McConnell re case background for Roe and Voe pro bono case re Army and Airforce policy on HIV+ members
11/19/18	A. Sommer	2.40	Confer with G. McConnell and P. Perkowski re strategy for Roe and Voe cases; consider proposed staffing for same; review motion to compel filing and propose edits to same
11/20/18	J. Bauer	3.50	Initial conference call re strategy, review pleadings and transcript from related case
11/20/18	L. Cooley	4.40	Read background information on Roe; read case briefs and Army Airforce policy information from related pro bono cases involving Army and Airforce policy on HIV+ members; attend introductory conference call
11/20/18	A. Sommer	1.60	Confer with P. Perkowski and S. Schottes re strategy for Roe and Voe cases and renewing preliminary injunction motion and correspondence with G. McConnell and propsoed Roe and Voe team re same
11/21/18	J. Bauer	1.00	Conference call re legal strategy with legal team
11/21/18	G. McConnell	1.00	Consider initial strategy for Roe and Voe TRO
11/26/18	J. Bauer	1.50	Phone conference with [Redacted], Roe and Voe and legal team re background facts and documents
11/26/18	L. Cooley	2.20	Attend conference call re background information on plaintiff for purposes of drafting declaration; type up notes from call; read declaration of other

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Winston &amp; Strawn (Pro Bono)

**2018 Fee Summary**Date 08/03/22  
Page No. 2**06131 Richard Roe and Victor Voe**

<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			plaintiff
11/27/18	L. Cooley	0.50	Read draft preliminary injunction motion in related case against the Air Force re the separation of members living with HIV
11/28/18	J. Bauer	5.50	Review draft pi brief, conference with D. Sommer, conference call with team re strategy, emails re same; review draft [Redacted] declaration, conference call with [Redacted] team re same, etc.
11/28/18	L. Cooley	2.00	Read and provide feedback on draft declaration for plaintiff; attend conference call re draft declaration for plaintiff; draft supplemental declaration for other plaintiff
11/28/18	A. Sommer	0.40	Confer with J. Bauer re strategy for motion for preliminary injunction and new Roe and Voe cases
11/29/18	L. Cooley	1.70	Read and respond to emails circulating draft documents; edit draft documents; read complaint in related cases with an eye towards drafting complaint with similar claims
11/30/18	J. Bauer	1.50	Phone conference re APA claim, emails re strategy
11/30/18	L. Cooley	2.80	Read complaint in related case with eye towards drafting complaint with similar claims; research re Administrative Procedure Act claims; attend conference call re related case with APA claims; meeting re strategy and division of work for drafting complaint
12/03/18	J. Bauer	2.50	Emails re status of declarations, discovery motion in Harrison, etc.
12/03/18	L. Cooley	0.50	Read and respond to updated drafts of declarations
12/05/18	J. Bauer	2.00	Weekly status conference call, phone conference with L. Gailey re work to be done
12/05/18	L. Gailey	6.60	Draft complaint; communicate with J. Bauer re

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Winston &amp; Strawn (Pro Bono)

**2018 Fee Summary**Date 08/03/22  
Page No. 3**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			same; attend weekly call
12/06/18	J. Bauer	1.00	Email re strategy, team, timing
12/06/18	L. Cooley	3.20	Research re pro hac vice admission to EDVA; research re newly barred attorney admission to EDVA; draft motion to proceed under pseudonym
12/06/18	L. Gailey	3.50	Draft complaint; attend weekly call
12/06/18	L. Gailey	1.50	Review letter from client; communicate with case team re same; draft response letter to client
12/07/18	J. Bauer	1.30	Conference with legal team re status and strategy, timing, etc.
12/07/18	L. Cooley	5.70	Draft motion to proceed under pseudonym; attend conference call re timeline for filing
12/07/18	L. Gailey	5.20	Communicate with co-counsel re filings; draft complaint
12/08/18	L. Gailey	0.50	Communicate with case team re: claims
12/09/18	J. Bauer	2.00	Phone conference with Roe and Voe and legal team re declaration; emails re strategy
12/09/18	L. Cooley	5.30	Draft motion to proceed under pseudonym
12/09/18	L. Gailey	1.00	Communicate with case team re filings
12/10/18	J. Bauer	3.00	Review/revise pseudonum motion; phone conferences with L. Cooley, L. Gailey, D. Somner, etc.
12/10/18	L. Cooley	8.40	Draft motion and memorandum to proceed under pseudonym; draft memorandum in support of motion for preliminary injunction
12/10/18	L. Gailey	12.00	Draft complaint; review motion to proceed anonymously; communicate with case team regarding upcoming filings

**WINSTON & STRAWN LLP**

Winston &amp; Strawn (Pro Bono)

**2018 Fee Summary**Date 08/03/22  
Page No. 4**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
12/11/18	J. Bauer	5.50	Review draft complaint; conferences with L. Gailey; further revisions to and circulate draft complaint; emails with team
12/11/18	L. Cooley	7.50	Draft memorandum in support of preliminary injunction
12/11/18	L. Gailey	7.20	Draft and revise complaint; communicate with internal case team re same; review documents; attend call re filing timeline
12/12/18	J. Bauer	3.00	Phone conference with legal team re scheduling and strategy, conferences with other teams re strategy, review draft pleadings, etc.
12/12/18	L. Cooley	4.10	Draft memorandum in support of preliminary injunction
12/12/18	L. Gailey	6.80	Revise complaint; communicate with internal case team re same
12/12/18	N. Wertheimer	1.00	Update case electronic files
12/13/18	L. Cooley	10.80	Draft memorandum in support of motion for preliminary injunction
12/13/18	L. Gailey	0.20	Communicate with internal case team re motion for preliminary injunction
12/14/18	J. Bauer	3.50	Work on PI papers, phone conferences with team
12/14/18	L. Cooley	7.30	Draft memorandum in support of preliminary injunction motion
12/14/18	L. Gailey	3.90	Communicate with internal case team re motion for preliminary injunction; edit same
12/14/18	A. Sommer	0.50	Confer with J. Bauer re strategy and timing for Roe and Voe case
12/15/18	L. Cooley	6.40	Revise memorandum in support of preliminary

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2018 Fee Summary**

Date 08/03/22  
Page No. 5

**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			injunction motions
12/15/18	L. Gailey	6.50	Communicate with internal case team re motion for preliminary injunction; edit same; communicate with co-counsel re complaint.
12/16/18	J. Bauer	4.50	Review revised complaint, work on PI memo, phone conferences with L. Cooley
12/16/18	L. Cooley	2.40	Revise memorandum in support of preliminary injunction motion
12/16/18	L. Gailey	6.70	Edit motion for preliminary injunction; communicate with internal case team re complaint and review revisions to same
12/17/18	J. Bauer	5.00	Review revised complaint; phone conference with team, repeat, emails/phone conferences re filing logistics, notice, phv papers, etc.
12/17/18	L. Cooley	7.00	Prepare Complaint re Air Force violation of the Administrative Procedure Act and Equal Protection Clause by discharging members living with HIV
12/17/18	L. Gailey	3.70	Communicate with internal case team re complaint; attend conference calls re same; review revisions to complaint; communicate with L. Cooley re motion for preliminary injunction
12/18/18	J. Bauer	6.50	Review and comment on draft complaints, emails with team re same
12/18/18	L. Cooley	11.30	Prepare and edit Complaint re Air Force violation of the Administrative Procedures Act and Equal Protection Clause by discharging individuals living with HIV; Prepare, proofread, and format motion to proceed under pseudonym and memorandum in support; Prepare pro hac vice motions, civil cover sheet, rule 7.1 disclosure, notice of motion, and summons

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Winston & Strawn (Pro Bono)

**2018 Fee Summary**

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Page No. 6

**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
12/18/18	L. Gailey	0.50	Communicate with case team re revisions to complaint; communicate with L. Cooley re same
12/18/18	A. Sommer	2.80	Continue reviewing and revising draft response to government's objections to discovery; analyze papers for Roe and Voe filings and sign same; review motion to proceed under a pseudonym
12/19/18	J. Bauer	4.70	Final reviews before filing, phone conference with L. Cooley re PI papers, draft introduction to same, weekly team call re status and strategy
12/19/18	L. Cooley	7.40	Final proofread and formatting of Complaint re Air Force violation of the Administrative Procedures Act and Equal Protection Clause by discharging members living with HIV; File Complaint, pro hac vice motions, motion to proceed under pseudonym, memorandum in support, summons; Prepare issued summons for service
12/19/18	L. Gailey	3.80	Communicate with case team re revisions to complaint and final preparations for filing; edit and proofread complaint; communicate with L. Cooley re same
12/19/18	A. Sommer	9.00	Analyze and propose revisions to Roe / Voe complaint;; field calls from clerks' office re Roe / Voe action; analyze and revise draft response to objections from the government and confer with team re same; prepare notice of related case; telephone conferences with DOJ counsel and Magistrate's law clerk re hearing logistics; confer with team re Judge's request that the parties meet and confer further; confer with team re drafting reply in support of motion to compel and strategy for same and study interrogatories and responses to same
12/20/18	L. Cooley	1.20	Prepare motion for preliminary injunction; prepare application for admission to the Eastern District of Virginia

**WINSTON & STRAWN LLP**

Winston &amp; Strawn (Pro Bono)

**2018 Fee Summary**Date 08/03/22  
Page No. 7**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
12/20/18	L. Gailey	1.00	Communicate with case team re preliminary injunction motion
12/21/18	J. Bauer	0.50	Phone conference with L. Cooley; email re court hearing
12/21/18	L. Cooley	5.10	Attend hearing on objections to discovery in Harrison v. Mattis; move for admission to the eastern district of Virginia; prepare memorandum in support of motion for preliminary injunction; email correspondence re summons
12/21/18	L. Gailey	0.20	Communicate with case team re hearing
12/24/18	L. Gailey	0.50	Communicate with case team re meet-and-confer
12/26/18	J. Bauer	3.50	Phone conferences re pi motion, consolidating cases, etc.
12/26/18	L. Cooley	4.90	Prepare memorandum in support of preliminary injunction; attend conference calls re status of case
12/26/18	L. Gailey	0.60	Attend weekly conference call; communicate with internal case team re motion for preliminary injunction
12/27/18	J. Bauer	1.00	Phone conference, emails re schedule and strategy
12/27/18	L. Cooley	6.20	Wrote memorandum in support of preliminary injunction
12/27/18	L. Gailey	0.30	Review correspondence with opposing counsel re discovery issues
12/27/18	G. Skogg	0.30	Research re recent documents for addition to electronic shared folders for review by team attorneys and preparation of documents for attorney review
12/28/18	J. Bauer	1.00	Emails, phone conferences re preliminary injunction

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Winston & Strawn (Pro Bono)

**2018 Fee Summary**  
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**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
12/28/18	L. Cooley	6.90	Write memorandum in support of prleiminary injunction
12/30/18	J. Bauer	3.50	Review, revise preliminary injunction memo
	<b>Total Hours</b>	<b>283.90</b>	

**Total for Legal Services** **\$196,528.40**

### Timekeeper Summary

<b><u>Attorney/Other Prof</u></b>	<b><u>Rank</u></b>	<b><u>Hours</u></b>
A. Sommer	Partner	16.70
J. Bauer	Of Counsel	67.00
L. Cooley	Associate	111.10
L. Gailey	Associate	72.20
L. Cooley	Associate	14.60
N. Wertheimer	Paralegal	1.00
G. Skogg	Paralegal	0.30
G. McConnell	Of Counsel	1.00
<b>Total Attorney/Other Prof</b>		<b>283.90</b>

**WINSTON & STRAWN LLP**

35 West Wacker Drive  
Chicago, IL 60601-9703  
TAX ID NO. 36-1975990

Winston & Strawn (Pro Bono)  
Nicholas Harrison

**2019 Fee Summary**

Date 08/03/22  
Client Matter No. 999997.05556

For Legal Services Rendered Through December 31, 2019 In Connection With:  
**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
01/01/19	A. Hemmings	6.00	Draft MTC
01/02/19	J. Harding	1.10	Participate in weekly call and finalize letter to opposing counsel
01/02/19	A. Hemmings	3.90	Draft MTC; weekly team phone call
01/02/19	N. Wertheimer	1.00	Update case electronic files
01/03/19	J. Harding	0.90	Emails with team re potential argument on motion to compel
01/03/19	A. Hemmings	1.00	Review motion for consolidation
01/03/19	N. Wertheimer	2.50	Update case electronic files
01/04/19	J. Harding	2.20	Draft stipulation re consolidated schedule and accompanying motions and proposed orders
01/04/19	A. Hemmings	2.50	Review motion for consolidation; review government production
01/04/19	A. Sommer	1.40	Revise draft motion to consolidate discovery and correspond with team and government re same; confer with S. Schottes re response from government; coordinate filing of consent motion re expert report deadlines; confer with R. Norway (government attorney) re final proposal re consolidation
01/04/19	N. Wertheimer	2.00	Update case electronic files; follow up with Lamda re access to Relativity database
01/06/19	A. Hemmings	2.20	Review documents for Lute Depo

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2019 Fee Summary**

Date 08/03/22  
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**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
01/07/19	C. Frelinghuysen	10.00	Review and analyze document production and confer with team members re same; review document production and materials and prepare Lute deposition outline; confer with team members re deposition preparation
01/07/19	J. Harding	2.70	Draft motion to compel re deliberative process privilege
01/07/19	A. Hemmings	5.30	Review documents for Lute Depo
01/08/19	C. Frelinghuysen	11.00	Review and analyze document production and case materials and prepare Lute deposition outline; confer with team members re deposition preparation; office conference with co-counsel re deposition preparation
01/08/19	J. Harding	4.40	Draft motion to compel re deliberative process privilege
01/08/19	A. Hemmings	6.40	Review documents for Lute Depo; outline for Lute Depo
01/09/19	C. Frelinghuysen	8.00	Office conference with team members and co-counsel re deposition preparation; attend Lute deposition and confer with team members re same
01/09/19	J. Harding	0.60	Draft motion to compel re deliberative process privilege
01/09/19	A. Hemmings	8.60	Lute deposition prep; Lute deposition
01/10/19	C. Frelinghuysen	3.00	Confer with team members re deposition notes and summary, motion to compel on deliberative process privilege, and review and analyze draft motion
01/10/19	J. Harding	4.80	Finalize Motion to Compel re deliberative process privilege; calls with C. Frelinghuysen and D. Sommer re same

**WINSTON & STRAWN LLP**

Winston &amp; Strawn (Pro Bono)

**2019 Fee Summary**Date 08/03/22  
Page No. 3**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
01/10/19	A. Hemmings	3.70	Organize notes from the Lute Deposition
01/10/19	N. Wertheimer	2.00	Update case electronic files for team review in preparation of upcoming reports and filings
01/11/19	C. Frelinghuysen	4.00	Confer with team members re motion to compel; conduct meet and confer with opposing counsel re motion to compel; research re deliberative process privilege; review and revise motion to compel and confer with team members re same
01/11/19	A. Hemmings	3.20	M&C on DPP; DPP research
01/13/19	A. Hemmings	0.50	DPP research
01/14/19	A. Hemmings	0.90	Categorize docs. leftover from Lute depo; document review
01/15/19	C. Frelinghuysen	4.00	Review and revise motion to compel re deliberative process privilege and confer with team members re same
01/15/19	J. Harding	1.10	Meeting with C. Frelinghuysen re deliberative process privilege
01/15/19	A. Hemmings	0.80	Document review
01/16/19	C. Frelinghuysen	3.00	Confer with team members re motion to compel; review privilege log and categorize entries for motion to compel
01/16/19	J. Harding	0.80	Participate in weekly call
01/16/19	A. Hemmings	0.80	Weekly case status call
01/17/19	J. Harding	3.30	Revise and edit Motion to Compel and categorize documents re same
01/17/19	A. Hemmings	2.10	Categorize DPP logs for MTC; assemble exhibits
01/17/19	A. Sommer	1.20	Analyze and revise draft motion to compel documents being withheld on deliberative process

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Winston & Strawn (Pro Bono)

**2019 Fee Summary**

Date 08/03/22  
Page No. 4

**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			privilege
01/18/19	J. Harding	1.30	Prepare for and participate in meet and confer with the government
01/18/19	A. Hemmings	0.70	Attend during the telephonic meet & confer
01/22/19	A. Hemmings	0.40	Update exhibit references in the Motion to Compel
01/23/19	J. Harding	2.30	Participate in meet and confer and follow-up re same
01/23/19	A. Hemmings	2.10	Weekly case update call; take notes during telephonic meet & confer with government
01/23/19	A. Sommer	0.60	Attend team meeting re case status and strategy
01/24/19	J. Harding	2.60	Revise DPP motion in light of meet and confer
01/24/19	G. Skogg	0.60	Research re documents for addition to electronic shared folders for attorney review; preparation of documents for attorney use; revisions to case index for attorney use
01/25/19	J. Harding	3.00	Finalize and file DPP motion
01/25/19	A. Hemmings	3.00	Research DPP cases employing heightened scrutiny and looking at the actual intent of the government
01/25/19	G. Skogg	0.50	Research re documents for delivery to case counsel for review; correspondence with litigation support personnel re distribution list; preparation of documents for updates to electronic case files for attorney review
01/25/19	A. Sommer	0.70	Analyze and revise draft motion to compel documents withheld on basis of deliberative process privilege and correspond with team re same
01/28/19	C. Frelinghuysen	1.00	Review and analyze discovery requests and confer

**WINSTON & STRAWN LLP**

Winston &amp; Strawn (Pro Bono)

**2019 Fee Summary**Date 08/03/22  
Page No. 5**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			with team members re same
01/28/19	J. Harding	0.70	Arrange for courtesy copies for Judge Davis and emails to team re next steps
01/28/19	A. Hemmings	1.40	Review National Guard documents
01/29/19	C. Frelinghuysen	0.50	Review and analyze summary of document production and confer with team members re same
01/30/19	J. Harding	4.30	Review Defendants Opposition and draft Reply
01/30/19	A. Hemmings	2.90	Compile DPP cases from briefs
01/30/19	A. Sommer	2.10	Analyze government's opposition to motion to compel documents related to deliberative process privilege; confer with J. Harding re same; draft portions of brief re same; confer with S. Schoettes re hearing and briefing for same
01/31/19	J. Harding	7.20	Draft reply and prepare for oral argument
01/31/19	A. Hemmings	1.00	Research for reply brief; review reply brief
01/31/19	A. Sommer	1.20	Analyze and revise draft reply brief in support of motion to compel documents withheld on basis of deliberative process privilege and confer with J. Harding re hearing preparation
02/01/19	J. Harding	5.70	Prepare for and argue motion to compel documents withheld under the deliberative process privilege
02/01/19	A. Hemmings	3.00	Attend MTC hearing
02/01/19	G. Skogg	1.50	Research re documents for addition to electronic shared folders for attorney review; preparation of documents for addition to case files for attorney use
02/04/19	J. Harding	5.10	Prepare for and participate in meet and confer with government

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2019 Fee Summary**

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**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
02/04/19	A. Hemmings	4.10	Preparation for M&C; take notes on M&C
02/05/19	J. Harding	4.60	Draft and file notice to the court re meet and confer
02/05/19	A. Hemmings	0.30	Proof draft status report
02/05/19	G. Skogg	0.40	Research re discovery documents for attorney review; correspondence with team attorneys re research
02/05/19	A. Sommer	0.90	Confer with J. Harding re status of meet and confer and preparation of notice re same per court order; revise draft notice and review revisions from government re same
02/06/19	C. Frelinghuysen	0.50	Participate in weekly teleconference re status of litigation and motion to compel
02/06/19	J. Harding	0.80	Participate in weekly call
02/06/19	A. Hemmings	1.40	Draft notice of deposition; weekly status call
02/06/19	G. Skogg	0.30	Preparation of discovery documents for attorney review; correspondence with team attorneys re case issues
02/07/19	J. Harding	5.10	Prepare for deliberative process privilege argument
02/07/19	G. Skogg	1.40	Review of documents for attorney review; preparation of documents for printing for binder; addition of documents to electronic shared folders for attorney review
02/07/19	A. Sommer	1.20	Prepare for hearing with J. Harding and research re deliberative process privliege
02/08/19	J. Harding	6.80	Prepare for and argue motion to compel re deliberative privilege process; meet and confer with opposing counsel re selection process
02/08/19	A. Hemmings	0.20	Discuss preparation of deposition outline with JH

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Winston & Strawn (Pro Bono)

**2019 Fee Summary**

Date 08/03/22  
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**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
02/08/19	G. Skogg	0.40	Research re documents for addition to electronic shared folders for attorney review; preparation of documents for attorney use
02/08/19	A. Sommer	0.50	Confer with team re strategy for arguing motion to compel documents withheld on deliberative process privilege
02/09/19	J. Harding	0.30	Emails re deposition outlines
02/10/19	A. Hemmings	4.50	Prepare deposition outline for LTC Tumminello
02/11/19	G. Skogg	0.40	Research re documents for addition to electronic shared folders for attorney review; preparation of documents for attorney use
02/12/19	J. Harding	7.20	Prepare for LTC. Tuminello deposition
02/12/19	A. Hemmings	0.40	M/C follow up call
02/12/19	G. Skogg	0.30	Research re documents for addition to electronic shared folders for attorney review; preparation of documents for attorney use
02/12/19	A. Sommer	2.50	Analyze deposition notices and prepare for meet and confer re deposition dates; attend meet and confer and confer with case team re deposition logistics and preparing for close of discovery
02/13/19	C. Frelinghuysen	0.50	Confer with team members re defendants' document production and potential deficiencies
02/13/19	J. Harding	4.60	Attend deposition of LTC. Tuminello and strategy call
02/14/19	A. Sommer	3.20	Prepare for oral argument on motion for preliminary injunction with team and participate in moots of same
02/15/19	C. Frelinghuysen	1.00	Participate in team litigation strategy meeting

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
02/15/19	J. Harding	2.10	Prepare for and participate in strategy call
02/15/19	A. Hemmings	3.40	Read Tumminello transcript; attend strategy meeting
02/15/19	G. Skogg	0.60	Research re documents for addition to electronic shared folders for review by team attorneys; preparation of documents for attorney use
02/15/19	A. Sommer	5.80	Prepare for and attend preliminary injunction hearing; attend case team meeting re case status and strategy
02/18/19	A. Sommer	1.20	Confer and correspond with team re motion to modify injunction, potential suit in Michigan, and potential reply re same
02/19/19	C. Frelinghuysen	2.00	Confer with team members re Defendants' document production and deposition preparation and review and analyze documents for M. Melillo deposition
02/19/19	J. Harding	1.50	Review documents for deposition
02/19/19	A. Hemmings	2.50	Review documents for Wiesen deposition
02/19/19	G. Skogg	0.40	Preparation of documents for addition to electronic shared folders for attorney review
02/19/19	A. Sommer	1.40	Analyze governments' opposition to motion to modify the preliminary injunction and correspond with team re same
02/20/19	C. Frelinghuysen	1.50	Confer with team members re deposition preparation and review and analyze documents for M. Melillo
02/20/19	J. Harding	0.70	Weekly call and emails re depositions
02/20/19	A. Hemmings	4.50	Draft outline for Wiesen deposition; weekly status call

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
02/20/19	G. Skogg	0.30	Preparation of discovery documents received for addition to electronic shared folders for attorney review
02/21/19	L. Cooley	6.80	Draft outline for deposition; draft objections to defendants' first requests for admission, requests for production, and interrogatories; attend conference call re status of the case and strategy
02/21/19	C. Frelinghuysen	3.00	Review and analyze documents for M. Melillo deposition and prepare deposition outline
02/21/19	J. Harding	1.80	Prepare for argument before the Court re deliberative process privilege
02/21/19	A. Hemmings	0.60	Wiesen deposition prep
02/21/19	J. Pesick	0.60	Team phone conference re preparation of expert reports
02/21/19	G. Skogg	0.40	Preparation of documents for addition to electronic shared folders for attorney review
02/21/19	A. Sommer	1.50	Coordinate logistics regarding depositions and correspond with Defendants re same; confer with J. Drosick re research into National Guard and scope of injunction; coordinate re objections to Defendants' written discovery; prepare for hearing on deliberative process privilege
02/22/19	L. Cooley	1.10	Attend meeting with A. Sommer re draft objections to defendants requests for production; requests for admission; and interrogatories
02/22/19	L. Cooley	7.50	Attend deposition of A. Wiesen
02/22/19	J. Harding	7.20	Prepare for and participate in hearing re deliberative process privilege and follow-up with team re same
02/22/19	A. Hemmings	9.80	Wiesen deposition

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
02/22/19	J. Pesick	0.30	Assist and prepare expert reports
02/22/19	G. Skogg	0.30	Research re printing access from database for outside counsel; correspondence with litigation support personnel re database issues from team attorneys
02/22/19	A. Sommer	7.90	Prepare for and attend hearing on motion to compel documents withheld on deliberative process privilege; de-brief with team re status of same; coordinate details re depositions of Plaintiff's witnesses; office conference with L. Cooley re preparation of objections to Defendants' discovery requests
02/23/19	L. Cooley	1.20	Research re qualified associational privilege; correspond with other team members re upcoming depositions and production of documents
02/23/19	J. Pesick	0.60	Assist and prepare expert reports
02/23/19	A. Sommer	0.70	Analyze issues related to depositions of witnesses for our side of the case and correspond with team re same (e.g., issuing cross-notices or cross-subpoenas, deposition locations, and preparation of directs for witnesses)
02/24/19	L. Cooley	2.50	Draft standard language for objections to requests for production; requests for admission; and interrogatories; collect documents for rule 26 production
02/24/19	A. Sommer	5.50	Prepare for deposition of M. Melillo
02/25/19	L. Cooley	8.20	Draft objections to defendants' first requests for admission, requests for production, and interrogatories; locate and prepare documents for upcoming deposition of M. Melillo
02/25/19	C. Frelinghuysen	1.00	Review and analyze documents for deposition preparation and confer with team members re same

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
02/25/19	J. Harding	2.50	Prepare for and participate in meet and confer with government regarding the deliberative process privilege
02/25/19	A. Hemmings	2.20	Take notes during M&C; Mellilo deposition prep
02/25/19	C. Lundin	0.80	Factual research resources re Touhy military requests using electronic resources for J. Pesick
02/25/19	J. Pesick	1.20	Meet with J. Bauer re case strategy; prepare Touhy requests to take depositions
02/25/19	A. Sommer	5.50	Continue preparing for deposition of M. Melillo
02/25/19	A. Sommer	1.00	Attend meet and confer with Defendants' counsel re various discovery issues including claims of privilege, deposition scheduling, and Touhy letters
02/26/19	L. Cooley	9.10	Draft objections to defendants' requests for production, requests for admission, and interrogatories; prepare rule 26 production to defendants; create documents to track witnesses that have been offered in response to rule 36(b)(6) request; gather documents relevant for upcoming deposition of A. Taylor
02/26/19	J. Drosick	4.00	Research jurisdiction issues for bringing a claim in the Northern District of Virginia
02/26/19	J. Harding	4.80	Attend deposition of LTC Melillo; draft Rule 45 subpoena for air force
02/26/19	A. Hemmings	0.30	Review previous deposition outline
02/26/19	C. Lundin	0.80	Factual research resources re Touhy requests using electronic resources for J. Pesick
02/26/19	J. Pesick	2.40	Prepare subpoenas and notices of subpoenas for upcoming depositions
02/26/19	G. Skogg	2.00	Review of documents in preparation of draft notices for attorney review; preparation of draft

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			notices for attorney use; correspondence with team attorneys re subpoenas received and deposition dates; preparation of documents for addition to electronic shared folders for attorney review
02/26/19	A. Sommer	6.20	Prepare for deposition of M. Melillo and take same re DoD's policy re separation of non-deployable service members; analyze and revise subpoenas and Touhy requests
02/27/19	L. Cooley	11.80	Assist with deposition; draft deposition outline for deposition of A. Taylor; finalized rule 26 production; serve subpoenas and notices of subpoena for depositions
02/27/19	J. Drosick	3.50	Research jurisdiction issues for bringing a claim in the Northern District of Virginia
02/27/19	J. Harding	1.20	Finalize and file status report with Court
02/27/19	A. Hemmings	5.00	Review documents for the Taylor and Ciminera depositions; review EDVA rules on amicus briefs; weekly call
02/27/19	J. Pesick	0.80	Participate in weekly team strategy phone conference
02/27/19	A. Sommer	1.60	Analyze draft Touhy letter and send same to Defendants; participate in telephone conference re case status and strategy; analyze and revise draft notice re status of meet and confer re deliberative process privilege and review government's edits to same
02/28/19	L. Cooley	4.80	Finalize objections to defendants' first requests for admission, requests for production, and interrogatories; draft deposition outline for deposition of A. Taylor; prepare documents for Taylor deposition; create plan for preparation of remaining depositions;
02/28/19	A. Hemmings	0.30	Review documents for the Taylor and Ciminera

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			depositions; review EDVA rules on amicus briefs; weekly call
02/28/19	J. Pesick	0.10	Team correspondence re case strategy
02/28/19	A. Sommer	1.50	Attend to reviewing various discovery responses and corresponding with team re discovery matters
03/01/19	L. Cooley	5.40	Assist with deposition of A. Taylor; draft deposition outlines for two Navy witnesses; draft and serve subpoena for deposition of M. Soper; brain storm on questions that should be asked in deposition of K. Cron
03/01/19	J. Harding	0.30	Emails re deficiency in Production 14
03/01/19	A. Hemmings	2.80	Review documents for the Ciminera deposition
03/02/19	A. Hemmings	3.30	Write Ciminera deposition outline
03/03/19	L. Cooley	0.60	Draft and serve Touhy request, subpoenas, and notice of subpoenas for witness to be deposed in March 5
03/03/19	A. Hemmings	1.60	Review documents for Ciminera outline
03/04/19	L. Cooley	7.10	Draft deposition outlines for 2 Navy deposition; attend meet and confer with opposing counsel to discuss 30(b)(6) witnesses; summarize and distribute the results of the call; update master calendar
03/04/19	J. Harding	0.10	Emails with D. Sommer re exhibits for trial
03/04/19	A. Hemmings	1.10	Prepare Ciminera deposition
03/04/19	J. Pesick	0.20	Team correspondence re case strategy
03/04/19	G. Skogg	0.80	Research re deposition documents for attorney review; preparation of documents for addition to electronic shared folders for attorney use; updates to case filings and discovery responses for attorney

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			review
03/05/19	L. Cooley	7.90	Draft deposition outlines for 2 Navy deposition; collect exhibits to use in depositions
03/05/19	C. Frelinghuysen	4.00	Review and analyze Department of Defense report and prepare summary re same
03/05/19	A. Hemmings	5.00	Prepare document for Ciminera deposition; review Shell documents
03/05/19	A. Sommer	0.60	Confer with L. Cooley re deposition preparation; attend to emails re deposition scheduling
03/06/19	L. Cooley	10.20	Review Navy and Marine regulations and manuals; draft deposition outlines for 2 Navy deposition; assist with deposition in office; collect documents for production in response to requests for production
03/06/19	C. Frelinghuysen	1.00	Review and analyze Department of Defense report and prepare summary re same
03/06/19	A. Hemmings	10.70	Provide on-call support for the Soper deposition; write Shell deposition outline
03/06/19	C. Parker	0.30	Meet with Julie Bauer to discuss discrete issues in the case
03/06/19	J. Pesick	3.70	Prepare expert reports
03/06/19	G. Skogg	1.80	Research re medical records and other documents in case productions; preparation of documents for attorney use; addition of case filings and discovery documents to electronic shared folders for attorney review; correspondence with team attorneys re research projects
03/06/19	A. Sommer	0.80	Confer with J. Bauer re deposition strategy and Hoppe report in light of 1996 legislation re service members living with HIV

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
03/07/19	L. Cooley	3.00	Take deposition of J. Reeser, representative of the Navy
03/07/19	L. Cooley	2.50	Draft deposition outline for Navy deposition; assist with deposition preparation for depositions of K. Cron and J. Kelley; draft responses to requests for production, requests for admission, and interrogatories
03/07/19	J. Drosick	1.70	Research case law re whether a national guardsmen would be considered a federal or state employee for the purposes of jurisdiction within a federal court
03/07/19	A. Hemmings	2.80	Write Shell deposition outline; provide on call deposition support
03/07/19	J. Pesick	5.40	Prepare expert report of Craig Hendrix, M.D., and phone conference with J. Bauer and other team members re same
03/07/19	G. Skogg	0.50	Preparation of documents for addition to electronic shared folders for attorney review in preparation of upcoming depositions
03/07/19	A. Sommer	3.40	Attend deposition of Navy representative on interpretation and implementation of DoDI 1332.18 and DES process; coordinate re depositions of OutServe members; analyze summary of N. Harrison's deposition and propose a motion in limine
03/08/19	L. Cooley	4.90	Draft deposition outline for Navy deposition; assist with deposition preparation for depositions of K. Cron and J. Kelley; draft responses to requests for production, requests for admission, and interrogatories
03/08/19	J. Drosick	1.10	Draft and correspond with J. Bauer and A. Sullivan re issues with researching jurisdiction and organizational standing issues

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
03/08/19	J. Harding	1.30	Identify exhibits for trial
03/08/19	A. Hemmings	5.00	Provide support for Shell deposition; phone call with Jason Pesick re: expert reports; prep the Aswell deposition
03/08/19	J. Pesick	0.50	Prepare Hendrix expert report
03/08/19	G. Skogg	0.30	Preparation of documents for addition to electronic shared folders for attorney review in preparation of upcoming depositions
03/10/19	J. Harding	3.20	Identify exhibits for trial
03/10/19	A. Hemmings	0.30	Identify possible trial exhibits
03/10/19	A. Sommer	2.10	Revise draft order of proof; telephone conference with core team re case status and strategy; delegate tasks to team based on decisions made during call
03/11/19	L. Cooley	8.10	Attend canceled deposition to go on the record and explain why witness did not come to deposition; prepare and integrate edits into responses to requests for production, requests for admission, and interrogatories; collect documents from clients for production; prepare outline for deposition of R. Beland
03/11/19	J. Harding	0.90	Review government privilege log
03/11/19	A. Hemmings	6.00	Review medical information for expert reports; call re: expert reports; call with experts; complete Aswell deposition outline
03/11/19	C. Parker	0.30	Review N. Harrison complete; research applicable law
03/11/19	J. Pesick	4.00	Team phone conference re preparation of expert reports; prepare Hendrix expert report
03/11/19	G. Skogg	3.00	Research re case depositions and discovery schedule deadlines; correspondence with court

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			reporting service re expedited transcripts for review by case experts; preparation of documents for review by team attorneys; preparation of expert reports documents for attorney use
03/12/19	L. Cooley	8.60	Draft outline for deposition of R. Beland; collect documents to use as exhibits in deposition of R. Beland; collect documents from clients for production in response to Defendants' requests for production
03/12/19	J. Harding	0.10	Draft email re meet and confer
03/12/19	A. Hemmings	6.00	Set up Aswell deposition; review Brown deposition documents; edit Hendrix report
03/12/19	C. Parker	7.00	Review N. Harrison complaint; research applicable Department of Defense instructions and Army regulations
03/12/19	J. Pesick	7.00	Phone conference with A. Sommer re preparation of expert reports; prepare expert reports of Drs. Hardy and Hendrix
03/13/19	L. Cooley	7.70	Depose R. Beland; integrate edits into responses to requests for admission, requests for production, and interrogatories; collect documents for production
03/13/19	J. Harding	0.20	Strategize re motion to compel
03/13/19	A. Hemmings	3.10	Prepare Brown Deposition; weekly status call
03/13/19	C. Parker	6.10	Research applicable Department of Defense instructions, Army regulations, and relevant statutes for age restrictions and waivers
03/13/19	J. Pesick	0.70	Participate in weekly phone conference re case strategy
03/13/19	G. Skogg	1.20	Preparation of deposition documents for review by team attorneys; research re documents for review

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			by team attorneys; correspondence with team attorneys and court reporting service re documents for electronic shared folders
03/13/19	A. Sommer	0.70	Attend team telephone conference re case status and strategy
03/14/19	L. Cooley	11.20	Review and prepare documents for production; finalize responses to requests for production; responses to interrogatories; responses to requests for admission; draft motion to amend the scheduling order to allow for depositions to be taken beyond the close of fact discovery
03/14/19	J. Drosick	1.70	Research direct standing for an organizational plaintiff
03/14/19	J. Harding	0.20	Review discovery order from Judge Davis
03/14/19	A. Hemmings	4.80	Provide support for Brown deposition; review newly produced documents
03/14/19	C. Parker	2.10	Research applicable Department of Defense instructions, Army regulations, and relevant statutes for age restrictions and waivers
03/14/19	J. Pesick	0.10	Team correspondence re preparation of expert reports
03/14/19	G. Skogg	0.80	Preparation of deposition documents for review by team attorneys; research re documents for review by team attorneys; correspondence with team attorneys and court reporting service re documents for electronic shared folders
03/14/19	A. Sommer	1.90	Analyze deposition transcript and correspond with team re same; review and revise draft motion to take depositions out of time; analyze email correspondence re depositions; review order on motion to compel and correspond with team re same

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
03/15/19	L. Cooley	1.40	Redact and mark as privileged documents for production; prepare production
03/15/19	J. Harding	2.10	Review and finalize Harrison production
03/15/19	A. Hemmings	8.00	File motion to amend scheduling order; send document production; edit expert report
03/15/19	A. Hodgson	0.20	Review deposition transcripts and exhibits re expert reports
03/16/19	J. Pesick	5.60	Assist in preparing expert report of Craig Hendrix
03/17/19	A. Hemmings	2.50	Edit expert report
03/17/19	J. Pesick	3.90	Assist in preparing expert report of Craig Hendrix
03/18/19	J. Harding	1.20	Review deposition transcripts
03/18/19	A. Hemmings	1.30	Review transcripts for inclusion in expert report
03/18/19	A. Hodgson	0.20	Review deposition transcripts and exhibits re expert reports
03/18/19	J. Pesick	6.50	Assist in preparing expert reports of Drs. Hendrix and Hardy; meet with J. Bauer re same
03/18/19	A. Sommer	0.80	Confer with J. Bauer re case status and strategy
03/19/19	A. Hodgson	0.10	Review deposition transcripts and exhibits re expert reports
03/19/19	J. Pesick	3.00	Assist in preparing expert reports of Drs. Hendrix and Hardy
03/19/19	G. Skogg	6.80	Research re documents cited in expert reports in preparation of index for service with reports; research re documents in productions for attorney review; correspondence with team attorneys re depositions received for review; preparation of documents for addition to electronic shared folders for attorney review

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
03/20/19	L. Cooley	5.50	Attend meet and confer re government's assertion of deliberative process privilege; attend team meeting re status of case and government's assertion of deliberative process privilege; draft motion to compel government to produce documents withheld under deliberative process privilege
03/20/19	J. Harding	2.40	Prepare and participate in meet and confer; revise draft motion to compel
03/20/19	A. Hemmings	2.80	Edit expert reports; call re: expert reports
03/20/19	J. Pesick	7.20	Assist in preparing expert reports; team phone conference re same
03/20/19	G. Skogg	3.00	Research re documents cited in expert reports in preparation of index for service with reports; research re documents in productions for attorney review; correspondence with team attorneys re depositions received for review; preparation of documents for addition to electronic shared folders for attorney review
03/20/19	A. Sommer	4.60	Analyze draft expert reports; meet and confer re application of deliberative process privilege and motion to compel; confer with J. Harding, J. Bauer, and L. Cooley re same; confer with team re expert report
03/21/19	L. Cooley	2.10	Prepare and serve touhy requests, subpoenas, and notices of subpoenas for witness; incorporate edits into motion to compel documents withheld under deliberative process privilege
03/21/19	J. Drosick	10.20	Team phone call for expert reports; edit and cite check C. Hendrix expert report
03/21/19	J. Harding	1.30	Revise motion to compel
03/21/19	A. Hemmings	0.50	Work on expert reports.

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
03/21/19	J. Pesick	0.90	Assist in preparing expert reports
03/21/19	G. Skogg	6.50	Review and analysis of draft expert reports in preparation of revisions to documents sets for attorney use; revisions to case indexes for service with expert report; correspondence with team attorneys re deposition documents received; preparation of documents for addition to electronic shared folders for attorney review
03/22/19	L. Cooley	3.00	Incorporate edits into motion to compel documents withheld under deliberative process privilege; prepare exhibits to be filed with motion; prepare other documents to be filed along with motion; file motion
03/22/19	J. Drosick	11.00	Edit and cite check C. Hendrix and D. Hardy expert reports; assist preparation for serving expert reports
03/22/19	J. Harding	0.80	Finalize motion to compel
03/22/19	A. Hemmings	0.90	Find citations for expert reports
03/22/19	C. Parker	0.90	Research applicable Department of Defense instructions, Army regulations, and relevant statutes for age restrictions and waivers
03/22/19	J. Pesick	9.30	Assist in preparing expert reports for service
03/22/19	G. Skogg	9.00	Review and analysis of revised expert reports in preparation of revisions to documents sets for attorney use; revisions to case indexes for service with expert report; correspondence with team attorneys re deposition documents received; preparation of documents for addition to electronic shared folders for attorney review; preparation of final expert reports for service to opposing counsel
03/22/19	A. Sommer	1.50	Analyze report of T. Hoppe and Dr. Hendrix; oversee service of same; coordinate re service of

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			document requests on opposing counsel
03/25/19	L. Cooley	2.20	Draft objections to Defendants second set of requests for the production of documents
03/25/19	J. Drosick	0.20	Locate expert witness documents
03/25/19	A. Hemmings	2.30	Review medical records
03/25/19	J. Pesick	0.90	Team phone conferences and review of documents re Plaintiffs' medical conditions
03/25/19	G. Skogg	1.40	Research re case documents and correspondence for addition to electronic shared folders for attorney review; preparation of document from court reporting service website for case files; revisions to case indexes for attorney use
03/26/19	L. Cooley	5.70	Draft objections to Defendants second set of requests for production; prepare to argue motion
03/26/19	J. Harding	4.00	Draft Opposition to Motion to Stay
03/26/19	A. Hemmings	2.40	Review medical records; review production 18
03/26/19	J. Pesick	0.40	Team correspondence re evaluation of Plaintiffs' medical conditions
03/26/19	G. Skogg	1.80	Research re documents needed for electronic shared folders for attorney review; preparation of document from court reporting service website for case files; revisions to case indexes for attorney use; correspondence with team attorneys re deposition documents received
03/26/19	A. Sommer	0.40	Confer with DOJ counsel re scope of injunction and modification of same, and correspond with team re same;
03/26/19	A. Sommer	0.80	Participate in telephone conference re case status and strategy

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
03/27/19	L. Cooley	10.20	Prepare to argue motion; draft reply to Defendants opposition to plaintiffs motion to compel; research re the same
03/27/19	J. Harding	1.20	Finalize opposition and file
03/27/19	A. Hemmings	2.00	Review productions 17 and 18
03/27/19	J. Pesick	0.30	Team correspondence re case strategy
03/27/19	G. Skogg	0.80	Research re documents needed for electronic shared folders for attorney review; preparation of document from court reporting service website for case files; revisions to case indexes for attorney use; correspondence with team attorneys re deposition documents received
03/27/19	A. Sommer	3.60	Revise draft opposition to motion to stay and correspond with team re same
03/28/19	L. Cooley	8.40	Incorporate edits into reply to Defendants' opposition to Plaintiffs' motion to compel; finalize and file reply; prepare for oral argument on motion to compel; review Defendants' privilege log with eye towards filing another motion to compel
03/28/19	J. Harding	1.10	Prepare for oral argument
03/28/19	A. Hemmings	0.50	Review KR production
03/28/19	A. Sommer	1.80	Analyze and revise draft reply brief; review additional comments on same; confer with J. Harding and L. Cooley re hearings; review government's reply brief
03/29/19	L. Cooley	3.50	Prepare for hearing re plaintiffs' motion to compel the production of documents and things; argue motion
03/29/19	J. Harding	3.70	Prepare for and argue Opposition to Motion to Stay; review objections to the magistrate judge's order

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
03/29/19	A. Hemmings	0.90	Review KR production
03/29/19	G. Skogg	0.80	Research re documents for addition to electronic shared folders for attorney review; revisions to case indexes for attorney use; preparation of deposition documents for delivery to team attorneys
03/30/19	A. Hemmings	0.30	Review KR production
03/31/19	A. Hemmings	0.40	Research DPP issues; review KR production
04/01/19	L. Cooley	5.40	Research re cases that require a document by document analysis of the assertion of the deliberative process privilege; attend meet and confer re assertion of the privilege over a new privilege log; draft and serve plaintiffs third set of requests for productions; review documents produced in new production
04/01/19	C. Frelinghuysen	1.00	Confer with team members re deliberative process privilege research and research re same
04/01/19	J. Harding	2.60	Meet and confer re DPP and draft opposition re same
04/01/19	A. Hemmings	4.70	Research DPP issues; review KR Production
04/01/19	G. Skogg	0.80	Research re documents for updates to electronic shared folders for attorney review; preparation of documents for attorney use
04/01/19	A. Sommer	3.60	Research related to response to objections regarding deliberative process privilege; attend meet and confer re deliberative process privilege
04/02/19	J. Drosick	2.80	Research deliberative process privilege
04/02/19	C. Frelinghuysen	4.00	Research re deliberative process privilege research and confer with team members re same

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
04/02/19	J. Harding	8.10	Draft response to Defendants' objections
04/02/19	A. Hemmings	4.40	Review Production 19; DPP research; pro hac application
04/02/19	J. Pesick	0.10	Team correspondence re case strategy
04/02/19	A. Sommer	5.10	Research re response to government's objections; analyze briefing in Doe 2 case against DOD and briefing in our case to structure similar arguments; analyze documents provided by A. Hemmings and correspond with R. Norway re same
04/03/19	L. Cooley	1.80	Review and edit response to objections to order of the magistrate judge; insert citations
04/03/19	J. Harding	3.20	Finalize response to Defendants' objections
04/03/19	G. Skogg	1.00	Research re documents needed for electronic shared folders for review by team attorneys; revisions to case index for attorney use; preparation of documents for addition to case files for attorney review
04/03/19	A. Sommer	5.10	Revise draft brief re response to government's objections regarding deliberative process privilege order
04/04/19	L. Cooley	0.40	Compile list and dates of all depositions in the case for purpose of ensuring that we have all transcripts
04/04/19	G. Skogg	1.50	Research for team attorneys re depositions and documents needed for expert review; revisions to case index for attorney use; correspondence with court reporting service re transcripts needed for case files for attorney review
04/04/19	A. Sommer	0.50	Coordinate various pre-trial strategies; review court order re hearing; confer with L. Cooley and G. Skogg re deposition transcripts
04/05/19	L. Cooley	0.50	Finalize and serve plaintiffs objections to

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			defendant's second set of requests for production re experts
04/05/19	J. Pesick	1.30	Review and analysis of deposition testimony of fact witnesses for use in expert reports
04/05/19	G. Skogg	1.20	Revisions to case index for attorney use; correspondence with outside counsel re documents needed for case files for attorney review; preparation of documents received for addition to electronic shared folders for attorney use
04/05/19	A. Sommer	1.10	Analyze and revise draft objections to expert discovery requests and correspond with team re same
04/07/19	J. Harding	0.60	Review Reply from Government
04/08/19	J. Pesick	0.10	Team correspondence re csae strategy
04/08/19	G. Skogg	0.80	Research re documents filed under seal; preparation of documents for addition to electronic shared folders for attorney use; correspondence with team attorney re documents needed for files
04/10/19	G. Skogg	1.30	Preparation of documents for addition to electronic shared folders for attorney use; research re documents filed under seal; correspondence with team attorney re documents needed for files; preparation of case transcripts and exhibits for delivery to team attorneys for review
04/11/19	L. Cooley	0.20	Contact opposing counsel to obtain access to sealed documents attached to opposing counsel's motion
04/11/19	J. Harding	5.60	Prepare for argument before Judge Brinkema
04/11/19	G. Skogg	2.80	Correspondence with court reporting service re deposition files and exhibits for review by team attorneys; preparation of documents for addition to electronic shared folders for attorney use;

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			correspondence with team attorneys re documents needed for files; preparation of case transcripts and exhibits for delivery to team attorneys for review; research re case schedule data for attorney use
04/11/19	A. Sommer	0.50	Confer with J. Harding re hearing on government's objections to magistrate judge's order re report and recommendation ordering production of documents withheld on privilege grounds
04/12/19	J. Harding	3.60	Prepare for and participate in oral argument before Judge Brinkema
04/12/19	G. Skogg	0.50	Research re documents for addition to electronic shared folders for attorney review; revisions to case chart for attorney use
04/12/19	A. Sommer	4.70	Prepare for and attend hearing on government's objections to deliberative process privilege documents and travel to and from same; confer with J. Bauer re preparation of case for trial
04/13/19	J. Pesick	0.20	Assist in preparing supplemental expert report of Dr. Hardy
04/15/19	G. Coffee	0.30	Phone conference with G. McConnell re assistance with case
04/15/19	A. Hemmings	0.20	Review supplemental production
04/15/19	J. Pesick	0.60	Collect documents from experts
04/16/19	G. Coffee	0.50	Exchange of emails with G. McConnell re assistance with case
04/16/19	J. Pesick	0.70	Collection of documents from experts for production
04/16/19	G. Skogg	1.70	Review and analysis of expert report materials re preparation of documents for upcoming production; creation of chart re documents for upcoming production; preparation of

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			correspondence re expert reports materials; preparation of documents for addition to electronic shared folders for attorney review
04/17/19	L. Cooley	3.50	Research re statement of undisputed fact; collect documents for production of documents relied upon by experts; attend conference call re status of the case;
04/17/19	J. Harding	1.00	Weekly call re cases and notice of appeal
04/17/19	J. Pesick	1.40	Participate in team phone conference and collect documents from experts to respond to government discovery requests
04/17/19	T. Woodward	0.30	Work to obtain chapters of 2017 edition of Fundamentals of HIV Medicine, for J. Pesick
04/18/19	L. Cooley	1.10	Review documents for production for privilege and confidentiality
04/18/19	J. Pesick	1.20	Prepare production of expert witness materials
04/18/19	G. Skogg	5.50	Correspondence with team attorneys re documents collected for case production; preparation of documents received from co-counsel for attorney review; revisions to chart re documents for upcoming production; correspondence with litigation support personnel re procedures for upcoming production; preparation of documents for addition to electronic shared folders for attorney review
04/19/19	L. Cooley	1.00	Prepare production letter; prepare responses to discovery requests; make production
04/19/19	J. Pesick	0.10	Team correspondence re case strategy
04/19/19	G. Skogg	3.50	Review and analysis of documents in preparation of document production to opposing counsel; preparation of Bates-stamped documents for delivery to opposing counsel; revisions to chart re

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			documents for upcoming production; correspondence with team attorney re questions re documents in production sets; preparation of documents for addition to electronic shared folders for attorney review
04/23/19	L. Cooley	0.10	Retrieve documents needed by counsel
04/23/19	J. Pesick	0.40	Team correspondence re case strategy
04/23/19	G. Skogg	2.40	Research re documents in productions for addition to electronic shared folders for use by team attorneys in preparation of upcoming trial; revisions to case charts of expert documents for attorney use; preparation of documents for attorney review
04/23/19	A. Sommer	2.10	Analyze expert disclosures and correspond with team re same; correspond with opposing counsel re missing expert reports
04/24/19	G. Coffee	2.30	Discussion with G. McConnell re assistance with case; several discussions with L. Cooley re government expert reports and whether there is a need to file a rebuttal report; review government expert reports; review Rule 26 requirements and local rule on expert reports; review scheduling order on expert reports
04/24/19	L. Cooley	3.70	Attend conference call re status of the case; update G. Coffee on status of the case; review hybrid fact/expert witness disclosures; update calendar; review amended rule 26 disclosures to determine if there is relevant new information; review rules of civil procedure and local rules on hybrid fact/expert witnesses
04/24/19	J. Harding	0.30	Participate in weekly call
04/24/19	J. Pesick	0.90	Participate in weekly strategy phone conference
04/24/19	G. Skogg	0.30	Research re documents for addition to electronic

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			shared folders for review by team attorneys; preparation of documents for attorney use
04/24/19	A. Sommer	1.00	Confer with team re case status and strategy
04/25/19	G. Coffee	2.50	Phone conference with J. Harding re status of case; begin to draft email re absence of need to file expert rebuttal reports; phone conference with A. Sommer re same; discussion with L. Cooley re research on need to file rebuttal report; send email to A. Sommer re Advisory Committee Note on no duty to supplement information provided in deposition
04/25/19	L. Cooley	1.70	Review order of proof plan for trial; collect privilege logs; update initial rule 26 disclosures
04/25/19	J. Harding	0.20	Call with Gordon Coffee
04/25/19	J. Pesick	0.10	Team correspondence re case strategy
04/25/19	G. Skogg	5.30	Research re case documents for addition to trial preparation files for attorney review; preparation of binders for attorney review in preparation of pretrial hearing filings; revisions to case indexes for attorney use
04/25/19	A. Sommer	1.90	Confer with G. Coffee re case transition and expert discovery issues; confer with J. Bauer re preparation for trial and strategy for same
04/26/19	L. Cooley	1.80	Draft first amended initial disclosures; confirm that all possible witnesses are included in disclosures
04/26/19	A. Hemmings	1.30	Draft expert witness deposition notices and organize deposition reservations
04/26/19	J. Pesick	0.30	Assist and prepare for expert depositions
04/26/19	G. Skogg	1.30	Research re case documents for addition to trial preparation files for attorney review; preparation of binders for attorney review in preparation of

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			pretrial hearing filings; revisions to case indexes for attorney use
04/28/19	J. Pesick	0.20	Team correspondence re case strategy
04/29/19	G. Coffee	0.80	Discussion with L. Cooley re status of case, intent to file motion in limine after pretrial conference, and research on need to file rebuttal report; review email from L. Cooley re research results
04/29/19	L. Cooley	2.10	Research re federal rule of civil procedure 26(e) and requirements for supplementing expert reports where information was disclosed in depositions; have new production from defendants uploaded and briefly review new production for documents relevant to upcoming deposition
04/29/19	C. Frelinghuysen	4.00	Research re testifying non-reporting experts and scope of work product and privilege protections; prepare summary re same
04/29/19	A. Hemmings	1.50	Deposition support; draft motion to take deposition out of time
04/29/19	J. Pesick	0.10	Team correspondence re upcoming depositions
04/29/19	G. Skogg	2.20	Research re documents for attorney review for potential trial exhibits set; preparation of index of key documents for attorney use for trial preparation; revisions to case index for attorney use
04/30/19	J. Drosick	1.70	Draft organizational standing memo
04/30/19	A. Hemmings	1.00	Deposition support; draft motion to take deposition out of time
04/30/19	J. Pesick	0.30	Conference with J. Bauer re case strategy
04/30/19	G. Skogg	6.80	Research re documents for attorney review for potential trial exhibits set; preparation of index of key documents for attorney use for trial

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			preparation; revisions to case index for attorney use
05/01/19	G. Coffee	0.80	Discussion with J. Harding re status of case; discussion and exchange of emails with L. Cooley re need to file supplemental/rebuttal report
05/01/19	L. Cooley	5.90	Research re Federal rule of civil procedure 26(a) and rebuttal expert reports; read deposition transcript with an eye towards drafting motion in limine
05/01/19	J. Drosick	1.80	Draft organizational standing memo
05/01/19	A. Hemmings	1.30	Draft and circulate motion to take deposition out of time
05/01/19	G. Skogg	2.00	Research re documents for attorney review for potential trial exhibits set; preparation of index of key documents for attorney use for trial preparation; revisions to case index for attorney use; preparation of documents for addition to electronic shared folders for attorney review
05/02/19	G. Coffee	1.00	Exchange of emails with associates re rebuttal reports and depositions
05/02/19	L. Cooley	6.70	Read deposition transcript of N. Harrison with eye toward writing motion to exclude evidence of N. Harrison's prior bad acts; research re motion to exclude
05/02/19	J. Drosick	4.60	Research organizational standing
05/02/19	A. Hemmings	2.20	Peel deposition support; review defendant's comments on motion to amend scheduling order
05/02/19	J. Pesick	0.20	Team correspondence conference re case strategy
05/02/19	G. Skogg	2.00	Research for team attorneys re documents for addition to files for review for trial preparation; correspondence with court reporting services re

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			documents needed; revisions to case indexes for trial preparation
05/03/19	L. Cooley	3.00	Research re motion to exclude prior bad acts; draft motion to exclude prior bad acts; read newly filed motion to dismiss and accompanying sealed exhibits
05/03/19	J. Drosick	8.50	Research organziational standing; draft memo re organizational standing
05/03/19	J. Harding	0.20	Call with D. Sommer re case
05/03/19	A. Hemmings	4.00	Peel deposition support; medical records summary chart
05/03/19	J. Pesick	1.80	Assist in preparing rebuttal expert reports
05/03/19	G. Skogg	3.00	Research for team attorneys re documents for addition to files for review for trial preparation; correspondence with court reporting services re documents needed; revisions to case indexes for trial preparation
05/04/19	J. Pesick	1.00	Assist in preparing Hendrix rebuttal report
05/05/19	J. Pesick	1.00	Assist in preparing Hendrix rebuttal report
05/06/19	G. Coffee	0.50	Review email from A. Sommer re rebuttal report; discussions with L. Cooley re same and re motion to dismiss advocacy group
05/06/19	L. Cooley	1.20	Attend conference call re opposition to renewed motion to dismiss filed by defendants; review documents that need to be produced along with rebuttal reports of experts
05/06/19	J. Drosick	1.90	Phone Call with P. Perkowski and K. Ingelhart re research for response to summary judgment motion (0.5); Research functional equiavlency for non-traditional orgnaizations to receive organizational standing (1.40)

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05/06/19	J. Harding	0.70	Call re Motion to Dismiss
05/06/19	A. Hemmings	2.20	MTD call; review MTD
05/06/19	J. Pesick	1.40	Assist and preparing expert reports of Drs. Hardy and Hendrix
05/06/19	G. Skogg	2.20	Research re documents for addition to electronic case folders for attorney review; review and analysis of documents in preparation of draft trial exhibit list for attorney review; preparation of expert report documents for potential production
05/07/19	L. Cooley	0.50	Review rebuttal report to determine what needs to be produced as supplement to plaintiff's responses to RFPs
05/07/19	J. Drosick	3.20	Research functional equivalency for non-traditional organizations to receive organizational standing
05/07/19	A. Hemmings	2.00	Provide support for Hardy deposition; review medical records
05/07/19	J. Pesick	0.70	Attention to case status and potential dispositive motion strategy
05/08/19	G. Coffee	0.30	Review list of pre-trial tasks and forward to associates
05/08/19	L. Cooley	4.10	Review and remove highlights and notes from documents for production; attend conference call re status update for the case and planning for final pretrial conference; discuss plan for summary judgment motion
05/08/19	J. Drosick	3.40	Research direct organizational standing under frustration of purpose
05/08/19	J. Harding	0.60	Participate in weekly call

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
05/08/19	A. Hemmings	1.80	Review medical records; weekly status call
05/08/19	J. Pesick	0.70	Team correspondence re expert deposition preparations and production of documents
05/08/19	G. Skogg	5.00	Research for team attorneys re discovery documents; research of expert document sets re documents in productions in preparation of supplemental production set; preparation of expert documents for production to opposing counsel; preparation of case transcripts and exhibits for delivery to outside counsel for review
05/09/19	G. Coffee	0.30	Discussion with L. Cooley re upcoming pretrial conference and intent to move for partial summary judgment
05/09/19	J. Harding	1.20	Prepare for and participate in meet and confer
05/09/19	A. Hemmings	0.60	Hendrix dep prep support
05/09/19	G. Skogg	5.60	Review and analysis of case documents in preparation of revised draft trial exhibit list for attorney review for exchange with opposing counsel; preparation of documents for attorney review
05/10/19	L. Cooley	1.10	Research re federal rule of evidence 404
05/10/19	J. Pesick	0.30	Phone conference with J. Bauer re trial strategy
05/10/19	G. Skogg	1.00	Preparation of documents for trial preparation files; review and analysis of documents in preparation of revised draft trial exhibits lists for attorney review
05/13/19	G. Coffee	0.50	Discussion with L. Cooley re exhibit list and ability to supplement at later date; check local rule re same
05/13/19	L. Cooley	6.70	Draft motion in limine to exclude evidence of prior bad acts; create list of documents that might be

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			used as exhibits at trial; edit motion to extend time to file pretrial disclosures
05/13/19	J. Harding	0.30	Emails re hearing
05/13/19	A. Hemmings	1.00	Hoppe dep prep support
05/13/19	J. Pesick	0.30	Team correspondence re trial preparations
05/13/19	G. Skogg	4.10	Research re documents for addition to draft trial exhibit list for attorney review; preparation of documents for trial files; review and analysis of documents in preparation of revised draft trial exhibits list for attorney review
05/14/19	G. Coffee	0.80	Discussion and exchange of several emails with L. Cooley re pretrial conference and government's intent to move for summary judgment
05/14/19	L. Cooley	8.80	Attend meet and confer with the government re final pretrial conference; draft motion in limine to exclude prior acts; draft section of reply to motion to dismiss on traditional membership organizations; finalize and file motion to extend time to file pretrial disclosures
05/14/19	J. Harding	0.10	Calls re meet and confer
05/14/19	A. Hemmings	0.50	Hoppe dep. support
05/14/19	J. Pesick	0.10	Team correspondence re case strategy
05/14/19	G. Skogg	5.20	Research re expert report documents for addition to draft trial exhibit list for attorney review; preparation of documents for trial files; review and analysis of documents in preparation of revised draft trial exhibits list for attorney review
05/15/19	G. Coffee	0.30	Discussion with L. Cooley re status of pretrial matters
05/15/19	L. Cooley	5.10	Draft motion in limine to exclude evidence of prior

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			acts; attend team meeting re final pretrial conference; compile list of documents that may be used as exhibits at trial; research re accessing legal services as a route to becoming a member of an organization
05/15/19	J. Harding	3.50	Prepare for final pretrial conference
05/15/19	A. Hemmings	2.50	Weekly status call; review deposition transcripts for DPP objections
05/15/19	G. Skogg	5.00	Correspondence with court reporting service re deposition documents on database; research re expert report documents for addition to draft trial exhibit list for attorney review; preparation of documents for trial files; review and analysis of documents in preparation of revised draft trial exhibits list for attorney review
05/16/19	L. Cooley	7.10	Draft motion in limine to exclude evidence of prior acts of plaintiff at trial; attend post pretrial meeting to discuss order of proof, exhibit lists, legal arguments, witnesses to be called at trial; look for documents to be used as exhibits at trial;
05/16/19	J. Harding	5.60	Prepare for and participate in final pre-trial conference and strategy meeting
05/16/19	A. Hemmings	5.30	Draft undisputed facts; trial strategy meeting
05/16/19	J. Pesick	3.00	Participate in team strategy phone conference
05/16/19	G. Skogg	7.00	Research re additions to case database for attorney review; research re medical records and expert report documents for addition to draft trial exhibit list for attorney review; preparation of documents for trial files; review and analysis of documents in preparation of revised draft trial exhibits list for attorney review
05/17/19	G. Coffee	0.50	Exchange of emails with L. Cooley re pretrial conference and trial preparation

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05/17/19	L. Cooley	6.90	Prepare list of potential exhibits to be used at trial; look for documents to be used as exhibits at trial; cite check, proofread, finalize and file opposition to renewed motion to dismiss and accompanying exhibits, and motion to seal exhibits and memorandum in support of motion to seal exhibits
05/17/19	J. Grant	1.50	Confer with J. Harding and L. Cooley re demonstrative evidentiary support; review notes and plan research for demonstrative
05/17/19	J. Harding	0.20	Meetings with summer associate re work assignments
05/17/19	A. Hemmings	1.20	Draft undisputed facts; review medical records
05/17/19	R. Miller	1.10	Meet with J. Harding and A. Cooley on research project; perform background research
05/17/19	J. Pesick	0.10	Team correspondence re trial preparation
05/17/19	G. Skogg	2.00	Research re additions to case database for attorney review; research re medical records and expert report documents for addition to draft trial exhibit list for attorney review; preparation of documents for trial files; review and analysis of documents in preparation of revised draft trial exhibits list for attorney review
05/20/19	G. Coffee	0.30	Discussion with J. Harding re decision to expand scope of equal protection argument
05/20/19	L. Cooley	2.40	Meet with E. Rodriguez to discuss research assignment; prepare exhibit list
05/20/19	R. Miller	3.70	Research Defense Department instructions
05/20/19	E. Rodriguez	0.50	Research for Equal Protection Challenge to Military Policies on HIV Assignment
05/21/19	L. Cooley	3.40	Prepare exhibit list; review documents for potential

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			use as exhibits; prepare and file pro hac vice motion on behalf of out-of-state attorney who will be arguing motion;
05/21/19	A. Hemmings	0.20	Edit undisputed facts
05/21/19	R. Miller	2.50	Research Defense Department instructions
05/21/19	J. Pesick	0.10	Correspondence with experts re trial preparations
05/21/19	G. Skogg	1.00	Preparation of documents from court reporting service website for addition to electronic shared folders for review by team attorneys; updates to trial preparation files for attorney use; preparation of draft trial exhibit chart for attorney review
05/22/19	G. Coffee	0.50	Discussion with L. Cooley re judge's ruling on deliberative process privilege and impact on case schedule
05/22/19	L. Cooley	5.30	Prepare exhibit list; search for and review documents to be used as exhibits at trial; attend weekly phone conference re status of the case; read order from the court re deliberative process privilege
05/22/19	L. Cooley	0.40	Research re local rules for who is allowed to appear in the signature block of a brief; enter appearance
05/22/19	J. Grant	5.00	Research policy history for military entities in preparation for demonstrative
05/22/19	J. Harding	2.00	Review court order and strategize re next steps; participate in weekly call
05/22/19	R. Miller	2.50	Research Defense Department instructions
05/22/19	G. Skogg	0.80	Preparation of documents for the trial preparation files; preparation of draft trial exhibit chart for attorney review

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
05/22/19	S. Wesclitz	2.00	Obtain Army and Air Force current and superseded regulations re AR 600-110 and AFI 44-178 from 1980s to present for J. Grant (DC)
05/23/19	J. Harding	2.50	Prepare for and participate in meet and confer with government; draft joint status report
05/23/19	A. Hemmings	0.60	Edit undisputed facts
05/23/19	R. Miller	0.60	Research Defense Department instructions
05/23/19	G. Skogg	1.30	Preparation of documents for the trial preparation files; preparation of draft trial exhibit chart for attorney review; addition of expert deposition documents to case files for attorney review
05/23/19	S. Wesclitz	1.00	Obtain Army and Air Force current and superseded regulations re AR 600-110 and AFI 44-178 from 1980s to present for J. Grant (DC)
05/24/19	L. Cooley	6.10	Prepare exhibit list; review documents for exhibit list
05/24/19	J. Grant	8.50	Research policy history for army and air force in preparation for demonstrative; draft informal report of case law findings re Human Immunodeficiency Virus and said policies
05/24/19	J. Harding	1.00	Finalize and file a joint status report
05/24/19	A. Hemmings	0.80	Edit undisputed facts
05/24/19	R. Miller	0.40	Review DOD materials; send email to J. Harding and L. Cooley re assignment
05/26/19	L. Cooley	4.10	Prepare exhibit list; review documents for exhibit list
05/27/19	L. Cooley	4.60	Prepare exhibit list; review documents for exhibit list; redact documents to be filed pursuant to court order

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
05/28/19	J. Harding	2.00	Prepare for and attend meet and confer re deliberative process privilege
05/28/19	G. Skogg	6.50	Set up of TextMap database for trial team; input of case depositions and videos to review by team attorneys; research re appellate case filings for attorney review; research re produced versions of potential trial exhibits for trial files
05/29/19	L. Cooley	3.70	Prepare skeleton brief; review brief filed by the court; attend meeting re plan for drafting a reply
05/29/19	L. Cooley	5.60	Prepare exhibit list; review documents for exhibit list; attend conference call re exhibit list; attend moot argument for motion to dismiss; attend weekly conference call re status of the case
05/29/19	J. Harding	2.00	Prepare for an participate in moot on motion to dismiss and weekly call; finalize filing consent motion
05/29/19	A. Hemmings	0.30	Weekly status call
05/29/19	J. Pesick	0.40	Participate in weekly team phone conference
05/29/19	G. Skogg	8.00	Research re case filings for attorney review; research re produced versions of potential trial exhibits for trial files; preparation of documents for addition to trial files for attorney use; revisions to case indexes for attorney review
05/30/19	L. Cooley	3.20	Prepare exhibit list; review documents with J. Bauer to be used as exhibits
05/30/19	L. Cooley	1.30	Attend meeting and call re strategy and plan for preparing plaintiffs' opening brief
05/30/19	J. Harding	0.60	Prepare for argument on motion to dismiss
05/30/19	A. Hemmings	0.70	Strategy call for 4th Cir. response
05/30/19	G. Skogg	4.80	Preparation of deposition documents for addition

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			to electronic case folders for attorney review; research re produced versions of potential trial exhibits for trial files; preparation of documents for addition to trial files for attorney use; revisions to case indexes for attorney review
05/31/19	L. Cooley	2.20	Edit and revise exhibit list based on feedback provided by J. Bauer and outside counsel D. Sommer; review documents to be used as exhibits
05/31/19	L. Cooley	0.70	Review Defendants' opening brief and pull documents relevant to briefs; confer with G. Eaton re plaintiffs' reply brief
05/31/19	J. Harding	2.30	Prepare for and attend hearing on motion to dismiss
05/31/19	J. Pesick	0.20	Correspondence with Craig Hendrix re preparation of expert declaration
05/31/19	G. Skogg	1.50	Revisions to trial exhibit set for attorney review in preparation of trial exhibit list; research re produced versions of potential trial exhibits for trial files; preparation of documents for addition to trial files for attorney use
06/02/19	G. Skogg	6.30	Research re additional potential trial exhibits for trial files and attorney review; preparation of documents for addition to trial files for attorney use; revisions to case indexes for attorney review; correspondence with team attorney re documents needed for trial files
06/03/19	L. Cooley	2.80	Prepare exhibit list for filing; review documents to determine if they should be used as exhibits; meet with J. Bauer and outside counsel D. Sommer to review proposed exhibits
06/03/19	L. Cooley	3.90	Research re administrative procedure acts claims; outline argument for likelihood of success on administrative procedure act claims

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
06/03/19	E. Rodriguez	7.00	Research into how the Fourth Circuit uses the similarly situated test
06/03/19	G. Skogg	1.00	Research re trial exhibits pulled from internet websites; preparation of documents for addition to potential trial exhibits for attorney review
06/04/19	L. Cooley	2.60	Outline section on likelihood of success on the merits of administrative procedure act; research re irreparable harm standard
06/04/19	L. Cooley	3.40	Review documents to be used as exhibits; prepare exhibit list; review proposed exhibit list with J. Bauer and outside counsel D. Sommer; attend weekly call re status of the case
06/04/19	A. Hemmings	1.00	Review additional government production
06/04/19	G. Skogg	0.80	Research re revisions to trial exhibits sets per team attorneys; research re documents for potential production to opposing counsel; correspondence with team attorneys re pretrial disclosure projects
06/05/19	L. Cooley	5.90	Review documents to be used as exhibits; finalize exhibit list; attend weekly conference call re status of the case; file exhibit list, witness list, and statement of undisputed fact; transmit exhibit list to defendants
06/05/19	J. Harding	0.80	Strategy call
06/05/19	A. Hemmings	4.30	Review additional government production; draft undisputed facts statement; weekly status call
06/05/19	E. Mastro	3.50	Stamp trial exhibits for production
06/05/19	J. Pesick	0.80	Weekly team phone conference re case strategy
06/05/19	E. Rodriguez	8.00	Write memo on how classifications are structured within the Fourth Circuit
06/05/19	J. Ryder	2.00	Annotating transcripts in Text Map and exporting

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			video clips of witness depositions for attorney review
06/05/19	G. Skogg	6.00	Preparation of documents for potential production to opposing counsel; research re revisions to trial exhibits sets per team attorneys; preparation of final set of trial exhibits for exhibit stamping and delivery to Defendants' counsel; set up of ftp delivery set for attorney use; revisions to final trial exhibits list for service
06/06/19	L. Cooley	3.60	Review newly produced documents to determine whether supplement to exhibit list is required; attend meet and confer with opposing counsel to discuss draft discovery requests to be served as part of supplemental discovery regarding organizational plaintiffs' standing
06/06/19	L. Cooley	3.80	Outline section of reply brief on imminent harm; research re legal standard for imminent harm requirement
06/06/19	J. Harding	1.30	Meet and confer re Outserve discovery
06/06/19	G. Skogg	2.10	Review and analysis of highlighted deposition transcripts re quality checking deposition designations on database; preparation of linked exhibits to database for use by trial team
06/07/19	L. Cooley	6.20	Review newly produced documents to determine whether supplement to exhibit list is required; listen to recording to determine if any portions should be included on exhibit list; review exhibit list and witness list filed by government, as well as exhibits produced by opposing counsel, with an eye towards drafting objections
06/07/19	J. Harding	0.50	Calls re OutServe discovery
06/07/19	G. Skogg	3.60	Preparation of trial documents received from Defendants' counsel for addition to trial files for attorney review; preparation of transcripts and

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			exhibits on database for trial team; review of trial exhibits sets for data for trial team attorneys; correspondence with team attorneys re trial document sets
06/09/19	J. Harding	0.20	Emails re pre-discovery assignments
06/10/19	L. Cooley	3.00	Attend meeting with entire trial team to determine work that needs to be done between now and trial date; attend conference call re objections to exhibit list; review defendants exhibits and draft objections to defendants' exhibits
06/10/19	J. Harding	1.30	Call re pre-trial responsibilities and exhibits
06/10/19	A. Hemmings	2.50	Review additional government production; team call
06/10/19	G. Skogg	0.80	Research re documents for review by team attorneys; preparation of documents for delivery to trial team on ftp; updates to electronic shared folders for attorney use
06/11/19	L. Cooley	1.00	Attend meeting re draft outline of brief
06/11/19	L. Cooley	4.00	Review Defendants' exhibits and draft list of objections to each exhibit; attend meet and confer with government to discuss supplemental discovery re standing of organizational plaintiff
06/11/19	J. Harding	2.00	Prepare for and participate in meet and confer; strategy call re appeal
06/11/19	A. Hemmings	1.30	Draft exhibit objections
06/11/19	G. Skogg	0.60	Preparation of documents for electronic trial files for attorney review; revisions to case indexes for attorney use
06/12/19	G. Coffee	0.30	Exchange of emails with L. Cooley re status of case

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
06/12/19	L. Cooley	4.00	Review Defendants' exhibits; draft objections to exhibits;
06/12/19	J. Harding	4.50	Review and object to Defendant's exhibits; participate in weekly call
06/12/19	A. Hemmings	1.00	Draft objections to defendant's trial exhibits; weekly status call
06/12/19	J. Pesick	0.90	Participate in weekly team phone conference
06/12/19	E. Rodriguez	2.00	Research case law outside the Fourth Circuit
06/12/19	G. Skogg	0.60	Research re updates to electronic trial files for attorney use; preparation of documents for attorney review
06/13/19	L. Cooley	3.00	Draft motion for extension of time
06/13/19	L. Cooley	3.00	Review defendants' exhibits; draft objections to defendants exhibits
06/13/19	J. Harding	0.20	Emails re objections to exhibits
06/13/19	A. Hemmings	3.00	Draft objections to defendant's trial exhibits; weekly status call
06/13/19	J. Pesick	5.50	Prepare direct examination of Trevor Hoppe; phone conference with J. Bauer re case strategy
06/13/19	E. Rodriguez	0.50	Review memo and organize to search for information requested by Laura
06/14/19	L. Cooley	3.80	Review defendants' exhibits; draft objections to defendants exhibits
06/14/19	L. Cooley	0.90	Incorporate feedback into motion for extension of time; finalize and proofread motion for extension of time; file motion for extension of time
06/14/19	J. Harding	3.40	Draft objections to Defendants' exhibits

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
06/14/19	A. Hemmings	2.00	Draft objections to defendant's trial exhibits; weekly status call
06/14/19	J. Pesick	7.20	Prepare direct examination of Trevor Hoppe, Ph.D.
06/14/19	G. Skogg	2.00	Preparation of documents for production to opposing counsel; preparation of documents for attorney review in preparation of upcoming trial; research re documents needed for trial files
06/15/19	L. Cooley	1.20	Incorporate feedback into objections to defendants' exhibits; finalize objections list
06/15/19	A. Hemmings	1.00	Draft objections to defense exhibits
06/15/19	J. Pesick	0.70	Prepare direct examination of Trevor Hoppe, Ph.D.
06/16/19	J. Harding	0.40	Finalize objections
06/16/19	J. Pesick	0.60	Prepare direct examination of Trevor Hoppe, Ph.D.
06/17/19	A. Hemmings	1.00	Finalize and file objections to the defendants' trial exhibits
06/17/19	J. Pesick	5.80	Prepare direct examination of Trevor Hoppe, Ph.D.
06/18/19	L. Cooley	2.40	Listen to MP3 produced by defendants pursuant to court order; meet with J. Pesick re documents to be collected for experts; begin looking for documents for experts
06/18/19	L. Cooley	0.50	Meet with G. Eaton re research needed for reply brief
06/18/19	J. Harding	0.90	Emails and call re DPP order
06/18/19	A. Hemmings	0.80	Team call re: expert exhibits
06/18/19	J. Pesick	3.20	Prepare direct examinations of expert witnesses; team phone conference re trial preparation
06/19/19	L. Cooley	2.80	Listen to MP3 the government produced pursuant

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			to court order; attend weekly meeting re status of the case; finalize and file supplemental exhibit list and produce stamped copies of exhibits to government; edit motion to take deposition out of time
06/19/19	L. Cooley	1.50	Draft fact section of appellate brief
06/19/19	A. Hemmings	0.50	Weekly team call
06/19/19	J. Pesick	4.20	Participate in weekly strategy phone conference; prepare direct examinations for experts and consider demonstratives; phone conference with J. Bauer re trial preparation
06/19/19	G. Skogg	1.60	Research re documents for supplemental trial exhibits for service to opposing counsel; preparation of documents for trial exhibit stamping; revisions to trial documents for attorney use; preparation of highlighted transcript text for attorney review for trial preparation
06/20/19	L. Cooley	2.80	Draft fact section for draft reply brief; research re whether rationality under the APA is the same as rationality under the equal protection clause
06/20/19	E. Mastro	1.50	Stamp trial exhibits; work on hotel and meeting space logistics.
06/20/19	J. Pesick	1.90	Prepare direct examinations for expert witnesses, as well as demonstratives
06/20/19	E. Rodriguez	0.50	Re-read memo and figure out how to look for new information
06/21/19	L. Cooley	3.50	Draft fact section for reply brief; research re whether defendants can provide a rational reason post hoc; research re whether courts owe deference to the judgment of the military
06/21/19	L. Cooley	2.00	Finalize and file motion to take deposition out of time; finalize and serve plaintiffs' objections to

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			defendants second set of requests for production to plaintiffs
06/21/19	J. Harding	0.60	Review OutServe Objections
06/21/19	G. McConnell	2.00	Telephone call with team re staffing and Lambda's amicus in 9th Cir case
06/21/19	J. Pesick	2.50	Reivew draft brief re mail-order prescription refills; prepare demonstratives for expert examinations; phone conference with J. Bauer re case strategy
06/21/19	E. Rodriguez	3.00	Research cases outside Fourth Circuit
06/21/19	G. Skogg	0.70	Preparation of case documents for electronic shared folders for attorney review for trial preparation; revisions to case index for attorney use
06/23/19	L. Cooley	0.80	Review documents on supplemental exhibit list and on defendants exhibit list to determine which documents experts need to review prior to trial
06/23/19	A. Hemmings	2.00	Review defense exhibits for expert documents
06/24/19	L. Cooley	0.90	Research re the power of the court to order the military to reinstate a member
06/24/19	Z. LaBomascus	0.20	Assistance with preparation of documents for expert witness per G. Skogg
06/24/19	E. Mastro	1.50	Review Westin contract and negotiate terms. Complete rooming list. Contatc vendors for IT equipment pricing.
06/24/19	J. Pesick	0.70	Prepare direct examination of Trevor Hoppe
06/24/19	E. Rodriguez	6.00	Research outside Fourth Circuit
06/24/19	M. Trucco	5.20	Meet with J. Bauer re Eastern District of Virginia District Court's handling of equal protection claims

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			on a Motion for Summary Judgment; research Eastern District of Virginia District Court's handling of equal protection claims on a Motion for Summary Judgment for J. Bauer
06/25/19	L. Cooley	2.70	Review documents to be produced by OutServe in response to second set of requests for production by Defendants; produce documents;
06/25/19	N. Garg	0.30	Meet with L. Cooley
06/25/19	N. Garg	3.90	research cases re military reinstatement; summarize and email findings to L. Cooley
06/25/19	J. Pesick	0.30	Team correspondence re case strategy
06/25/19	E. Rodriguez	6.00	Research cases outside Fourth Circuit
06/25/19	G. Skogg	2.70	Review and analysis of client documents in preparation of document production; set up of documents for delivery to DOJ counsel; preparation of documents for addition to electronic shared folders for attorney review
06/25/19	M. Trucco	6.80	Research Eastern District of Virginia District Court's handling of equal protection claims on a Motion for Summary Judgment for J. Bauer
06/26/19	L. Cooley	3.10	Review documents to be produced by OutServe in response to second set of requests for production; attend weekly conference call re current status of the case;
06/26/19	L. Cooley	4.50	Draft section of appellate brief on arbitrary and capricious and irrational nature of Defendants' policies
06/26/19	A. Hemmings	1.80	Updated expert report table; team call
06/26/19	J. Pesick	1.20	Participate in weekly team strategy phone conference; review defendants' recent production of documents

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
06/26/19	E. Rodriguez	6.00	Research outside Fourth Circuit
06/26/19	G. Skogg	1.30	Review and analysis of client documents in preparation of document production; set up of documents for delivery to DOJ counsel; preparation of documents for addition to electronic shared folders for attorney review
06/27/19	L. Cooley	1.90	Locate cases to be used in place of missing citations; locate pages in joint appendix to be used as citations
06/27/19	L. Cooley	1.60	Review documents to be produced by OutServe in response to second set of requests for production; review documents in health records to determine if there are additional health records that need to be reviewed by experts
06/27/19	A. Hemmings	1.50	Update expert report table
06/27/19	J. Pesick	3.50	Prepare for meeting with expert Trevor Hoppe; review Defendants' newly produced documents on Defendants' exhibit list
06/27/19	E. Rodriguez	6.00	Research cases outside Fourth Circuit
06/27/19	M. Trucco	2.50	Research Eastern District of Virginia District Court's handling of equal protection claims on a Motion for Summary Judgment for J. Bauer
06/28/19	L. Cooley	8.30	Review and redact documents to be produced by OutServe; attend meet and confer with opposing counsel re documents still being withheld under the deliberative process privilege, and individuals plaintiffs would like to depose; review, edit and serve interrogatory responses; draft motion in limine re prior acts of plaintiffs
06/28/19	J. Harding	0.90	Prepare for and participate in a meet and confer with the government regarding outstanding discovery issues

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
06/28/19	A. Hemmings	1.50	Circulate expert report documents; serve ROG and RFP responses
06/28/19	J. Pesick	6.60	Meet with Trevor Hoppe to prepare direct exam; prepare for meeting; phone conference with Scott Schoettes re case strategy
06/28/19	G. Skogg	2.50	Review of selected medical records for attorney review for trial preparation; review and analysis of client documents in preparation of document production; set up of documents for delivery to DOJ counsel; preparation of documents for addition to electronic shared folders for attorney review
06/28/19	M. Trucco	2.30	Research Eastern District of Virginia District Court's handling of equal protection claims on a Motion for Summary Judgment for J. Bauer
07/01/19	G. Coffee	0.30	Discussion with L. Cooley re status of case
07/01/19	L. Cooley	5.20	Draft motion to take depositions out of time; proofread, finalize, and serve supplemental interrogatory responses by OutServe; search for contact information for Dr. Danaher and consult with him re being subpoenaed for a deposition
07/01/19	J. Harding	0.90	Calls and emails re Danaher deposition
07/01/19	J. Pesick	1.90	Prepare direct examination of Trevor Hoppe
07/01/19	M. Trucco	7.20	Research Eastern District of Virginia District Court's handling of equal protection claims on a Motion for Summary Judgment for J. Bauer; compile Eastern District of Virginia District Court cases re Motion for Summary Judgment in equal protection cases
07/02/19	L. Cooley	3.00	Search for documents to be used in summary judgment; review documents to be produced by OutServe

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
07/02/19	J. Pesick	3.90	Prepare direct examination of Trevor Hoppe
07/02/19	G. Skogg	0.80	Research re documents sets for attorney review in preparation of trial; preparation of documents for attorney review; revisions to case index for attorney use
07/02/19	M. Trucco	4.10	Research Eastern District of Virginia District Court's handling of equal protection claims on a Motion for Summary Judgment for J. Bauer; compile Eastern District of Virginia District Court cases re Motion for Summary Judgment in equal protection cases
07/03/19	L. Cooley	6.80	Finalize and file motion to take depositions out of time; draft memorandum in support of motion to compel production of documents; attend weekly conference call re status of the case
07/03/19	J. Harding	1.00	Review and finalize motions to take depositions out of time
07/03/19	A. Hemmings	0.50	Review additional government production
07/03/19	J. Pesick	1.40	Prepare direct examination of Trevor Hoppe; team phone conference re case strategy
07/03/19	G. Skogg	0.60	Preparation of deposition documents for delivery to co-counsel for review for trial preparation; revisions to electronic trial files for use by team attorneys
07/03/19	M. Trucco	5.60	Research Eastern District of Virginia District Court's handling of equal protection claims on a Motion for Summary Judgment for J. Bauer; compile Eastern District of Virginia District Court cases re Motion for Summary Judgment in equal protection cases
07/04/19	L. Cooley	1.20	Review new production by government for documents that should be included in supplemental

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			exhibit list
07/05/19	J. Pesick	0.70	Prepare direct examination of Trevor Hoppe, Ph.D.
07/06/19	A. Hemmings	0.30	Review additional government production
07/08/19	L. Cooley	6.30	Review and prepare outserve production re standing; search for documents to be used in partial motion for summary judgment; prepare and serve Touhy request
07/08/19	J. Pesick	1.70	Phone conference with Scott Schoettes and Craig Hendrix, M.D., re preparation of supplemental expert report
07/08/19	G. Skogg	3.00	Preparation of documents for production to opposing counsel; research for team attorneys re trial documents for review; preparation of trial documents for delivery on ftp website; research re updates to electronic shared folders for attorney review
07/08/19	M. Trucco	10.30	Research Eastern District of Virginia District Court's handling of equal protection claims on a Motion for Summary Judgment for J. Bauer; compile Eastern District of Virginia District Court cases re Motion for Summary Judgment in equal protection cases; meet with J. Pesick re research for project
07/09/19	G. Coffee	0.80	Discussion with L. Cooley re status of case, upcoming argument on motion for leave to take deposition, and billing issue; forward to L. Cooley excerpts from EDVA cases on de bene esse depositions
07/09/19	L. Cooley	0.50	Review draft of appellate brief
07/09/19	L. Cooley	6.40	Edit motion to compel production of documents withheld on the basis of deliberative process privilege; research re record in summary judgment motion for Administrative Procedure Act

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
07/09/19	J. Harding	0.60	Call re motion to take deposition out of time
07/09/19	A. Hemmings	0.30	Draft notice of deposition
07/09/19	J. Pesick	3.10	Review and prepare supplemental expert report of Craig Hendrix, M.D.; phone conference with Dr. Hendrix re preparation of supplemental report and direct examination
07/09/19	M. Trucco	5.80	Research Eastern District of Virginia District Court's handling of equal protection claims on a Motion for Summary Judgment for J. Bauer; compile Eastern District of Virginia District Court cases re Motion for Summary Judgment in equal protection cases
07/10/19	G. Coffee	0.30	Discussion with L. Cooley re upcoming argument on motion to compel and government opposition
07/10/19	L. Cooley	9.60	Draft statement of undisputed facts for summary judgment; review defendants' opposition to motion to take the deposition of colonel Danaher out of time; draft reply to defendants' opposition
07/10/19	J. Harding	2.60	Revise motion to compel re eight redacted emails and team strategy call
07/10/19	A. Hemmings	1.00	Serve notice of deposition; assist in preparation of motion
07/10/19	J. Pesick	1.40	Participate in weekly team strategy phone conference; prepare supplemental report by Craig Hendrix, M.D.
07/10/19	M. Trucco	8.90	Research Eastern District of Virginia District Court's handling of equal protection claims on a Motion for Summary Judgment for J. Bauer; compile Eastern District of Virginia District Court cases re Motion for Summary Judgment in equal protection cases

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
07/11/19	L. Cooley	7.80	Prepare supplemental exhibit list; finalize and file reply brief re government's opposition to plaintiff's motion to compel the deposition of Colonel Danaher; write and file motion to seal reply brief and exhibits in support of plaintiffs' motion to compel the deposition of colonel Danaher; draft statement of undisputed facts re partial motion for summary judgment
07/11/19	J. Harding	1.10	Finalize reply and serve subpoena
07/11/19	J. Pesick	1.00	Prepare supplemental expert report of Craig Hendrix, M.D.
07/11/19	M. Trucco	6.40	Research Eastern District of Virginia District Court's handling of equal protection claims on a Motion for Summary Judgment for J. Bauer; compile Eastern District of Virginia District Court cases re Motion for Summary Judgment in equal protection cases
07/12/19	L. Cooley	5.70	Research re standard of review on motion for summary judgment; search for documents to be used as exhibits in supplemental brief on OutServe's standing; prepare, finalize, and file motion to compel production of documents still being withheld on the basis of deliberative process privilege and accompanying exhibits; file supplemental brief re outserve's standing
07/12/19	A. Hemmings	0.30	Assist co-counsel in finding documents
07/12/19	J. Pesick	5.20	Prepare supplemental expert report of Craig Hendrix, M.D.
07/12/19	M. Trucco	7.30	Research Eastern District of Virginia District Court's handling of equal protection claims on a Motion for Summary Judgment for J. Bauer; compile Eastern District of Virginia District Court cases re Motion for Summary Judgment in equal protection cases

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
07/13/19	J. Pesick	0.30	Prepare supplemental expert report of Craig Hendrix, M.D.
07/13/19	M. Trucco	7.00	Research Eastern District of Virginia District Court's handling of equal protection claims on a Motion for Summary Judgment for J. Bauer; compile Eastern District of Virginia District Court cases re Motion for Summary Judgment in equal protection cases
07/14/19	M. Trucco	4.00	Compile Eastern District of Virginia District Court cases re Motion for Summary Judgment in equal protection cases; format excel file containing research re Motion for Summary Judgment in equal protection cases; draft research summary file re Motion for Summary Judgment in equal protection cases
07/15/19	L. Cooley	5.00	Research re summary judgment standard of review; research re cases stating that it is arbitrary and capricious under APA to decide same facts differently; verify that all facts included in argument of summary judgment are included in statement of undisputed facts; provide edits and comments on draft memorandum in support of motion for summary judgment; incorporate edits of other into draft motion for summary judgment
07/15/19	A. Hemmings	1.00	Draft deposition notices
07/15/19	J. Pesick	3.60	Phone conference with Craig Hendrix, M.D., to prepare direct examination; prepare supplemental report by Dr. Hendrix
07/15/19	M. Trucco	2.00	Complete excel file containing research re Motion for Summary Judgment in equal protection cases; complete research summary file re Motion for Summary Judgment in equal protection cases; submit assignment to J. Bauer
07/16/19	G. Coffee	0.50	Discussion with L. Cooley re whether to oppose government motion to delay trial pending Fourth

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			Circuit ruling
07/16/19	L. Cooley	5.10	Draft motion in limine re excluding prior bad acts of plaintiffs; research re local rules re timing for filing motion for summary judgment; search for sources for supplemental expert reports; attend meet and confer with opposing counsel re motion to stay trial pending and appeal and planned timeline for summary judgment;
07/16/19	J. Harding	0.30	Review deposition notices
07/16/19	A. Hemmings	2.30	Draft deposition notices; redact outserve documents
07/16/19	J. Pesick	2.80	Assist in preparing supplemental expert report of Craig Hendrix, M.D.; phone conference with J. Bauer re preparing motions in limine
07/16/19	G. Skogg	1.40	Research re documents from internet database for updates to electronic shared folders for trial preparation; set up of ftp delivery of deposition files for review by co-counsel; revisions to case index for trial preparation
07/16/19	T. Woodward	0.50	Work to locate and obtain UK and Israel articles regarding post exposure profphylaxis, for J. Pesick
07/17/19	G. Coffee	0.30	Discussion with L. Cooley re grounds for opposing government's motion to delay trial date
07/17/19	L. Cooley	3.40	Edit second supplemental exhibit list; draft reply in support of motion to compel the production of documents and information withheld on the basis of deliberative process privilege
07/17/19	L. Cooley	5.00	Research re 4th circuit rules on consent for amicus briefs; fill in missing citations and verify existing citations to the record; insert corrected legal citations
07/17/19	J. Harding	0.40	Review and edit Reply to Motion to Compel

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
07/17/19	A. Hemmings	4.00	Redact outserve documents; weekly status call; cite check Hendrix report
07/17/19	J. Pesick	2.80	Weekly team conference call; prepare supplemental expert report of Craig Hendrix, M.D.
07/17/19	T. Woodward	0.30	Work to locate and obtain 2001 US guidelines for the Management of Occupational Exposures to HBV, HCV and HIV, for J. Pesick
07/18/19	L. Cooley	7.30	Research re 4th circuit rules on consent for amicus briefs; fill in missing citations and verify existing citations to the record; legal citation check, proofread brief
07/18/19	L. Cooley	0.10	Edit second supplemental exhibit list;
07/18/19	A. Hemmings	2.30	Cite check Hendrix supplemental report
07/18/19	C. Parker	1.80	Analyze case law regarding the purpose of discovery in narrowing issues for trial in the Eastern District of Virginia
07/18/19	J. Pesick	1.80	Prepare motion in limine re justifications for deployment and service restrictions; assist in preparing supplemental expert report of Craig Hendrix, M.D.
07/18/19	G. Skogg	2.50	Research re case documents for addition to electronic shared folders in anticipation of trial preparation; preparation of appellate filings for attorney review; revisions to case indexes for trial preparation
07/19/19	L. Cooley	6.20	Finalize and file supplemental brief in opposition to defendants motion to dismiss; finalize supplemental exhibit list; prepare motion to seal exhibit to supplemental exhibit list; redact exhibits from previous week's motion to be filed on the public record

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
07/19/19	J. Harding	0.60	Finalize reply on motion to compel
07/19/19	A. Hemmings	0.30	Outserve document redaction
07/19/19	C. Parker	3.60	Analyze case law regarding the purpose of discovery in narrowing issues for trial in the Eastern District of Virginia
07/19/19	J. Pesick	1.00	Prepare motion in limine re government's justification for service restrictions
07/19/19	G. Skogg	4.60	Review and analysis of documents in preparation of production to opposing counsel; preparation of trial exhibits for service; research re case documents for addition to electronic shared folders in anticipation of trial preparation; revisions to case indexes for trial preparation
07/20/19	J. Pesick	1.00	Prepare motion in limine re justificaitons for restrictions on service
07/21/19	J. Pesick	0.30	Prepare motion in limine re government's justification for service restrictions
07/21/19	G. Skogg	0.60	Research re revised set of trial exhibits for service to opposing counsel; preparation of exhibits for stamping for service; correspondence with team re additional trial exhibits for service
07/22/19	L. Cooley	6.70	Edit second supplemental exhibit list; attend meeting re memorandum in support of motion for summary judgment; edit memorandum in support of motion for summary judgment; prepare motion for summary judgment, proposed order, exhibits, and motion to seal exhibits and memorandum in support
07/22/19	A. Hemmings	0.30	Outserve document redaction
07/22/19	J. Pesick	3.80	Prepare motion in limine re excluding justifications for military HIV policies; correspondence with A. Sommer re potential

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			dispute with Defendants re supplemental Hendrix report
07/22/19	M. Vaught	0.60	Review and prepare revised trial exhibits for service
07/23/19	L. Cooley	9.70	Edit memorandum in support of motion for summary judgment; insert citations to statements of undisputed facts for memorandum in support of motion for summary judgment; cite check and proofread memorandum in support of motion for summary judgment; finalize and file motion for summary judgment, memorandum in support, exhibits, and motion to seal
07/23/19	A. Hemmings	1.00	Collect Danaher documents
07/23/19	C. Parker	0.50	Analyze case law regarding the purpose of discovery in narrowing issues for trial in the Eastern District of Virginia
07/23/19	J. Pesick	3.20	Prepare motion in limine to exclude evidence re additional justifications for military HIV policy; review and analysis of 2014 and 2018 reports to Congress;
07/23/19	G. Skogg	1.00	Research re documents for delivery to co-counsel for review; preparation of documents for electronic trial files for attorney use; research re recent case transcripts for exhibits for filing
07/24/19	L. Cooley	3.60	Edit, finalize, and file Plaintiffs opposition to Defendants motion to stay summary judgment and trial; attend weekly call re status of the case
07/24/19	L. Cooley	2.50	Read deposition of Colonel Lute in preparation for deposition of Colonel Frazier; create deposition outline
07/24/19	A. Hemmings	0.80	Weekly call
07/24/19	J. Pesick	3.10	Participate in weekly strategy phone conference;

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			prepare cross examination of Andrew Wiesen, M.D.; attention to general case strategy
07/24/19	G. Skogg	1.50	Research re documents for trial preparation files for attorney review; review and analysis of attorney work product in preparation of revised charts for attorney use in trial preparation
07/25/19	L. Cooley	6.80	Prepare deposition outline for deposition of Colonel Frazier; prepare exhibits for deposition of Colonel Frazier
07/25/19	L. Cooley	0.80	Obtain docket stamped copies of documents filed under seal to provide to opposing counsel; draft amended certificate of service
07/25/19	J. Pesick	5.70	Prepare cross examination for Dr. Wiesen and deposition designations for Dr. Wiesen
07/25/19	G. Skogg	3.50	Revisions to trial files for attorney review for trial preparation; preparation of highlighted text on database in preparation of initial deposition designations for attorney review; preparation of charts of deposition designations for attorney review for service to opposing counsel; research re documents needed for deposition files for trial
07/26/19	G. Coffee	1.80	Discussion with L. Cooley re new 30(b)(6) deposition; attend portion of deposition; discussion with L. Cooley re impressions of deposition testimony
07/26/19	G. Coffee	0.50	Phone conference with G. McConnell re case management issue; discussion with L. Cooley re impact of case on DOD policy
07/26/19	L. Cooley	5.30	Prepare for and take deposition of S. Frazier
07/26/19	J. Pesick	5.40	Prepare cross examination and deposition designations for Andrew Wiesen, M.D.; phone conference with J. Bauer re same and trial strategy

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
07/26/19	G. Skogg	6.00	Research re sealed filings for attorney review; revisions to trial files for attorney review for trial preparation; preparation of highlighted text on database in preparation of initial deposition designations for attorney review; preparation of charts of deposition designations for attorney review for service to opposing counsel
07/29/19	J. Harding	1.10	Review Harrison transcript for direct examination outline
07/29/19	J. Pesick	1.00	Prepare for testimony of Craig Hendrix, M.D.; prepare cross examination of Andrew Wiesen, M.D.; team correspondence re case strategy
07/29/19	G. Skogg	5.30	Research re sealed filings for attorney review; revisions to trial files for attorney review for trial preparation; preparation of highlighted text on database in preparation of initial deposition designations for attorney review; preparation of charts of deposition designations for attorney review for service to opposing counsel
07/30/19	J. Harding	0.40	File motion to for C. Frelinghuysen to withdraw as counsel
07/30/19	J. Pesick	0.80	Prepare direct examination for Trevor Hoppe, Ph.D.
07/30/19	G. Skogg	5.50	Research re sealed filings for attorney review; revisions to trial files for attorney review for trial preparation; preparation of highlighted text on database in preparation of initial deposition designations for attorney review; preparation of charts of deposition designations for attorney review for service to opposing counsel
07/31/19	L. Cooley	0.70	Redact summary judgment documents to be filed on public record pursuant to court order
07/31/19	J. Harding	0.70	Meet and confer re consolidation of summary judgment motions

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
07/31/19	J. Pesick	3.80	Meet with Trevor Hoppe, Ph.D., to prepare direct examination
07/31/19	G. Skogg	8.30	Research re documents for addition to case files for attorney review for trial preparation; preparation of highlighted text on database in preparation of initial deposition designations for attorney review; preparation of charts of deposition designations for attorney review for service to opposing counsel; correspondence with team attorneys re trial preparation projects
08/01/19	G. Coffee	0.30	Exchange of emails with L. Cooley re judge's order staying proceedings; review order
08/01/19	J. Pesick	0.30	Team correspondence re case strategy
08/02/19	L. Cooley	0.60	Redact and file sealed documents related to motion for summary judgment
08/02/19	J. Pesick	2.30	Team phone conference and case analysis
08/05/19	J. Pesick	2.70	Prepare memorandum re case status; prepare for presentation at legal conference
08/06/19	J. Pesick	3.50	Attention to case strategy
08/06/19	G. Skogg	0.30	Preparation of documents for addition to trial preparation files for team attorneys; updates to case indexes for attorney use
08/07/19	G. Coffee	0.50	Discussion with J. Harding re status of case; discussion with J. Gailey re status of appeal and delay of trial
08/08/19	G. Skogg	0.30	Research re recent case transcripts for attorney review; preparation of documents for attorney use
08/13/19	L. Cooley	0.80	Review reply brief filed by appellant
08/13/19	L. Cooley	2.00	Draft work stop memorandum; draft exit

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			memorandum detailing institutional knowledge and location of files
08/13/19	J. Pesick	0.10	Team correspondence re case strategy
08/14/19	L. Cooley	2.20	Review and organize electronic files related to case so that they can be handed off to another associate before my last day
08/14/19	G. Skogg	0.20	Preparation of textbooks received from library personnel in preparation of return to outside source
08/16/19	G. Skogg	0.60	Preparation of recent appellate documents for addition to electronic shared folders for attorney review; revisions to documents for chronological review set; research re documents needed for case files for attorney use
08/21/19	L. Cooley	0.70	Attend conference call re planning for oral argument
08/22/19	L. Cooley	3.00	Review government's reply brief for arguments that plaintiffs will need to respond to at oral argument; create chart of these arguments; begin research on possible responses to these arguments
08/23/19	G. Skogg	0.40	Research re case documents for attorney review; preparation of documents for attorney use
08/26/19	L. Cooley	2.00	Research re best responses to points raised by the government in their reply brief
08/26/19	J. Pesick	0.50	Team correspondence re case strategy
08/27/19	L. Cooley	2.00	Research re best responses to points raised by the government in their reply brief
08/27/19	J. Pesick	1.60	Review appellate briefs to prepare for moot oral argument
08/28/19	L. Cooley	3.00	Research re responses to points raised by the government in their reply brief

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
08/28/19	J. Pesick	0.10	Team correspondence re case strategy
08/29/19	J. Pesick	0.40	Prepare for moot oral argument
08/30/19	J. Pesick	0.10	Prepare for oral argument moot
08/30/19	G. Skogg	0.70	Research re documents for electronic shared folders for attorney review; correspondence with team attorney re case data; preparation of documents for attorney use
09/02/19	J. Pesick	1.20	Prepare for moot
09/03/19	J. Pesick	1.00	Prepare for moot
09/04/19	J. Pesick	4.00	Participate in oral argument moot
09/05/19	J. Pesick	0.90	Team correspondence re preparing for oral argument
09/10/19	A. Hemmings	0.80	Review administrative record for "integrity of blood supply" argument
09/11/19	J. Harding	0.20	Prepare for and attend moot on 4th Circuit argument
09/14/19	A. Hemmings	0.30	Look up AF number
09/15/19	A. Hemmings	6.00	Research 4th Circuit judges previous opinions re equal protection
09/16/19	A. Hemmings	0.30	Research 4th Circuit judges previous opinions re equal protection
09/17/19	A. Hemmings	0.50	Review "talking paper" document
09/20/19	J. Pesick	1.10	Listen to oral argument
09/23/19	G. Coffee	0.30	Exchange of emails with associates re oral argument in Fourth Circuit and status of District Court proceeding

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
09/25/19	G. Skogg	0.50	Research re documents for attorney review; preparation of documents for attorney use; revisions to case index for team attorneys
09/27/19	J. Pesick	0.10	Team correspondence re trial preparation
10/01/19	G. Skogg	0.40	Research re documents for attorney review; preparation of documents for attorney use; set up of access to case files for new team member
10/07/19	J. Pesick	1.70	Phone conference with J. Bauer re trial preparation; review expert reports to prepare order of proof for trial
10/07/19	G. Skogg	0.80	Research re documents for attorney review; preparation of documents for attorney binder for attorney use
10/08/19	J. Pesick	1.90	Meet with J. Bauer to prepare order of proof and findings of facts
10/11/19	G. Skogg	0.30	Research re expert documents for attorney review; preparation of documents for attorney use
10/14/19	G. Skogg	1.00	Research for team attorney re documents in trial exhibit sets; correspondence with attorneys re documents found in sets; preparation of documents for electronic shared folders for use by team attorneys
10/18/19	G. Skogg	1.00	Review and analysis of deposition text in preparation of designations for TextMap database; preparation of report on deposition designation run times for review by team attorneys; research re deposition videos needed for database for trial preparation
10/18/19	G. Skogg	0.90	Review and analysis of deposition text in preparation of designations for TextMap database; preparation of report on deposition designation run times for review by team attorneys; research re

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			deposition videos needed for database for trial preparation
10/21/19	G. Skogg	0.40	Research re deposition video files needed for attorney review; correspondence with court reporting services re video files; revisions to case index for attorney review

**Total Hours 1,916.00**

**Total for Legal Services \$1,149,372.70**

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**Timekeeper Summary**

<u>Attorney/Other Prof</u>	<u>Rank</u>	<u>Hours</u>
G. Coffee	Partner	18.10
A. Sommer	Partner	103.90
C. Frelinghuysen	Associate	68.00
J. Pesick	Associate	214.70
J. Harding	Associate	206.30
J. Drosick	Associate	61.30
L. Cooley	Associate	528.00
C. Parker	Associate	5.90
A. Hemmings	Associate	172.90
N. Garg	Associate	4.20
C. Parker	Associate	16.70
A. Hemmings	Associate	94.10
J. Grant	Associate	15.00
R. Miller	Associate	10.80
E. Rodriguez	Associate	45.50
M. Trucco	Associate	85.40
N. Wertheimer	Paralegal	7.50
G. Skogg	Paralegal	240.20
Z. LaBomascus	Paralegal	0.20
A. Hodgson	Paralegal	0.50
M. Vaught	Paralegal	0.60
S. Wesclitz	Library	3.00
T. Woodward	Library	1.10
G. McConnell	Of Counsel	2.00
C. Lundin	Library	1.60
E. Mastro	Practice Support	6.50
J. Ryder	Practice Support	2.00
<b>Total Attorney/Other Prof</b>		<b>1,916.00</b>

**WINSTON & STRAWN LLP**

35 West Wacker Drive  
Chicago, IL 60601-9703  
TAX ID NO. 36-1975990

Winston & Strawn (Pro Bono)  
Richard Roe and Victor Voe

**2019 Fee Summary**

Date 08/03/22  
Client Matter No. 999997.06131

For Legal Services Rendered Through December 31, 2019 In Connection With:  
**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
01/02/19	J. Bauer	0.50	Weekly conference call re strategy and schedule
01/02/19	L. Cooley	0.80	Attend conference call re current status of case
01/02/19	L. Gailey	0.70	Attend weekly conference call
01/02/19	G. Skogg	0.30	Preparation of documents for addition to electronic shared folders for attorney review
01/02/19	A. Sommer	0.60	Attend telephone conference re case status and strategy for Harrison and Roe and Voe matter
01/02/19	N. Wertheimer	0.50	Update case electronic files
01/03/19	L. Gailey	0.30	Review communications among case team and with opposing counsel re discovery disputes
01/04/19	L. Gailey	0.20	Review communications with opposing counsel re case management and discovery issues
01/07/19	J. Bauer	2.50	Review preliminary injunction papers, team emails, scheduling order, etc.
01/07/19	L. Cooley	5.70	Prepare all necessary documents for preliminary injunction, exhibits, and motion to seal exhibits; attend conference call re memorandum in support of motion for preliminary injunction
01/07/19	L. Gailey	0.90	Attend team conference call re motion for preliminary injunction
01/08/19	L. Cooley	4.60	Prepare all documents and motions necessary to file motion for preliminary injunctions, exhibits, and motion to seal exhibits

**WINSTON & STRAWN LLP**

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**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
01/09/19	J. Bauer	1.70	Review draft pi brief, related draft motions and orders; phone conferences with L. Cooley; review scheduling order, etc.
01/09/19	L. Cooley	4.90	Prepare all documents necessary to file motion for preliminary injunction, exhibits, and motion to seal; attend conference call re memorandum in support of preliminary injunction
01/09/19	L. Gailey	0.20	Review draft motion for preliminary injunction and communications among internal case team re same
01/10/19	J. Bauer	5.00	Phone conference with team re strategy decisions; review and revise filings; review draft Rule 26 disclosures
01/10/19	L. Cooley	4.80	Prepare documents associated with filing motion for preliminary injunction, including exhibits and motion to seal exhibits
01/10/19	L. Gailey	0.90	Attend conference call re motion for preliminary injunction; communicate with L. Cooley re same; review communications among case team re draft motion
01/11/19	J. Bauer	5.00	Attention to preliminary injunction filings and Rule 26 disclosures, emails with team
01/11/19	L. Cooley	10.70	Prepared motion for preliminary injunction; memorandum in support of motion for preliminary injunction; motion to seal; memorandum in support of motion to seal; exhibits; and other related documents; file the same
01/11/19	L. Gailey	2.00	Review and edit brief in preparation for filing; communicate with L. Cooley, J. Bauer, and co-counsel re same
01/11/19	A. Sommer	3.00	Analyze and comment on draft pleadings regarding motion for preliminary injunction, motion to seal,

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			and service of initial disclosures in Roe / Voe case and correspond with team re same; confer re deliberative process privilege and motion to compel documents allegedly subject to same
01/14/19	J. Bauer	1.00	Emails re protective order, etc.
01/14/19	L. Cooley	2.90	Draft protective order, motion for protective order, and electronically stored information order
01/15/19	J. Bauer	1.00	Conference call with L. Cooley re protective orders and written discovery
01/15/19	L. Cooley	4.10	Draft motion for protective order, protective order, and ESI order; research re first set of document requests, interrogatories, and requests for admissions
01/15/19	L. Gailey	0.90	Review motion for protective order and related papers
01/16/19	J. Bauer	5.00	Weekly team conference call; draft discovery, etc.
01/16/19	L. Cooley	2.80	Attend conference call re current status of the case; make final changes to motion for protective order, protective order, and ESI order; send orders to opposing counsel for agreement
01/16/19	A. Sommer	1.30	Attend telephone conference re case status and strategy; review draft protective order in Voe case
01/16/19	N. Wertheimer	1.40	Update case electronic pleadings files (Roe/Voe)
01/17/19	J. Bauer	4.00	Revise document requests; draft RFAs
01/17/19	L. Cooley	2.00	Prepare document requests, interrogatories, requests for admission; Prepare agreed upon protective order and ESI order
01/18/19	J. Bauer	4.00	Attention to protective order issues, including emails and phone conferences

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01/18/19	L. Cooley	5.00	Prepare proposed protective order; confer with government to get agreement; file motion to enter agreed upon proposed protective order, proposed protective order, and proposed ESI order; prepare requests for production, requests for admission, and interrogatories
01/18/19	L. Gailey	0.50	Attend weekly conference call; communicate with internal case team re motion for preliminary injunction
01/19/19	L. Cooley	1.00	Redact exhibits in order to comply with court order
01/20/19	L. Cooley	4.50	Redact documents to comply with court order; draft requests for production, requests for admission, interrogatories
01/20/19	L. Gailey	0.70	Communicate with internal case team re redacted documents; review same
01/21/19	L. Cooley	1.20	Edit requests for production, requests for admission, and interrogatories
01/21/19	L. Gailey	4.80	Review discovery documents and redactions; review motion to dismiss in Harrison case
01/22/19	J. Bauer	2.00	Review draft RFAs and interrogatories; phone conference with L. Cooley re same; review Supreme Court decision on transgender military ban
01/22/19	L. Cooley	4.10	Incorporate edits into Requests for Production, finalize and serve; edit requests for admission and interrogatories; file redacted exhibits
01/23/19	J. Bauer	1.50	Weekly team conference call; conference with W&S team re response to motion to dismiss
01/23/19	L. Cooley	4.20	Attend conference call re court's standing order re shutdown, preparing for reply and opposition drafting, and discovery; attend meet and confer in

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			Harrison to observe procedure to prepare for similar meetings in Roe/Voe; re-read department of defense and air force policies and instructions to ensure that requests for production, requests for admission, and interrogatories are comprehensive
01/23/19	L. Gailey	0.50	Communicate with J. Bauer and L. Cooley re drafting of opposition to motion to dismiss
01/24/19	J. Bauer	1.00	Review comments to draft RFAs; emails re same
01/24/19	L. Cooley	1.00	Edit requests for production and interrogatories; send to team for review; read reply to opposition to preliminary injunction and opposition to motion to dismiss in Harrison case in preparation of drafting similar motions in this case
01/25/19	J. Bauer	1.00	Review revisions to draft discovery, etc.
01/25/19	L. Cooley	1.20	Read government's opposition to preliminary injunction motion and motion to dismiss; begin review of appendix
01/25/19	G. Skogg	0.40	Research re documents needed for case files; preparation of documents for updates to electronic case files for attorney review
01/26/19	J. Bauer	2.00	Review defense memo in support of dismissal and in opposition to pi
01/26/19	L. Gailey	0.50	Analyze motion to dismiss and related paperwork
01/27/19	J. Bauer	0.60	Phone conference with L. Gailey and L. Cooley re brief
01/27/19	L. Cooley	0.70	Attend call re strategy for drafting opposition to motion to dismiss and reply to opposition to motion for preliminary injunction
01/27/19	L. Gailey	5.70	Analyze motion to dismiss and accompanying papers; communicate with internal case team re issues to address in opposition; draft same

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01/28/19	J. Bauer	4.00	Reread response to PI; phone conferences with team and with W&S team re preparation of reply, exhaustion argument, reenlistment, etc.
01/28/19	L. Cooley	6.50	Read New York case re APA claims re citizenship question in 2020 census for relevancy to out APA claims; review government's 1000 page appendix to their motion to dismiss and opposition to preliminary injunction; attend conference call re reply to opposition to preliminary injunction and opposition to motion to dismiss; research re exhaustion of administrative remedies
01/28/19	L. Gailey	8.40	Communicate with full case team re issues in response to motion to dismiss; draft brief shell and integrate existing text; draft introduction section
01/29/19	J. Bauer	2.50	Roe and Voe - Reviewing beginning of PI reply; review administrative record and draft discovery requests
01/29/19	L. Cooley	9.50	Finalized requests for production and interrogatories; draft section of reply/opposition to the governments opposition to preliminary injunction/motion to dismiss
01/29/19	L. Gailey	13.10	Draft sections of opposition to motion to dismiss; edit same; communicate with case team re same
01/29/19	A. Hemmings	4.30	Draft portion of the Opposition to the Motion to Dismiss for Roe v. Shanahan
01/30/19	J. Bauer	2.00	Roe and Voe - Attention to preliminary injunction filing
01/30/19	L. Cooley	11.20	Finalized and served requests for production and interrogatories; draft section of reply/opposition to the governments opposition to preliminary injunction/motion to dismiss; integrate comments on draft from various team members

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01/30/19	L. Gailey	16.50	Draft sections of opposition to motion to dismiss; edit same; communicate with case team re same
01/30/19	A. Hemmings	0.30	Incorporate citations into Opp to MTD PI Reply Draft
01/31/19	J. Bauer	4.00	Attention to Pl brief; emails and phone conferences with team
01/31/19	L. Cooley	10.20	Edit and integrate other team member's edits into updated draft of the brief; insert citations into brief; draft motion to seal; memorandum in support of motion to seal; edit declarations
01/31/19	L. Gailey	1.50	Communicate with case team re edits to brief; review same
02/01/19	J. Bauer	4.50	Attention to preliminary injunction brief and related filings
02/01/19	L. Cooley	6.60	Edit, finalize and file opposition to motion to dismiss and reply to opposition to preliminary injunction; file motion to seal and exhibits; redact exhibits
02/01/19	L. Gailey	5.00	Review final round of edits to reply in support of motion for preliminary injunction; communicate with case team re same; proofread same in preparation for filing
02/01/19	A. Sommer	6.10	Prepare for and attend hearing re motion to compel re deliberative process privilege and confer with J. Harding re same; analyze and revise draft reply in support of motion for preliminary injunction (Roe / Voe) and opposition to motion to dismiss under rules 12(b)(1) and 12(b)(6)
02/04/19	G. Skogg	0.50	Research re documents for addition to electronic shared folders for attorney review; preparation of ftp site for delivery of medical records for attorney review

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02/05/19	J. Bauer	2.50	Review appendices and brief
02/05/19	L. Cooley	0.20	Review 30(b)(6) motion from related case to determine what needs to be done in this case
02/05/19	L. Gailey	0.40	Review discovery dispute filing in Harrison matter
02/06/19	J. Bauer	4.50	Review appendices, declaration, work on draft discovery, weekly conference call re strategy
02/06/19	L. Cooley	4.60	Draft 30(b)(6) notice; attend conference call re current status of case
02/06/19	L. Gailey	1.30	Review and edit draft 30(b)(6) deposition notice; attend weekly conference call
02/06/19	G. Skogg	0.60	Research re documents for addition to electronic shared folders for attorney review; preparation of documents for attorney use; set up of ftp link for medical records for case files; preparation of medical records received for attorney review
02/07/19	J. Bauer	3.00	Emails, conferences re plaintiffs' discovery requests; review defense responses; prepare for team meeting, etc.
02/07/19	L. Cooley	4.00	Drafted second set of requests for production, requests for admission, and interrogatories; draft 30(b)(6) notice; reviewed defendants objections to first set of requests for production
02/07/19	L. Gailey	0.80	Communicate with J. Bauer and L. Cooley re discovery strategy
02/08/19	L. Cooley	6.00	Draft second set of requests for production, requests for admission, and interrogatories; edit 30(b)(6) notice; review defendants brief and appendix to ensure that all topics are covered by requests; reviewed defendants objections to first set of requests for production with eye towards drafting response; reviewed response to defendants objections in related Harrison case with eye

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			towards drafting a response to objections in this case; organize room reservations and lunch for meetings next week;
02/08/19	G. Skogg	0.60	Conference with litigation support personnel re encrypted documents on disc for attorney review; research re documents for addition to electronic shared folders for attorney review; preparation of documents for attorney use
02/10/19	J. Bauer	2.00	Review government reply brief, draft discovery, emails re same
02/11/19	J. Bauer	2.70	Phone conference with L. Cooley re draft discovery, draft agenda and team meeting; emails re depositions
02/11/19	L. Cooley	3.10	Incorporate edits into requests for production, interrogatories, requests for admission, and 30(b)(6) notice; draft motion to compel production of documents in response to defendants' objections
02/11/19	L. Gailey	0.80	Review draft discovery requests and communications re depositions; research procedural rules re depositions
02/11/19	G. Skogg	0.40	Research re documents received from DOJ personnel for addition to electronic case files for attorney review; conference with litigation support personnel re encrypted documents and issues with extracting documents
02/12/19	J. Bauer	3.00	Phone conferences re strategy; meeting and confer re depositions; work on agenda for meeting
02/12/19	L. Cooley	5.50	Attend meet and confer re deposition; attend internal meeting re deposition; edit and incorporate edits into discovery requests and 30(b)(6) notice; draft motion to compel production of documents
02/12/19	L. Gailey	2.30	Review draft deposition notices; attend meet-and-confer with opposing counsel; communicate with

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			case team re strategy
02/12/19	G. Skogg	0.30	Conference with litigation support personnel re encrypted documents and issues with extracting documents; preparation of documents received from DOJ personnel for addition to electronic case files for attorney review; correspondence with team attorneys re medical records received
02/13/19	J. Bauer	4.50	Meet and confer re document requests; weekly team conference call
02/13/19	L. Cooley	6.30	Attend internal strategy meeting; attend meet and confer re government objections to discovery requests; review government discovery requests; finalize and serve second set of discovery requests and 30(b)(6) notice; create calendar for Roe and Harrison with all remaining deadlines; prepare for moot argument
02/13/19	L. Gailey	0.90	Attend weekly conference call
02/13/19	A. Sommer	3.70	Analyze issues related to Navy's document production and consider issues related to issuing a subpoena to the Department of the Navy and prepare same; attend meet and confer re document production in Roe / Voe case
02/14/19	J. Bauer	8.50	Prepare for and conference with S. Schoettes and team to prepare for preliminary injunction hearing
02/14/19	L. Cooley	7.00	Prepare for moot of argument; prepare binder for argument; attend moot for argument
02/14/19	L. Gailey	5.10	Moot argument re preliminary injunction and motion to dismiss; prepare for hearing
02/14/19	J. Harding	1.00	Participate in Roe moot
02/15/19	J. Bauer	10.00	Conference with D. Sommer re staffing and strategy; attend preliminary injunction hearing; review memorandum opinion; conference with

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			team re strategy, staffing, etc.
02/15/19	L. Cooley	5.00	Attend hearing on Motion to Dismiss and Motion for Preliminary Injunction; attend strategy meeting re progression of the case and discovery
02/15/19	L. Gailey	8.00	Travel to and attend hearing re preliminary injunction and motion to dismiss; attend discovery strategy meeting
02/15/19	G. Skogg	0.40	Research re documents for addition to electronic shared folders for review by team attorneys; preparation of documents for attorney use
02/16/19	J. Pesick	1.40	Review court opinion in Roe/Voe
02/17/19	J. Bauer	5.00	Emails re staffing depositions; Air National Guard member; work on order of proof for trial
02/17/19	L. Gailey	3.80	Communicate with case team re scope of order and various discovery issues
02/18/19	J. Bauer	4.00	Work on order of proof; deposition scheduling; emails re QS
02/18/19	L. Gailey	1.20	Communicate with case team re scope of order, strategy for obtaining relief for Air National Guard declarant
02/19/19	L. Cooley	5.00	Update calendar re depositions; draft objections to Defendants first set of requests for production, first set of requests for admission, and first set of interrogatories; prepare deposition outline for deposition of A. Wiesen; arrange conference room, videographer, court reporter, and other logistics for depositions this week
02/19/19	L. Gailey	2.70	Communicate with case team re scope of injunction order; review filings and order re same; communicate with case team re extension for declarant

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02/19/19	G. Skogg	0.30	Preparation of documents for addition to electronic shared folders for attorney review
02/20/19	J. Bauer	3.50	Weekly team call; calls/emails re depositions, etc.
02/20/19	L. Cooley	7.00	Draft outline for deposition; draft objections to defendants' first requests for admission, requests for production, and interrogatories
02/20/19	L. Gailey	1.50	Attend weekly conference call; communicate with case team re discovery
02/20/19	A. Sommer	1.90	Confer with L. Cooley re preparation of objections to written discovery requests on Roe, Voe, Harrison, and OutServe; correspondence with R. Norway re Mr. Melillo deposition and production of witnesses re topics 15 and 16; confer with team re case status and strategy
02/21/19	J. Bauer	1.00	Emails with team
02/21/19	G. Eaton	2.00	Review trial court briefing on dismissal and injunction
02/22/19	J. Bauer	0.50	Emails re case
02/22/19	L. Gailey	0.60	Communicate with case team re discovery issue
02/24/19	J. Bauer	1.00	Review material circulated by A. Sommer; emails re discovery
02/25/19	J. Bauer	1.00	Emails re depositions; review Wiesen rough transcript
02/25/19	G. Eaton	1.60	Review case complaint; begin review of key cases
02/25/19	L. Gailey	0.40	Communicate with G. Eaton re possible government appeal; communicate with case team re discovery
02/26/19	J. Bauer	2.50	Phone conferences with A. Sommer; review DOD reports to Congress

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02/26/19	L. Gailey	1.10	Communicate with case team re discovery issues; review discovery documents
02/26/19	C. Pace	1.50	Process and load documents to database for review by case team
02/26/19	G. Skogg	0.60	Preparation of client documents received for addition to database for attorney review; correspondence with litigation support personnel re database needed and documents for attorney review; correspondence with team attorneys re medical record issues
02/27/19	J. Bauer	6.50	Begin preparing for K. Cron deposition, weekly team conference call; emails /conference calls with A. Sommer; attention to travel, etc.
02/27/19	L. Gailey	3.20	Analyze due process privilege hearing transcript; attend weekly conference call; communicate with case team re discovery issues
02/27/19	K. Howard	0.80	Background research in connection with two military doctors; requested by J. Bauer
02/27/19	C. Pace	0.50	Enable and troubleshoot access to database for additional users
02/27/19	G. Skogg	0.80	Research re documents for addition to electronic shared folders for the Harrison and Roe cases for attorney review; preparation of documents for case files for attorney use
02/28/19	J. Bauer	5.50	Work on discovery, etc.
02/28/19	L. Gailey	0.20	Review discovery papers
02/28/19	K. Howard	1.00	Background research re military doctors, Colonel Kevin Cron with the Department of Defense in Tampa, Florida, and Dr. Devin Kelly with the Air Force, currently at Wright Patterson AFB in Dayton, Ohio; requested by J. Bauer

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02/28/19	C. Pace	0.70	Set up and run production, stamp and export same; compress files and copy up to mft link for case team transfer to opposing counsel
02/28/19	G. Skogg	0.40	Preparation of documents for production and delivery to outside counsel for review; preparation of documents for electronic shared folders for use by team attorneys
03/01/19	L. Gailey	0.10	Analyze OutServe witness deposition summary
03/01/19	K. Howard	1.30	Research related to military policies affecting HIV servicemen; requested by J. Bauer
03/01/19	S. Wesclitz	0.30	Obtain full LinkedIn profiles re Col. Kevin Cron and Dr. Devin Kelly for J. Bauer
03/03/19	J. Bauer	5.50	Review defendants' discovery responses; review notes for Cron deposition; conference call re strategy with A. Sommer, P. Perkowski and S. Schoettes; attention to discovery, etc.
03/03/19	A. Sommer	2.40	Prepare for and conduct case management meeting re case strategy and requested relief for Harrison and Roe/Voe cases
03/04/19	J. Bauer	4.70	Meet and confer with defense counsel; emails re discovery issues; begin deposition preparation
03/04/19	L. Gailey	0.20	Communicate with J. Bauer re claims
03/04/19	A. Sommer	1.20	Analyze and revise case plan for Roe/Voe and Harrison cases; confer with case team re 2018 and 2014 reports and identifying all potential rational bases for government's conduct, and identifying hot documents for trial in the Harrison case; correspondence related to deposition notice to the Secretary of the Air Force
03/05/19	J. Bauer	4.50	Preparation for upcoming depositions; review additional admin record, etc.

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03/05/19	L. Gailey	0.80	Review discovery documents and communications re same
03/05/19	G. Skogg	0.80	Preparation of deposition documents for review by team attorneys; updates to Harrison and Roe case filings and discovery responses for attorney review
03/06/19	J. Bauer	7.00	Work on D. Kelly outline; phone conferences with A. Sommer; conference with C. Parker re age-related research; emails re Soper deposition
03/06/19	L. Gailey	0.60	Review discovery materials
03/07/19	G. McConnell	0.50	Telephone conference with P. Perkowski re counsel roles
03/08/19	J. Bauer	5.50	Prepare for upcoming depositions; review draft discovery responses, etc.
03/08/19	G. Skogg	0.20	Research re medical records sent to outside counsel for review; correspondence with outside counsel re research
03/08/19	A. Sommer	0.40	Correspond with J. Bauer re potential MIL related to Harrison's background and potential motion for summary judgment in the Roe / Voe case
03/09/19	J. Bauer	5.00	Prepare for Kelly and Cron depositions
03/10/19	J. Bauer	5.00	Preparation for K. Cron deposition; phone conference with A. Sommer, P. Perkowski and S. Schoettes
03/12/19	J. Bauer	5.00	Prepare for Kelly deposition; emails re expert reports, etc.
03/13/19	J. Bauer	10.00	Deposition of D. Kelly; emails with team
03/14/19	J. Bauer	9.00	Prepare for K. Cron deposition; emails re discovery, travel to Tampa, etc.

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03/14/19	L. Gailey	0.60	Analyze deposition transcripts
03/15/19	J. Bauer	8.20	Depose K. Cron; emails re experts, discovery, etc.
03/18/19	J. Bauer	4.50	Prepare summary of K. Cron deposition; emails re medical experts; phone conference with D. Sommer; emails re DDP
03/20/19	J. Bauer	4.00	Review expert reports, conference call re same; meet and confer re DPP, etc.
03/20/19	L. Gailey	3.40	Draft chart of claims and regulations
03/21/19	L. Gailey	2.20	Draft chart of claims and regulations
03/22/19	J. Bauer	5.50	Attention to expert reports; review DPP motion; conference with C. Parker and research re age restrictions, etc.
03/22/19	L. Gailey	2.00	Review and edit motion to compel; attend call with expert re report
03/22/19	A. Sommer	0.50	Analyze and revise draft motion to compel documents withheld in the Roe and Voe cases on deliberative process privilege grounds
03/23/19	L. Gailey	0.50	Review deposition transcripts
03/25/19	J. Bauer	1.00	Emails re alteration of injunction, etc.
03/26/19	J. Bauer	1.50	Phone conference with team re upcoming tasks, etc.
03/26/19	L. Gailey	0.30	Review deposition transcripts; review draft opposition to motion for stay
03/27/19	J. Bauer	0.50	Attention to emails
03/27/19	L. Gailey	2.50	Review and edit opposition to stay; communicate with case team re same
03/28/19	J. Bauer	4.00	Conference with L. Gailey re summary judgment;

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			review and edit reply brief re DPP; attention to discovery issues, etc.
03/28/19	L. Gailey	0.30	Communicate with J. Bauer re strategy for summary judgment motion
03/29/19	A. Sommer	6.40	Prepare for and attend hearings on Roe / Voe and Harrison cases and discuss same with J. Harding and L. Cooley; analyze Defendants objections to magistrate's order on motion to compel documents withheld on privilege grounds; coordinate drafting response with team
04/02/19	J. Bauer	1.00	Emails re recently produced documents, etc.
04/02/19	L. Gailey	0.30	Review hot documents
04/03/19	J. Bauer	1.50	Review and revise response to objections to magistrate judge's ruling; attention to emails, etc.
04/05/19	J. Bauer	0.50	Attention to discovery, etc.
04/09/19	J. Bauer	0.50	Conference with G. McConnell re staffing
04/10/19	J. Bauer	1.00	Team calls, conferences
04/10/19	L. Gailey	1.10	Communicate with J. Bauer re summary judgment strategy
04/12/19	J. Bauer	1.50	Phone conference with A. Sommer; conference with J. Drosick re organizational standing research
04/16/19	J. Bauer	0.20	Review notice of appeal, emails re same
04/16/19	L. Gailey	5.30	Analyze preliminary injunction order and hearing transcript; draft memorandum re possible grounds for summary judgment
04/17/19	J. Bauer	1.00	Weekly conference call re strategy and next steps
04/17/19	G. Eaton	3.20	Review notice of appeal; review Fourth Circuit appellate rules; begin drafting appellate timeline;

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			begin reviewing opinion; teleconf with team re appeal; email exchange with L. Gailey re scope of appellate jurisdiction
04/17/19	L. Gailey	8.20	Analyze filings for use in formulating summary judgment strategy; research appealability issues; communicate with G. Eaton re same; attend weekly conference call
04/18/19	J. Bauer	0.50	Emails re discovery, etc.
04/19/19	G. Eaton	0.30	Teleconf with L. Gailey re appellate issues, process, staffing
04/19/19	L. Gailey	1.30	Communicate with G. Eaton re appellate strategy, timeline, and staffing; review Fourth Circuit rules
04/20/19	L. Gailey	0.10	Review Fourth Circuit rules
04/23/19	L. Gailey	5.50	Analyze deposition transcripts and other discovery papers
04/24/19	J. Bauer	0.50	Attention to emails, etc.
04/24/19	L. Gailey	5.80	Analyze deposition transcripts and other discovery papers
04/25/19	J. Bauer	4.50	Conference with A. Sommer re work to be done; emails/conferences with G. Skogg, L. Cooley re follow up tasks, etc.
04/25/19	L. Gailey	5.80	Analyze deposition transcripts and other discovery papers; review Fourth Circuit rules and procedures; draft admission and appearance paperwork
04/26/19	L. Gailey	7.00	Analyze district court opinion and related documents; review Eastern District of Virginia summary judgment procedures; draft preliminary outline for possible motion for summary judgment
04/29/19	J. Bauer	5.50	Begin deposition review, send sample motions to

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			L. Cooley, emails re status, etc.
04/29/19	G. Eaton	0.30	Review, edit, and approve notices of appearance
04/29/19	L. Gailey	5.20	Analyze district court opinion and draft memorandum re summary judgment strategy; communicate with L. Cooley re same
04/30/19	J. Bauer	5.00	Review G. Palumbo and beginning of M. Soper deposition, start proposed findings of fact
04/30/19	L. Gailey	6.70	Analyze documents and deposition transcripts; draft memorandum re summary judgment strategy
05/01/19	J. Bauer	3.50	Finish review of Soper deposition, review memo re affirmative summary judgment and conference with L. Gailey
05/01/19	L. Gailey	6.70	Analyze documents and deposition transcripts; communicate with L. Cooley re documents; draft memorandum re summary judgment strategy; communicate with J. Bauer re same
05/02/19	J. Bauer	5.50	Continued deposition review, work on trial strategy
05/02/19	L. Gailey	0.30	Review deposition summary and related communication
05/03/19	J. Bauer	3.50	Review transcript of A. Taylor deposition; emails re rebuttal reports, etc.
05/03/19	L. Gailey	0.30	Review government's motion and other related filings
05/04/19	L. Gailey	0.40	Communicate with case team re procedural rules that apply to response to motion to dismiss
05/05/19	L. Gailey	0.30	Communicate with case team re response to motion to dismiss
05/06/19	J. Bauer	3.50	Review motion to dismiss, review memo re

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			organizational standing, conference re follow up research, phone conference re motion
05/06/19	L. Gailey	1.30	Attend conference call re strategy for response to motion to dismiss; review same
05/07/19	J. Bauer	3.50	Review depositions, work on strategy
05/07/19	G. Eaton	0.40	Review appeal timeline; discuss DOJ failure to file docketing statement with L. Gailey; draft email to working group re same
05/07/19	L. Gailey	0.60	Review court rules applicable to government's submissions; communicate with G. Eaton re same
05/08/19	J. Bauer	4.00	Weekly conference call with team, review Shell deposition, conference with A. Sommer re trial strategy and relief sought
05/08/19	L. Gailey	1.50	Attend weekly conference call; communicate with J. Bauer and L. Cooley re summary judgment strategy
05/09/19	J. Bauer	5.00	Phone conference with trial team re strategy; review deposition transcripts, etc.
05/09/19	L. Gailey	0.50	Communicate with case team re summary judgment strategy
05/10/19	J. Bauer	4.50	Review G. Brown deposition; travel arrangements; phone conference with A. Sommer re strategy, etc.
05/10/19	L. Gailey	0.20	Communicate with J. Bauer and L. Cooley re summary judgment strategy; review draft response to motion to dismiss
05/13/19	J. Bauer	6.00	Conferences re pretrial conference, required submission; work to prepare for trial; review transcript of P. Ciminera
05/13/19	G. Eaton	0.90	Review Department of Justice docketing statement, email group re same; review 4th Circuit

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			rules re same; review Department of Justice proposed appendix doc list, email group re same
05/13/19	L. Gailey	0.20	Review draft response to motion to dismiss
05/14/19	J. Bauer	4.70	Review transcript of Aswell deposition; phone conference re pretrial conference; phone conference with D. Sommer re trial, etc.
05/14/19	G. Eaton	1.40	Prepare for meeting with S. Schoette; meet with S. Schoettes, L. Gailey re appellate issues; research local rules on docketing statement etc.; email with S. Schoette
05/14/19	L. Gailey	2.00	Review government's Fourth Circuit filings; meet with G. Eaton and S. Schoettes re strategy on appeal
05/15/19	J. Bauer	7.50	Weekly conference call; prepare for Pre-trial conference; review expert reports; travel to DC
05/15/19	G. Eaton	1.30	Review L. Cooley edits to proposed joint appendix index; email exchanges with L. Cooley, L. Gailey; begin review of key injunction cases
05/15/19	L. Gailey	5.10	Attend weekly conference call; review and edit record designations; communicate with L. Cooley and G. Eaton re same; review record documents
05/16/19	J. Bauer	14.00	Attend final pretrial conference, conference with team re pretrial strategy, review J. Blaylock deposition transcript, travel home
05/16/19	G. Eaton	0.50	Review revised list of appendix designations; email exchanges with L. Gailey re same; circulate to DOJ
05/16/19	L. Gailey	5.50	Attend trial strategy meeting
05/17/19	J. Bauer	2.00	Finish reviewing J. Blaylock deposition transcript, emails with team

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05/17/19	L. Gailey	0.80	Review filings; communicate with L. Cooley and G. Eaton re record on appeal
05/20/19	J. Bauer	2.50	Review draft undisputed facts, work on to do list, trial logistics
05/20/19	L. Gailey	1.20	Communicate with G. Eaton re record on appeal; review S. Schoettes analysis
05/21/19	J. Bauer	2.50	Prepare for trial
05/21/19	G. Eaton	0.30	Email correspondence with J Xi, L Cooley, L Gailey re Fourth Circuit issues
05/22/19	J. Bauer	3.50	Weekly phone conference re status and strategy, work on exhibit and witness issues, review DPP order, etc.
05/22/19	G. Eaton	0.50	Address signature block issue with group; task L. Cooley with preparing brief shell; begin planning brief
05/22/19	L. Gailey	1.00	Communicate with G. Eaton and L. Cooley re documents to be filed; attend weekly conference call; analyze opinion re deliberative process privilege
05/23/19	L. Cooley	7.70	Prepare exhibit list; review documents for exhibit list; attend meet and confer regarding deliberative process privilege motion in Roe case in light of the district court's ruling in the Harrison case on the deliberative process privilege
05/23/19	G. Eaton	0.60	Emails with S. Schoettes, J. Xi re appearance/signature issue; research standard of review for appeal
05/24/19	J. Bauer	5.50	Attention to undisputed facts, exhibit and witness list, review depositions, etc.
05/24/19	G. Eaton	1.40	Review opinion in Harrison motion to compel; review governing law; continue preparing for Voe

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			brief
05/26/19	J. Bauer	1.50	Rereview Melillo deposition
05/28/19	J. Bauer	4.00	Conferences with A. Sommer re pretrial disclosures, emails re extension, review Tumminello deposition
05/28/19	G. Eaton	2.30	Review DOJ opening brief; emails to J. Harding, L. Gailey, L. Cooley, team re same
05/28/19	L. Gailey	2.60	Communicate with G. Eaton and L. Cooley re brief skeleton; analyze opening brief and appendix
05/29/19	J. Bauer	5.50	Conference calls re exhibit list, preparation for motion to dismiss hearing, weekly team call
05/29/19	G. Eaton	5.10	Complete initial review of DOJ brief; perform detailed review of same; make notes for response brief; email exchanges with team re next steps; teleconference with L. Gailey, L. Cooley re same
05/29/19	L. Gailey	3.80	Attend weekly conference call; analyze government's opening brief; meet with G. Eaton and L. Cooley re strategy on appeal
05/30/19	J. Bauer	5.50	Emails re hearing, conference call re exhibits, work on dep designations, etc.
05/30/19	G. Eaton	5.20	Continue reviewing materials for appellate brief; email exchanges with L. Cooley, L. Gailey re same; call with L. Cooley, L. Gailey to prepare for group call; group call with L. Cooley, L. Gailey, J. Harding, S. Schoettes, J. Bauer; research supplementation of appellate record
05/30/19	L. Gailey	6.60	Attend conference calls with appellate team; analyze government brief; research procedural issue re amicus briefs
05/31/19	J. Bauer	0.50	Attention to emails re jurisdiction hearing

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05/31/19	G. Eaton	5.10	Continue work on response brief; discussions with L. Cooley, L. Gailey re same
05/31/19	L. Gailey	0.30	Communicate with G. Eaton and L. Cooley re outline
05/31/19	G. Skogg	1.00	Preparation of documents for delivery to expert and to client for review; addition of documents to electronic case folders for attorney review
06/03/19	J. Bauer	6.00	Work on deposition designations, exhibit list, undisputed facts
06/03/19	G. Eaton	2.40	Continue work on response brief; email exchange with L. Cooley, L. Gailey re same
06/03/19	L. Gailey	5.40	Research decisions and scholarship re nationwide injunctions
06/04/19	J. Bauer	4.50	Conference call re exhibit list, revise witness list, begin review of Aswell deposition for designations
06/04/19	G. Eaton	1.90	Review L. Cooley draft outline of APA argument; continue work on outline of remaining sections
06/04/19	L. Gailey	9.30	Research scholarship and opinions re nationwide injunctions; outline brief section
06/05/19	J. Bauer	6.00	Review depositions of Aswell, Palumbo for designations, attention to pretrial filings, weekly conference call re status and strategy
06/05/19	G. Eaton	6.50	Continue work on response brief; email exchanges re same with L. Gailey, L. Cooley
06/05/19	L. Gailey	8.10	Research standard of review issues; draft summary of same; communicate with G. Eaton re same; research issues related to nationwide injunctions; draft summary judgment outline; attend weekly conference call
06/06/19	J. Bauer	3.50	Work on trial list

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06/06/19	G. Eaton	5.20	Continue work on response brief; review L. Cooley draft of irreparable harm argument
06/06/19	L. Gailey	3.30	Review discovery materials; read case law relevant to appeal; attend telephone conference with G. Eaton and co-counsel re amici
06/07/19	J. Bauer	3.00	Review emails, voicemail; review L. Lute deposition transcript
06/07/19	G. Eaton	3.40	Teleconference with L. Gailey, S. Schoettes, P. Perkowski re amici; continue work on brief
06/07/19	L. Gailey	6.50	Review appellate brief outline; read case law; review documents
06/08/19	G. Eaton	4.10	Continue work on brief and outline
06/09/19	J. Bauer	1.00	Phone conference with D. Sommer re work to be done
06/09/19	G. Eaton	5.90	Continue work on brief and outline
06/10/19	J. Bauer	5.50	Conference call re trial preparation, review depositions, exhibit list, etc.
06/10/19	G. Eaton	2.30	Finish initial outline, circulate to working group with cover memo
06/10/19	L. Gailey	3.40	Analyze and refine appeal outline; review documents from new production
06/11/19	J. Bauer	4.00	Conference call re trial logistics, review deposition transcripts, etc.
06/11/19	G. Eaton	3.30	Teleconference with working group re brief outline, extension issue, argument timing issue; teleconference with J Xi (DOJ re same); second teleconference with J Xi re same; continue work on brief

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06/11/19	L. Gailey	2.80	Communicate with D. Sommer re motion for summary judgment; draft outline for same; meet with appeal team re initial outline
06/12/19	J. Bauer	5.00	Review deposition transcripts for D. Kelly and K. Cron, weekly team conference call, phone conference with D. Sommer re OutServe and scope of relief
06/12/19	G. Eaton	5.50	Email exchange with J. Xi (DOJ) re extension; continue drafting response brief
06/12/19	L. Gailey	0.40	Attend weekly conference call
06/12/19	G. Skogg	0.30	Preparation of document set for delivery to case expert for review; correspondence with expert re documents for review
06/13/19	J. Bauer	1.00	Phone conferences re staffing, work to be done
06/13/19	G. Eaton	5.60	Review and edit draft motion to extend time; teleconf with J. Xi re same; continue drafting response brief
06/13/19	L. Gailey	1.40	Edit motion for extension; communicate with G. Eaton and L. Cooley re same
06/13/19	G. Skogg	1.80	Research re documents for expert report exhibits; preparation of documents for electronic shared folders for attorney review; preparation of documents for service with expert report
06/14/19	J. Bauer	7.50	Deposition designations for D. Kelly and K. Cron, emails re exhibit objections, etc.
06/14/19	L. Gailey	0.20	Communicate with case team re extension
06/15/19	L. Gailey	0.30	Analyze email re potential amicus
06/17/19	G. Eaton	4.10	Continue drafting response brief; email working group re same

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06/18/19	J. Bauer	5.00	Emails re discovery ruling, work on J. Blaylock deposition designations
06/18/19	G. Eaton	5.10	Meet with L. Cooley to discuss brief questions; continue drafting response brief
06/19/19	J. Bauer	5.00	Work on Blaylock deposition designations, weekly team conference call, conference call re logistics, conference call with D. Sommer re additional exhibits, depositions, etc.
06/19/19	G. Eaton	3.10	Continue work on response brief
06/19/19	G. Skogg	0.50	Preparation of documents for delivery to case expert and to client for review; preparation of documents for electronic shared folders for attorney use
06/20/19	J. Bauer	2.50	Emails re trial logistics, possible order of proof
06/20/19	G. Eaton	3.30	Continue drafting response brief
06/21/19	J. Bauer	3.30	Emails, phone conferences re possible amicus brief, possible demonstratives, begin review of Kelly deposition designations
06/21/19	G. Eaton	3.10	Continue work on response brief
06/21/19	L. Gailey	0.30	Review docket and scheduling order; communicate with case team re same
06/21/19	G. Skogg	0.30	Preparation of case file documents for delivery to expert and outside counsel for review
06/22/19	J. Bauer	4.00	Review deposition designations for Kelly and Cron
06/24/19	J. Bauer	5.50	Work on deposition designations, begin review of Soper deposition, conference with M. Trucco, emails with A. Sommer
06/24/19	G. Eaton	3.30	Continue work on response brief

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
06/24/19	L. Gailey	2.50	Communicate with G. Eaton re strategy and issues on appeal; prepare summary judgment outline
06/25/19	J. Bauer	2.70	Continue review of M. Soper deposition, etc.
06/25/19	G. Eaton	1.60	Continue revising response brief
06/26/19	J. Bauer	5.00	Finish Soper designations, begin A. Wiesen review
06/26/19	G. Eaton	2.10	Continue revising response brief
06/27/19	J. Bauer	3.50	Review deposition subpoenas, emails to D. Sommer
06/27/19	G. Eaton	2.40	Continue revising response brief
06/27/19	L. Gailey	3.30	Edit draft appellate brief; communicate with case team re issues on appeal and potential waiver argument
06/28/19	J. Bauer	3.50	Rereview of Soper and Wiesen depositions for designations
06/28/19	G. Eaton	7.50	Finalize and circulate draft response brief; discussions with L. Cooley, L. Gailey re same; review draft sections from L. Cooley
06/28/19	L. Gailey	5.60	Edit Fourth Circuit brief; research waiver standard; draft text addressing host-country restrictions argument; communicate with G. Eaton and L. Cooley re same
06/29/19	L. Gailey	1.00	Draft outline of motion for summary judgment, review documents and email communications re same
06/30/19	L. Gailey	9.40	Draft outline of motion for summary judgment, review documents and email communications re same
07/01/19	J. Bauer	5.70	Review deposition transcripts of P. Ciminera, L.

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			Lute for designations, review draft motion re Danaher, etc.
07/01/19	L. Gailey	1.90	Draft outline of motion for summary judgment; communicate with D. Sommer re same
07/02/19	J. Bauer	3.50	Deposition designations for L. Lute, emails re additional depositions, etc.
07/02/19	L. Gailey	2.90	Draft outline of motion for summary judgment, review documents and email communications re same
07/03/19	J. Bauer	4.20	Weekly conference call, send deposition designations, update to do list, attention to other trial prep
07/03/19	G. Eaton	3.20	Email exchanges with S. Schoettes, group re structure, focus of brief; continue work on brief
07/03/19	L. Gailey	1.10	Attend weekly telephone conference
07/06/19	G. Eaton	1.40	Begin review of S. Schoettes revisions
07/06/19	L. Gailey	0.50	Communicate with case team re appellate brief
07/07/19	G. Eaton	2.70	Continue review of S. Schoettes revisions
07/08/19	G. Eaton	3.30	Email discussion of brief structure with A. Sommer, L. Gailey, L. Cooley; continue reviewing/revising S. Schoettes draft of brief
07/08/19	L. Gailey	0.20	Communicate with D. Sommer re summary judgment motion; review comments to draft outline; communicate with appeal team re draft brief
07/09/19	G. Eaton	0.90	Revise motion for extension, recirculate; review analysis re equivalents
07/09/19	G. Eaton	5.20	Teleconference with D. Sommer re brief; continue revising brief

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07/09/19	L. Gailey	2.10	Communicate with D. Sommer re summary judgment outline; communicate with L. Cooley re scope of review
07/10/19	G. Eaton	7.50	Continue revising response brief; circulate draft to team
07/10/19	L. Gailey	1.00	Attend weekly conference call; communicate with G. Eaton re appellate brief; communicate with L. Cooley re summary judgment brief
07/11/19	G. Eaton	1.60	Email exchanges with L. Gailey, A. Sommer, S. Schoettes re next steps on briefs; teleconf with S. Schoettes re same
07/11/19	L. Gailey	6.20	Communicate with case team re appellate strategy; edit introduction and statement of facts for summary judgment motion; draft argument
07/12/19	J. Bauer	4.00	Review Peel deposition, begin review of Murray deposition
07/12/19	L. Gailey	7.00	Draft outline of motion for summary judgment, review documents re same; communicate with L. Cooley re same
07/12/19	M. Vaught	1.20	Review online court docket and update Harrison and Roe case files re recent court filings; prepare ftp delivery of all docket filings per L. Cooley
07/13/19	L. Gailey	0.80	Draft outline of motion for summary judgment; communicate with D. Sommer re same
07/15/19	J. Bauer	3.50	Phone conference with A. Sommer re current status, strategy, etc.
07/15/19	L. Gailey	3.20	Revise motion for summary judgment; communicate with case team re same
07/16/19	J. Bauer	0.30	Emails re additional investigation

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07/16/19	G. Eaton	2.60	Review S. Schoettes revisions to brief; further revise brief; recirculate to S. Schoettes; teleconf with A. Sommer re same; meeting with L. Gailey re same
07/16/19	L. Gailey	6.60	Review draft brief; communicate with G. Eaton and L. Cooley re same; communicate with G. Eaton re oral argument
07/17/19	J. Bauer	4.50	Weekly conference call re strategy, review and comment on revised appellate brief
07/17/19	G. Eaton	3.50	Review revised drafts and edits from S. Schoettes, L. Gailey; circulate revised comprehensive draft to L. Cooley for cite-check etc.; email DOJ re amicus consents; further review of edits, recirculate to group; discuss oral argument issue with G. McConnell
07/17/19	L. Gailey	7.00	Edit appellate brief; communicate with case team re same
07/18/19	J. Bauer	4.00	Review and revise brief re motion to compel, forward proposed witness assignments, review equal protection research and forward same, other trial prep
07/18/19	G. Eaton	6.60	Finalize and file response brief
07/18/19	L. Gailey	6.50	Edit and finalize response brief for filing; communicate with case team re same
07/19/19	J. Bauer	0.50	Phone conference with D. Sommer re status and strategy
07/19/19	G. Eaton	0.40	Review motion to stay trial issue, respond to A. Sommer
07/19/19	L. Gailey	3.20	Edit summary judgment motion; communicate with case team re same; analyze government's motion to stay trial; communicate with case team re same

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07/20/19	J. Bauer	5.00	Review and revise affirmative summary judgment motion, review Shell deposition for designations
07/20/19	L. Gailey	1.20	Communicate with case team re motion for summary judgment and appellate brief
07/21/19	L. Gailey	0.30	Communicate with case team re motion for summary judgment
07/22/19	J. Bauer	5.50	Designations for D. Shell, email re delegation of authority for deployment, phone conference re summary judgment motion, review/revise response to stay motion, other trial prep
07/22/19	B. Cooper	0.50	Review appellate brief re preliminary injunction in Roe/Voe HIV case
07/22/19	G. Eaton	0.70	Review opposition to stay motion; provide comments to L. Gailey
07/22/19	L. Gailey	3.30	Edit motion for summary judgment; communicate with case team re same
07/23/19	J. Bauer	4.50	Attention to witness assignments, exam outlines, designation; conference call with senior team, etc.
07/23/19	L. Gailey	6.00	Edit motion for summary judgment; communicate with case team re same; communicate with L. Cooley re final preparations for filing
07/24/19	J. Bauer	4.50	Weekly conference call, revise guidelines for direct and cross exams, review dep designations for several witnesses, circulate to team members, etc.
07/24/19	G. Eaton	1.50	Begin reviewing draft amicus briefs in 4th Circuit
07/24/19	L. Gailey	3.80	Edit opposition to stay; communicate with L. Cooley re same; attend weekly telephone conference

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
07/26/19	G. Eaton	1.20	Teleconf with DOJ counsel re extension; email exchanges with team re press release, extension, other matters; review amicus brief
07/30/19	J. Bauer	1.50	Emails re deposition designations, trial logistics
07/30/19	G. Eaton	0.60	Review email chain re CDC revision of HIV transmission risk; research potential Rule 28 motion; respond to group re same
07/31/19	J. Bauer	2.50	Conference with D. Sommer, review deposition designations, etc.
07/31/19	L. Gailey	0.30	Communicate with J. Harding re summary judgment hearing; review government's draft motion
08/01/19	J. Bauer	2.00	Review court order re stay, emails and phone conferences re same
08/01/19	L. Gailey	0.30	Analyze order staying case; communicate with case team re same
08/06/19	G. Skogg	0.30	Correspondence with team attorneys re case deadlines for review
08/07/19	J. Bauer	1.00	Prepare status memo, etc.
08/07/19	G. Eaton	1.40	Continue work on petition for writ of coram nobis; email with client
08/09/19	L. Gailey	0.40	Edit opposition to stay; communicate with L. Cooley re same
08/20/19	G. Eaton	1.10	Review government reply brief
08/21/19	J. Bauer	2.00	Phone conference re oral argument, review M. Soper deposition for cross exam preparation
08/21/19	G. Eaton	0.40	Teleconference with team re oral argument planning

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Winston & Strawn (Pro Bono)

**2019 Fee Summary**

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**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
08/21/19	L. Gailey	0.80	Communicate with case team re oral argument planning
08/22/19	J. Bauer	4.00	Work on Soper cross, etc.
08/28/19	G. Eaton	4.80	Prepare materials for oral argument preparation; emails with L. Coberly, J. Bauerl; plan travel for moot; begin preparing for argument
08/28/19	L. Gailey	1.00	Communicate with L. Cooley re oral argument; review outline of issues re same
08/29/19	G. Eaton	4.70	Continue preparing for oral argument; email exchanges with L. Cooley, L. Gailey re same
08/29/19	L. Gailey	2.80	Communicate with L. Cooley re oral argument questions; review Fourth Circuit case law
08/30/19	G. Eaton	4.70	Continue preparing for 9/4 moot; call with P. Perkowski; meeting with L. Cooley; email exchanges with J. Bauer, A. Sommer, P. Perkowski
08/30/19	L. Gailey	0.80	Communicate with appeal team re outstanding oral argument questions
09/03/19	J. Bauer	4.00	Preparation for moot court session, review appellate briefs, regulations, etc.
09/03/19	G. Eaton	8.20	Continue prep for 9/4 moot; travel to Chicago for same
09/03/19	L. Gailey	0.50	Communicate with G. Eaton re outstanding oral argument issues
09/04/19	J. Bauer	4.00	Attend moot court for appeal, review regulations, briefs for same
09/04/19	L. Coberly	4.50	Prepare for and participate in moot for 4th Circuit argument
09/04/19	G. Eaton	9.50	Finish preparing for moot; participate in moot;

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			return travel to DC
09/04/19	L. Gailey	4.00	Communicate with G. Eaton re oral argument issues and questions; attend moot
09/04/19	G. McConnell	4.00	Prepare for and participate in Roe/Voe appeal moot
09/05/19	J. Bauer	2.50	Phone conferences with G. Eaton, G. McConnell, emails re possible issues at oral argument
09/05/19	G. Eaton	4.30	Teleconference with J. Bauer re argument strategy; continue revising argument outline
09/06/19	G. Eaton	3.90	Continue working on argument outline; discuss same with L. Gailey
09/06/19	L. Gailey	7.30	Communicate with G. Eaton re oral argument preparation; research various issues related to same; summarize research
09/09/19	G. Eaton	5.70	Continue preparing for oral argument; meet with L. Gailey to discuss same; email exchange with P. Perkowski re same
09/09/19	L. Gailey	7.10	Communicate with G. Eaton re oral argument issues; research key Fourth Circuit and Supreme Court case law; summarize same
09/10/19	J. Bauer	1.50	Review Roe administrative record, emails to G. Eaton re oral argument
09/10/19	G. Eaton	8.20	Continue prep for Wednesday moot; teleconference with J. Bauer re same; email exchanges with S. Schoettes, L. Gailey re same
09/10/19	L. Gailey	1.50	Communicate with case team re issues related to oral argument
09/11/19	J. Bauer	1.00	Draft memo re possible amendment of complaint, emails and phone conference with L. Coberly re amendment of complaint

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
09/11/19	G. Eaton	4.80	Complete prep for DC moot; participate in moot with L. Gailey, A. Nichols, D. Sommer, S. Schoettes, J. Harding, others from Lambda Legal
09/11/19	L. Gailey	1.50	Attend moot; communicate with case team re outstanding issues
09/12/19	J. Bauer	5.00	Preparation of M. Soper cross
09/12/19	G. Eaton	1.60	Continue preparing for oral argument
09/13/19	L. Gailey	5.50	Research outstanding legal issues
09/14/19	L. Gailey	3.40	Research cases addressing outstanding issues; synthesize and summarize same
09/15/19	G. Eaton	2.00	Continue preparing for oral argument
09/15/19	L. Gailey	1.00	Communicate with G. Eaton re open issues; communicate with A. Hemmings re Fourth Circuit research
09/16/19	G. Eaton	7.10	Continue preparing for Wednesday oral argument
09/16/19	L. Gailey	2.60	Communicate with case team re Fourth Circuit judges; review key case law; discuss same with G. Eaton
09/17/19	J. Bauer	3.50	Phone conferences with G. Eaton, G. McConnell, emails re possible issues at oral argument
09/17/19	G. Eaton	11.40	Final day of preparation for 4th Circuit argument; travel to Richmond for argument; working dinner with S. Schoettes, N. Harrison; final review of argument notes and potential questions
09/17/19	L. Gailey	7.00	Research standard of review; review and annotate appendix in preparation for oral argument; review briefs in preparation for oral argument; travel to Richmond for same

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Winston & Strawn (Pro Bono)

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
09/18/19	J. Bauer	3.50	Attend oral argument; conference with team; travel back
09/18/19	G. Eaton	7.50	Final preparation for 4th Circuit argument; participate in 4th Circuit argument; post-argument discussions with team; lunch with team; travel back to DC from Richmond
09/18/19	L. Gailey	9.30	Attend oral argument; attend lunch meeting with client and co-counsel; travel back from Richmond
09/19/19	J. Bauer	4.50	Conferences and phone conferences re oral argument, timeline for appellate decision, next steps for trial, etc.
09/19/19	L. Gailey	3.00	Draft timeline of procedural stages of appeal; research rules re same
09/21/19	L. Gailey	0.50	Listen to oral argument recording; communicate with case team re same
09/23/19	J. Bauer	4.50	Work on Soper cross, proposed findings of fact, etc.
09/23/19	G. Eaton	0.80	Review DOJ post-argument filing; respond to L. Gailey re same; listen to recording of oral argument
09/23/19	L. Gailey	0.50	Analyze supplemental authority letter; communicate with case team re same
09/24/19	J. Bauer	2.70	Work on statement of facts, incorporating Lambda Legal's facts
09/25/19	J. Bauer	4.50	Designations for P. Danaher deposition, revise statement of facts
09/25/19	G. Skogg	2.50	Review and analysis of medical records received from defendants in preparation of index for review by team attorney; preparation of documents for electronic shared folders

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**2019 Fee Summary**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
09/26/19	J. Bauer	3.50	Work on proposed findings, especially re host nation requirements
09/26/19	G. Skogg	3.00	Review and analysis of medical records received from defendants in preparation of index for review by team attorney; research re case materials for attorney review; preparation of documents for electronic shared folders
09/27/19	J. Bauer	2.50	Work on proposed findings, especially re stigma and discrimination
09/30/19	J. Bauer	3.80	Conference with J. Cartwright re case, attention to factual statement
09/30/19	J. Cartwright	0.40	Spoke on the phone with Julie Bauer about the case and her team's expectations of me
10/01/19	J. Bauer	2.50	Work on findings of fact, especially re Voe decisions, conference with J, Cartwright re COCOMs
10/01/19	J. Cartwright	1.00	Began to read case materials, and spoke with Julie Bauer on the phone about a research project that I will be working on
10/02/19	J. Cartwright	0.90	Read through preliminary injunction
10/07/19	J. Cartwright	1.30	Look through military policies to see if any other geographic locations prohibit deployment of HIV positive servicemembers
10/08/19	J. Bauer	2.50	Conference with J. Pesick re proposed findings
10/09/19	J. Bauer	1.50	Work on statement of facts
10/14/19	J. Bauer	5.50	Review expert reports, update proposed findings, email Danaher designations, etc.
10/16/19	J. Bauer	4.50	Review Hendrix expert reports and revise proposed factual findings

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
10/16/19	G. Skogg	1.00	Review of case expert report in preparation of index of exhibits cited; preparation of documents for expert declaration exhibit set; correspondence with team attorney re exhibit set for review
10/17/19	J. Bauer	2.50	Review expert reports, revise proposed findings
10/17/19	G. Skogg	0.60	Review of documents in preparation of exhibit sets for expert declaration; correspondence with team attorney re declaration exhibits
10/18/19	J. Bauer	2.00	Review expert reports, revise proposed findings, etc.
10/21/19	J. Bauer	4.00	Review of Okulicz and Kelly designations in preparation for trial, etc.
10/21/19	J. Cartwright	0.70	Conducted Research to see whether other deployment locations ban HIV+ servicemembers from deploying
10/22/19	J. Bauer	4.00	Phone conference with A. Sommer; review City of Cleburne and Windsor cases; other trial preparation
10/22/19	J. Cartwright	0.20	Spoke on the phone with Julie Bauer discussing research regarding Equal Protection Claims and the cost of health care for HIV+ servicemembers
10/23/19	J. Bauer	3.50	Re-review Aswell and Beland designations
10/24/19	J. Bauer	3.00	Re-review Brown deposition
10/24/19	L. Gailey	1.30	Edit motion to substitute; communicate with case team re same
10/28/19	J. Bauer	4.00	Trial prep
10/29/19	J. Bauer	2.00	Review Cron deposition designations
10/30/19	J. Bauer	1.50	Re-review Lute deposition designations

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Winston & Strawn (Pro Bono)

**2019 Fee Summary**

Date 08/03/22  
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**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
10/30/19	G. Skogg	0.30	Preparation of correspondence to team re case deadlines per court order; preparation of documents for electronic shared folders for attorney review
11/01/19	J. Bauer	3.50	Complete re-review of Lute deposition
11/04/19	J. Bauer	3.50	Complete review of Lute deposition and re-review of Melillo deposition
11/05/19	J. Bauer	4.00	Review Reeser deposition transcript, trial prep
11/08/19	J. Bauer	3.50	Rereview of Tuminello deposition
11/11/19	J. Bauer	4.20	Complete re-review of Tuminello deposition
11/14/19	J. Bauer	2.00	Deposition review, trial prep
11/15/19	J. Bauer	4.00	Begin re-review of Wiesen deposition
11/18/19	J. Bauer	3.00	Begin rereview of Shell deposition
11/20/19	J. Bauer	4.00	Emails re QS, finish rereview of Shell deposition
11/21/19	J. Bauer	2.00	Begin rereview of M. Soper deposition
12/02/19	J. Bauer	3.00	Review deposition transcript of S. Frazier
12/02/19	G. Skogg	0.50	Revisions to draft amended complaint for attorney review; preparation of documents for filing
12/09/19	J. Bauer	1.50	Rereview Taylor deposition
12/10/19	J. Bauer	4.30	Review Taylor deposition, emails with A. Sommer, review notes, pleadings, etc. re status of case
12/10/19	L. Gailey	0.50	Communicate with case team re status
12/16/19	J. Cartwright	1.00	Meet with Lauren Gailey and the rest of the team to discuss the case

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**2019 Fee Summary**

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**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
12/16/19	L. Gailey	1.90	Communicate with A. Hemmings and J. Cartwright re status and history of case; review key docket documents

**Total Hours 1,519.50**

**Total for Legal Services**

**\$1,182,072.20**

**Timekeeper Summary**

<b><u>Attorney/Other Prof</u></b>	<b><u>Rank</u></b>	<b><u>Hours</u></b>
L. Coberly	Partner	4.50
G. Eaton	Partner	249.10
B. Cooper	Partner	0.50
A. Sommer	Partner	27.50
J. Bauer	Of Counsel	624.00
J. Pesick	Associate	1.40
J. Harding	Associate	1.00
L. Cooley	Associate	171.60
L. Gailey	Associate	397.40
J. Cartwright	Associate	5.50
A. Hemmings	Associate	4.60
N. Wertheimer	Paralegal	1.90
G. Skogg	Paralegal	18.70
M. Vaught	Paralegal	1.20
S. Wesclitz	Library	0.30
G. McConnell	Of Counsel	4.50
K. Howard	Library	3.10
C. Pace	Practice Support	2.70
<b>Total Attorney/Other Prof</b>		<b>1,519.50</b>

**WINSTON & STRAWN LLP**

35 West Wacker Drive  
Chicago, IL 60601-9703  
TAX ID NO. 36-1975990

Winston & Strawn (Pro Bono)  
Nicholas Harrison

**2020 Fee Summary**

Date 08/03/22  
Client Matter No. 999997.05556

For Legal Services Rendered Through December 31, 2020 In Connection With:  
**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
01/10/20	J. Pesick	1.60	Review and analysis of Fourth Circuit opinion
01/10/20	G. Skogg	0.30	Research re documents for attorney review; updates to case files for attorney use
02/12/20	A. Hemmings	0.50	Participate in weekly case status call
02/12/20	J. Pesick	0.40	Participate in weekly team phone conference
02/26/20	J. Harding	0.90	Review material and participate in call re next steps
03/02/20	J. Pesick	0.10	Team correspondence re case strategy
03/03/20	J. Harding	0.90	Call with chambers re telephonic status conference and emails re same
03/04/20	L. Chan	1.10	Participate in group conference call re: upcoming court filings and overall litigation strategy.
03/04/20	J. Harding	1.70	Strategy call re next steps in case; call with opposing counsel
03/04/20	J. Pesick	0.60	Participate in weekly team phone conference
03/05/20	J. Harding	1.40	Prepare for and participate in telephonic status conference
03/05/20	J. Pesick	0.10	Team correspondence re court hearing
03/06/20	J. Harding	1.30	Revise filings and Rule 25 motion
03/10/20	J. Harding	0.30	Email communications re filings to effectuate Court's schedule

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2020 Fee Summary**

Date 08/03/22  
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**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
03/10/20	G. Skogg	0.80	Preparation of documents for electronic case files for attorney review; research re documents for attorney use
03/11/20	L. Chan	0.30	Participate in weekly group conference call.
03/11/20	J. Harding	0.30	Participate in team strategy call
03/11/20	A. Hemmings	0.50	Weekly team call
03/11/20	J. Pesick	0.50	Participate in team phone confernce re case strategy
03/12/20	L. Chan	0.80	Review and analyze Harrison court filings and case background.
03/17/20	A. Hemmings	0.30	Correspond with team regarding deposition transcripts
03/18/20	J. Harding	0.60	Participate in weekly call
03/18/20	A. Hemmings	0.30	Weekly call
03/18/20	J. Pesick	0.40	Participate in weekly team phone conference
03/18/20	G. Skogg	0.70	Research re documents for review by co-counsel; preparation of documents for delivery to co-counsel; updates to case documents sets in electronic folders for attorney review
03/25/20	A. Hemmings	0.80	Weekly team call
03/27/20	G. Skogg	0.30	Preparation of documents for addition to electronic shared folders for attorney review
04/06/20	A. Hemmings	0.10	Draft section of SJM pertaining to battlefield blood transfusions
04/07/20	A. Hemmings	2.50	Draft section of SJM pertaining to battlefield blood transfusions

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**2020 Fee Summary**

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**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
04/08/20	J. Harding	0.60	Call re motion for summary judgment and discussion with A. Hemmings re same
04/08/20	A. Hemmings	3.00	Draft section of SJM pertaining to battlefield blood transfusions; weekly call
04/08/20	G. Skogg	1.00	Preparation of case documents from electronic shared folders for delivery to outside co-counsel for attorney review; correspondence with counsel re document sets to be sent by ftp website
04/09/20	G. Skogg	0.50	Research re documents for addition to electronic shared folders for attorney review; preparation of documents for attorney use
04/10/20	G. Skogg	1.20	Research re revisions to case index and documents for addition to electronic shared folders for attorney review; preparation of documents for attorney use; set up of case deposition transcripts and exhibits for delivery to outside counsel using the ftp website
04/13/20	A. Hemmings	3.00	Draft section of SJM pertaining to battlefield blood transfusions; weekly call
04/15/20	J. Harding	0.20	Participate in weekly strategy call
04/15/20	A. Hemmings	0.50	Weekly call
04/17/20	J. Harding	0.80	Emails re summary judgment research
04/17/20	J. Pesick	0.30	Correspondence with J. Bauer re case strategy
04/22/20	J. Harding	1.60	Review motion for summary judgment and participate in strategy call
04/22/20	A. Hemmings	0.50	Weekly team call
04/29/20	J. Harding	0.80	Call re summary judgment filing and emails re same
04/29/20	G. Skogg	1.70	Research re documents for addition to electronic

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**2020 Fee Summary**

Date 08/03/22  
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**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			shared folders for attorney review; preparation of documents from internet database for case files; correspondence re documents for review
04/30/20	G. Skogg	6.30	Research re documents for attorney review for the draft Motion for Summary Judgment for filing; preparation of document for attorney use; review and analysis of case citations for corrections or draft Motion for Summary Judgment
05/01/20	J. Harding	4.30	Review Summary Judgment Motion
05/01/20	A. Hemmings	3.80	Draft notice to seal and order for summary judgment
05/01/20	G. Skogg	7.00	Research re documents cited in draft motion for summary judgment; preparation of chart of deposition excerpts cited for attorney use; preparation of documents for exhibits for motion for summary judgment; correspondence with Lambda Legal counsel re documents for exhibits for filing
05/02/20	J. Harding	0.70	Revise Motion to Seal and Memorandum in Support
05/02/20	G. Skogg	6.30	Research re documents cited in draft motion for summary judgment; preparation of chart of deposition excerpts cited for attorney use; preparation of documents for exhibits for motion for summary judgment; correspondence with Lambda Legal counsel re documents for exhibits for filing
05/03/20	J. Harding	1.40	Emails with team re summary judgment filing
05/03/20	G. Skogg	4.50	Review and analysis of draft brief for additional documents cited in preparation of exhibits for filing; preparation of documents for exhibits for motion for summary judgment; correspondence with Lambda Legal counsel re revised set of documents for exhibits for filing

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Winston & Strawn (Pro Bono)

**2020 Fee Summary**

Date 08/03/22  
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**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
05/04/20	J. Harding	9.30	Finalize and file motion to seal and motion for summary judgment with accompanying exhibits
05/04/20	A. Hemmings	6.00	Finalize notice of order to seal
05/04/20	S. Rogers	3.00	Cite check motion for summary judgment, compile three cite check components and transmit complete motion to J. Harding
05/04/20	G. Skogg	10.60	Review and analysis of draft brief for additional documents cited in preparation of exhibits for filing; preparation of documents for exhibits for motion for summary judgment; correspondence with Lambda Legal counsel re revised set of documents for exhibits for filing; correspondence with docket personnel re documents for filing
05/04/20	A. Steeg	2.10	Cite check motion for summary judgment
05/05/20	J. Harding	1.00	Emails with opposing counsel re filing; respond to media requests
05/05/20	G. Skogg	5.40	Research re documents for case files for attorney review; preparation of documents for electronic shared folders for team attorneys; preparation of documents for linking to TextMap database for attorney use with deposition designations; revisions to case index for attorney review
05/06/20	J. Harding	1.20	Calls with clerk re filing error
05/13/20	G. Skogg	0.80	Research re deposition videos for attorney review; preparation of video files for addition to TextMap database
05/14/20	G. Skogg	0.80	Research re obtaining sealed, file-stamped documents on docker website; correspondence with team attorney and A. Goodenough re sealed documents for case files and delivery to co-counsel
05/26/20	J. Harding	0.20	Emails with defense counsel re consent motion

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**2020 Fee Summary**

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**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
06/03/20	J. Harding	0.10	Emails re production
06/04/20	J. Harding	1.50	Review opposition to summary judgment
06/04/20	A. Hemmings	2.00	Review defendants' filings for PII
06/04/20	J. Pesick	0.40	Review pretrial motions to exclude Plaintiffs' expert testimony
06/05/20	J. Harding	1.60	Review materials and strategy call re summary judgment
06/05/20	J. Pesick	1.80	Participate in team phone conferences re case strategy and preparing response to Defendants' motion to exclude and Daubert motion
06/06/20	J. Pesick	0.40	Legal research re response to Daubert motion
06/08/20	J. Harding	0.80	Emails with opposing counsel and team re consent motion to extend time
06/08/20	G. Skogg	1.50	Attendance at webinar meeting with Lambda Legal personnel re projects for the preparation of Plaintiffs' response to Defendants' cross-motion for summary judgment and reply in support of Plaintiffs' motion for summary judgment; research re documents for review for attorney working chart of case facts and responses
06/09/20	J. Harding	1.50	Review and revise motion for extension of time and emails re same
06/09/20	A. Hemmings	1.00	Draft consent motion to extend deadlines
06/09/20	G. Skogg	1.50	Preparation of chart of statements of undisputed facts filed by Plaintiffs' counsel and Defendants' counsel in support of motions for summary judgment; research re documents for review for attorney working chart of case facts and responses; correspondence with Lambda Legal personnel re preparation of charts for attorney review

**WINSTON & STRAWN LLP**

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**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
06/10/20	J. Harding	0.70	Participate in team strategy call
06/10/20	A. Hemmings	0.30	Weekly team call
06/10/20	J. Pesick	0.20	Participate in weekly team phone conference
06/10/20	G. Skogg	5.00	Revisions to chart of statements of undisputed facts filed by Plaintiffs' counsel and Defendants' counsel in support of motions for summary judgment; research re documents for review for attorney working chart of case facts and responses; correspondence with Lambda Legal personnel re preparation of charts for attorney review
06/11/20	G. Skogg	2.60	Research re fact checking on Defendants' statements of facts; revisions to chart of statements of undisputed facts filed by Plaintiffs' counsel and Defendants' counsel in support of motions for summary judgment; research re documents for review for attorney working chart of case facts and responses
06/12/20	G. Skogg	4.70	Revisions to chart of statements of undisputed facts filed by Plaintiffs' counsel and Defendants' counsel in support of motions for summary judgment; research re documents for review for attorney working chart of case facts and responses; correspondence with Lambda Legal personnel re preparation of charts for attorney review
06/15/20	G. Skogg	4.60	Revisions to chart of statements of undisputed facts filed by Plaintiffs' counsel and Defendants' counsel in support of motions for summary judgment; research re documents for review for attorney working chart of case facts and responses; correspondence with Lambda Legal personnel re preparation of charts for attorney review
06/16/20	A. Hemmings	1.00	Review defendants' motion for summary judgment
06/16/20	G. Skogg	5.20	Revisions to chart of statements of undisputed

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2020 Fee Summary**

Date 08/03/22  
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**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			facts filed by Plaintiffs' counsel and Defendants' counsel in support of motions for summary judgment; research re documents for review for attorney working chart of case facts and responses; correspondence with Lambda Legal personnel re preparation of charts for attorney review
06/17/20	J. Harding	0.30	Draft email to opposing counsel
06/17/20	G. Skogg	5.00	Video conference with Lambda Legal personnel re fact checking of statements of facts for attorney review; revisions to chart of statements of undisputed facts filed by Plaintiffs' counsel and Defendants' counsel in support of motions for summary judgment; research re documents for review for attorney working chart of case facts and responses
06/18/20	G. Skogg	1.00	Revisions to chart of statements of undisputed facts filed by Plaintiffs' counsel and Defendants' counsel in support of motions for summary judgment; research re documents for review for attorney working chart of case facts and responses
06/19/20	A. Hemmings	2.00	APA research for J. Bauer
06/22/20	A. Hemmings	2.00	APA research for J. Bauer
06/22/20	G. Skogg	4.50	Correspondence with team attorneys re statements of facts and responses for reply; revisions to chart of statements of undisputed facts filed by Plaintiffs' counsel and Defendants' counsel in support of motions for summary judgment; research re documents for review for attorney working chart of case facts and responses
06/23/20	G. Skogg	2.00	Revisions to chart of statements of undisputed facts filed by Plaintiffs' counsel and Defendants' counsel in support of motions for summary judgment; research re documents for review for attorney working chart of case facts and responses; correspondence with team attorneys re statements

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**2020 Fee Summary**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			of facts and responses for reply
06/24/20	G. Skogg	3.00	Research re federal court, local and chambers rules re citations in motions and preparation of exhibits; research re formats of case citations for reply briefs; correspondence with team re reply brief citations; preparation of documents for review for plaintiffs' reply in support of motion for summary judgment
06/26/20	J. Harding	2.00	Review and revise Reply
06/26/20	G. Skogg	5.00	Research re supporting documents and deposition testimony for citations for Plaintiffs' reply brief in support of its motion for summary judgment; revisions to draft reply re citations for attorney review; preparation of documents for exhibits set
06/29/20	G. Skogg	12.50	Research re supporting documents and deposition testimony for citations for Plaintiffs' reply brief in support of its motion for summary judgment; revisions to draft reply re citations for attorney review; preparation of documents for exhibits set
06/30/20	J. Harding	0.40	Emails re Reply and filing
06/30/20	G. Skogg	9.00	Research re supporting documents and deposition testimony for citations for Plaintiffs' reply brief in support of its motion for summary judgment; revisions to draft reply re citations for attorney review; preparation of documents for exhibits set
07/01/20	J. Harding	3.90	Draft motions to seal and supporting documents and emails re filing
07/01/20	G. Skogg	14.00	Conference with team members re reply brief citations and other issues re motion for summary judgment filing; preparation of motion for summary judgment documents in preparation of binders for delivery to judge's chambers; research re supporting documents and deposition testimony for citations for Plaintiffs' reply brief in support of

**WINSTON & STRAWN LLP**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			its motion for summary judgment; revisions to draft reply re citations for attorney review; preparation of documents for exhibits set
07/02/20	J. Harding	5.00	Finalize and file Reply for Motion for Summary Judgment
07/02/20	G. Skogg	6.00	Preparation of motion for summary judgment documents in preparation of binders for delivery to judge's chambers; research re supporting documents and deposition testimony for citations for Plaintiffs' reply brief in support of its motion for summary judgment; revisions to draft reply re citations for attorney review; preparation of documents for exhibits set; conference with team members re reply brief citations and other issues re motion for summary judgment filing
07/06/20	J. Harding	1.70	Prepare chamber copies of summary judgment filings
07/06/20	G. Skogg	6.50	Preparation of Plaintiffs' reply brief and exhibits in support of motion for summary judgment in preparation of binders for delivery to judge's chambers; correspondence with team attorneys re revised sets of motion for summary judgment documents and exhibits for delivery to judge's chambers; revisions to motion for summary judgment document sets and binders for copies for judge; set up of delivery of copies to clerk's office
07/13/20	G. Skogg	0.30	Review of case documents in preparation of attorney review of linked documents on TextMap database
07/14/20	J. Harding	2.90	Review summary judgment materials for argument
07/14/20	G. Skogg	0.50	Review of case documents in preparation of attorney review of linked documents on TextMap database; revisions to document set for database
07/15/20	J. Harding	2.60	Review summary judgment materials for argument

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
07/15/20	G. Skogg	0.40	Research re documents for attorney review; preparation of documents for binder re motion for summary judgment filings
07/21/20	J. Harding	1.20	Review Reply
07/22/20	J. Harding	2.50	Participate in strategy call and review materials for argument
07/22/20	J. Pesick	4.00	Participate in weekly team phone conference re case strategy; prepraie for summary judgment argument moot
07/22/20	G. Skogg	0.40	Preparation of documents for shared folders re Defendants' reply brief and other filings; updates to files for attorney review
07/23/20	J. Harding	3.40	Review material for summary judgment moot
07/23/20	J. Pesick	2.10	Prepare for summary judgment argument moot
07/24/20	J. Harding	1.60	Participate in summary judgment moot
07/24/20	J. Pesick	3.50	Participate in moot for summary judgment argument
07/27/20	J. Harding	0.20	Emails re oral argument hearing
07/28/20	J. Harding	1.00	Calls re rescheduling the hearing
07/29/20	J. Harding	0.80	Call with clerk; prepare for presentation on case
07/30/20	J. Harding	1.60	Prepare for and participate in panel on case
07/30/20	J. Pesick	1.10	Participate in panel re discussion HIV military litigation
08/12/20	J. Pesick	0.40	Prepare for moot of oral argument re summary judgment motion
08/13/20	G. Skogg	0.30	Preparation of documents for electronic shared

**WINSTON & STRAWN LLP**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			folders for attorney review; preparation of documents for attorney use
08/28/20	J. Pesick	1.70	Prepare for moot of summary judgment argument
08/29/20	J. Pesick	1.00	Prepare for moot of summary judgment argument
08/31/20	J. Pesick	0.20	Team correspondence re case strategy
09/01/20	J. Pesick	1.10	Prepare for moot of summary judgment argument
09/09/20	J. Harding	0.90	participate in strategy call and draft and file notice of related case
09/09/20	J. Pesick	1.00	Participate in team phone conferences re case strategy
09/10/20	J. Harding	1.30	Participate in summary judgment moot
09/10/20	A. Hemmings	1.50	Participate in SJM hearing moot
09/10/20	J. Pesick	1.70	Participate in moot for summary judgment argument
09/10/20	G. Skogg	0.30	Correspondence with Lambda Legal personnel and copy center re data for binders created for oral argument hearing
09/12/20	J. Harding	0.40	Emails re summary judgment argument
09/14/20	J. Harding	2.50	Prepare for and attend motion for summary judgment
09/14/20	A. Hemmings	1.00	Listen to SJM hearing
09/14/20	J. Pesick	1.20	Participate in summary judgment argument hearing
09/14/20	G. Skogg	0.40	Preparation of documents for electronic shared folders for attorney review; review of case correspondence re oral argument hearing

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
09/16/20	J. Harding	0.80	Follow-up calls re summary judgment argument
09/16/20	A. Hemmings	0.50	Weekly team call
09/16/20	J. Pesick	0.80	Participate in weekly team phone conference re case strategy
10/13/20	J. Harding	0.40	Emails re transcript
11/30/20	G. Skogg	0.30	Preparation of documents for electronic shared folders for attorney review; additions to case folders for attorney use
12/14/20	G. Skogg	0.40	Preparation of documents for addition to electronic shared folders for attorney review

**Total Hours 285.20**

**Total for Legal Services**

**\$160,462.00**

**Timekeeper Summary**

<b><u>Attorney/Other Prof</u></b>	<b><u>Rank</u></b>	<b><u>Hours</u></b>
J. Pesick	Associate	26.60
J. Harding	Associate	73.10
A. Steeg	Associate	2.10
S. Rogers	Associate	3.00
L. Chan	Associate	2.20
A. Hemmings	Associate	33.10
G. Skogg	Paralegal	145.10
<b>Total Attorney/Other Prof</b>		<b>285.20</b>

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35 West Wacker Drive  
Chicago, IL 60601-9703  
TAX ID NO. 36-1975990

Winston & Strawn (Pro Bono)  
Richard Roe and Victor Voe

**2020 Fee Summary**

Date 08/03/22  
Client Matter No. 999997.06131

For Legal Services Rendered Through December 31, 2020 In Connection With:  
**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
01/09/20	L. Gailey	0.30	Review Fourth Circuit order; communicate with G. Eaton re same
01/10/20	J. Bauer	3.50	Review appellate decision; emails to team members and others re same
01/10/20	G. Eaton	4.20	Review Fourth Circuit opinion; teleconf with G. McConnell re same; teleconf with L. Gailey re same; email exchanges with team members re same; review Lambda press release; teleconf with G. Douglass (Bloomberg) re case; teleconf with PR reps from Rubinstein to prep for Bloomberg call
01/10/20	L. Gailey	2.50	Analyze Fourth Circuit opinion; communicate with case team re same
01/10/20	A. Hemmings	0.50	Read 4th circuit opinion in Roe
01/10/20	K. Howard	0.30	Obtain copy of January 10, 2020 Bloomberg article, "Ruling to Stop Discharge of Air Force Members With HIV Valid"; requested by G. Eaton
01/13/20	J. Bauer	1.80	Continue review of 4th Circuit opinion, emails re same
01/14/20	J. Bauer	0.50	Review write-up of appellate decision, etc.
01/14/20	L. Gailey	0.30	Review amended order; communicate with G. Eaton re same
01/15/20	G. Skogg	0.30	Preparation of case files for updates to electronic shared folders for attorney review

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
01/17/20	J. Bauer	4.20	Begin cross examination outline for D. Shell
01/20/20	J. Bauer	2.50	Continued work on Shell cross-examination, review deposition transcript
01/21/20	J. Bauer	1.00	Trial strategy conference call
01/21/20	G. Eaton	0.80	Teleconf with team re next steps
01/28/20	J. Bauer	0.50	Email to team leaders re summary judgment strategy
01/29/20	J. Bauer	1.00	Phone conference with A. Sommer re next steps
01/29/20	G. Skogg	0.40	Preparation of documents from database for addition to electronic shared folder for attorney review; correspondence with team attorneys re case files
02/02/20	L. Gailey	0.30	Communicate with S. Khan re shared folder
02/02/20	G. Skogg	0.30	Research re documents for electronic shared folders for attorney review
02/05/20	J. Bauer	0.30	Weekly team conference call
02/10/20	J. Bauer	2.70	Re-review of complaints and court opinions, prepare outline of possible claims and theories
02/11/20	J. Bauer	1.50	Work on outline of possible claims and summary judgment strategy
02/11/20	G. Skogg	0.40	Preparation of filings for addition to electronic shared folders for attorney review; preparation of document sets for delivery to outside counsel per team attorneys
02/12/20	J. Bauer	1.00	Revise outline of claims, weekly conference call with team
02/12/20	J. Cartwright	0.50	Participated in Weekly Call

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
02/12/20	G. Skogg	0.30	Preparation of document sets for delivery to outside counsel via ftp website per team attorneys
02/14/20	G. Eaton	0.40	Teleconf with L. Gailey to discuss administrative record issue; review appeal materials re same
02/18/20	G. Skogg	1.50	Research re documents for attorney review; preparation of document sets for attorney binders; correspondence with team attorney re binders for review
02/19/20	J. Bauer	1.50	Phone conference with S. Schoettes and A. Sommer re next steps, review research re equal protection cases in 4th Circuit, etc.
02/20/20	J. Bauer	5.00	Review and annotate 2019 motion for summary judgment, compare to Fourth Circuit opinion, etc.
02/21/20	J. Bauer	1.50	Work on revising summary judgment motion, etc.
02/22/20	G. Skogg	0.20	Preparation of documents for electronic shared folders for attorney review
02/24/20	J. Bauer	1.00	Work on summary judgment
02/24/20	G. Skogg	0.30	Preparation of documents for delivery to client on ftp website
02/25/20	J. Bauer	4.20	Revise motion for summary judgment; review regulations to be challenged; phone conference with G. Eaton re next steps
02/25/20	G. Eaton	0.90	Teleconf with J. Bauer; review email correspondence and drafts
02/26/20	J. Bauer	4.00	Continued revision of summary judgment motion, weekly team call
02/26/20	L. Gailey	0.50	Communicate with case teams via team calls
02/28/20	J. Bauer	1.00	Prepare draft order of proof on equal protection claims

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
03/02/20	J. Bauer	0.50	Emails re justification for accessions ban, etc.
03/03/20	J. Bauer	0.30	Emails re scheduling call with court, etc.
03/04/20	J. Bauer	2.50	Phone conference with D. Sommer, review Deese motion, weekly conference call with team
03/04/20	J. Cartwright	1.50	Worked on a motion to submit 7.1 Financial disclosure
03/04/20	L. Gailey	1.00	Attend team call
03/05/20	J. Bauer	0.50	Review emails re status conference
03/05/20	J. Cartwright	0.80	Work on motion to substitute Parties
03/06/20	J. Bauer	0.50	Review emails re court status conference
03/06/20	J. Cartwright	0.80	Put together Rule 25 motion and proposed order
03/06/20	A. Hemmings	0.50	Draft notice of withdrawal of summary judgment
03/11/20	J. Bauer	3.00	Review draft response to motion to dismiss
03/11/20	J. Bauer	0.50	Weekly team conference call
03/11/20	J. Bauer	0.50	Weekly team conference call
03/12/20	J. Bauer	4.00	Emails, review and review response to summary judgment motion
03/12/20	G. Skogg	0.50	Preparation of documents for production to opposing counsel; correspondence with team attorneys re document production
03/13/20	G. Skogg	1.00	Preparation of exhibits for opposition brief filing; preparation of documents for production to opposing counsel; correspondence with team attorneys re document production
03/18/20	J. Bauer	0.50	Weekly team call, emails re confidential

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Winston & Strawn (Pro Bono)

**2020 Fee Summary**

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**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			information
03/18/20	J. Cartwright	0.30	Participate in conference call
03/24/20	G. Skogg	0.40	Research re documents for addition to electronic shared folders for attorney review; preparation of documents for attorney use
03/25/20	J. Bauer	1.50	Review outline, weekly team phone conference re strategy
03/25/20	L. Gailey	0.50	Attend team call
03/26/20	J. Bauer	2.00	Circulate proposed findings of fact, revise and comment on sj outline
03/27/20	L. Gailey	1.00	Analyze opinions re organizational standing and deliberative process privilege; communicate with case team re same
03/27/20	G. Skogg	0.30	Preparation of documents for addition to electronic shared folders for attorney review
03/31/20	J. Bauer	2.00	Work on insert to SJ brief re Air Force separations
04/01/20	J. Bauer	2.00	Revise insert re AF discharges, review testimony re same, send to S. Schoettes
04/02/20	J. Bauer	2.70	Review documents re host nation requirements, SJ insert
04/02/20	L. Gailey	0.30	Communicate with case team re summary judgment brief
04/06/20	J. Bauer	4.00	Work on insert re host nation requirements, review documents and deposition testimony
04/07/20	J. Bauer	2.50	Draft insert re host nation requirements
04/07/20	G. Skogg	0.20	Preparation of documents for electronic shared folders for attorney use

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
04/08/20	J. Bauer	1.00	Work on host nation requirements insert to SJ motion, email to S. Schoettes
04/08/20	J. Cartwright	0.10	Participate in weekly conference call
04/08/20	G. Skogg	0.20	Preparation of documents for electronic shared folders for attorney use
04/09/20	G. Skogg	0.50	Research re documents for addition to electronic shared folders for attorney review; preparation of documents for attorney use
04/13/20	L. Gailey	2.30	Research and outline assigned sections of motion for summary judgment
04/14/20	L. Gailey	10.50	Draft assigned sections of motion for summary judgment; communicate with case team re same
04/15/20	J. Bauer	1.50	Review draft SJ brief; weekly team phone conference
04/15/20	G. Eaton	2.40	Review and comment on Roe/Voe summary judgment brief
04/15/20	L. Gailey	0.80	Draft assigned sections of motion for summary judgment; communicate with case team re same
04/16/20	G. Eaton	3.10	Continue reviewing and editing MSJ
04/17/20	J. Bauer	1.00	Phone conference with A. Sommer, follow up with team
04/17/20	G. Eaton	3.20	Complete review and editing/commenting on MSJ, circulate to S. Schoettes
04/17/20	L. Gailey	0.30	Review comments re draft summary judgment brief
04/21/20	J. Bauer	5.00	Review, revise draft summary judgment brief
04/21/20	L. Gailey	0.30	Analyze comments to draft summary judgment brief

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
04/22/20	J. Bauer	1.50	Weekly team call, work on response brief
04/23/20	J. Bauer	1.00	Review Wiesen dep transcript re routine evacuation frequency
04/23/20	G. Skogg	0.70	Research re documents received from military review departments for addition to electronic shared folders for review by team attorney; correspondence re issues with downloading documents
04/27/20	J. Bauer	1.00	Review latest draft of SJ brief
04/27/20	G. Skogg	0.80	Research re encrypted documents received from military departments for review by team attorneys; preparation of documents for attorney use
04/28/20	J. Bauer	4.50	Edit brief in support of SJ
04/29/20	J. Bauer	1.00	Emails re summary judgment motion, logistics of filing
04/29/20	L. Gailey	0.50	Attend weekly team calls
05/01/20	J. Bauer	3.00	Review and comment on latest draft of SJ brief
05/03/20	J. Bauer	0.30	Emails re age limits on commissioning
05/03/20	L. Gailey	0.30	Communicate with case team re Harrison MSJ
05/04/20	J. Bauer	0.50	Emails, phone conferences re filing
05/04/20	J. Cartwright	2.20	Cite check summary judgment brief
05/04/20	L. Gailey	4.80	Redact and edit motion for summary judgment; communicate with case team re same
05/05/20	J. Bauer	0.50	Attention to emails re filing
05/14/20	G. Skogg	0.80	Review of draft BCNR brief re exhibits cited; preparation of documents for exhibits set for

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			service
05/26/20	G. Skogg	0.50	Research re case schedule orders and changes to case calendar invites; preparation of documents for electronic case files for attorney use
06/01/20	J. Bauer	0.50	Emails re government's motion to exclude
06/02/20	J. Bauer	0.30	Emails re government request to exclude
06/04/20	J. Bauer	1.00	Brief review of government filings
06/04/20	J. Cartwright	2.40	Review public filings from defendants and determine whether any personally identifying information is involved.
06/04/20	G. Skogg	1.50	Research re case documents from docket database needed for electronic case files; preparation of documents for the Harrison case files and the Roe\Voe case files
06/05/20	J. Bauer	5.00	Conference call with team re defense brief; finish reviewing brief and other materials
06/05/20	L. Gailey	1.00	Review government filings; attend team call re response
06/08/20	J. Bauer	0.30	Emails re briefing
06/10/20	J. Bauer	1.00	Conference call re sj response; review pleadings and order re motion to exclude
06/10/20	L. Gailey	0.60	Attend weekly team call; communicate with case team re order
06/12/20	J. Bauer	3.50	Reread opposing brief for research issues, read and comment on S. Schoettes outline
06/15/20	J. Bauer	0.50	Review emails, brief in preparation for reply brief
06/15/20	L. Gailey	0.30	Communicate with case team re research issues

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Winston & Strawn (Pro Bono)

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
06/16/20	J. Bauer	2.00	Prepare materials, notes for section of reply brief
06/16/20	L. Gailey	0.50	Analyze research issues for reply brief
06/18/20	J. Bauer	1.50	Work on reply brief
06/19/20	J. Bauer	1.50	Work on reply brief
06/22/20	J. Bauer	4.00	Work on reply brief
06/22/20	L. Gailey	3.30	Research legal issues re APA and equal protection review for summary judgment reply brief; summarize same
06/23/20	J. Bauer	1.50	Emails with team, review Soper declaration, etc
06/23/20	L. Gailey	7.50	Research and analyze reviewability and deference issues for summary judgment reply brief
06/23/20	G. Skogg	0.40	Preparation of documents for the electronic shared folders for review by team attorneys
06/26/20	J. Bauer	6.00	Revise, comment on reply brief
06/26/20	L. Gailey	0.30	Review draft reply brief and outstanding research issues
06/30/20	J. Bauer	0.80	Phone conference with D. Sommer, etc.
06/30/20	L. Gailey	0.80	Review draft reply brief
07/01/20	J. Bauer	2.00	Weekly conference call, attention to reply brief
07/01/20	L. Gailey	0.50	Attend team calls
07/02/20	J. Bauer	2.00	Review and edit near final version of brief, emails re filing
07/08/20	G. Skogg	4.50	Research re documents for attorney binders for oral arguments on the defendants' motion to dismiss; review of case filings for medical records cited; preparation of documents for printing for

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Date 08/03/22  
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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			attorney use; research re videos needed for TextMap database
07/10/20	G. Skogg	1.00	Preparation of documents for review by team attorneys in preparation of upcoming oral arguments re motion to dismiss or for summary judgment; correspondence with copy center re delivery of documents to team attorneys
07/13/20	J. Bauer	4.00	Review briefs and prepare for mock argument
07/13/20	G. Skogg	0.40	Preparation of documents for delivery to team attorneys for review for oral arguments; correspondence with litigation support re access to case files for attorneys
07/14/20	J. Bauer	2.50	Participate in moot court
07/16/20	J. Bauer	1.50	Listen to oral argument in Deese case
07/22/20	J. Bauer	1.00	Weekly team conference call
07/22/20	L. Gailey	0.50	Attend weekly call
07/23/20	J. Bauer	1.00	Review reply brief
07/24/20	J. Bauer	3.00	Prepare for and attend informal moot court for SJ argument
07/24/20	L. Gailey	2.00	Attend moot summary judgment argument
07/27/20	J. Bauer	2.00	Email to S. Schoettes re Harrison age issues, emails re hearing date, etc.
07/28/20	J. Bauer	1.00	Phone conference and emails re continuance
08/12/20	J. Bauer	0.50	Emails re rescheduled court hearing and moot
09/02/20	J. Bauer	1.00	Review opinion in Deese, forward same to team members
09/09/20	J. Bauer	0.20	Review notice of related case

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2020 Fee Summary**

Date 08/03/22  
Page No. 11

**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
09/09/20	J. Cartwright	0.70	Draft letter to Judge Brinkema regarding Deese decision
09/10/20	L. Gailey	1.50	Attend summary judgment moot
09/13/20	J. Bauer	0.30	Emails re upcoming argument
09/14/20	J. Bauer	1.00	Listen to oral argument on summary judgment motion
09/14/20	L. Gailey	1.00	Attend summary judgment hearing by phone
09/16/20	J. Bauer	0.50	Attend weekly team call
09/16/20	L. Gailey	1.00	Attend team call; communicate with case team re summary judgment hearing
11/06/20	L. Gailey	0.30	Communicate with case team re summary judgment hearing transcript
11/18/20	J. Bauer	0.50	Review email re potential change in administration policy
12/22/20	G. Skogg	0.30	Preparation of case documents for addition to electronic shared folders for attorney review

**Total Hours 234.30**

**Total for Legal Services \$219,359.35**

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2020 Fee Summary**  
Date 08/03/22  
Page No. 12

**06131 Richard Roe and Victor Voe**

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**Timekeeper Summary**

<b><u>Attorney/Other Prof</u></b>	<b><u>Rank</u></b>	<b><u>Hours</u></b>
G. Eaton	Partner	15.00
J. Bauer	Of Counsel	143.40
J. Cartwright	Associate	9.30
A. Hemmings	Associate	1.00
L. Gailey	Associate	47.60
G. Skogg	Paralegal	17.70
K. Howard	Library	0.30
<b>Total Attorney/Other Prof</b>		<b>234.30</b>

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TAX ID NO. 36-1975990

Winston & Strawn (Pro Bono)  
Nicholas Harrison

**2021 Fee Summary**

Date 08/03/22  
Client Matter No. 999997.05556

For Legal Services Rendered Through December 31, 2021 In Connection With:  
**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
03/24/21	J. Pesick	0.20	Team correspondence re case strategy
04/07/21	J. Harding	0.50	Draft and file notices of appearance
04/08/21	J. Pesick	0.50	Phone conference with G. McConnell re case strategy; team correspondence re same
04/08/21	G. Skogg	0.30	Preparation of documents for addition to electronic shared folders for attorney review
04/14/21	G. Skogg	0.40	Preparation of documents for electronic case files for review by team attorneys; research re documents for case files
04/19/21	J. Harding	0.40	Call re co-counsel agreements
04/19/21	J. Pesick	0.50	Team phone conference re engagement letters
05/13/21	J. Harding	0.50	Emails and calls re engagement letter changes
05/18/21	J. Harding	0.30	Emails with N. Harrison
05/19/21	J. Harding	1.10	Call with N. Harrison re <b>Redacted</b>
06/23/21	J. Harding	0.60	Participate in call with team re next steps
07/26/21	G. Skogg	0.20	Preparation of documents for electronic shared folders for attorney review
07/28/21	J. Harding	0.30	Emails with S Schoettes re case status
09/07/21	J. Harding	0.60	Emails with team re DOJ response

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2021 Fee Summary**

Date 08/03/22  
Page No. 2

**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
10/12/21	J. Harding	0.70	Strategize re next steps and potential request for status conference
10/13/21	J. Harding	0.80	Prepare for and participate in strategy call with the clients
11/08/21	J. Harding	0.10	Emails re meeting with DOJ
11/09/21	J. Harding	1.20	Strategy call re call with DOJ
11/10/21	J. Harding	0.70	Participate in call with DOJ
12/16/21	J. Harding	0.80	Draft request for status conference
12/16/21	J. Pesick	0.50	Attention to case status
12/20/21	J. Pesick	0.50	Phone conference with J. Bauer re case strategy
12/20/21	J. Pesick	0.90	Prepare case status update
12/21/21	J. Harding	3.00	Draft status letter and emails re same
12/21/21	J. Pesick	0.50	Team correspondence re case strategy
12/21/21	G. Skogg	0.40	Research re documents for addition to electronic shared folders for attorney review; preparation of documents for attorney use; research of Pacer database for case schedule order per team attorneys
12/22/21	J. Harding	0.20	File status update
12/22/21	J. Pesick	0.20	Team correspondence re case strategy
12/23/21	J. Harding	0.30	Emails re status update
<b>Total Hours</b>		<b>17.20</b>	

**Total for Legal Services \$15,617.65**

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2021 Fee Summary**

Date 08/03/22  
Page No. 3

**05556 Nicholas Harrison - HIV deployment claim**

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**Timekeeper Summary**

<b><u>Attorney/Other Prof</u></b>	<b><u>Rank</u></b>	<b><u>Hours</u></b>
J. Pesick	Associate	3.80
J. Harding	Associate	12.10
G. Skogg	Paralegal	<u>1.30</u>
<b>Total Attorney/Other Prof</b>		<b>17.20</b>

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Winston & Strawn (Pro Bono)  
Richard Roe and Victor Voe

**2021 Fee Summary**

Date 08/03/22  
Client Matter No. 999997.06131

For Legal Services Rendered Through December 31, 2021 In Connection With:  
**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
01/22/21	L. Gailey	0.50	Communicate with IT and case team re technical issue
01/27/21	L. Gailey	0.30	Communicate with IT staff re mailing lists
02/11/21	J. Bauer	0.50	emails with S. Schoettes re status
02/25/21	G. Skogg	0.30	Research re revisions to electronic shared folders for attorney review
03/18/21	G. Skogg	0.40	Preparation of documents for electronic case files for attorney review; revisions to case schedules and electronic case calendar for schedule notices to team attorneys
03/23/21	J. Cartwright	1.70	Draft Change of Address/Affiliation for outside Attorney on the case
03/24/21	J. Bauer	0.50	Emails re changes of affiliation, etc
03/24/21	J. Cartwright	0.30	Draft change of affiliation and address for outside attorney on the case
04/08/21	G. Skogg	0.30	Preparation of documents for addition to electronic shared folders for attorney review
04/14/21	G. Skogg	0.40	Preparation of documents for electronic case files for review by team attorneys; research re documents for case files
04/19/21	J. Bauer	0.50	Conference re new co-counsel arrangements
06/09/21	J. Cartwright	0.40	Prepare change of affiliation for S. Schoettes

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Winston & Strawn (Pro Bono)

**2021 Fee Summary**

Date 08/03/22  
Page No. 2

**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
06/09/21	L. Gailey	0.30	Communicate with case team re status of decision
06/11/21	L. Gailey	0.30	Communicate with case team re summary judgment
06/16/21	G. Skogg	0.60	Preparation of documents for electronic shared folders for attorney review; updates to case calendar dates for attorney review
06/23/21	J. Bauer	0.50	Team call re strategy
06/23/21	L. Gailey	0.80	Attend meeting re strategy for obtaining decision
07/20/21	J. Bauer	0.30	Emails re settlement efforts
07/21/21	J. Bauer	0.50	conference call re updates
07/26/21	G. Skogg	0.20	Preparation of documents for electronic shared folders for attorney review
08/18/21	J. Bauer	0.80	Conference call re status and strategy, phone conference with D. Sommer, etc.
09/08/21	J. Bauer	0.50	emails re AF policy, next steps
09/13/21	G. Skogg	0.40	Preparation of documents for electronic shared folders for attorney review; preparation of electronic calendar date re case status
09/15/21	J. Bauer	1.00	emails re client request for meeting, phone conference with A. Sommer, etc.
09/20/21	L. Gailey	0.20	Communicate with case team re summary judgment status
09/22/21	L. Gailey	0.20	Communicate with case team re summary judgment
09/27/21	L. Gailey	0.30	Analyze communications re recent developments in case
10/05/21	J. Bauer	1.00	attention to email from client and related emails

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Winston & Strawn (Pro Bono)

**2021 Fee Summary**

Date 08/03/22  
Page No. 3

**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			(.5), conference with Deese team re discovery plan (.5)
10/06/21	J. Bauer	0.50	email to N. Harrison and team, emails re scheduling
10/12/21	L. Gailey	0.20	Communicate with case team re summary judgment
10/13/21	J. Bauer	1.00	phone conference with team and clients re strategy
10/13/21	L. Gailey	0.50	Attend meeting with case team re status of summary judgment
10/22/21	L. Gailey	0.30	Communicate with case team re status conference
10/26/21	G. Skogg	0.60	Research re documents for addition to case files for attorney review; preparation of electronic calendar dates for review by team attorneys
10/27/21	J. Bauer	0.20	emails re settlement outreach
11/02/21	J. Bauer	0.50	review emails re settlement overtures in Roe, Voe, Deese cases
12/16/21	G. Skogg	0.70	Research re documents for addition to electronic shared folders for attorney review; preparation of documents for case files for attorney use
12/20/21	G. Skogg	0.70	Research re documents for addition to electronic shared folders for attorney review; preparation of documents for attorney use; research of Pacer database for case schedule order per team attorneys
12/21/21	J. Bauer	0.50	Emails re status update to court
12/21/21	L. Gailey	0.40	Edit draft status report and communicate with case team re same
12/21/21	G. Skogg	0.30	Research re documents for addition to electronic shared folders for attorney review; preparation of

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2021 Fee Summary**

Date 08/03/22  
Page No. 4

**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			documents for attorney use; research of Pacer database for case schedule order per team attorneys

**Total Hours 20.40**

**Total for Legal Services \$16,493.90**

**Timekeeper Summary**

<b><u>Attorney/Other Prof</u></b>	<b><u>Rank</u></b>	<b><u>Hours</u></b>
J. Bauer	Of Counsel	8.80
J. Cartwright	Associate	2.40
L. Gailey	Associate	4.30
G. Skogg	Paralegal	4.90
<b>Total Attorney/Other Prof</b>		<b>20.40</b>

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TAX ID NO. 36-1975990

Winston & Strawn (Pro Bono)  
Nicholas Harrison

**2022 Fee Summary**

Date 08/03/22  
Client Matter No. 999997.05556

For Legal Services Rendered Through August 3, 2022 In Connection With:  
**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
03/22/22	G. Skogg	0.40	Research re documents in electronic shared folders for team attorneys
03/29/22	G. Skogg	0.60	Correspondence with litigation support personnel re set up of databases for related HIV litigation cases; research re documents for review by case attorneys; set up of attorney access to case files
04/01/22	G. Skogg	0.40	Correspondence with litigation support personnel re Relativity database and attorney access to shared folders; preparation of revised folders on shared folders for attorney use
04/05/22	G. Skogg	0.80	Review of case files in preparation of revisions to electronic shared folders for attorney review; preparation of documents for addition to case files and related pro bono litigation
04/06/22	J. Harding	3.70	Review opinion and emails re same
04/06/22	G. Skogg	0.40	Preparation of court filings for addition to electronic case files for attorney review; review of documents in preparation of updates to cases schedule for attorney use; correspondence with team re filings and new case deadlines
04/07/22	J. Harding	6.10	Review opinion for sealing; revise media responses; emails with team re next steps
04/08/22	J. Harding	0.80	Emails re redactions
04/11/22	J. Harding	0.20	Emails re decision
04/12/22	J. Harding	3.00	Draft and revise responses to media inquiries and

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Winston & Strawn (Pro Bono)

**2022 Fee Summary**

Date 08/03/22  
Page No. 2

**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			emails re same
04/14/22	J. Harding	0.40	Emails with opposing counsel re redactions
04/19/22	J. Harding	1.20	Emails re redaction of opinion
04/20/22	J. Harding	2.90	Work on fee request; call with court re redactions; emails re same
04/20/22	G. Skogg	0.70	Correspondence with team attorney re preparation of charts of attorney fees and case expenses per court order; preparation of documents for attorney review
04/21/22	J. Harding	1.60	Work on fee request
04/21/22	G. Skogg	4.40	Correspondence with team attorney re preparation of charts of attorney fees and case expenses per court order; preparation of documents for attorney review; research re case data re attorney years of experience for fees chart
04/22/22	J. Bauer	1.00	Conference with G. McConnell, J. Harding and client re <b>Redacted</b>
04/22/22	J. Harding	1.60	Analyze fees and apply billing judgment to reduce fees
04/22/22	G. Skogg	3.00	Correspondence with team attorneys re revisions to charts of attorney fees and case expenses per court order; preparation of documents for attorney review; research re case data re attorney years of experience for fees chart
04/25/22	J. Harding	2.50	Analyze fees and apply billing judgment; draft email to government re same
04/25/22	G. Skogg	2.50	Research re documents re expert expenses for addition to charts of fees and expenses per court order; correspondence with outside attorneys re documents for revisions to charts; preparation of

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2022 Fee Summary**

Date 08/03/22  
Page No. 3

**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			documents for attorney review; research re case data for addition to charts for attorney use
04/26/22	J. Harding	2.20	Research EAJA and emails re same; email DOJ
04/27/22	J. Harding	1.40	Draft response to DOJ's objection to negotiate
04/30/22	J. Harding	2.00	Draft status report and emails re same
05/01/22	J. Harding	2.20	Research law re EAJA and emails re same
05/02/22	J. Harding	0.30	Emails with government re meet and confer
05/03/22	J. Harding	3.70	Draft request for clarification and emails re same
05/04/22	J. Harding	0.50	Emails with team re next steps
05/10/22	G. Skogg	0.30	Preparation of documents for addition to electronic shared folders for attorney review
05/16/22	J. Harding	0.50	Emails with N. Harrison and D. Sommer
05/17/22	G. Skogg	0.30	Preparation of documents for addition to electronic shared folders for attorney review
05/24/22	J. Harding	0.10	Emails re joint status report
06/02/22	J. Harding	0.60	Participate in meet and confer with DOJ
06/03/22	J. Harding	0.30	Emails re joint status report
06/06/22	G. Skogg	0.30	Preparation of documents for updates to electronic shared folders for attorney review
06/08/22	G. Skogg	0.30	Preparation of documents for electronic shared folders for attorney review
06/09/22	J. Harding	1.00	Draft email to DOJ re expedited relief for Sgt. Harrison
06/10/22	J. Harding	1.60	Emails and calls with N. Harrison re <b>Redacted</b>

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2022 Fee Summary**

Date 08/03/22  
Page No. 4

**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
06/15/22	J. Bauer	0.50	Harrison: review emails re Harrison relief
06/15/22	J. Harding	0.20	Emails and call with N. Harrison
06/15/22	G. Skogg	0.30	Preparation of documents for electronic shared folders for attorney review
06/16/22	J. Bauer	1.30	Harrison: emails, phone conference with D. Sommer re N. Harrison next steps
06/16/22	J. Harding	1.60	Emails re draft demand letter
06/16/22	G. Skogg	0.30	Preparation of documents for addition to electronic shared folders for attorney review
06/17/22	J. Bauer	0.80	Harrison: team conference call re relief for N. Harrison
06/17/22	J. Harding	1.20	Calls with N. Harrison and team re next steps
06/17/22	G. Skogg	0.30	Preparation of discovery documents for electronic shared folders for attorney review
06/20/22	J. Harding	1.10	Draft response to DOJ re injunctive relief for Sgt. Harrison
06/21/22	J. Harding	0.70	Team call re injunctive relief and next steps
06/22/22	G. Skogg	0.40	Preparation of documents for addition to electronic shared folders for attorney review
06/23/22	J. Harding	0.50	Review email from DOJ re expeditring Sgt. Harrison's commissioning and emails with N. Harrison re <span style="background-color: black; color: white; font-size: 8px;">Redacted</span>
06/24/22	J. Harding	0.50	Meet and confer re relief for Sgt. Harrison
06/28/22	J. Harding	0.50	Emails re attorney fees and EAJA
06/29/22	J. Harding	0.20	Emails re joint status report
06/30/22	G. Skogg	0.40	Preparation of documents for addition to electronic

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2022 Fee Summary**

Date 08/03/22  
Page No. 5

**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			shared folders for attorney review
07/01/22	J. Harding	0.80	Revise and finalize letter to DOJ regarding implementation of Judge Brinkema's order
07/05/22	J. Harding	0.40	Emails with N. Harrison re <b>Redacted</b>
07/05/22	G. Skogg	0.30	Preparation of documents for addition to electronic shared folders for attorney review
07/07/22	J. Harding	1.60	Emails with N. Harrison re <b>Redacted</b> ; revise and finalize chart summarizing attorneys' time
07/07/22	G. Skogg	0.40	Preparation of documents for addition to electronic shared folders for attorney review
07/08/22	J. Harding	0.50	Call re response to DOJ re fee petition
07/11/22	J. Harding	1.80	Emails and calls with N. Harrison and team re <b>Redacted</b>
07/12/22	J. Harding	0.40	Emails with N. Harrison re <b>Redacted</b>
07/14/22	J. Harding	1.40	Draft various emails to the government re current status of fees, Sgt. Harrison, and motion to extend deadline; emails to team re same
07/14/22	G. Skogg	0.40	Preparation of documents for addition to electronic shared folders for attorney review; revisions to case schedule for attorney use
07/18/22	J. Harding	0.70	Finalize and file motion for extension of time and emails re same
07/19/22	G. Skogg	0.40	Preparation of documents for addition to electronic shared folders for attorney use
07/20/22	J. Harding	1.50	Strategize and draft response to DOJ's refusal to provide a counter offer without providing them complete timesheets

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2022 Fee Summary**

Date 08/03/22  
Page No. 6

**05556 Nicholas Harrison - HIV deployment claim**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
07/20/22	G. Skogg	0.30	Preparation of documents for addition to electronic shared folders for attorney review for the Harrison and Roe-Voe cases
07/24/22	J. Harding	0.50	Strategize re motion for fees
07/25/22	J. Harding	0.50	Emails re forthcoming motion
07/26/22	J. Harding	0.50	Call with D. Sommer re fee petition
07/27/22	J. Harding	1.50	Calls and emails with C. Molster re serving as an expert
07/27/22	G. Skogg	0.80	Research re case documents for attorney review in preparation of revisions to time billed and case expenses for motion for attorney fees and expenses; preparation of documents for attorney review; updates to electronic case files for attorney review
07/31/22	J. Harding	0.30	Work on motion for fees
<b>Total Hours</b>		<b>81.60</b>	

**Total for Legal Services                      \$82,884.20**

**Timekeeper Summary**

<b><u>Attorney/Other Prof</u></b>	<b><u>Rank</u></b>	<b><u>Hours</u></b>
J. Bauer	Of Counsel	3.60
J. Harding	Associate	59.30
G. Skogg	Paralegal	<u>18.70</u>
<b>Total Attorney/Other Prof</b>		<b>81.60</b>

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TAX ID NO. 36-1975990

Winston & Strawn (Pro Bono)  
Richard Roe and Victor Voe

**2022 Fee Summary**

Date 08/03/22  
Client Matter No. 999997.06131

For Legal Services Rendered Through August 3, 2022 In Connection With:  
**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
02/11/22	G. Skogg	0.40	Preparation of case documents for addition to electronic shared files for attorney review
03/22/22	G. Skogg	0.40	Research re documents in electronic shared folders for team attorneys
03/29/22	G. Skogg	0.70	Correspondence with litigation support personnel re set up of databases for related HIV litigation cases; research re documents for review by case attorneys; set up of attorney access to case files
04/01/22	G. Skogg	0.80	Correspondence with litigation support personnel re Relativity database and attorney access to shared folders; preparation of revised folders on shared folders for attorney use
04/04/22	G. Skogg	0.80	Review of case files in preparation of revisions to electronic shared folders for attorney review; preparation of documents for addition to case files and related pro bono litigation
04/06/22	J. Bauer	3.70	Review memorandum opinion re summary judgment, emails to team re same
04/06/22	L. Gailey	2.00	Analyze decision and communicate with case team re same
04/06/22	G. Skogg	0.30	Preparation of court filings for addition to electronic case files for attorney review; review of documents in preparation of updates to cases schedule for attorney use; correspondence with team re filings and new case deadlines
04/07/22	J. Bauer	1.00	attention to draft press release, etc.

**WINSTON & STRAWN LLP**

Winston & Strawn (Pro Bono)

**2022 Fee Summary**

Date 08/03/22  
Page No. 2

**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
04/07/22	L. Gailey	0.30	Review press release and redactions and communicate with case team re same
04/07/22	G. Skogg	0.40	Preparation of documents received for electronic shared folders for team attorneys
04/11/22	J. Bauer	1.00	review and revise PBI A
04/12/22	L. Gailey	0.50	Review draft announcement and communicate with case team re same
04/18/22	L. Gailey	0.70	Analyze rules re motions for attorney's fees and communicate with case team re same
04/20/22	J. Bauer	0.50	emails, phone conference re possible redactions
04/20/22	L. Gailey	0.30	Communicate with case team re redaction issue
04/21/22	J. Bauer	0.20	Attention to unsealing of court opinion
04/21/22	G. Skogg	0.40	Preparation of documents for electronic shared folders for attorney review; revisions to case files for attorney use
04/25/22	J. Bauer	1.00	attention to emails re fee request
04/25/22	G. Skogg	0.40	Preparation of documents for case files for attorney review
04/25/22	G. Skogg	0.40	Preparation of documents received for addition to electronic case files for attorney review
04/26/22	J. Bauer	1.00	attention to emails re attorneys fees claim
04/26/22	G. Skogg	0.40	Review of case documents re amended case schedule for team attorneys; preparation of documents for electronic shared folders
04/27/22	L. Gailey	0.20	Communicate with case team re attorney's fees
04/27/22	G. Skogg	0.60	Review of case documents in preparation of chart

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**06131 Richard Roe and Victor Voe**

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			of case deadlines set by judge; preparation of chart for use by team attorneys
04/28/22	G. Skogg	0.80	Preparation of numerous electronic case calendar date invites for attorney use; addition of documents to case files for attorney review
04/29/22	J. Bauer	0.50	Attention to emails re amending order
05/03/22	L. Gailey	0.30	Review and edit motion and communicate with case team re same
05/06/22	J. Bauer	1.50	emails re Voe change of status
05/09/22	J. Bauer	3.00	rulings re adding reserves to injunction; review draft status report; email, phone calls with D. Sommer, J. Harding and team re same
05/09/22	L. Gailey	0.20	Communicate with case team re status updates
05/09/22	G. Skogg	0.40	Preparation of documents for addition to Harrison and Roe-Voe electronic shared folders for attorney review
05/10/22	L. Gailey	0.50	Review amended order and research effect of amendment on appeal deadline
05/12/22	L. Gailey	1.00	Research procedural rules and case law re effect of amended order on appeal deadline and summarize same
05/13/22	G. Skogg	1.00	Review of case documents in shared folder in preparation of discovery documents for attorney review; revisions to document sets for attorney use; revisions to case index for attorney review re upcoming projects
05/17/22	J. Bauer	0.50	Attend court status hearing
05/17/22	G. Skogg	0.40	Preparation of documents for addition to electronic shared folders for attorney review; research re case deadlines for attorney use

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
05/18/22	J. Bauer	0.80	Video conference re strategy with G. McConnell and D. Sommer re strategy
05/18/22	L. Gailey	0.20	Communicate with case team re settlement strategy
05/19/22	L. Gailey	1.60	Prepare for and attend pre-call re strategy for meeting with DOJ
05/23/22	L. Gailey	1.30	Attend calls re possible settlement with DOJ
05/24/22	L. Gailey	2.00	Summarize notes from DOJ meeting and communicate with case team re same; research jurisdictional implications of EAJA fee motion
05/25/22	J. Bauer	1.00	Roe and Voe: strategy re fees
05/25/22	L. Gailey	0.80	Communicate with M. Hill re research assignment on jurisdiction over fee motions
05/26/22	J. Bauer	1.00	Roe and Voe: strategy call with W&S and GT lawyers
05/26/22	L. Gailey	4.20	Research issues re jurisdiction to decide fee motion while appeal is pending
05/26/22	M. Hill	2.60	Research whether notice of appeal would divest district court of jurisdiction to hear motion for attorney's fees in EAJA action
05/26/22	G. Skogg	0.40	Preparation of discovery documents for electronic shared folders for attorney review
05/27/22	G. Skogg	0.40	Research re case schedule revisions and preparation of electronic case calendar dates; correspondence with team re revised case schedule dates
05/31/22	L. Gailey	0.20	Communicate with case team re status of order
06/01/22	L. Gailey	0.20	Draft status report

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
06/02/22	L. Gailey	2.00	Draft updated status report and communicate with J. Harding re same
06/03/22	L. Gailey	1.20	Edit draft status report and communicate with case team re same
06/03/22	G. Skogg	0.40	Preparation of document for electronic filing; revisions to document set in electronic shared folders for attorney review
06/06/22	L. Gailey	0.50	Communicate with case team re notice of appeal
06/06/22	G. Skogg	0.30	Preparation of documents for updates to electronic shared folders for attorney review
06/07/22	L. Gailey	0.80	Communicate with case team re status of appeal and settlement
06/08/22	L. Gailey	0.90	Communicate with case team re appeal and motion to enforce judgment (0.9)
06/08/22	G. Skogg	0.30	Preparation of documents for electronic shared folders for attorney review
06/09/22	J. Bauer	0.50	Roe and Voe: emails re N. Harrison request re status
06/09/22	L. Gailey	1.90	Communicate with case team re appeal and motion to enforce judgment
06/10/22	L. Gailey	0.30	Communicate with case team re procedural issues re fee motion
06/13/22	L. Gailey	0.30	Communicate with E. Batty re case-opening documents
06/14/22	L. Gailey	0.20	Communicate with E. Batty re deadlines
06/15/22	L. Gailey	2.10	Communicate with case team re motion to enforce and communicate with M. Hill re fee motion

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
06/15/22	M. Hill	1.00	Meet with Lauren Gailey to discuss assignment
06/15/22	G. Skogg	0.30	Preparation of documents for electronic shared folders for attorney review
06/16/22	L. Gailey	0.30	Communicate with case team re motion to enforce
06/17/22	L. Gailey	1.00	Communicate with case team re settlement strategy
06/17/22	G. Skogg	0.40	Preparation of discovery documents for electronic shared folders for attorney review
06/20/22	L. Gailey	1.00	Prepare case-opening documents for appeal
06/21/22	L. Gailey	0.30	Prepare case-opening papers
06/21/22	M. Hill	2.00	Read and took notes on 4th Cir. decision
06/22/22	L. Gailey	2.10	Edit and file case-opening documents
06/22/22	G. Skogg	0.50	Preparation of documents for addition to electronic shared folders for attorney review; research re revisions to electronic case calendar dates for attorney use
06/23/22	M. Hill	3.00	Read E.D.Va summary judgment ruling; research EAJA motion for attorney's fees requirements
06/27/22	J. Bauer	0.70	Roe and Voe: <b>Redacted</b>
06/27/22	M. Hill	3.00	Research factual background for EAJA motion for attorneys' fees
06/28/22	J. Bauer	1.00	Roe and Voe: <b>Redacted</b>
06/28/22	M. Hill	2.00	Research legal standards for EAJA motion for attorneys' fees
06/29/22	M. Hill	4.00	Continue research legal standards for EAJA motion for attorneys' fees; draft outline for motion

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
06/30/22	G. Skogg	0.30	Preparation of documents for addition to electronic shared folders for attorney review
07/01/22	L. Gailey	1.10	Review and edit settlement demand letter (0.3); review appellate docket and communicate with government re motion for voluntary dismissal (0.8)
07/05/22	M. Hill	4.00	Research similar cases in which plaintiffs were awarded attorneys' fees under EAJA
07/06/22	L. Gailey	2.30	Edit outline of fee motion and communicate with M. Hill re same
07/06/22	M. Hill	3.00	Meet with Lauren Gailey to discuss next steps, draft motion for attorneys' fees
07/07/22	M. Hill	2.00	Re-read E.D.Va. opinion and 4th Cir. opinion for background facts
07/08/22	L. Gailey	1.50	Research deadlines for fee motion and communicate with case team re same
07/08/22	M. Hill	4.00	Research precedent in 4th Cir. regarding EAJA fees awarded when rational basis threshold not met
07/11/22	L. Gailey	0.40	Communicate with case team re DOJ correspondence
07/11/22	M. Hill	6.00	Draft legal standard section for motion for attorneys' fees; conduct further research supporting argument that government position was not substantially justified
07/12/22	L. Gailey	1.00	Review and edit communications with DOJ re execution of court order
07/12/22	M. Hill	5.00	Draft motion for fees under EAJA
07/13/22	L. Gailey	1.10	Draft motion for extension of deadline to file motion for attorney's fees

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
07/13/22	M. Hill	5.00	Draft motion for fees under EAJA
07/14/22	L. Gailey	1.80	Communicate with M. Hill re motion for attorney's fees; draft motion and memorandum
07/14/22	M. Hill	4.00	Finalize and turn in motion for fees under EAJA
07/15/22	L. Gailey	0.50	Communicate with case team re motion for fees and extension re same
07/15/22	M. Hill	5.00	Finalize and turn in motion for fees under EAJA
07/18/22	L. Gailey	0.50	Communicate with case team re fee motion
07/19/22	L. Gailey	1.30	Draft and edit motion for extension re fee motion and communicate with case team re same
07/20/22	J. Bauer	0.30	Roe and Voe: emails re fees motion
07/20/22	L. Gailey	1.00	Review draft motion for attorney's fees and communicate with case team re same
07/22/22	L. Gailey	1.30	Communicate with case team re motion for attorney's fees
07/25/22	L. Gailey	0.40	Review status report; communicate with case team re attorney's fees and motion to enforce
07/26/22	L. Gailey	0.20	Communicate with case team re motions to enforce and for attorney's fees
07/27/22	L. Gailey	0.30	Review draft status report; communicate with case team re motion to enforce
07/28/22	L. Gailey	2.10	Research case law re fee motion; communicate with J. Harding re same
07/29/22	L. Gailey	0.60	Edit motion for attorney's fees
07/30/22	L. Gailey	4.60	Draft motion for attorney's fees
07/31/22	L. Gailey	11.50	Draft motion for attorney's fees, researching case

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<b>Date</b>	<b>Attorney/Other Prof</b>	<b>Hours</b>	<b>Description</b>
			law and attorney bios as needed
08/01/22	L. Gailey	5.40	Draft motion for attorney's fees; assemble exhibits for same
08/02/22	L. Gailey	8.10	Draft and edit motion for attorney's fees; communicate with case team re same; review Winston time entries
	<b>Total Hours</b>	<b>165.10</b>	

**Total for Legal Services \$142,312.30**

**Timekeeper Summary**

<b><u>Attorney/Other Prof</u></b>	<b><u>Rank</u></b>	<b><u>Hours</u></b>
J. Bauer	Of Counsel	19.20
L. Gailey	Associate	78.40
M. Hill	Law Clerk	55.60
G. Skogg	Paralegal	<u>11.90</u>
<b>Total Attorney/Other Prof</b>		<b>165.10</b>

# Exhibit B

Disb ID	Date	Tkpr	TKPR Name	Client	Matter	Cost Desc	Base Amt	Narrative	Bill Num
23218345	5/30/2018	16329	Sommer, Andrew	999997	5556	Filing and Other Fees	\$400.00	VENDOR: Diners Club Commercial INVOICE#: 55282800684965870618 DATE: 6/15/2018 LA Diners Club - June 2018 Invoice	2633900
23218347	5/31/2018	17220	Harding, John	999997	5556	Filing and Other Fees	\$75.00	VENDOR: Diners Club Commercial INVOICE#: 55282800684965870618 DATE: 6/15/2018 LA Diners Club - June 2018 Invoice	2633900
23218348	5/31/2018	17220	Harding, John	999997	5556	Filing and Other Fees	\$75.00	VENDOR: Diners Club Commercial INVOICE#: 55282800684965870618 DATE: 6/15/2018 LA Diners Club - June 2018 Invoice	2633900
23218359	5/31/2018	17220	Harding, John	999997	5556	Court Costs and Fees	\$75.00	VENDOR: Diners Club Commercial INVOICE#: 55282800684965870618 DATE: 6/15/2018 LA Diners Club - June 2018 Invoice	2633900
23218350	6/6/2018	17220	Harding, John	999997	5556	Court Costs and Fees	\$75.00	VENDOR: Diners Club Commercial INVOICE#: 55282800684965870618 DATE: 6/15/2018 LA Diners Club - June 2018 Invoice	2633900
23183934	6/8/2018	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (VAEDC) 1:18-CV-00641-LMB-IDD	2633900
23120566	6/13/2018	16406	Frelinghuysen, Cyrus	999997	5556	Service of Process Fees	\$80.00	VENDOR: Capitol Process Services, Inc. INVOICE#: 1546307 DATE: 6/13/2018 For professional process services rendered in June 2018	2623766
23120568	6/13/2018	16329	Sommer, Andrew	999997	5556	Service of Process Fees	\$65.00	VENDOR: Capitol Process Services, Inc. INVOICE#: 1546314 DATE: 6/13/2018 For professional process services rendered in June 2018	2623766
23120573	6/13/2018	16406	Frelinghuysen, Cyrus	999997	5556	Service of Process Fees	\$80.00	VENDOR: Capitol Process Services, Inc. INVOICE#: 1546308 DATE: 6/13/2018 For professional process services rendered in June 2018	2623766
23120574	6/13/2018	16329	Sommer, Andrew	999997	5556	Service of Process Fees	\$140.00	VENDOR: Capitol Process Services, Inc. INVOICE#: 1546304 DATE: 6/13/2018 For professional process services rendered in June 2018	2623766
23155782	6/13/2018	16406	Frelinghuysen, Cyrus	999997	5556	Document Retrieval	\$36.00	VENDOR: Diners Club Commercial INVOICE#: 55282800685548150618 DATE: 6/15/2018 Order for article, Medical Aspects of Transgender Military Service, from Sage by S. Geiger for C. Frelinghuysen 6/13/18	2628796
23155787	6/14/2018	16406	Frelinghuysen, Cyrus	999997	5556	Document Retrieval	\$42.50	VENDOR: Diners Club Commercial INVOICE#: 55282800685548150618 DATE: 6/15/2018 Order for article, Single Tablet HIV Regimens Facilitate Virologic Suppression and Retention in Care Among Treatment Naive Patients, from Taylor & Francis by S. Geiger for C. Frelinghuysen 5/14/18	2628796
23136089	6/15/2018	19335	Gallenstein, Donald	999997	5556	Computerized Legal Research	\$57.53		2623766
23187197	6/15/2018	19335	Gallenstein, Donald	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) ALL COURTS; CASE NUMBER 18CV641; CASE TYPE CV; PAGE: 1	2633900
23187206	6/15/2018	19335	Gallenstein, Donald	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (VAEDC) 1:18-CV-00641-LMB-IDD	2633900
23136090	6/18/2018	19335	Gallenstein, Donald	999997	5556	Computerized Legal Research	\$81.85		2623766
23136091	6/19/2018	19335	Gallenstein, Donald	999997	5556	Computerized Legal Research	\$25.17		2623766
23142144	6/19/2018	16329	Sommer, Andrew	999997	5556	Service of Process Fees	\$150.00	VENDOR: Capitol Process Services, Inc. INVOICE#: 1546312 DATE: 6/19/2018 For professional process services in June 2018	2628796
23136092	6/20/2018	19335	Gallenstein, Donald	999997	5556	Computerized Legal Research	\$0.00		2623766
23136093	6/21/2018	19335	Gallenstein, Donald	999997	5556	Computerized Legal Research	\$68.31		2623766
23136094	6/22/2018	19335	Gallenstein, Donald	999997	5556	Computerized Legal Research	\$25.17		2623766
23190825	6/22/2018	19335	Gallenstein, Donald	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) ALL COURTS; CASE NUMBER 17-CV-00116; CASE TYPE CV; PAGE: 1	2633900
23190897	6/22/2018	19335	Gallenstein, Donald	999997	5556	Computer Docket System	\$1.50	New - - Old - PACER - - (VAEDC) 1:17-CV-00116-LMB-TCB	2633900
23190900	6/22/2018	19335	Gallenstein, Donald	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (VAEDC) 1:17-CV-00116-LMB-TCB DOCUMENT 23-0	2633900
23190901	6/22/2018	19335	Gallenstein, Donald	999997	5556	Computer Docket System	\$0.40	New - - Old - PACER - - (VAEDC) 1:17-CV-00116-LMB-TCB DOCUMENT 31-1	2633900
23190902	6/22/2018	19335	Gallenstein, Donald	999997	5556	Computer Docket System	\$2.70	New - - Old - PACER - - (VAEDC) 1:17-CV-00116-LMB-TCB DOCUMENT 31-0	2633900
23136095	6/25/2018	19335	Gallenstein, Donald	999997	5556	Computerized Legal Research	\$0.00		2623766
23192291	6/25/2018	19335	Gallenstein, Donald	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) ALL COURTS; CASE NUMBER 2017-CV-00116; CASE TYPE CV; PAGE: 1	2633900
23192338	6/25/2018	19335	Gallenstein, Donald	999997	5556	Computer Docket System	\$1.50	New - - Old - PACER - - (VAEDC) 1:17-CV-00116-LMB-TCB	2633900
23192339	6/25/2018	19335	Gallenstein, Donald	999997	5556	Computer Docket System	\$2.70	New - - Old - PACER - - (VAEDC) 1:17-CV-00116-LMB-TCB DOCUMENT 31-0	2633900
23192340	6/25/2018	19335	Gallenstein, Donald	999997	5556	Computer Docket System	\$0.40	New - - Old - PACER - - (VAEDC) 1:17-CV-00116-LMB-TCB DOCUMENT 31-1	2633900

23200983	7/13/2018	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.30	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD	2633900
23202880	7/17/2018	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.30	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD	2633900
23168520	7/18/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$270.08		2628796
23203787	7/18/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.30	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD	2633900
23203788	7/18/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 8-0	2633900
23203789	7/18/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$2.10	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 1-0	2633900
23203790	7/18/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 1-1	2633900
23203801	7/18/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 13-0	2633900
23175253	7/19/2018	11018	Wertheimer, Nancy	999997	5556	Overtime Transportation	\$32.49	VENDOR: Flash Cab Company INVOICE#: 50443 DATE: 8/1/2018 NANCY WERTH-35WEST WACKER DRIVE/2623W LUNT AVE	2628796
23176250	7/19/2018	16329	Sommer, Andrew	999997	5556	Messenger Services	\$68.95	VENDOR: Washington Express, LLC INVOICE#: 168147 DATE: 7/31/2018 OrderNumber: 2801393 Sherri Southern-1700 K St NW/401 Courthouse Square	2628796
23204103	7/19/2018	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.30	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD	2633900
23205343	7/19/2018	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.30	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD	2633900
23207386	7/23/2018	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.30	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD	2633900
23207767	7/24/2018	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.30	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD	2633900
23212841	7/31/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.40	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD	2633900
23212842	7/31/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 2-0	2633900
23212843	7/31/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 3-0	2633900
23212844	7/31/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 4-0	2633900
23212846	7/31/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 5-0	2633900
23212847	7/31/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 6-0	2633900
23212848	7/31/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 7-0	2633900
23212849	7/31/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 9-0	2633900
23212850	7/31/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 10-0	2633900
23212852	7/31/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 11-0	2633900
23212853	7/31/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 12-0	2633900
23233103	8/1/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$75.51		2633900
23241742	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 14-0	2633900
23241744	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 15-0	2633900
23241747	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 16-0	2633900
23241748	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 17-0	2633900
23241750	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$1.00	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 18-0	2633900
23241755	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 18-1	2633900
23241756	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 19-0	2633900
23241760	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 20-0	2633900
23241762	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 21-0	2633900
23241765	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 22-0	2633900
23241768	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 23-0	2633900
23241769	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 24-0	2633900
23241774	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.30	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 27-0	2633900
23241777	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.30	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 28-0	2633900
23241778	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 28-1	2633900
23241783	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.50	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 29-0	2633900
23241785	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.30	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 26-1	2633900
23241786	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$3.00	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 26-2	2633900
23241787	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$3.00	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 26-3	2633900
23241788	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$1.80	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 26-4	2633900
23241789	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$3.00	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 26-5	2633900
23241792	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD Document 26-6	2633900

23241794	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD Document 26-7	2633900
23241796	8/1/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD Document 32-0	2633900
23233104	8/20/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$161.80		2633900
23233105	8/23/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$118.23		2633900
23220791	8/24/2018	18795	Gianino, Vincent	999997	5556	Computerized Legal Research	\$0.00		2633900
23233106	8/24/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$0.00		2633900
23220792	8/25/2018	18795	Gianino, Vincent	999997	5556	Computerized Legal Research	\$25.94		2633900
23233107	8/26/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$0.00		2633900
23220793	8/27/2018	18795	Gianino, Vincent	999997	5556	Computerized Legal Research	\$287.54		2633900
23233108	8/27/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$7.19		2633900
23275953	9/7/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$0.00		2639097
23275954	9/10/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$310.69		2639097
23297491	9/10/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (VAEDC) 1:15-cv-01214-LMB-TCB	2656689
23297492	9/10/2018	17220	Harding, John	999997	5556	Computer Docket System	\$1.20	New - - Old - PACER - - (VAEDC) 1:15-cv-01214-LMB-TCB Document 39-0	2656689
23297493	9/10/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (VAEDC) 1:15-cv-01214-LMB-TCB Document 39-1	2656689
23298955	9/11/2018	11294	Southern, Sherri	999997	5556	Computer Docket System	\$0.50	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2656689
23299200	9/11/2018	11294	Southern, Sherri	999997	5556	Computer Docket System	\$0.50	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2656689
23262916	9/12/2018	16529	Bennett, Yolanda	999997	5556	Business Meals	\$135.53	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 2991023 DATE: 9/16/2018	2639097
23300342	9/12/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.50	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2656689
23275955	9/13/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$0.00		2639097
23260602	9/14/2018	17220	Harding, John	999997	5556	Travel - Local Transportation	\$10.00	VENDOR: Harding, John W. INVOICE#: 2773085009201800 DATE: 9/20/2018 Parking; 09/14/2018 - 09/14/2018; Parking for Hearing	2639097
23275956	9/14/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$50.34		2639097
23326293	9/14/2018	16406	Frelinghuysen, Cyrus	999997	5556	Travel - Local Transportation	\$22.41	VENDOR: Uber Technologies, Inc. INVOICE#: 32CA84 DATE: 9/30/2018 Cyrus Frelinghuysen-908 17th St NW Washington DC 20006 USA/2086 Jamieson Ave Alexandria VA 22314 USA	2656689
23323121	10/16/2018	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$115.75		2656689
23343686	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$3.00	New - - Old - PACER - - (WAWDC) 2:17-cv-01297-MJP	2656689
23343690	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.60	New - - Old - PACER - - (WAWDC) 2:17-cv-01297-MJP Document 318-0	2656689
23343783	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 1297; Case Year 2017; Case Number 2:17-cv-01297; Office 2; Case Type cv; Jurisdiction CV; Page: 1	2656689
23343841	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 1597; Case Year 2017; Case Number 1:17-cv-01597; Office 1; Case Type cv; Page: 1	2656689
23343848	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 2459; Case Year 2017; Case Number 1:17-cv-02459; Office 1; Case Type cv; Page: 1	2656689
23343893	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 1597; Case Year 2017; Case Number 1:17-cv-01597; Office 1; Case Type cv; Page: 1	2656689
23343918	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$3.00	New - - Old - PACER - - (DCDC) 1:17-cv-01597-CKK	2656689
23343919	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.90	New - - Old - PACER - - (DCDC) 1:17-cv-01597-CKK Document 76-0	2656689
23343920	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$3.00	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR	2656689
23343921	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.50	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Document 210-0	2656689
23343922	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Document 210-1	2656689
23343923	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Document 170-0	2656689
23343924	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.40	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Document 100-0	2656689
23343927	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.80	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Document 102-0	2656689
23343936	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$3.00	New - - Old - PACER - - (DCDC) 1:17-cv-01597-CKK	2656689
23343937	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$1.20	New - - Old - PACER - - (DCDC) 1:17-cv-01597-CKK Document 97-0	2656689
23343940	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$2.10	New - - Old - PACER - - (DCDC) 1:17-cv-01597-CKK Document 108-0	2656689
23343941	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (DCDC) 1:17-cv-01597-CKK Document 108-1	2656689

23343942	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (DCDC) 1:17-cv-01597-CKK Document 108-2	2656689
23343943	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (DCDC) 1:17-cv-01597-CKK Document 108-3	2656689
23343944	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (DCDC) 1:17-cv-01597-CKK Document 108-4	2656689
23343945	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (DCDC) 1:17-cv-01597-CKK Document 108-5	2656689
23343946	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (DCDC) 1:17-cv-01597-CKK Document 108-6	2656689
23343947	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$1.10	New - - Old - PACER - - (DCDC) 1:17-cv-01597-CKK Document 108-7	2656689
23343949	10/16/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.80	New - - Old - PACER - - (DCDC) 1:17-cv-01597-CKK Document 110-0	2656689
23344253	10/17/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$3.00	New - - Old - PACER - - (WAWDC) 2:17-cv-01297-MJP	2656689
23344254	10/17/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$1.90	New - - Old - PACER - - (WAWDC) 2:17-cv-01297-MJP Document 245-0	2656689
23344255	10/17/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (WAWDC) 2:17-cv-01297-MJP Document 245-1	2656689
23344261	10/17/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$1.60	New - - Old - PACER - - (WAWDC) 2:17-cv-01297-MJP Document 266-0	2656689
23344262	10/17/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.90	New - - Old - PACER - - (WAWDC) 2:17-cv-01297-MJP Document 273-0	2656689
23344370	10/17/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 1297; Case Year 2017; Case Number 2:17-cv-01297; Office 2; Case Type cv; Page: 1	2656689
23323113	10/18/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$75.68		2656689
23323122	10/18/2018	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$100.91		2656689
23345247	10/19/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 641; Case Year 2018; Case Number 18-cv-00641; Case Type cv; Page: 1	2656689
23345274	10/19/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.60	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2656689
23345275	10/19/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD Document 59-0	2656689
23292261	10/22/2018	17220	Harding, John	999997	5556	Transcript Fees	\$98.10	VENDOR: Anneliese J. Thomson INVOICE#: 20180183 DATE: 10/22/2018 Transcription Fee of 9/14/18 Motions Hearing in Nick Harrison, et al. v. James N. Mattis, et al.	2656689
23346328	10/22/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 3448; Case Year 2013; Case Number 1:13-cv-03448; Office 1; Case Type cv; Page: 1	2656689
23346330	10/22/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 2459; Case Year 2017; Case Number 1:17-cv-02459; Office 1; Case Type cv; Page: 1	2656689
23346337	10/22/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$2.80	New - - Old - PACER - - (NYEDC) 1:13-cv-03448-PKC-JO	2656689
23346338	10/22/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$1.10	New - - Old - PACER - - (NYEDC) 1:13-cv-03448-PKC-JO Document 20-1	2656689
23346339	10/22/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.70	New - - Old - PACER - - (NYEDC) 1:13-cv-03448-PKC-JO Document 20-2	2656689
23346343	10/22/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$3.00	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR	2656689
23346345	10/22/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$1.50	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Document 177-5	2656689
23346346	10/22/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$1.70	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Document 177-6	2656689
23347497	10/24/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$1.70	New - - Old - PACER - - (SDDC) 4:17-cv-04130-KES Document 83-0	2656689
23349083	10/29/2018	17220	Harding, John	999997	5556	Computer Docket System	\$3.00	New - - Old - PACER - - (WAWDC) 2:17-cv-01297-MJP	2656689
23349333	10/29/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 1297; Case Year 2017; Case Number 2:17-cv-01297; Office 2; Case Title Karnoski v. Trump; Case Type cv; Jurisdiction CV	2656689
23349335	10/29/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 1297; Case Year 2017; Case Number 2:17-cv-01297; Office 2; Case Title Karnoski v. Trump; Case Type cv; Jurisdiction CV	2656689
23349336	10/29/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 1297; Case Year 2017; Case Number 17-cv-01297; Case Title Karnoski v. Trump; Case Type cv; Jurisdiction CV	2656689
23349337	10/29/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 1297; Case Year 2017; Case Number 17-cv-01297; Case Type cv; Jurisdiction CV; Page: 1	2656689
23349379	10/29/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 116; Case Year 2017; Case Number 17-cv-00116; Case Title Aziz et al v. Trump et al. ; Case Type cv; Jurisdiction CV	2656689

23349380	10/29/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 116; Case Year 2017; Case Number 17-cv-00116; Case Type cv; Jurisdiction CV; Page: 1	2656689
23349389	10/29/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 2459; Case Year 2017; Case Number 17-cv-02459; Case Title Stone v. Trump; Case Type cv	2656689
23349391	10/29/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 2459; Case Year 2017; Case Number 17-cv-02459; Case Type cv; Page: 1	2656689
23349437	10/29/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (VAEDC) 1:17-cv-00116-LMB-TCB	2656689
23349449	10/29/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.60	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR	2656689
23349450	10/29/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Document 50-0	2656689
23349456	10/29/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.40	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Document 110-0	2656689
23349458	10/29/2018	17220	Harding, John	999997	5556	Computer Docket System	\$1.30	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Document 111-0	2656689
23332384	11/1/2018	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	\$1,527.00	VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 18110276 DATE: 11/1/2018 For October services rendered, including license fees, hosting, imports, processing, project management, etc	
23379210	11/2/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (SDDC) 4:17-cv-04130-KES Document 89-0	2656689
23379213	11/2/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.50	New - - Old - PACER - - (SDDC) 4:17-cv-04130-KES Document 82-0	2656689
23379214	11/2/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$1.20	New - - Old - PACER - - (SDDC) 4:17-cv-04130-KES Document 82-1	2656689
23379215	11/2/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$1.10	New - - Old - PACER - - (SDDC) 4:17-cv-04130-KES Document 82-2	2656689
23379216	11/2/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.60	New - - Old - PACER - - (SDDC) 4:17-cv-04130-KES Document 82-3	2656689
23379217	11/2/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.40	New - - Old - PACER - - (SDDC) 4:17-cv-04130-KES Document 82-4	2656689
23379218	11/2/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (SDDC) 4:17-cv-04130-KES Document 82-5	2656689
23379219	11/2/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.50	New - - Old - PACER - - (SDDC) 4:17-cv-04130-KES Document 82-6	2656689
23379220	11/2/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.80	New - - Old - PACER - - (SDDC) 4:17-cv-04130-KES Document 82-7	2656689
23379221	11/2/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (SDDC) 4:17-cv-04130-KES Document 80-0	2656689
23379222	11/2/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (SDDC) 4:17-cv-04130-KES Document 79-0	2656689
23379224	11/2/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$1.20	New - - Old - PACER - - (SDDC) 4:17-cv-04130-KES Document 72-0	2656689
23371784	11/3/2018	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$25.17		2656689
23380288	11/6/2018	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.60	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2656689
23456718	11/7/2018	11018	Wertheimer, Nancy	999997	5556	Document Retrieval	\$56.45	VENDOR: Wisconsin TechSearch INVOICE#: 18NOV8610 DATE: 11/30/2018 Wisconsin TechSearch, Standard for articles, 11/7/18 by T. Woodward for N. Wertheimer	2663295
23371750	11/9/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$100.67		2656689
23371751	11/12/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$31.80		2656689
23371752	11/13/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$25.23		2656689
23371785	11/13/2018	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$302.74		2656689
23416603	11/13/2018	11018	Wertheimer, Nancy	999997	5556	Document Retrieval	\$39.95	VENDOR: Diners Club Commercial INVOICE#: 55282800685548151118 DATE: 11/15/2018 Order for article, Changing Clinical Pheotypes of HIV-Associated Neurocognitive Disorders, from Springer by C. Lundin for N. Wertheimer 11/13/18	2656689
23371786	11/14/2018	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$695.36		2656689
23385297	11/16/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$2.70	New - - Old - PACER - - (DEDC) 1:16-cv-01114-RGA Start date: 1/1/1970 End date: 11/16/2018	2656689
23385922	11/19/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.60	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2656689
23371787	11/20/2018	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$75.68		2656689
23386434	11/20/2018	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.60	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2656689
23377411	11/21/2018	16406	Frelinghuysen, Cyrus	999997	5556	Messenger Services	\$34.90	VENDOR: Washington Express, LLC INVOICE#: 172557 DATE: 11/30/2018 Order Number: 2866579 Sherri Southern-1700 K St NW/401 Courthouse Square	2656689
23387181	11/21/2018	17220	Harding, John	999997	5556	Computer Docket System	\$0.60	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2656689
23371753	11/23/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$0.00		2656689
23371788	11/23/2018	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$850.54		2656689

23371754	11/24/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$0.00		2656689
23371755	11/26/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$0.00		2656689
23371756	11/27/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$1,215.81		2656689
23371757	11/28/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$458.80		2656689
23371758	11/29/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$25.23		2656689
23377412	11/29/2018	16406	Frelinghuysen, Cyrus	999997	5556	Messenger Services	\$104.70	VENDOR: Washington Express, LLC INVOICE#: 172557 DATE: 11/30/2018 Order Number: 2869739 Sherri Southern-1700 K St NW/401 Courthouse Square	2656689
23389630	11/29/2018	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.70	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2656689
23371759	11/30/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$0.00		2656689
23374422	11/30/2018	16406	Frelinghuysen, Cyrus	999997	5556	Travel - Local Transportation	\$9.00	VENDOR: Frelinghuysen, Cyrus T. INVOICE#: 2960540012072102 DATE: 12/7/2018 Parking; 11/30/2018 - 11/30/2018; Parking while attending hearing	2656689
23393878	11/30/2018	17220	Harding, John	999997	5556	Travel - Local Transportation	\$10.00	VENDOR: Harding, John W. INVOICE#: 2993121212191921 DATE: 12/19/2018 Parking; 11/30/2018 - 11/30/2018; 11/30/18 Parking to Attend Hearing Re Motion to Compel	2656689
23391521	12/1/2018	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	\$967.50	VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 18120271 DATE: 12/1/2018 For November services rendered, including license fees, hosting, imports, processing, project management, etc	
23402596	12/3/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$0.00		2656689
23419413	12/3/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$3.00	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Start date: 12/03/2017	2656689
23419414	12/3/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$3.00	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Document 209-0	2656689
23419415	12/3/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Document 209-1	2656689
23419416	12/3/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Document 228-0	2656689
23402597	12/4/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$629.04		2656689
23373885	12/6/2018	17220	Harding, John	999997	5556	Transcript Fees	\$57.75	VENDOR: Anneliese J. Thomson INVOICE#: 20180211 DATE: 12/6/2018 Transcript of 11/30/18 Motion Hearing in Harrison v. Mattis	2656689
23402621	12/11/2018	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$25.23		2656689
23402622	12/12/2018	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$25.23		2656689
23402598	12/13/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$199.31		2656689
23415721	12/13/2018	17220	Harding, John	999997	5556	Air Courier	\$7.71	VENDOR: FedEx INVOICE#: 640793776 DATE: 12/21/2018 Robert Norway WASHINGTON DC 20005 US	2656689
23402601	12/14/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$0.00		2656689
23415729	12/14/2018	16406	Frelinghuysen, Cyrus	999997	5556	Air Courier	\$12.77	VENDOR: FedEx INVOICE#: 640793776 DATE: 12/21/2018 Honorable Ivan Davis ALEXANDRIA VA 22314 US	2656689
23402599	12/18/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$25.23		2656689
23402602	12/18/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$50.46		2656689
23402603	12/19/2018	17220	Harding, John	999997	5556	Computerized Legal Research	\$50.46		2656689
23428761	12/19/2018	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.80	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2656689
23459883	12/19/2018	16329	Sommer, Andrew	999997	5556	Court Costs and Fees	\$75.00	VENDOR: Diners Club Commercial INVOICE#: 55282800685691930119 DATE: 1/15/2019 Pro Hac Vice filing fee for Julie Bauer in Roe et al v. Defense et al, 18-cv-1565	2663295
23459884	12/19/2018	16329	Sommer, Andrew	999997	5556	Court Costs and Fees	\$75.00	VENDOR: Diners Club Commercial INVOICE#: 55282800685691930119 DATE: 1/15/2019 Pro Hac Vice filing fee for Kara Nicole Ingelhart in Roe et al v. Defense et al, 18-cv-1565	2663295
23459885	12/19/2018	16329	Sommer, Andrew	999997	5556	Court Costs and Fees	\$75.00	VENDOR: Diners Club Commercial INVOICE#: 55282800685691930119 DATE: 1/15/2019 Pro Hac Vice filing fee for Lauren Gailey in Roe et al v. Defense et al, 18-cv-1565	2663295

23459886	12/19/2018	16329	Sommer, Andrew	999997	5556	Court Costs and Fees	\$75.00	VENDOR: Diners Club Commercial INVOICE#: 55282800685691930119 DATE: 1/15/2019 Pro Hac Vice filing fee for Peter Perkowski in Roe et al v. Defense et al, 18-cv-1565	2663295
23459887	12/19/2018	16329	Sommer, Andrew	999997	5556	Court Costs and Fees	\$75.00	VENDOR: Diners Club Commercial INVOICE#: 55282800685691930119 DATE: 1/15/2019 Pro Hac Vice filing fee for Scott Schoettes in Roe et al v. Defense et al, 18-cv-1565	2663295
23459888	12/19/2018	16329	Sommer, Andrew	999997	5556	Filing and Other Fees	\$400.00	VENDOR: Diners Club Commercial INVOICE#: 55282800685691930119 DATE: 1/15/2019 New complaint filing fee in Roe et al v. Defense et al, 18-cv-1565	2663295
23402600	12/20/2018	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$489.01		2656689
23418073	12/20/2018	16406	Frelinghuysen, Cyrus	999997	5556	Messenger Services	\$47.50	VENDOR: Washington Express, LLC INVOICE#: 173541 DATE: 12/31/2018 Order Number: 2880808 Sherri Southern-1700 K St NW/401 Courthouse Square	2656689
23429257	12/20/2018	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.80	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2656689
23429316	12/20/2018	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.80	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2656689
23402745	12/21/2018	17220	Harding, John	999997	5556	Travel - Local Transportation	\$9.00	VENDOR: Harding, John W. INVOICE#: 3000680612211903 DATE: 12/21/2018 Parking; 12/21/2018 - 12/21/2018; Parking to Attend Hearing	2656689
23402842	12/21/2018	17220	Harding, John	999997	5556	Court Reporter	\$5.40	VENDOR: Anneliese J. Thomson INVOICE#: 20180221 DATE: 12/21/2018 Transcript of 12/21/18 Hearing	2656689
23418074	12/21/2018	16406	Frelinghuysen, Cyrus	999997	5556	Messenger Services	\$42.70	VENDOR: Washington Express, LLC INVOICE#: 173541 DATE: 12/31/2018 Order Number: 2881693 Sherri Southern-1700 K St NW/401 Courthouse Square	2656689
23429673	12/21/2018	11018	Wertheimer, Nancy	999997	5556	Computer Docket System	\$0.80	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2656689
23437515	1/1/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	\$3,676.80	VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19010275 DATE: 1/1/2019 For December services rendered, including license fees, hosting, imports, processing, project management, etc	
23463037	1/4/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.90	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2663295
23436590	1/8/2019	17220	Harding, John	999997	5556	Computerized Legal Research	\$51.94		2663295
23449888	1/8/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$251.48	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3062394 DATE: 1/13/2019 OrderID: 1984625608 Fresh Connections Catering [DC] Harrison/Deposition 12N Yolanda Bennett	2663295
23436591	1/10/2019	17220	Harding, John	999997	5556	Computerized Legal Research	\$0.00		2663295
23451262	1/11/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$697.27		2663295
23451263	1/13/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$151.58		2663295
23459836	1/15/2019	15255	Gordon, Kimberly	999997	5556	Messenger Services	\$35.79	VENDOR: Washington Express, LLC INVOICE#: 174453 DATE: 1/31/2019 Order Number: 2889182 Kim Gordon-1700 K St NW/401 Courthouse Square	2663295
23459837	1/15/2019	15255	Gordon, Kimberly	999997	5556	Messenger Services	\$35.79	VENDOR: Washington Express, LLC INVOICE#: 174453 DATE: 1/31/2019 Order Number: 2889183 Kim Gordon-401 Courthouse Square/1700 K St NW	2663295
23459838	1/22/2019	15255	Gordon, Kimberly	999997	5556	Messenger Services	\$50.79	VENDOR: Washington Express, LLC INVOICE#: 174453 DATE: 1/31/2019 Order Number: 2891605 Kim Gordon-1700 K St NW/401 Courthouse Square	2663295
23459839	1/22/2019	15255	Gordon, Kimberly	999997	5556	Messenger Services	\$35.79	VENDOR: Washington Express, LLC INVOICE#: 174453 DATE: 1/31/2019 Order Number: 2891606 Kim Gordon-401 Courthouse Square/1700 K St NW	2663295
23451242	1/24/2019	17220	Harding, John	999997	5556	Computerized Legal Research	\$8.48		2663295
23451264	1/25/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$485.06		2663295
23459840	1/28/2019	16406	Frelinghuysen, Cyrus	999997	5556	Messenger Services	\$48.54	VENDOR: Washington Express, LLC INVOICE#: 174453 DATE: 1/31/2019 Order Number: 2893880 Sherri Southern-1700 K St NW/401 Courthouse Square	2663295
23472576	1/28/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.90	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2663295
23451265	1/29/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$697.27		2663295
23451266	1/30/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$1,931.53		2663295
23456454	1/30/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$1,931.53		2663295

23456441	1/31/2019	17220	Harding, John	999997	5556	Computerized Legal Research	\$0.00		2663295
23456455	1/31/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$51.94		2663295
23459841	1/31/2019	16406	Frelinghuysen, Cyrus	999997	5556	Messenger Services	\$90.31	VENDOR: Washington Express, LLC INVOICE#: 174453 DATE: 1/31/2019 Order Number: 2895782 Sherri Southern-1700 K St NW/401 Courthouse Square	2663295
23474679	1/31/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.00	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2663295
23474680	1/31/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.90	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD Document 112-5	2663295
23459997	2/1/2019	17220	Harding, John	999997	5556	Travel - Local Transportation	\$10.00	VENDOR: Harding, John W. INVOICE#: 3099571302111901 DATE: 2/11/2019 Parking; 02/01/2019 - 02/08/2019; Parking Re Attendance at Hearing in Harrison Matter	2665738
23475261	2/1/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	\$2,149.20	VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19020273 DATE: 2/1/2019 For January services rendered, including license fees, hosting, imports, processing, project management, etc	
23458645	2/4/2019	17220	Harding, John	999997	5556	Court Reporter	\$92.65	VENDOR: Anneliese J. Thomson INVOICE#: 20190025 DATE: 2/4/2019 Transcript of 2/1/19 Motion Hearing	2665738
23500660	2/4/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.00	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2665738
23512301	2/4/2019	15255	Gordon, Kimberly	999997	5556	Messenger Services	\$35.79	VENDOR: Washington Express, LLC INVOICE#: 175414 DATE: 2/28/2019 Order Number: 2896942 Kim Gordon-1700 K St NW/401 Courthouse Square	2665738
23512302	2/4/2019	15255	Gordon, Kimberly	999997	5556	Messenger Services	\$35.79	VENDOR: Washington Express, LLC INVOICE#: 175414 DATE: 2/28/2019 Order Number: 2896943 Kim Gordon-401 Courthouse Square/1700 K St NW	2665738
23458340	2/5/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	(\$1,527.00)	Cancellation of: VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 18110276 DATE: 11/1/2018 For October services rendered, including license fees, hosting, imports, processing, project management, etc	
23458359	2/5/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	(\$967.50)	Cancellation of: VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 18120271 DATE: 12/1/2018 For November services rendered, including license fees, hosting, imports, processing, project management, etc	
23501975	2/5/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.00	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2665738
23482160	2/7/2019	17220	Harding, John	999997	5556	Computerized Legal Research	\$30.32		2665738
23495430	2/7/2019	11098	Skogg, Gregory	999997	5556	Document Imaging & OCR	\$29.76	email print	2665738
23495686	2/7/2019	11098	Skogg, Gregory	999997	5556	Color Copies	\$46.40	email print	2665738
23496045	2/7/2019	11098	Skogg, Gregory	999997	5556	Copy Center Charges	\$1.60	Tabs	2665738
23459998	2/8/2019	17220	Harding, John	999997	5556	Travel - Local Transportation	\$6.00	VENDOR: Harding, John W. INVOICE#: 3099571302111901 DATE: 2/11/2019 Parking; 02/01/2019 - 02/08/2019; Parking Re Attendance at Hearing in Harrison Matter	2665738
23494227	2/12/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$104.28	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3082513 DATE: 2/17/2019 OrderID: 1992729000 W. Millar & Co. Catering (4PM CUT Off! NO ORDERS ACCEPTED AFTER 4PM) Deposition breakout 12K Sherri Southern	2665738
23506466	2/15/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.70	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2665738
23506528	2/15/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.70	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2665738
23507378	2/19/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.10	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2665738
23494245	2/21/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$318.57	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3083804 DATE: 2/24/2019 OrderID: 1994725765 Baja Grille Catering Lunch for Weisen Deposition 12G Myrna Taylor	2665738
23499643	2/22/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$121.20	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3092188 DATE: 3/3/2019 OrderID: 1995020358 VIPS Catering Deposition Preparation 12F Myrna Taylor	2665738
23499646	2/26/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$219.19	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3092188 DATE: 3/3/2019 OrderID: 1995677566 Fresh Connections Catering [DC] Lunch Blaylock Deposition 12G Myrna Taylor	2665738

23486643	2/27/2019	17220	Harding, John	999997	5556	Court Reporter	\$71.40	VENDOR: Anneliese J. Thomson INVOICE#: 20190042 DATE: 2/27/2019 Transcript of 2/22/19 Motion Hearing	2665738
23489667	2/27/2019	99991	Firm Attorney (CH)	999997	5556	Computerized Legal Research	\$93.52		2665738
23493073	2/27/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$30.32		2665738
23499649	2/28/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$133.80	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3092188 DATE: 3/3/2019 OrderID: 1996369290 VIPs Catering Lunch for A. Taylor Deposition 12G Myrna Taylor	2665738
23513761	3/1/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	\$3,023.95	VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19030270 DATE: 3/1/2019	2670883
23519129	3/1/2019	14367	Newby, Paula	999997	5556	Secretarial Overtime	\$37.50	Alicia Lynn	2670883
23514491	3/4/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$187.19	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3093539 DATE: 3/10/2019 OrderId: 1996976630 W. Millar & Co. Catering (4PM CUT OFF! NO ORDERS ACCEPTED AFTER 4PM) Lunch for Ciminera Deposition 12G Myrna Taylor	2670883
23514489	3/5/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$198.80	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3093539 DATE: 3/10/2019 OrderId: 1997318506 Baja Grille Catering Lunch for Soper Deposition 12G Myrna Taylor	2670883
23514488	3/6/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$181.65	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3093539 DATE: 3/10/2019 OrderId: 1997659162 Fresh Connections Catering [DC] Lunch for Navy Deposition 12G Myrna Taylor	2670883
23561207	3/6/2019	18748	Cooley, Laura	999997	5556	HVAC	\$43.20	VENDOR: 1700 K. Street Associates, LLC INVOICE#: 716101700776 DATE: 3/11/2019 Overtime HVAC on 3/6/19 until 10 pm on the 12th floor	2677084
23499104	3/7/2019	16329	Sommer, Andrew	999997	5556	Court Reporter	\$1,197.61	VENDOR: Alderson Court Reporting INVOICE#: 110560 DATE: 3/7/2019 For professional court reporting services in Harrison, et al. v. Shanahan	2670883
23514486	3/7/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$192.13	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3093539 DATE: 3/10/2019 OrderId: 1997980689 G Street Food (Corporate Catering) Lunch for Shell Deposition 12G Myrna Taylor	2670883
23518922	3/11/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$181.65	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3098153 DATE: 3/17/2019 OrderId: 1998601052 Fresh Connections Catering [DC] Lunch for Aswell Deposition 12G Myrna Taylor	2670883
23537410	3/11/2019	16329	Sommer, Andrew	999997	5556	Court Reporter	\$76.20	VENDOR: Alderson Court Reporting INVOICE#: 110830 DATE: 3/19/2019 For Professional court reporter services rendered in March 2019	2670883
23537456	3/11/2019	16329	Sommer, Andrew	999997	5556	Court Reporter	\$699.34	VENDOR: Alderson Court Reporting INVOICE#: 110619 DATE: 3/11/2019 Professional court reporting services in Harrison, et al. v. Shanahan	2670883
23518923	3/12/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$112.06	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3098153 DATE: 3/17/2019 OrderId: 1998887567 VIPs Catering Roe/Voe Preparation 12H/P Myrna Taylor	2677084
23518924	3/12/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$260.06	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3098153 DATE: 3/17/2019 OrderId: 1998890257 MGM Roast Beef Catering Lunch for Navy deposition 12G Myrna Taylor	2670883
23518925	3/13/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$201.84	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3098153 DATE: 3/17/2019 OrderId: 1999260061 G Street Food (Corporate Catering) DOD Breakout Room for Navy Deposition 12G Myrna Taylor	2670883
23540279	3/16/2019	10800	Bauer, Julie	999997	5556	Lodging	\$1,524.24	VENDOR: Bauer, Julie A INVOICE#: 3213570804041604 DATE: 3/29/2019 Hotel - Lodging; 03/16/2019 - 03/16/2019; Hotel for [Redacted] re N. Harrison et al v. J. Mattis et al.	2670883
23540293	3/16/2019	10800	Bauer, Julie	999997	5556	Lodging	\$1,524.24	VENDOR: Bauer, Julie A INVOICE#: 3213536104041604 DATE: 3/29/2019 Hotel - Lodging; 03/16/2019 - 03/16/2019; Hotel for [Redacted] re N. Harrison et al v. J. Mattis et al	2670883

23537398	3/19/2019	16329	Sommer, Andrew	999997	5556	Court Reporter	\$817.46	VENDOR: Alderson Court Reporting INVOICE#: 110827 DATE: 3/19/2019 For professional court reporter services rendered in March 2019 e David Earl Neal Jr.	2670883
23539126	3/19/2019	16329	Sommer, Andrew	999997	5556	Court Reporter	\$2,820.89	VENDOR: Alderson Court Reporting INVOICE#: 110822 DATE: 3/19/2019 For professional court reporter services in re Harrison rendered in March 2019	2670883
23546932	3/19/2019	11098	Skogg, Gregory	999997	5556	Court Reporter	\$1,139.75	VENDOR: U.S. Legal Support INVOICE#: 130096943 DATE: 3/19/2019 Court reporting services from U.S. Legal Support for the 2/28/19 deposition of Anthony Blevins in the Harrison et al. v. Shanahan et al. case	2677084
23537416	3/20/2019	16329	Sommer, Andrew	999997	5556	Court Reporter	\$1,402.17	VENDOR: Alderson Court Reporting INVOICE#: 110842 DATE: 3/20/2019 For professional court reporter services rendered in March 2019 re <b>Redacted</b>	2670883
23556983	3/20/2019	17220	Harding, John	999997	5556	Computer Docket System	\$0.80	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2677084
23539109	3/21/2019	16329	Sommer, Andrew	999997	5556	Court Reporter	\$319.65	VENDOR: Alderson Court Reporting INVOICE#: 110925 DATE: 3/21/2019 For professional court reporting services rendered in March 2019 re Derrick Long	2670883
23539573	3/21/2019	16329	Sommer, Andrew	999997	5556	Court Reporter	\$910.58	VENDOR: Alderson Court Reporting INVOICE#: 110877 DATE: 3/21/2019 For professional court reporting services rendered in March 2019 re <b>Redacted</b>	2670883
23557286	3/21/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.80	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2677084
23537374	3/22/2019	18748	Cooley, Laura	999997	5556	Video/Equipment Rental Expense	\$1,877.50	VENDOR: Veritext INVOICE#: CHI3700388 DATE: 3/22/2019 video services	2670883
23537396	3/22/2019	16329	Sommer, Andrew	999997	5556	Court Reporter	\$547.50	VENDOR: Veritext INVOICE#: CHI3693811 DATE: 3/22/2019 For professional court reporter services re M. Melillo	2670883
23537399	3/22/2019	19511	Hemmings, Alexandra	999997	5556	Transcript Fees	\$2,853.45	VENDOR: Veritext INVOICE#: CHI3697477 DATE: 3/22/2019 Transcript services	2670883
23537401	3/22/2019	18748	Cooley, Laura	999997	5556	Video/Equipment Rental Expense	\$1,972.50	VENDOR: Veritext INVOICE#: CHI3702495 DATE: 3/22/2019 Video services	2670883
23537423	3/22/2019	18748	Cooley, Laura	999997	5556	Transcript Fees	\$2,649.35	VENDOR: Veritext INVOICE#: CHI3697475 DATE: 3/22/2019 Transcript services	2670883
23537460	3/22/2019	18748	Cooley, Laura	999997	5556	Transcript Fees	\$1,109.00	VENDOR: Veritext INVOICE#: CHI3699868 DATE: 3/22/2019 Transcript Services	2670883
23537464	3/22/2019	16329	Sommer, Andrew	999997	5556	Court Reporter	\$772.10	VENDOR: Veritext INVOICE#: CHI3692982 DATE: 3/22/2019 For professional court reporter services rendered re M. Melillo	2670883
23539121	3/22/2019	18748	Cooley, Laura	999997	5556	Transcript Fees	\$1,745.20	VENDOR: Veritext INVOICE#: CHI3702925 DATE: 3/22/2019 Transcript services	2670883
23541070	3/22/2019	14893	Geiger, Sharisse	999997	5556	Air Courier	\$9.19	VENDOR: FedEx INVOICE#: 650545966 DATE: 3/29/2019 Harold Holt CHICAGO IL 60601 US	2677084
23558174	3/22/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.20	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2677084
23539102	3/25/2019	10800	Bauer, Julie	999997	5556	Transcript Fees	\$2,138.64	VENDOR: Veritext INVOICE#: CHI3704952 DATE: 3/25/2019 Court reporter transcript fees for deposition of K. Cron on March 15, 2019 in Tampa, FL	2670883
23544522	3/25/2019	18748	Cooley, Laura	999997	5556	Messenger Services	\$35.79	VENDOR: Washington Express, LLC INVOICE#: 176916 DATE: 3/31/2019 OrderNumber: Sherri Southern-1700 K St NW/401 Courthouse Square	2677084
23558531	3/25/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.20	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2677084
23537375	3/26/2019	18748	Cooley, Laura	999997	5556	Video/Equipment Rental Expense	\$1,592.50	VENDOR: Veritext INVOICE#: CHI3708688 DATE: 3/26/2019 Video Services	2670883
23537402	3/26/2019	18748	Cooley, Laura	999997	5556	Video/Equipment Rental Expense	\$547.50	VENDOR: Veritext INVOICE#: CHI3708696 DATE: 3/26/2019 Video Services	2670883
23537414	3/26/2019	10800	Bauer, Julie	999997	5556	Transcript Fees	\$1,457.50	VENDOR: Veritext INVOICE#: CHI3708701 DATE: 3/26/2019 Court reporter transcript fee for deposition of K. Cron on March 15, 2019 in Tampa, FL	2670883
23537462	3/26/2019	18748	Cooley, Laura	999997	5556	Transcript Fees	\$797.20	VENDOR: Veritext INVOICE#: CHI3707508 DATE: 3/26/2019 Transcript services	2670883
23534907	3/27/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$21.62		2670883
23559509	3/27/2019	17220	Harding, John	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 641; Case Year 2018; Case Number 18-cv-641; Case Title Harrison; Case Type cv; Jurisdiction CV; Page: 1	2677084

23559524	3/27/2019	17220	Harding, John	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 2459; Case Year 2017; Case Number 17-cv-2459; Case Title Stone; Case Type cv; Page: 1	2677084
23559570	3/27/2019	17220	Harding, John	999997	5556	Computer Docket System	\$1.20	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2677084
23559572	3/27/2019	17220	Harding, John	999997	5556	Computer Docket System	\$0.90	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD Document 112-5	2677084
23559581	3/27/2019	17220	Harding, John	999997	5556	Computer Docket System	\$2.40	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Start date: 12/27/2018	2677084
23559582	3/27/2019	17220	Harding, John	999997	5556	Computer Docket System	\$0.60	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Document 249-0	2677084
23559583	3/27/2019	17220	Harding, John	999997	5556	Computer Docket System	\$3.00	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Start date: 03/27/2018	2677084
23559585	3/27/2019	17220	Harding, John	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (MDDC) 1:17-cv-02459-GLR Document 228-0	2677084
23534908	3/28/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$38.16		2670883
23560031	3/28/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.90	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2677084
23560032	3/28/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.20	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2677084
23560043	3/28/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.90	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2677084
23531439	3/29/2019	17220	Harding, John	999997	5556	Travel - Local Transportation	\$6.00	VENDOR: Harding, John W. INVOICE#: 3213727103291607 DATE: 3/29/2019 Parking; 03/29/2019 - 03/29/2019; Parking to Attend Harrison Hearing	2670883
23544495	3/29/2019	16406	Frelinghuysen, Cyrus	999997	5556	Messenger Services	\$62.98	VENDOR: Washington Express, LLC INVOICE#: 176916 DATE: 3/31/2019 OrderNumber: Sherri Southern-1700 K St NW/401 Courthouse Square	2677084
23540181	3/31/2019	18748	Cooley, Laura	999997	5556	Court Reporter	\$1,046.50	VENDOR: Veritext INVOICE#: CHI3711418 DATE: 3/31/2019 Court Reporter and Transcript Services for P. Aswell Deposition on 3/12/19	2670883
23540182	3/31/2019	18748	Cooley, Laura	999997	5556	Court Reporter	\$1,416.60	VENDOR: Veritext INVOICE#: CHI3716333 DATE: 3/31/2019 Court Reporter and Transcript Services for Gary Brown Deposition on 3/14/19	2670883
23540185	3/31/2019	18748	Cooley, Laura	999997	5556	Court Reporter	\$1,242.20	VENDOR: Veritext INVOICE#: CHI3712316 DATE: 3/31/2019 Court Reporter and Transcript Services for R. Beland Deposition on 3/13/19	2670883
23542603	4/1/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	\$2,971.00	VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19040269 DATE: 4/1/2019 For March services rendered, including license fees, hosting, imports, processing, project management, etc	
23574744	4/1/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$30.32		2677084
23574746	4/1/2019	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$1,159.51		2677084
23574776	4/1/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$394.11		2677084
23537706	4/2/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	(\$3,676.80)	Cancellation of: VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19010275 DATE: 1/1/2019 For December services rendered, including license fees, hosting, imports, processing, project management, etc	
23537721	4/2/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	(\$2,149.20)	Cancellation of: VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19020273 DATE: 2/1/2019 For January services rendered, including license fees, hosting, imports, processing, project management, etc	
23567821	4/2/2019	99991	Firm Attorney (CH)	999997	5556	Computerized Legal Research	\$93.52		2677084
23574747	4/2/2019	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$2,129.39		2677084
23574749	4/2/2019	17220	Harding, John	999997	5556	Computerized Legal Research	\$190.38		2677084
23574777	4/2/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$1,364.22		2677084
23584339	4/3/2019	17220	Harding, John	999997	5556	Filing and Other Fees	\$75.00	VENDOR: Diners Club Commercial INVOICE#: 55282800685691930419 DATE: 4/15/2019 Pro hac vice filing fee for Alexandra Jane Hemming in 18-cv-1565. Filing under John Harding.	2688231
23584340	4/3/2019	17220	Harding, John	999997	5556	Filing and Other Fees	\$75.00	VENDOR: Diners Club Commercial INVOICE#: 55282800685691930419 DATE: 4/15/2019 Pro hac vice filing fee for Alexandra Jane Hemming in 18-cv-641. Filing under John Harding.	2688231
23606911	4/3/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.30	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2688231
23541631	4/4/2019	16329	Sommer, Andrew	999997	5556	Court Reporter	\$289.40	VENDOR: Alderson Court Reporting INVOICE#: 111197 DATE: 4/4/2019 For professional court reporting services rendered in April 2019 re Keith Rowe, Jr.	2677084

23585397	4/4/2019	17220	Harding, John	999997	5556	Messenger Services	\$36.72	VENDOR: Washington Express, LLC INVOICE#: 177940 DATE: 4/30/2019 OrderNumber: 2926658 Sherri Southern-1700 K St NW/401 Courthouse Square	2688231
23541639	4/8/2019	18748	Cooley, Laura	999997	5556	Court Reporter	\$1,022.50	VENDOR: Veritext INVOICE#: CHI3719785 DATE: 4/8/2019 Video services for deposition of Russell Beland on 3/13/19	2677084
23541643	4/8/2019	18748	Cooley, Laura	999997	5556	Court Reporter	\$1,592.50	VENDOR: Veritext INVOICE#: CHI3720344 DATE: 4/8/2019 Video services for Deposition of Paul Ciminera on 3/5/19	2677084
23541645	4/8/2019	18748	Cooley, Laura	999997	5556	Court Reporter	\$1,117.50	VENDOR: Veritext INVOICE#: CHI3720678 DATE: 4/8/2019 Video services for deposition of A. Taylor on 3-1-19	2677084
23544529	4/8/2019	18748	Cooley, Laura	999997	5556	Court Reporter	\$1,307.50	VENDOR: Veritext INVOICE#: CHI3718860 DATE: 4/8/2019 Video Services for G. Brown Deposition on 3/14/19	2677084
23567822	4/9/2019	99991	Firm Attorney (CH)	999997	5556	Computerized Legal Research	\$31.17		2677084
23574750	4/11/2019	17220	Harding, John	999997	5556	Computerized Legal Research	\$0.00		2677084
23610081	4/11/2019	18748	Cooley, Laura	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2688231
23612184	4/16/2019	16472	Pesick, Jason	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD Document 112-0	2688231
23612516	4/17/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) Name: McCotter, Richard (aty) (XML)	2688231
23612838	4/18/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) 19-1410	2688231
23612856	4/18/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) Case: 19-1410 (XML)	2688231
23612857	4/18/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) 19-1410	2688231
23612984	4/18/2019	16406	Frelinghuysen, Cyrus	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD Document 112-0	2688231
23627148	4/18/2019	16472	Pesick, Jason	999997	5556	Document Retrieval	\$227.14	VENDOR: Wisconsin TechSearch INVOICE#: 19MAY9674 DATE: 5/31/2019 Wisconsin TechSearch, 8-hour rush for articles, 4/18/19 by T. Woodward for J. Pesick	2688231
23614861	4/23/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) 19-1410	2688231
23577975	4/25/2019	11098	Skogg, Gregory	999997	5556	Document Imaging & OCR	\$38.40	email print	2677084
23577976	4/25/2019	11098	Skogg, Gregory	999997	5556	Document Imaging & OCR	\$61.68	email print	2677084
23578041	4/25/2019	11098	Skogg, Gregory	999997	5556	Document Imaging & OCR	\$59.68	email print	2677084
23578401	4/25/2019	11098	Skogg, Gregory	999997	5556	Binding	\$3.00	Binds	2677084
23578476	4/25/2019	11098	Skogg, Gregory	999997	5556	Binding	\$1.50	Binds	2677084
23578653	4/25/2019	11098	Skogg, Gregory	999997	5556	Copy Center Charges	\$1.20	Tabs	2677084
23578666	4/25/2019	11098	Skogg, Gregory	999997	5556	Copy Center Charges	\$0.90	Tabs	2677084
23578667	4/25/2019	11098	Skogg, Gregory	999997	5556	Copy Center Charges	\$0.90	Tabs	2677084
23563275	4/26/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	(\$3,023.95)	Cancellation of: VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19030270 DATE: 3/1/2019	2671772
23616168	4/26/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) 19-1410	2688231
23616348	4/26/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.30	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2688231
23616349	4/26/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.00	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2688231
23574745	4/29/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$0.00		2677084
23574748	4/29/2019	16406	Frelinghuysen, Cyrus	999997	5556	Computerized Legal Research	\$837.94		2677084
23591517	4/29/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$116.69	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3123738 DATE: 5/5/2019 OrderId: 2005621536 VIPS Catering Breakout room for Colonel Murray deposition 12P Cindy Soto-Hopp	2688231
23617648	4/30/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (04CA) 19-1410	2688231
23617649	4/30/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (04CA) Case: 19-1410, Document: 9	2688231
23617650	4/30/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) Case: 19-1410, Document: 6	2688231
23617651	4/30/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (04CA) Case: 19-1410, Document: 7	2688231
23617652	4/30/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (04CA) Case: 19-1410, Document: 8	2688231
23585094	5/1/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	\$1,627.85	VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19050275 DATE: 5/1/2019 For April services rendered, including license fees, hosting, imports, processing, project management, etc	
23603725	5/1/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$121.26		2688231

23603726	5/2/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$90.95		2688231
23591340	5/3/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$133.26	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3127314 DATE: 5/12/2019 OrderId: 2006245939 Baja Grille Catering Harrison Expert Witness Prep 12G Cindy Soto-Hopp	2688231
23591518	5/3/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$121.25	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3123738 DATE: 5/5/2019 OrderId: 2006192054 Devon & Blakely (18th St NW) Catering Deposition of Dr. Peel (Breakout Room) and Lunch 12P Yolanda Bennett	2688231
23596409	5/3/2019	99991	Firm Attorney (CH)	999997	5556	Computerized Legal Research	\$31.17		2688231
23596410	5/6/2019	99991	Firm Attorney (CH)	999997	5556	Computerized Legal Research	\$93.52		2688231
23596411	5/7/2019	99991	Firm Attorney (CH)	999997	5556	Computerized Legal Research	\$31.17		2688231
23584395	5/8/2019	19511	Hemmings, Alexandra	999997	5556	Court Reporter	\$1,832.50	VENDOR: Veritext INVOICE#: CHI3748395 DATE: 5/8/2019 Video Services for Lt. Col. Jason Okulicz, MD on 3/20/19	2688231
23584431	5/8/2019	19511	Hemmings, Alexandra	999997	5556	Court Reporter	\$617.50	VENDOR: Veritext INVOICE#: CHI3769053 DATE: 5/8/2019 Video services for Guy Palumbo Deposition on 20/19	2688231
23584445	5/8/2019	19511	Hemmings, Alexandra	999997	5556	Court Reporter	\$2,475.75	VENDOR: Veritext INVOICE#: CHI3722426 DATE: 5/8/2019 Court reporter for Guy Palumbo Deposition on 3/20/19	2688231
23663692	5/8/2019	19511	Hemmings, Alexandra	999997	5556	Court Reporter	\$617.50	VENDOR: Veritext INVOICE#: MW3769053 DATE: 5/8/2019 Video Services	2688231
23591348	5/9/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$122.30	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3127314 DATE: 5/12/2019 OrderId: 2006796461 Devon & Blakely (18th St NW) Catering Depo Prep - Dr. Hendrix 12F Somchay Chinyavong	2688231
23603727	5/10/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$0.00		2688231
23603728	5/13/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$121.26		2688231
23621409	5/13/2019	18748	Cooley, Laura	999997	5556	Court Costs and Fees	\$221.00	VENDOR: Diners Club Commercial INVOICE#: 55282800685691930519 DATE: 5/15/2019 4th Circuit bar admission fee for Laura Cooley	2688231
23635247	5/13/2019	18748	Cooley, Laura	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) Case: 19-1410 (XML)	2688231
23645748	5/13/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$122.06	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3129153 DATE: 5/19/2019 OrderId:2007116748 Who's Cookin Catering Deposition of Dr. Hoppe 12M Yolanda Bennett	2688231
23603729	5/14/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$0.00		2688231
23635968	5/14/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.10	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2688231
23636072	5/14/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.40	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2688231
23603730	5/15/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$181.90		2688231
23636451	5/15/2019	18748	Cooley, Laura	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 1565; Case Year 2018; Case Number 18-1565; Jurisdiction CV; Page: 1	2688231
23636494	5/15/2019	18748	Cooley, Laura	999997	5556	Computer Docket System	\$1.10	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2688231
23645752	5/15/2019	14877	Garcia, Angela	999997	5556	Business Meals	\$211.58	VENDOR: GrubHub Holdings Inc. d/b/a Seamless INVOICE#: 3129153 DATE: 5/19/2019 OrderId:2007427320 Fresh Connections Catering [DC] Pro Bono Harrison Team Strategy Meeting 12F Patty Brown	2688231
23585333	5/16/2019	17220	Harding, John	999997	5556	Travel - Local Transportation	\$6.00	VENDOR: Harding, John W. INVOICE#: 3330786105161602 DATE: 5/16/2019 Parking; 05/16/2019 - 05/16/2019; Parking to Attend Final Pre-Trial Conference	2688231
23588411	5/17/2019	11098	Skogg, Gregory	999997	5556	Court Reporter	\$2,786.35	VENDOR: Veritext INVOICE#: PA3777921 DATE: 5/17/2019 Transcript services for witness - Colonel Clinton K. Murray, M.D.	2688231
23603731	5/17/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$0.00		2688231
23624693	5/17/2019	12889	McConnell, Gregory	999997	5556	Professional/Consulting Fees	\$1,862.51	VENDOR: Perkowski Legal, PC INVOICE#: 148 DATE: 5/17/2019 Deposition - K.R (rescheduled)	2688231
23624708	5/17/2019	12889	McConnell, Gregory	999997	5556	Professional/Consulting Fees	\$2,490.08	VENDOR: Perkowski Legal, PC INVOICE#: 149 DATE: 5/17/2019 Depositions K.R., Roe and Voe	2688231
23628736	5/17/2019	12889	McConnell, Gregory	999997	5556	Professional/Consulting Fees	\$1,552.16	VENDOR: Perkowski Legal, PC INVOICE#: 147 DATE: 5/17/2019 Andy Blevins - deposition	2688231

23628737	5/17/2019	12889	McConnell, Gregory	999997	5556	Professional/Consulting Fees	\$908.38	VENDOR: Perkowski Legal, PC INVOICE#: 152 DATE: 5/17/2019 S.H /D.L. Depositions	2688231
23637683	5/17/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.10	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2688231
23637684	5/17/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.50	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2688231
23648099	5/17/2019	12889	McConnell, Gregory	999997	5556	Professional/Consulting Fees	\$1,801.63	VENDOR: Perkowski Legal, PC INVOICE#: 151 DATE: 5/17/2019 Roe PI - preliminary injunction motion hearing, moot, and team strategy meetings	2688231
23663906	5/17/2019	12889	McConnell, Gregory	999997	5556	Professional/Consulting Fees	\$713.41	VENDOR: Perkowski Legal, PC INVOICE#: 150 DATE: 5/17/2019 Q.S. deposition	2688231
23668981	5/20/2019	18748	Cooley, Laura	999997	5556	Messenger Services	\$73.43	VENDOR: Washington Express, LLC INVOICE#: 178897 DATE: 5/31/2019 OrderNumber: 2948863 Sherri Southern-1700 K St NW/401 Courthouse Square	2693500
23588408	5/21/2019	10800	Bauer, Julie	999997	5556	Transcript Fees	\$1,457.55	VENDOR: Alderson Court Reporting INVOICE#: 112352 DATE: 5/21/2019 Court reporter and transcript fees for deposition of W. Hardy, M.D. on May 7, 2019	2688231
23638618	5/21/2019	18748	Cooley, Laura	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 1410; Case Year 2019; Case Number 19-1410; Page: 1	2688231
23638649	5/21/2019	18748	Cooley, Laura	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) Case: 19-1410 (XML)	2688231
23638653	5/21/2019	18748	Cooley, Laura	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) Case: 19-1410 (XML)	2688231
23638674	5/21/2019	18748	Cooley, Laura	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) 19-1410	2688231
23638675	5/21/2019	18748	Cooley, Laura	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) Case: 19-1410, Document: 6	2688231
23638715	5/21/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (04CA) 19-1410	2688231
23643300	5/21/2019	15255	Gordon, Kimberly	999997	5556	Court Costs and Fees	\$75.00	VENDOR: Diners Club Commercial INVOICE#: 55282800685691930619 DATE: 6/15/2019 PHV filing fee for co-counsel. Filing completed by Kim Gordon.	2688231
23603755	5/22/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$121.26		2688231
23623156	5/23/2019	10800	Bauer, Julie	999997	5556	Transcript Fees	\$2,117.75	VENDOR: Alderson Court Reporting INVOICE#: 112519 DATE: 5/23/2019 Court reporter and transcript fee for deposition of C Hendrix, M.D. on May 10, 2019	2688231
23603756	5/24/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$403.44		2688231
23640254	5/24/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.20	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2688231
23589987	5/27/2019	19511	Hemmings, Alexandra	999997	5556	Transcript Fees	\$2,311.07	VENDOR: Veritext INVOICE#: PA3791098 DATE: 5/27/2019 Case: Richard, Roe et al. v. Shanahan, Patrick M. for witness Sheila Peel, Ph.D. re transcript services, etc.	2688231
23589985	5/28/2019	10800	Bauer, Julie	999997	5556	Transcript Fees	\$572.90	VENDOR: Alderson Court Reporting INVOICE#: 112599 DATE: 5/28/2019 Court reporter and transcript service for deposition of T. Hoppe on May 14, 2019	2688231
23640824	5/28/2019	11098	Skogg, Gregory	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) Case: 19-1410 (XML)	2688231
23640825	5/28/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.60	New - - Old - PACER - - (04CA) Case: 19-1410, Document: 2	2688231
23640826	5/28/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) Case: 19-1410, Document: 1	2688231
23640827	5/28/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (04CA) Case: 19-1410, Document: 3	2688231
23640828	5/28/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) Case: 19-1410, Document: 4	2688231
23641291	5/29/2019	11098	Skogg, Gregory	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) Case: 19-1410 (XML)	2688231
23641292	5/29/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (04CA) 19-1410	2688231
23641319	5/29/2019	11098	Skogg, Gregory	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (04CA) 19-1410	2688231
23641321	5/29/2019	11098	Skogg, Gregory	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (04CA) 19-1410 (XML)	2688231
23641324	5/29/2019	11098	Skogg, Gregory	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (04CA) 19-1410	2688231
23641643	5/29/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.40	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2688231
23641644	5/29/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.50	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2688231
23641645	5/29/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$3.00	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD Document 144-0	2688231
23641646	5/29/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.50	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD Document 144-1	2688231
23641647	5/29/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.60	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD Document 144-2	2688231
23641648	5/29/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.70	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD Document 144-3	2688231

23641649	5/29/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.00	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD Document 144-4	2688231
23641650	5/29/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.40	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD Document 144-5	2688231
23641651	5/29/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD Document 144-6	2688231
23641652	5/29/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.50	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD Document 144-7	2688231
23641653	5/29/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.20	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2688231
23641654	5/29/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.20	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2688231
23641670	5/29/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.20	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2688231
23622353	5/31/2019	17220	Harding, John	999997	5556	Travel - Local Transportation	\$9.00	VENDOR: Harding, John W. INVOICE#: 3371375706031807 DATE: 6/3/2019 Parking; 05/31/2019 - 05/31/2019; Parking Re Hearing on Motion to Dismiss	2688231
23626194	6/1/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	\$2,052.65	VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19060279 DATE: 6/1/2019 For May services rendered, including license fees, hosting, imports, processing, project management, etc	
23645646	6/2/2019	11098	Skogg, Gregory	999997	5556	Overtime Transportation	\$23.29	VENDOR: Flash Cab Company INVOICE#: 58417 DATE: 6/17/2019 GREG SKOGG-35 W WACKER DR/5415 N SHERIDAN RD	2688231
23603880	6/3/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	(\$2,971.00)	Cancellation of: VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19040269 DATE: 4/1/2019 For March services rendered, including license fees, hosting, imports, processing, project management, etc	
23658458	6/3/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$166.58		2688231
23658431	6/4/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$0.00		2688231
23658459	6/4/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$106.11		2688231
23627147	6/12/2019	17220	Harding, John	999997	5556	Court Reporter	\$32.40	VENDOR: Anneliese J. Thomson INVOICE#: 20190110 DATE: 6/12/2019 Transcript of 5/31/19 Hearing in Harrison/Roe v. Shanahan, et al.	2688231
23676581	6/14/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (04CA) 19-1410	2693500
23676641	6/14/2019	18748	Cooley, Laura	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) Case: 19-1410 (XML)	2693500
23677517	6/18/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.70	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2693500
23678663	6/20/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (04CA) 19-1410	2693500
23678666	6/20/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (04CA) 19-1410	2693500
23658432	6/21/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$303.11		2688231
23658433	6/22/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$159.16		2688231
23658434	6/23/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$159.16		2688231
23658435	6/24/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$53.05		2688231
23658460	6/24/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$212.21		2688231
23658436	6/25/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$13.36		2688231
23658461	6/25/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$106.11		2688231
23667216	7/1/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	\$2,482.00	VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19070249 DATE: 7/1/2019 For June services rendered, including license fees, hosting, imports, processing, project management, etc	
23688758	7/2/2019	16472	Pesick, Jason	999997	5556	Computerized Legal Research	\$0.00		2693500
23688821	7/2/2019	99991	Firm Attorney (CH)	999997	5556	Computerized Legal Research	\$109.11		2693500
23671455	7/8/2019	10800	Bauer, Julie	999997	5556	Transcript Fees	\$1,779.26	VENDOR: Alderson Court Reporting INVOICE#: 113609 DATE: 7/8/2019 Court reporter and transcript fees for deposition of A. Blevins on July 2, 2019	2693500
23688822	7/8/2019	99991	Firm Attorney (CH)	999997	5556	Computerized Legal Research	\$177.78		2693500
23695756	7/8/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$0.00		2693500
23695757	7/9/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$146.17		2693500
23706952	7/9/2019	18748	Cooley, Laura	999997	5556	Messenger Services	\$52.98	VENDOR: Washington Express, LLC INVOICE#: 180791 DATE: 7/31/2019 OrderNumber: 2970560 Paula Trimble-1700 K St NW/401 Courthouse Square	2698821
23695758	7/10/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$106.11		2693500
23728166	7/11/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.50	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2698821
23695759	7/12/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$53.05		2693500
23728680	7/12/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.50	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2698821
23728767	7/12/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.50	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2698821

23728768	7/12/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.80	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2698821
23728805	7/12/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.80	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2698821
23688754	7/14/2019	18795	Gianino, Vincent	999997	5556	Computerized Legal Research	\$296.04		2693500
23688755	7/15/2019	18795	Gianino, Vincent	999997	5556	Computerized Legal Research	\$109.11		2693500
23695760	7/15/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$238.92		2693500
23706953	7/15/2019	18748	Cooley, Laura	999997	5556	Messenger Services	\$113.45	VENDOR: Washington Express, LLC INVOICE#: 180791 DATE: 7/31/2019 OrderNumber: 2973395 Myrna Taylor-1700 K St NW/401 Courthouse Square	2698821
23670134	7/16/2019	18748	Cooley, Laura	999997	5556	Transcript Fees	\$70.85	VENDOR: Anneliese J. Thomson INVOICE#: 20190130 DATE: 7/16/2019 Transcript order	2693500
23695761	7/16/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$53.05		2693500
23695762	7/17/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$218.52		2693500
23688756	7/18/2019	18821	Parker, Chris	999997	5556	Computerized Legal Research	\$218.22		2693500
23695763	7/18/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$0.00		2693500
23730523	7/18/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.40	New - - Old - PACER - - (04CA) 19-1410	2698821
23688757	7/19/2019	18821	Parker, Chris	999997	5556	Computerized Legal Research	\$272.77		2693500
23706954	7/19/2019	18748	Cooley, Laura	999997	5556	Messenger Services	\$47.98	VENDOR: Washington Express, LLC INVOICE#: 180791 DATE: 7/31/2019 OrderNumber: 2975900 Sherri Southern-1700 K St NW/401 Courthouse Square	2698821
23731314	7/19/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.90	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2698821
23731315	7/19/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.70	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2698821
23731316	7/19/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.70	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2698821
23731317	7/19/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.90	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2698821
23688759	7/20/2019	16472	Pesick, Jason	999997	5556	Computerized Legal Research	\$0.00		2693500
23688760	7/22/2019	16472	Pesick, Jason	999997	5556	Computerized Legal Research	\$0.00		2693500
23695764	7/22/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$0.00		2693500
23704886	7/23/2019	18748	Cooley, Laura	999997	5556	Air Courier	\$8.23	VENDOR: FedEx INVOICE#: 662437359 DATE: 7/26/2019 Anneliese J. Thomson ALEXANDRIA VA 22314 US	2693500
23732250	7/23/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.90	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2698821
23732251	7/23/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.80	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2698821
23695765	7/24/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$0.00		2693500
23706955	7/24/2019	18748	Cooley, Laura	999997	5556	Messenger Services	\$47.98	VENDOR: Washington Express, LLC INVOICE#: 180791 DATE: 7/31/2019 OrderNumber: 2977804 Paula Trimble-1700 K St NW/401 Courthouse Square	2698821
23732601	7/24/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.50	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD Start date: 07/17/2019	2698821
23732602	7/24/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.50	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD Start date: 07/17/2019	2698821
23732747	7/24/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.90	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2698821
23733357	7/26/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.90	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2698821
23733361	7/26/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.90	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2698821
23734209	7/30/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.00	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2698821
23696610	7/31/2019	16472	Pesick, Jason	999997	5556	Business Meals - Conference Roo	\$80.00	Order ID: 160015 Conference Room 47G 4 Lunch: Hot: Greek Themed J. Pesick - Client Meeting	2693500
23723709	7/31/2019	16472	Pesick, Jason	999997	5556	Business Meals - Conference Roo	\$80.00	Order ID: 160015 Conference Room 47G 4 Lunch: Hot: Greek Themed J. Pesick - Client Meeting	2698821
23709560	8/1/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	\$3,004.65	VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19080260 DATE: 8/1/2019 For July services rendered, including license fees, hosting, imports, processing, project management, etc	
23700493	8/2/2019	18748	Cooley, Laura	999997	5556	Court Reporter	\$1,804.66	VENDOR: Hoffman Reporting & Video Service INVOICE#: 1032562 DATE: 8/2/2019 Oral and video deposition/Col. P. Danaher	2698821
23741307	8/2/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.90	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2703834

23716461	8/5/2019	18795	Gianino, Vincent	999997	5556	Computerized Legal Research	\$54.55		2698821
23716462	8/6/2019	18795	Gianino, Vincent	999997	5556	Computerized Legal Research	\$0.00		2698821
23716463	8/8/2019	18795	Gianino, Vincent	999997	5556	Computerized Legal Research	\$0.00		2698821
23716464	8/9/2019	18795	Gianino, Vincent	999997	5556	Computerized Legal Research	\$0.00		2698821
23716465	8/12/2019	18795	Gianino, Vincent	999997	5556	Computerized Legal Research	\$0.00		2698821
23716466	8/13/2019	18795	Gianino, Vincent	999997	5556	Computerized Legal Research	\$0.00		2698821
23745728	8/16/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.80	New - Old - PACER - (04CA) 19-1410	2703834
23745729	8/16/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.80	New - Old - PACER - (04CA) 19-1410	2703834
23746753	8/20/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.00	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD	2703834
23746756	8/20/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.90	New - Old - PACER - (VAEDC) 1:18-cv-01565-LMB-IDD	2703834
23746758	8/20/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.80	New - Old - PACER - (04CA) 19-1410	2703834
23723328	8/26/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$0.00		2698821
23737118	8/26/2019	16472	Pesick, Jason	999997	5556	Document Imaging & OCR	\$21.12	email print	2698821
23737536	8/26/2019	16472	Pesick, Jason	999997	5556	Binding	\$1.50	Binds	2698821
23737725	8/26/2019	16472	Pesick, Jason	999997	5556	Copy Center Charges	\$0.70	Tabs	2698821
23710350	8/27/2019	19511	Hemmings, Alexandra	999997	5556	Court Reporter	(\$617.50)	Cancellation of: VENDOR: Veritext INVOICE#: MW3769053 DATE: 5/8/2019 Video Services	2698821
23723329	8/27/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$0.00		2698821
23749929	8/27/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.00	New - Old - PACER - (VAEDC) 1:18-cv-00641-LMB-IDD	2703834
23749930	8/27/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.90	New - Old - PACER - (VAEDC) 1:18-cv-01565-LMB-IDD	2703834
23749931	8/27/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.80	New - Old - PACER - (04CA) 19-1410	2703834
23723330	8/28/2019	18748	Cooley, Laura	999997	5556	Computerized Legal Research	\$0.00		2698821
23711661	8/30/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	(\$1,627.85)	Cancellation of: VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19050275 DATE: 5/1/2019 For April services rendered, including license fees, hosting, imports, processing, project management, etc	
23711701	8/30/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	(\$2,052.65)	Cancellation of: VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19060279 DATE: 6/1/2019 For May services rendered, including license fees, hosting, imports, processing, project management, etc	
23711711	8/30/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	(\$2,482.00)	Cancellation of: VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19070249 DATE: 7/1/2019 For June services rendered, including license fees, hosting, imports, processing, project management, etc	
23751647	8/30/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.00	New - Old - PACER - (VAEDC) 1:18-cv-01565-LMB-IDD	2703834
23759823	9/1/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	\$1,050.15	VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19090269 DATE: 9/1/2019 For August services rendered, including license fees, hosting, imports, processing, project management, etc	
23773299	9/15/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$1,877.26		2703834
23795029	9/15/2019	19511	Hemmings, Alexandra	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (00PCL) All Courts; Case Number 1565; Case Year 2018; Case Number 1:18-cv-01565; Office 1; Case Type cv; Page: 1	2709723
23795033	9/15/2019	19511	Hemmings, Alexandra	999997	5556	Computer Docket System	\$0.60	New - Old - PACER - (VAEDC) 1:18-cv-01565-LMB-IDD	2709723
23795034	9/15/2019	19511	Hemmings, Alexandra	999997	5556	Computer Docket System	\$2.30	New - Old - PACER - (VAEDC) 1:18-cv-01565-LMB-IDD Document 216-0	2709723
23795035	9/15/2019	19511	Hemmings, Alexandra	999997	5556	Computer Docket System	\$1.00	New - Old - PACER - (VAEDC) 1:18-cv-01565-LMB-IDD Document 216-1	2709723
23795036	9/15/2019	99992	Firm Attorney (DC)	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (04CA) Case: 18-01565	2709723
23795037	9/15/2019	99992	Firm Attorney (DC)	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (04CA) Case: 18-01565	2709723
23795038	9/15/2019	99992	Firm Attorney (DC)	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (04CA) Name: gailey, lauren (pty)	2709723
23795039	9/15/2019	99992	Firm Attorney (DC)	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (04CA) Name: gailey, lauren (aty)	2709723
23795040	9/15/2019	99992	Firm Attorney (DC)	999997	5556	Computer Docket System	\$0.20	New - Old - PACER - (04CA) 19-1410	2709723
23795041	9/15/2019	19511	Hemmings, Alexandra	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (00PCL) All Courts; Case Number 1410; Case Year 2019; Case Number 19-1410; Page: 1	2709723
23795042	9/15/2019	19511	Hemmings, Alexandra	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (00PCL) All Courts; Case Number 1410; Case Year 2019; Case Number 19-1410; Jurisdiction AP; Page: 1	2709723
23795045	9/15/2019	19511	Hemmings, Alexandra	999997	5556	Computer Docket System	\$0.10	New - Old - PACER - (04CA) 19-1410	2709723

23795046	9/15/2019	19511	Hemmings, Alexandra	999997	5556	Computer Docket System	\$3.00	New - - Old - PACER - - (04CA) Case: 19-1410, Document: 59	2709723
23773300	9/16/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$53.05		2703834
23781661	10/1/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	\$300.15	VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19100268 DATE: 10/1/2019 For September services rendered, including license fees, hosting, imports, processing, project management, etc	
23830688	10/4/2019	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.00	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2715432
23816338	10/7/2019	11098	Skogg, Gregory	999997	5556	Document Imaging & OCR	\$8.40	email print	2709723
23816921	10/7/2019	11098	Skogg, Gregory	999997	5556	Binding	\$1.50	Binds	2709723
23817153	10/7/2019	11098	Skogg, Gregory	999997	5556	Copy Center Charges	\$0.70	Tabs	2709723
23813739	10/22/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$106.11		2709723
23803549	11/1/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	(\$3,004.65)	Cancellation of: VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19080260 DATE: 8/1/2019 For July services rendered, including license fees, hosting, imports, processing, project management, etc	
23803563	11/1/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	(\$1,050.15)	Cancellation of: VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19090269 DATE: 9/1/2019 For August services rendered, including license fees, hosting, imports, processing, project management, etc	
23822833	11/1/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	\$825.15	VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19110260 DATE: 11/1/2019 For October services rendered, including license fees, hosting, imports, processing, project management, etc	
23857917	11/5/2019	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$53.05		2715432
23847749	11/27/2019	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	(\$300.15)	Cancellation of: VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19100268 DATE: 10/1/2019 For September services rendered, including license fees, hosting, imports, processing, project management, etc	
23918671	12/19/2019	19511	Hemmings, Alexandra	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) ALL COURTS; CASE NUMBER 1410; CASE YEAR 2019; CASE NUMBER 19-1410; CASE TITLE ROE	2723948
23890922	1/2/2020	99990	Firm Attorney (FW)	999997	5556	Electronic Discovery Services	(\$825.15)	Cancellation of: VENDOR: Winston & Strawn LLP - EDSS INVOICE#: 19110260 DATE: 11/1/2019 For October services rendered, including license fees, hosting, imports, processing, project management, etc	
23953853	1/9/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.80	New - - Old - PACER - - (04CA) 19-1410	2731600
23955502	1/13/2020	10786	Bach, Edward	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (04CA) Case: 19-1410 (XML)	2731600
23955503	1/13/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.80	New - - Old - PACER - - (04CA) 19-1410	2731600
23957644	1/17/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.00	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2731600
23963732	1/31/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.80	New - - Old - PACER - - (04CA) 19-1410	2731600
24016958	2/14/2020	99992	Firm Attorney (DC)	999997	5556	Computer Docket System	\$2.00	Gordon, Kimberly Docket Report (VAEDC) 1:18-cv-01565-LMB-IDD	2738860
24020057	2/25/2020	99992	Firm Attorney (DC)	999997	5556	Computer Docket System	\$0.80	Gordon, Kimberly Docket Report (filtered) (04CA) 19-1410	2738860
24032200	4/7/2020	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$40.07		2744078
24066175	4/29/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.10	(VAEDC) 1:18-cv-00641-LMB-IDD	2744078
24066186	4/29/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.10	(VAEDC) 1:18-cv-01565-LMB-IDD	2744078
24066187	4/29/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.10	(VAEDC) 1:18-cv-01565-LMB-IDD	2744078
24066205	4/29/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.80	(04CA) 19-1410	2744078
24066206	4/29/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.80	(04CA) 19-1410	2744078
24072055	5/4/2020	19321	Steeg, Aaron	999997	5556	Computerized Legal Research	\$82.31		2744078
24073184	5/4/2020	19336	Rogers, Siarra	999997	5556	Computerized Legal Research	\$53.05		2744078
24081474	5/4/2020	11098	Skogg, Gregory	999997	5556	Document Imaging & OCR	\$1.76	Null	2744078
24081571	5/4/2020	11098	Skogg, Gregory	999997	5556	Document Imaging & OCR	\$1.76	Null	2744078
24140413	5/4/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.10	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2762265
24140414	5/4/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.10	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2762265
24140729	5/5/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.80	New - - Old - PACER - - (04CA) 19-1410	2762265
24140730	5/5/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$0.80	New - - Old - PACER - - (04CA) 19-1410	2762265
24140732	5/5/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.20	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2762265
24140733	5/5/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.20	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2762265

24140743	5/5/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.20	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2762265
24140745	5/5/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.20	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2762265
24141135	5/5/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.20	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2762265
24141136	5/5/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.20	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2762265
24141137	5/5/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$1.20	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD Document 257-35	2762265
24141732	5/6/2020	17220	Harding, John	999997	5556	Computer Docket System	\$0.10	New - - Old - PACER - - (00PCL) All Courts; Case Number 1565; Case Year 2018; Case Number 18-cv-01565; Case Type cv; Page: 1	2762265
24141775	5/6/2020	17220	Harding, John	999997	5556	Computer Docket System	\$0.70	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2762265
24141777	5/6/2020	17220	Harding, John	999997	5556	Computer Docket System	\$0.70	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2762265
24142060	5/7/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.20	New - - Old - PACER - - (VAEDC) 1:18-cv-00641-LMB-IDD	2762265
24142067	5/7/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.20	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2762265
24142068	5/7/2020	15255	Gordon, Kimberly	999997	5556	Computer Docket System	\$2.20	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD	2762265
24145153	5/14/2020	11098	Skogg, Gregory	999997	5556	Computer Docket System	\$0.50	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD Start date: 02/14/2020	2762265
24145154	5/14/2020	11098	Skogg, Gregory	999997	5556	Computer Docket System	\$0.30	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD Document 265-0	2762265
24145155	5/14/2020	11098	Skogg, Gregory	999997	5556	Computer Docket System	\$0.20	New - - Old - PACER - - (VAEDC) 1:18-cv-01565-LMB-IDD Document 265-1	2762265
24087533	6/5/2020	16472	Pesick, Jason	999997	5556	Computerized Legal Research	\$54.55		2753578
24087534	6/6/2020	16472	Pesick, Jason	999997	5556	Computerized Legal Research	\$0.00		2753578
24092716	6/19/2020	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$340.21		2753578
24092717	6/22/2020	99992	Firm Attorney (DC)	999997	5556	Computerized Legal Research	\$371.37		2753578
24094935	6/30/2020	11098	Skogg, Gregory	999997	5556	Computerized Legal Research	\$0.00		2753578
24128910	7/6/2020	14488	Stull, Mark	999997	5556	Messenger Services	\$122.88	VENDOR: Washington Express, LLC INVOICE#: 190096 DATE: 7/31/2020 OrderNumber: 3112960 Dimika Evans-1901 L St NW/401 Courthouse Square	2762265
24117303	7/15/2020	11098	Skogg, Gregory	999997	5556	Document Imaging & OCR	\$17.44	email print	2762265
24117671	7/15/2020	11098	Skogg, Gregory	999997	5556	Binding	\$1.50	Binds	2762265
24117756	7/15/2020	11098	Skogg, Gregory	999997	5556	Copy Center Charges	\$0.30	Tabs	2762265
24112412	7/24/2020	16472	Pesick, Jason	999997	5556	Computerized Legal Research	\$54.55		2762265
24171600	9/11/2020	14488	Stull, Mark	999997	5556	Messenger Services	\$73.40	VENDOR: Washington Express, LLC INVOICE#: 191211 DATE: 9/30/2020 Sabrina Cabbagestalk-1901 L St NW/400 Courthouse Square	2769284
24193982	9/14/2020	99992	Firm Attorney (DC)	999997	5556	Computer Docket System	\$2.50	(VAE99992) 1:18-cv-00641-LMB-IDD	2769284
24173691	10/13/2020	17220	Harding, John	999997	5556	Court Reporter	\$124.10	VENDOR: Anneliese J. Thomson INVOICE#: 20200141 DATE: 10/13/2020 9/14/2020 Motions Hearing Transcript Re Harrison/Roe v. Mark Esper	2777933
24397421	4/7/2021	17220	Harding, John	999997	5556	Filing and Other Fees	\$75.00	VENDOR: Diners Club Commercial INVOICE#: 5528286869590421 DATE: 4/15/2021 PHV filing fee for Gregory Nevins re: Roe et al v. Defense et al	2827233
24397422	4/7/2021	17220	Harding, John	999997	5556	Filing and Other Fees	\$75.00	VENDOR: Diners Club Commercial INVOICE#: 5528286869590421 DATE: 4/15/2021 PHV filing fee for Gregory Nevins re: Harrison et al v. Spencer et al	2827233
24446811	10/30/2021	11098	Skogg, Gregory	999997	5556	Computerized Legal Research	\$328.09		2833353
24553471	3/1/2022	17220	Harding, John	999997	5556	Computerized Legal Research	\$0.00		2855796
24575323	4/19/2022	17220	Harding, John	999997	5556	Computerized Legal Research	\$239.30		2867585
24575324	4/20/2022	17220	Harding, John	999997	5556	Computerized Legal Research	\$79.77		2867585
24575325	4/21/2022	17220	Harding, John	999997	5556	Computerized Legal Research	\$0.00		2867585
24575326	4/25/2022	17220	Harding, John	999997	5556	Computerized Legal Research	\$100.91		2867585
24575327	4/26/2022	17220	Harding, John	999997	5556	Computerized Legal Research	\$0.00		2867585
24575328	4/27/2022	17220	Harding, John	999997	5556	Computerized Legal Research	\$0.00		2867585
24595904	5/1/2022	17220	Harding, John	999997	5556	Computerized Legal Research	\$0.00		0
24595905	5/3/2022	17220	Harding, John	999997	5556	Computerized Legal Research	\$79.77		0
24615757	6/1/2022	17220	Harding, John	999997	5556	Computerized Legal Research	\$159.53		0
24615758	6/15/2022	17220	Harding, John	999997	5556	Computerized Legal Research	\$0.00		0

Disb ID	Date	Tkpr	TKPR Name	Client	Matter	Cost Desc	Base Amt	Narrative	Bill Num
23817800	9/3/2019	14552	Eaton, Geoffrey	999997	6131	Travel - Long Distance Transportation	\$19.00	VENDOR: Uber Technologies, Inc. INVOICE#: AF0191 DATE: 9/30/2019 Geoffrey Eaton-1730 K St NW Washington DC 20006 USA/4 Aviation Cir Arlington VA 22202 USA --	2709723
23817801	9/3/2019	14552	Eaton, Geoffrey	999997	6131	Travel - Long Distance Transportation	\$2.00	VENDOR: Uber Technologies, Inc. INVOICE#: AF0191 DATE: 9/30/2019 Geoffrey Eaton-1730 K St NW Washington DC 20006 USA/4 Aviation Cir Arlington VA 22202 USA --	2709723
23817874	9/4/2019	14552	Eaton, Geoffrey	999997	6131	Travel - Long Distance Transportation	\$39.29	VENDOR: Uber Technologies, Inc. INVOICE#: AF0191 DATE: 9/30/2019 Geoffrey Eaton-35 W Wacker Dr Chicago IL 60601 USA/Chicago IL 60666 USA --	2709723
23817875	9/4/2019	14552	Eaton, Geoffrey	999997	6131	Travel - Long Distance Transportation	\$5.69	VENDOR: Uber Technologies, Inc. INVOICE#: AF0191 DATE: 9/30/2019 Geoffrey Eaton-35 W Wacker Dr Chicago IL 60601 USA/Chicago IL 60666 USA --	2709723
23773284	9/16/2019	14552	Eaton, Geoffrey	999997	6131	Computerized Legal Research	\$1,634.02		2703834
23773285	9/17/2019	14552	Eaton, Geoffrey	999997	6131	Computerized Legal Research	\$2,320.17		2703834
23777847	9/17/2019	10800	Bauer, Julie	999997	6131	Travel - Long Distance Transportation	\$45.00	VENDOR: Bauer, Julie A INVOICE#: 3670623010031605 DATE: 10/2/2019 Taxi; 09/17/2019 - 09/18/2019; Travel to Virginia to attend oral argument	2703834
23777848	9/17/2019	10800	Bauer, Julie	999997	6131	Business Meals	\$38.73	VENDOR: Bauer, Julie A INVOICE#: 3670623010031605 DATE: 10/2/2019 Dinner; 09/17/2019 - 09/18/2019; Travel to Virginia to attend oral argument, Julie Bauer	2703834
23777849	9/18/2019	10800	Bauer, Julie	999997	6131	Travel - Long Distance Transportation	\$51.00	VENDOR: Bauer, Julie A INVOICE#: 3670623010031605 DATE: 10/2/2019 Parking 09/17/2019 - 09/18/2019; Travel to Virginia to attend oral argument	2703834
23777850	9/18/2019	10800	Bauer, Julie	999997	6131	Lodging	\$350.10	VENDOR: Bauer, Julie A INVOICE#: 3670623010031605 DATE: 10/2/2019 Hotel - Lodging; 09/17/2019 - 09/18/2019; Travel to Virginia to attend oral argument	2703834

# EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

RICHARD ROE, ET AL.,

PLAINTIFFS,

v.

LLOYD AUSTIN, ET AL.,  
DEFENDANTS.

CIVIL ACTION NO. 1:18-cv-01565

NICHOLAS HARRISON, ET AL.,

PLAINTIFFS,

v.

LLOYD AUSTIN, ET AL.,  
DEFENDANTS.

CIVIL ACTION NO. 1:18-CV-00641

**AFFIDAVIT OF CHARLES B. MOLSTER, III**

COMES NOW the affiant, Mr. Charles B. Molster, III, Esq., and under oath hereby submits the following affidavit in support of the Motion for Attorneys' Fees and Costs filed herein on behalf of counsel for Plaintiffs. *Harrison*, ECF No. 328; *Roe*, ECF No. 342.

1. I am a practicing attorney with my own firm, the Law Offices of Charles B. Molster, III PLLC. I obtained my J.D. from the University of Richmond School of Law in 1983. From 1983-1984, I served as a law clerk for the Hon. James C. Cacheris in the Eastern District of Virginia. I have been licensed to practice law since 1984. I worked for the law firm of Grove & Engelberg from 1984 – 1986. We were acquired by Keck, Mahin & Cate, where I worked from 1986-1996, and where I served as General Counsel for the firm's Washington, D.C. office, and served on the firm's Associate Committee and Associate Compensation Committee. I worked for the law firm of Winston & Strawn from 1996-2016, where I served on the firm's Compensation

Committee, Finance Committee, Diversity Committee, and Audit Committee. I started my own law firm in July 2016, and have been operating that firm through the present.

2. I am admitted to practice before all courts in the Commonwealth of Virginia, the United States District Court for the Eastern District of Virginia, the United States District Court for the District of Columbia, the United States District Court for the District of Colorado, and the United States Court of Appeals for the Fourth Circuit.

3. I am a Past President and former long-time Board Member of the Northern Virginia Chapter of the Federal Bar Association. I was previously Chair, and then Chair Emeritus, of the Virginia State Bar's Special Committee on Technology and the Practice of Law. I am a Board Member (and Secretary) of the Virginia State Bar Intellectual Property Section, and a Permanent Member of the Fourth Circuit Judicial Conference. I am a former Member of the Virginia Bar Association's Committee on Federal Judgeships in the Eastern District of Virginia. I am a long-time faculty member of the National Institute of Trial Advocacy.

4. During my long career, I have tried cases involving complex litigation of all types in the Eastern District of Virginia, as well as other state and federal courts around the Country, including in Virginia, Texas, New York, California, Washington, D.C., Georgia, South Carolina, North Carolina, Illinois, Colorado, Nebraska, Florida, Delaware, Pennsylvania, Michigan and New Jersey.

5. I have also presented numerous CLE programs around the country, including numerous national webcasts, as well as live programs in Washington, D.C., Texas, Rhode Island, Tokyo, Japan and Mainland China.

6. I have also moderated and/or presented numerous CLE presentations in Virginia, including a CLE on Trade Secrets at the Patent & Trademark office in January 2017, as well as an annual CLE on Patent Infringement Litigation in the Rocket Docket (held at the Alexandria Federal Courthouse from 2008 – 2019, with Judges Trenga, O’Grady, Anderson and other EDVA practitioners), and an annual Nuts & Bolts of EDVA Civil Practice (again held at the Alexandria Federal Courthouse (or remotely) from 2017 – 2022, again with Federal Judges and other EDVA practitioners). I also moderated a CLE in the Norfolk Division regarding Intellectual Property cases with Judge Henry Morgan, U.S. Magistrate Judge Doug Miller, and Norfolk IP practitioner Steve Noona on February 18, 2021. I have also presented several CLEs sponsored by the Virginia State Bar, including for the VSB 30<sup>th</sup> Annual Intellectual Property Section Seminar in September 2018.

7. I have also authored several articles in the Virginia Lawyer, including two (2) articles on Trade Secrets (co-authored with Mary Zensner of Troutman): The Defend Trade Secrets Act of 2016: New Choices for Litigators and Corporate Counsel (February 2017); and A Fresh Look: The Defend Trade Secrets Act and Recent Developments (April 2019).

8. As a result of my extensive experience as a trial lawyer in the Eastern District of Virginia (including in the Alexandria, Richmond and Norfolk Divisions), I am familiar with the prevailing and customary rates and effort required to litigate complex civil litigation in the Eastern District of Virginia. I am also familiar with the pace of litigation and other idiosyncrasies unique to litigation in the Eastern District of Virginia, including in the Alexandria Division.

9. During my long career, I have tried cases involving litigation of all types. I also have decades of experience in litigating complex civil matters. I have extensive experience

litigating these and other cases in the Eastern District of Virginia, as well as other state and federal courts.

10. I have previously served as an expert witness regarding attorney fee petitions in Virginia, and I have been involved in litigating other fee petitions in the Eastern District of Virginia and elsewhere. Most recently, I served as an expert witness regarding attorney's fees in an arbitration in Northern Virginia, and before that as an expert regarding attorney's fees in a Circuit Court case in Fairfax, Virginia.

11. My affidavit and the opinions herein are based on my personal knowledge and experience, my review of the docket for the above-captioned matters (including the Motion for Attorneys' Fees and Costs and all associated briefing), the Court's Memorandum Opinion (*Roe*, ECF No. 321) and other rulings, the Fourth Circuit opinion and associated briefing, and my independent investigation. I have discussed this case with John Harding and Andrew Sommer. I have reviewed the declarations of Andrew Sommer, John Harding, Julie Bauer, Kara Ingelhart, Scott Schoettes, and Peter Perkowski and the supporting exhibits thereto.

12. I understand that most attorneys in this case are seeking fees based on the statutory rate under the Equal Access of Justice Act (EAJA) with a cost-of-living adjustment based on the U.S. Department of Labor's Consumer Price Index–Urban. However, attorneys with a specialized experience or expertise are seeking fees at the standard prevailing rate for attorneys practicing in Northern Virginia. Additionally, I have also been asked to opine on the prevailing market rates of law clerks, and other support staff like legal librarians.

13. Courts in the Eastern District of Virginia have historically adopted the *Vienna Metro* Matrix developed by Craig C. Reilly in 2011 when determining the reasonable rates in the

northern Virginia area. *Vienna Metro LLC v. Pulte Home Corp.*, No. 1:10-cv-502, 2011 WL 13369780, at \*6 (E.D. Va. Aug. 24, 2011). *See also, Prudential Ins. Co. of Am. v. pru.com*, 2021 WL 6332355, at \*3 (E.D. Va. Mar. 9, 2021) (The Court consistently employs the *Vienna Metro* matrix in determining the customary rates for attorneys engaged in commercial litigation in northern Virginia); *JK Moving & Storage, Inc. v. Winmar Constr., Inc.*, No. 117-CV-1213, 2018 WL 4365573, at \*3 (E.D. Va. June 20, 2018) (“[T]he Court finds no reason to deviate from the reasonable range of rates provided in the *Vienna Metro* matrix.”).

14. The Matrix is as follows:

<b>Years of Experience</b>	<b>Paralegal</b>	<b>1-3</b>	<b>4-7</b>	<b>8-10</b>	<b>11-19</b>	<b>20+</b>
<b>Hourly Rate</b>	\$130-350	\$250-435	\$350-600	\$465-640	\$520-770	\$505-820

15. While, the Matrix may need to be updated, especially in areas such as intellectual property where I regularly practice, it is a reasonable and *conservative* estimate of the prevailing market rate in Northern Virginia.

16. While law clerks, legal librarians, and litigation support are not included in the *Vienna Metro* Matrix, based on my experience in Northern Virginia, I believe that the prevailing market rate for a law clerk would be above the EAJA statutory maximum adjusted for inflation and the prevailing hourly rate for a legal librarian and litigation support staff would be approximately \$100.

17. In my opinion, based on the complexity of the case, the duration of the case (four years); the excellent result obtained on summary judgment – thereby avoiding a trial which would

have cost even more time and money, the time spent by counsel for Plaintiffs in connection with the prosecution of these matters is reasonable and appropriate given the complexities of the issues involved and the hard-fought course of litigation.

18. The following table provides a timeline of events for the two related cases, including appeal. Black text reflects either events in the *Harrison* case only or events that occurred in both cases on the same date. Where appropriate, the case and the docket entry are identified. Red text indicates events in the *Roe* case only. Orange cells indicate court appearances before either Judge Brinkema or Judge Davis. All but one of the thirteen appearances was in person at the courthouse. Green cells indicate events before the United States Court of Appeals for the Fourth Circuit. Discovery motions and objections are identified in yellow and dispositive motions are identified in blue. The preliminary injunction motions are identified in bold text.

Harrison Phase	Roe Phase	Date	Description
Pre-Filing		2017-May 2018	Developing case, drafting pleadings
		May 30, 2018	<i>Harrison</i> Complaint filed (Dkt. 1)
Early Motions		July 19, 2018	<b>Plaintiff's Motion for Preliminary Injunction (Dkt. 25)</b>
		August 16, 2018	Defendants Motion to Dismiss for Failure to State a Claim; Defendants' Motion to Dismiss for Lack of Jurisdiction (Dkt. 41 & 42)
	Pre-Filing	September 14, 2018	Hearing on Plaintiff's Motion for Preliminary Injunction and Defendants' Motions to Dismiss (Dkt. 59)
Discovery		November 20, 2018	Plaintiff's Motion to Compel (Dkt. 72)
		November 30, 2018	Hearing on Plaintiff's Motion to Compel (Dkt. 80)
		December 14, 2018	Plaintiff's Motion to Compel (Dkt. 82)
		December 14, 2018	Defendants' Objections to Magistrate Judge Davis's Ruling or Recommendation (Dkt. 85)

Harrison Phase	Roe Phase	Date	Description
		December 19, 2018	Complaint Filed (Dkt. 1)
	Early Motions	December 21, 2018	Hearing on Defendants' Objections to Judge Davis's Ruling or Recommendation (Dkt. 96)
		January 3, 2019	Plaintiff and Defendant Reach Compromise Mooting Plaintiff's Motion to Compel (Dkt. 101)
		January 11, 2019	<b>Motion for Preliminary Injunction (Dkt. 33)</b>
		January 25, 2019	Plaintiff's Motion to Compel Documents Withheld on Basis of Deliberative Process Privilege (Dkt. 107)
			Defendants' Motion to Dismiss for Lack of Jurisdiction; Defendants' Motion to Dismiss for Failure to States a Claim (Dkt. 48 & 49)
		February 1, 2019	Hearing on Plaintiff's Motion to Compel Documents Withheld on Basis of Deliberative Process Privilege (Dkt. 107)
		February 8, 2019	Second Hearing on Plaintiff's Motion to Compel Documents Withheld on Basis of Deliberative Process Privilege (Dkt. 107)
		February 15, 2019	Hearing on Plaintiff's Motion for Preliminary Injunction and Defendants' Motions to Dismiss (Dkt. 71)
	Discovery	February 22, 2019	Third Hearing on Plaintiff's Motion to Compel Documents Withheld on Basis of Deliberative Process Privilege (Dkt. 107)
		March 22, 2019	Defendants' Motion to Stay Deadline to Comply With Magistrate Judge Davis's Order (Dkt. 132)
			Plaintiff's Motion to Compel Documents Withheld on Basis of Deliberative Process Privilege (Dkt. 95)
		March 28, 2019	Defendants' Objections to Judge Davis's Ruling or Recommendation on Deliberative Process Privilege (Dkt. 137)
		March 29, 2019	Hearing on Defendants' Motion to Stay Deadline to Comply With Magistrate Judge

Harrison Phase	Roe Phase	Date	Description
			Davis's Order ( <i>Harrison</i> , Dkt. 140; <i>Roe</i> , Dkt. 100)
		April 12, 2019	Hearing on Defendants' Objections to Judge Davis's Ruling or Recommendation on Deliberative Process Privilege (Dkt. 148)
		April 16, 2019	Defendants' Notice of Appeal (Dkt. 112)
Dispositive Motions		May 3, 2019	Defendants' Motion to Dismiss In Part ( <i>Harrison</i> , Dkt. 154; <i>Roe</i> , Dkt. 118)
		May 16, 2019	Final Pretrial Conference
		May 28, 2019	Appellants' Opening Brief To the Fourth Circuit (Appeal Dkt. 18)
		May 31, 2019	Hearing on Defendants' Motion to Dismiss In Part ( <i>Harrison</i> , Dkt. 154; <i>Roe</i> , Dkt. 146)
Pretrial	Pretrial; Appeal	June 5, 2019	Witness Lists, Exhibit Lists, Statement of Undisputed Facts Filed in both <i>Harrison</i> and <i>Roe</i> cases
		June 17, 2019	Objections to Exhibit and Witness Lists Filed in both <i>Harrison</i> and <i>Roe</i> cases
		July 12, 2019	Motion to Compel Documents Withheld on the Basis of Deliberative Process Privilege (Dkt. 184)
		July 12, 2019	Additional Briefing in Opposition to Defendants' Motion to Dismiss In Part (Dkt. 205)
		July 18, 2019	Appellees' Responsive Brief filed with the Fourth Circuit (Appellate Dkt. 34)
		July 19, 2019	Defendants' Motion to Stay Summary Judgment and Trial Pending Appellate Ruling ( <i>Harrison</i> , Dkt. 219; <i>Roe</i> , Dkt. 214)
		July 23, 2019	Motion for Partial Summary Judgment (Counts II and III) (Dkt. 230)
		July 25, 2019	Amicus Briefs Filed with Fourth Circuit (Appellate Dkts. 36, 38, 39, 40)
		August 1, 2019	Case Stayed Pending Fourth Circuit Appeal
			Appeal

Harrison Phase	Roe Phase	Date	Description
		September 18, 2019	Oral Argument Before U.S. Court of Appeals for the Fourth Circuit (Appellate Dkt. 64)
		January 10, 2020	Fourth Circuit Opinion and Judgment – Affirming Grant of Preliminary Injunction (Dkt. 249 & 250)
		March 3, 2020	Mandate Issues from Fourth Circuit (Dkt. 253)
Dispositive Motions	Dispositive Motions	March 5, 2020	Telephonic Hearing Held re case management (Dkt. 249)
		March 11, 2020	Stay Lifted; Summary Judgment Briefing Schedule Set ( <i>Harrison</i> , Dkt. 249; <i>Roe</i> , Dkt. 260)
		May 4, 2020	Plaintiffs’ Motion for Summary Judgment Filed ( <i>Harrison</i> , Dkt. 256; <i>Roe</i> , Dkt. 269)
		June 3, 2020	Defendants’ Combined Opposition and Cross-Motion for Summary Judgment Filed ( <i>Harrison</i> , Dkt 263; <i>Roe</i> , Dkt. 275)
		June 3, 2020	Defendants’ Motion to Exclude Evidence (Dkt. 274)
		June 4, 2020	Defendants’ Motion to Exclude Evidence (Dkt. 286)
		September 14, 2020	Hearing on Cross-Motions for Summary Judgment ( <i>Harrison</i> , Dkt. 298; <i>Roe</i> , Dkt. 310)
		April 6, 2022	Summary Judgment Granted ( <i>Harrison</i> , Dkt. 307; <i>Roe</i> , Dkt. 321)
		June 6, 2022	Defendants’ Notice of Appeal ( <i>Harrison</i> , Dkt. 317; <i>Roe</i> , Dkt. 331)
		July 11, 2022	Defendants’ Motion to Dismiss Appeal Granted ( <i>Harrison</i> , Dkt. 322; <i>Roe</i> , Dkt. 336)

19. There were multiple motions to dismiss (and renewed motions to dismiss) filed by Defendants, a successful motion for preliminary injunction filed by Plaintiffs, which was later unsuccessfully appealed by Defendants to the Fourth Circuit, and multiple rounds of summary

judgment briefing. Indeed, in the Court's Summary Judgment Opinion, Judge Brinkema noted that there were over 1,500 pages of materials filed in connection with Roe and Voe's motion for preliminary injunction alone. *Roe*, ECF 321 at 4.

20. Defendants' approach to discovery also required significant time and effort to be expended by counsel for Plaintiffs in order to protect the interests of their clients. Particularly, there were multiple motions to compel the production of documents by Plaintiffs, numerous depositions, and significant expert discovery.

21. Based on the tight time frame, especially in 2018 and 2019, and the hard-fought nature of the litigation, the size and seniority of the Plaintiffs' litigation team was—in my professional opinion—necessary and reasonable. The sheer volume of work necessitated by the schedule, Defendants' resistance to discovery, motions and renewed motions, and the number of depositions from various service branches, required intense effort on multiple fronts, and justifies the size and experience of Plaintiffs' counsel team in this action. The work simply could not have been accomplished by a leaner-staffed or less-experienced team in the time-frame set for this case.

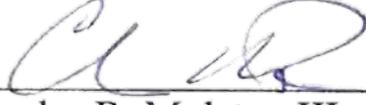
22. The detailed time records submitted by counsel for Plaintiffs demonstrate that counsel spent a reasonable and appropriate amount of time addressing the issues in this case, and staffed various workstreams efficiently, given the multiple tasks being performed simultaneously under this Court's rigorous schedule. The time records also reflect an appropriate division of labor between partners and associate-level attorneys, as well as between firms.

23. In preparing this declaration, I worked 7.8 hours. My rate is \$695 an hour. An exception to the statutory rate is warranted for my time because of the distinctive knowledge I

possess concerning the prevailing and customary rates and idiosyncrasies unique to litigation in the Eastern District of Virginia.

I declare under penalty of perjury the foregoing is true and correct to the best of my knowledge and belief.

Executed this 5<sup>th</sup> day of August, 2022.

  
\_\_\_\_\_  
Charles B. Molster, III

# EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

RICHARD ROE, ET AL.,

PLAINTIFFS,

v.

LLOYD AUSTIN, ET AL.,  
DEFENDANTS.

CIVIL ACTION NO. 1:18-cv-01565

NICHOLAS HARRISON, ET AL.,

PLAINTIFFS,

v.

LLOYD AUSTIN, ET AL.,  
DEFENDANTS.

CIVIL ACTION NO. 1:18-CV-00641

**DECLARATION OF KARA N. INGELHART**

I, Kara N. Ingelhart, hereby declare as follows:

1. I am an attorney licensed in Illinois. If called upon to testify about this declaration, I can and will do so.
2. I have personal knowledge of the statements contained herein. The statements are true and correct to the best of my knowledge, information, and belief.
3. I submit this declaration in support of Plaintiffs Nicholas Harrison, Richard Roe, Victor Voe, and the Modern Military Association of America's motion for attorneys' fees as prevailing parties in these actions.
4. I have personal knowledge of the statements contained herein. The statements are true and correct to the best of my knowledge, information, and belief.

5. I am Senior Attorney with Lambda Legal Defense and Education Fund, Inc. (“Lambda Legal”), and one of the attorneys for Plaintiffs. Since September 2015, I have been employed by Lambda Legal Defense and Education, Inc. (“Lambda Legal”), a 501(c)(3) nonprofit organization “committed to achieving the full civil rights of lesbians, gay men, bisexuals, transgender (“LGBT”) people and everyone living with HIV through impact litigation, public policy work and education. I graduated from the University of Chicago Law School in 2015. I work in its Midwestern Regional Office, which is based in Chicago, Illinois.

6. Attached as Exhibit A to this declaration is a true and correct copy of my billing records for the above-captioned cases.

7. Attached as Exhibit B is a true and correct copy of Lambda Legal’s expense records for the above-captioned cases.

8. Attached as Exhibit C to this declaration is a copy of my professional resume detailing my practice experience representing and advocating for LGBT people and people living with HIV.

9. It is my regular practice to enter my time spent on a matter at the time I work on a particular task. My time entries reflect time I actually spent working on this matter. I have exercised billing judgment to ensure that the time for which fees are sought was reasonable and necessary under the circumstances. As part of that process, I eliminated time that could be deemed unnecessary, duplicative, or excessive. For example, there were instances in which I had spent time on these actions, such as, in the review of certain email correspondence or travel time, where I did not enter time.

10. Lambda Legal has been party counsel in several leading cases challenging government discrimination against LGBT people and people living with HIV across various

contexts, with many of its cases establishing important precedent in the field or achieving policy change through settlement after significant litigation success. *See, e.g., Karnoski v. Trump*, 926 F.3d 1180, 1200 (9th Cir. 2019) (holding, in case challenging ban on open military service by transgender people, that discrimination against transgender people requires heightened scrutiny under equal protection); *Obergefell v. Hodges*, 576 U.S. 644 (2015) (holding that the fourteenth amendment guarantees fundamental right to marriage for same-sex couples); *Rhoades v. State*, 848 N.W.2d 22 (Iowa 2014) (the first state supreme court reversal of a (felony) conviction for exposing a person to HIV through sexual contact, holding a person’s HIV-positive status alone is insufficient to establish risk of HIV transmission without further evidence); *Glenn v. Brumby*, 663 F.3d 1312 (11th Cir. 2011) (holding, in case on behalf of transgender public employee, that discrimination against transgender people is sex discrimination); *Taylor v. Rice*, 451 F.3d 898 (D.C. Cir. 2006) (reversing and remanding summary judgment for the U.S. State Department in a challenge to its policy of refusing to employ foreign service officers living with HIV); *Lawrence v. Texas*, 539 U.S. 558 (2003) (invalidating sodomy laws, holding that the fourteenth amendment guarantees fundamental right to consensual same-sex sexual activity). As here, Lambda Legal’s impact litigation often involves novel or cutting-edge legal issues that require specialized knowledge and experience. We recognize that when we undertake such litigation, the rights of many others in the LGBT community and communities most impacted by HIV may be directly affected. That is a responsibility we take seriously.

11. Lambda Legal has particular expertise in litigating the issue of discrimination against people living with HIV in the context of employment as first responders and health care workers based on purported presentation of a “direct threat” to the health and safety of others. *See, e.g., Pierce v. Ackal*, No. 17-cv-01365 (W.D. La. Dismissed pursuant to settlement June 30, 2020);

*Moore v. Air Evac EMS, Inc.*, No. 15-cv-01395 (E.D. Mo. dismissed pursuant to settlement Feb. 1, 2017). This expertise has created a base of institutional knowledge and experience that uniquely equips the organization's attorneys to deliver effective and efficient representation working as a team.

12. Even at a national level, the pool of attorneys with experience litigating the issue of discrimination against people living with HIV, risk of HIV transmission, and the legality or constitutionality of such differential treatment, is very limited.

13. I have represented Plaintiffs in the *Roe v. Austin* (No. 18-cv-01565) case from its inception, prior when the action was filed on December 19, 2018 and have been part of the *Harrison v. Austin* litigation team as well since the spring of 2019 when discovery was combined in the two matters.

14. I have specialized in litigation concerning the civil rights of LGBT people and people living with HIV in my litigation practice at Lambda Legal since 2015.

15. I have significant experience representing people living with HIV seeking relief under federal civil rights laws and pursuing federal constitutional claims on their behalf.

16. During my time at Lambda Legal, I have attended the annual LGBTQ Litigators Roundtable—a three-day conference convening the nation's leading LGBTQ and HIV rights impact litigators to present and attend panels on cutting edge litigation and policy matters presented by the advocates leading that work—every year since 2015.

17. During my time at Lambda Legal, I have acquired specialized experience and knowledge litigating constitutional claims on behalf of LGBT people, including equal protection claims, which I relied upon in representing Plaintiffs in this litigation. Examples of the cases that I have litigated include serving as counsel in: a challenge to ban on open military service by

transgender people (*Karnoski v. Trump*, 926 F.3d 1180 (9th Cir. 2019)); multiple cases challenging bars to transgender individuals from correcting the gender markers on their birth certificates (*Ray v. McCloud*, No. 18-272 (S.D. Ohio); *Foster v. Andersen*, No. 18-2552 (D. Kansas); *Arroyo González v. Rosselló*, No. 17-1457 (D.P.R.); *F.V. v. Jeppesen*, No. 17-170 (D. Idaho)); and challenging bans against transgender people accessing sex-segregated spaces (*Evancho v. Pine Richland Sch. Dist.*, 237 F. Supp. 3d 267 (W.D. Pa. 2017)).

18. During my time at Lambda Legal, I have acquired specialized experience and knowledge litigating claims on behalf of people living with HIV and filing amicus brief that focus on the rights of people living with HIV. *See, e.g., Doe v. AJ Boggs & Co.*, No. 565456 (Cal. Superior Ct., S.F. Cnty.) (party counsel for settlement class of plaintiffs whose HIV statuses were compromised in data breach); *Stinson v. Florida*, No. 1D18-3506 (Fla. Circuit Ct, First Judicial Circuit, Walton Cnty.) (party counsel in challenge to improper use of HIV-positive status as a criminal sentencing factor); *Dorn v. Mich. Dep't of Corr.*, No. 15-359 (W.D. Mich.) (same); *Doe v. Kink.com*, No. A 155384 (Cal. Ct. App.) (amicus counsel in brief re medical privacy implications of HIV testing); *Erotic Serv. Provider Legal, Educ. and Rsch. Project v. Gascón*, No. 16-15927 (9th Cir.) (amicus counsel in brief regarding the harmful public health implications of criminal prostitution and solicitation laws, including impact on HIV transmission rates and access to health care for people living with HIV).

19. I have sought hourly rates for \$345 for 2018, \$455 for 2019, \$455 for 2020, \$455 for 2021, and \$455 for 2022. These are justified as follows:

a. I believe that my knowledge and experience, described above, entitles me to enhanced rates beyond those allowed by the Equal Access to Justice Act.

b. To determine my enhanced rate, I used the guidance commonly referred to as the “*Vienna Metro Matrix*,” which reflect the prevailing rates within the jurisdiction for

non-EAJA attorney fee awards. (A chart of the *Vienna Metro* Matrix is reflected in the Affidavit of Charles Molster III, filed concurrently, and shown below.)

Year	Years of Experience	Paralegal	1-3	4-7	8-10	11-19	20+
2011	Hourly Rate	\$130-350	\$250-435	\$350-600	\$465-640	\$520-770	\$505-820

c. Specifically, in 2018, I had three years of experience, so for time billed in those years, I selected an hourly rate of \$345, which is just about the middle of the range of the \$4250-435 in the Matrix. In 2018 and after, I had four-seven years of experience, so I selected the \$455 average hourly rate, which is less than the middle of the Matrix's range of \$350-600. I understand that the *Vienna Metro* Matrix rates are from 2011, and hourly rates have risen in the last 11 years. Accordingly, my enhanced rate is within the range of prevailing rates—and likely the low range—in this jurisdiction.

20. Lambda Legal is a 501(c)(3) non-profit organization that does not charge its clients for legal services. Neither it, nor any of Plaintiffs' counsel, charged Plaintiffs here for the legal services provided in this litigation. Lambda Legal instead relies upon the recovery of attorneys' fees as part of its budget to sustain its operations. The contingent nature of the representation here meant that Plaintiffs' counsel needed to invest hundreds of hours without any assurance of compensation. That expenditure of time also necessarily precluded other work that would have been done in its place.

21. Plaintiffs have not sought fees for a variety of legal work performed by Lambda Legal staff. For example, although Lambda Legal paralegals with many years of litigation experience devoted extensive time to this case, plaintiffs have not sought any fees to reflect that contribution in these matters. Three attorneys employed by Lambda Legal were staff on these matters who contributed more than one-hundred hours of work each: Scott A. Schoettes, Anthony

Pinggera, and me. Additional Lambda Legal attorneys in Lambda Legal legal department leadership including Sharon McGowan, Diana Flynn, and Camilla Taylor also contributed significant legal assistance in these matters. Plaintiff's request for fees does not include request for fees for Sharon McGowan, Diana Flynn, or Camilla Taylor and is further discounted as Anthony Pinggera's time is excluded because a significant amount of detail regarding his time was lost when we discontinued use of a prior billing system.

22. Additionally, both motion practice as well as fact and expert discovery in these cases were extensive and labor-intensive. Plaintiffs filed two preliminary injunction motions, opposed several motions to dismiss, moved for summary judgment twice, and opposed summary judgment in each case with discovery entailing Plaintiffs filing numerous motions to compel in addition to thirty-one fact witness depositions, 316 written discovery requests, five expert reports, and five expert depositions.

23. Lambda Legal incurred a range of out-of-pocket costs as a result of this litigation. They seek to recover \$44,221.99 in costs incurred in these matters.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

August 5, 2022

By:   
KARA N. INGELHART

# Exhibit A

Date	Name	Hours	Rate	Description
12/04/18	Kara Ingelhart	1	\$345	Study deploy or get out policy and review re Voe & Roe facts.
12/05/18	Kara Ingelhart	1	\$345	Participate in weekly team telephone conference re Roe client investigations for potential complaint.
12/07/18	Kara Ingelhart	1	\$345	Telephone conference with Voe & Roe & team re complaint.
12/07/18	Kara Ingelhart	0.5	\$345	Draft Lambda Legal retainers for Voe & Roe.
12/08/18	Kara Ingelhart	0.5	\$345	Telephone conference with Roe re [Redacted]
12/09/18	Kara Ingelhart	0.6	\$345	Finalize Voe retainer.
12/09/18	Kara Ingelhart	0.4	\$345	Review and confirm Voe facts.
12/09/18	Kara Ingelhart	0.6	\$345	Finalize Roe retainer.
12/09/18	Kara Ingelhart	0.4	\$345	Review and confirm Roe facts.
12/11/18	Kara Ingelhart	1	\$345	Participate in team litigation call re Complaint.
12/11/18	Kara Ingelhart	1	\$345	Review and edit Complaint and pleading papers.
12/12/18	Kara Ingelhart	1	\$345	Incorporate Lambda edits Complaint and pleading papers.
12/13/18	Kara Ingelhart	0.4	\$345	Review factual timeline & incorporate line edits to Complaint.
12/13/18	Kara Ingelhart	0.3	\$345	Edit Voe & Roe retainers to final and transmit to litigation director for review and execution.
12/17/18	Kara Ingelhart	6	\$345	Draft complaint.
12/17/18	Kara Ingelhart	1	\$345	Meeting with Voe & Roe re [Redacted]
12/17/18	Kara Ingelhart	1	\$345	Participate in team litigation call re Complaint.
12/18/18	Kara Ingelhart	5.6	\$345	Incorporate team edits to finalize complaint and transmit to litigation team for review, formatting.
12/18/18	Kara Ingelhart	0.7	\$345	Finalize client retainer execution.
12/19/18	Kara Ingelhart	1	\$345	Review and respond to email correspondence re filing complaint.
12/19/18	Kara Ingelhart	0.5	\$345	Participate in weekly team telephone conference re complaint filing.
<b>TOTAL</b>		<b>25.5</b>	<b>\$8,797.50</b>	
01/02/19	Kara Ingelhart	1	\$455	Prepare team drafting schedule for preliminary injunction pleading drafting responsibilities.
01/07/19	Kara Ingelhart	0.5	\$455	Team strategy call re preliminary injunction.
01/09/19	Kara Ingelhart	2.2	\$455	Incorporate team edits to preliminary injunction pleadings.
01/10/19	Kara Ingelhart	1	\$455	Incorporate team edits to and proofread preliminary injunction pleadings.
01/10/19	Kara Ingelhart	1	\$455	Lead meeting to reconcile substantive notes to final preliminary injunction pleadings.
01/28/19	Kara Ingelhart	0.8	\$455	Participate in team telephone conference re response to Defendants' Motion to Dismiss and Reply ISO Preliminary Injunction.
02/14/19	Kara Ingelhart	2	\$455	Prepare for and participate in preliminary injunction hearing moot.
02/15/19	Kara Ingelhart	0.7	\$455	Participate in team telephone conference re discovery.
02/20/19	Kara Ingelhart	1	\$455	Participate in weekly team telephone conference re discovery.
02/21/19	Kara Ingelhart	0.5	\$455	Participate in team telephone conference re Blaylock deposition preparation.
02/25/19	Kara Ingelhart	0.2	\$455	Communication with Jason Pesick re experts.
02/25/19	Kara Ingelhart	2.5	\$455	Prepare Blaylock deposition outline.
02/26/19	Kara Ingelhart	3	\$455	Prepare to defend Declarant Q.S. deposition.
02/26/19	Kara Ingelhart	1.2	\$455	Prepare Blaylock deposition outline.

02/27/19	Kara Ingelhart	0.3	\$455	Participate in team telephone conference re discovery.
02/27/19	Kara Ingelhart	0.3	\$455	Telephone conference with Peter Perkowskie in advacnce of deposition.
02/27/19	Kara Ingelhart	2	\$455	Prepare to defend Declarant Q.S. deposition.
02/28/19	Kara Ingelhart	1	\$455	Meeting with Declarant Q.S. for deposition preparation; Peter Perkowski joining via telephone conference.
02/28/19	Kara Ingelhart	3.4	\$455	Prepare to defend Declarant Q.S. deposition.
03/01/19	Kara Ingelhart	0.7	\$455	Prepare to defend Declarant Q.S. deposition.
03/01/19	Kara Ingelhart	2.5	\$455	Defend Q.S. deposition with Peter Perkowski second chair.
03/03/19	Kara Ingelhart	1.5	\$455	Prepare to defend Declarant S.H. deposition.
03/04/19	Kara Ingelhart	1.5	\$455	Prepare to defend Declarant S.H. deposition.
03/04/19	Kara Ingelhart	2	\$455	Meeting with Declarant S.H. for deposition preparation.
03/05/19	Kara Ingelhart	2	\$455	Defend S.H. deposition.
03/06/19	Kara Ingelhart	2	\$455	Participate in Nick Harrison deposition preparation meeting.
03/11/19	Kara Ingelhart	1.5	\$455	Prepare to defend Declarant D.N. deposition.
03/11/19	Kara Ingelhart	2	\$455	Meeting with Declarant D.N. for deposition preparation.
03/11/19	Kara Ingelhart	0.7	\$455	Participate in team meeting re experts.
03/12/19	Kara Ingelhart	2	\$455	Defend D.N. deposition.
03/12/19	Kara Ingelhart	3.5	\$455	Prepare to defend Voe & Roe depositions.
03/12/19	Kara Ingelhart	2	\$455	Prepare to defend Voe & Roe depositions.
03/13/19	Kara Ingelhart	2	\$455	Meeting with Voe & Roe for deposition preparation with Peter Perkowski.
03/14/19	Kara Ingelhart	3	\$455	Defend Roe deposition.
03/15/19	Kara Ingelhart	3	\$455	Defend Voe deposition.
03/19/19	Kara Ingelhart	1.8	\$455	Review deposition transcripts for Q.S. and S.H.; email correspondence to Q.S. and S.H.
03/14/19	Kara Ingelhart	0.5	\$455	Assist T. Hoppe with expert report.
03/19/19	Kara Ingelhart	0.5	\$455	Assist T. Hoppe with expert report and deposition outline prep.
03/20/19	Kara Ingelhart	0.6	\$455	Assist T. Hoppe with expert report and email to litigation team re same.
03/20/19	Kara Ingelhart	0.5	\$455	J. Pessick meeting re discovery.
03/25/19	Kara Ingelhart	0.6	\$455	Errata sheet review.
03/26/19	Kara Ingelhart	1.5	\$455	Review deposition transcripts for Q.S., S.H., Nick, Roe, Voe; email correspondence with Q.S, S.H., Nick, Roe, Voe.
03/28/19	Kara Ingelhart	0.6	\$455	Telephone conference with Q.S.
03/29/19	Kara Ingelhart	0.5	\$455	Telephone conference with S.H.
03/29/19	Kara Ingelhart	0.7	\$455	Telephone conference with Voe.
04/08/19	Kara Ingelhart	0.2	\$455	Review S.H. email correspondence.
04/08/19	Kara Ingelhart	0.5	\$455	Review client email correspondence.
04/11/19	Kara Ingelhart	0.3	\$455	Review N.H. and D.N. email correspondence.
04/15/19	Kara Ingelhart	0.5	\$455	Review Nick Harrison email correspondence; telephone with D.L.
04/17/19	Kara Ingelhart	0.7	\$455	Participate in weekly team telephone conference re trial preparation and discovery.
04/17/19	Kara Ingelhart	0.3	\$455	Review Voe email correspondence.
04/18/19	Kara Ingelhart	0.2	\$455	Review Roe email correspondence.
05/05/19	Kara Ingelhart	4.2	\$455	Review and analyze Defendants' Motion to Dismiss Plaintiff Outserve; Review research on organizational standing; Draft outline for Response in Opposition to MTD; telephone conference with P Perkowski re same.

05/06/19	Kara Ingelhart	0.6	\$455	Participate in team telephone conference re trial preparation.
05/06/19	Kara Ingelhart	0.5	\$455	Participate in telephone conference re Outserve standing for MTD.
05/06/19	Kara Ingelhart	0.3	\$455	Research organizational standing for Response in Opposition to MTD.
05/07/19	Kara Ingelhart	3	\$455	Draft Response in Opposition to MTD.
05/08/19	Kara Ingelhart	1	\$455	Participate in weekly team telephone conference re trial preparation.
05/08/19	Kara Ingelhart	2.7	\$455	Draft Response in Opposition to MTD.
05/09/19	Kara Ingelhart	7.7	\$455	Draft Response in Opposition to MTD.
05/09/19	Kara Ingelhart	0.5	\$455	Participate in team telephone conference re trial preparation.
05/10/19	Kara Ingelhart	6.6	\$455	Draft Response in Opposition to MTD.
05/10/19	Kara Ingelhart	0.2	\$455	Send Lambda Legal Litigation Director Opposition to MTD to review.
05/11/19	Kara Ingelhart	2.5	\$455	Review draft opposition to MTD Outserve.
05/13/19	Kara Ingelhart	2.5	\$455	Review draft opposition to MTD Outserve.
05/14/19	Kara Ingelhart	5	\$455	Review draft opposition to MTD Outserve.
05/15/19	Kara Ingelhart	3.5	\$455	Review draft opposition incorporating edits to MTD Outserve.
05/15/19	Kara Ingelhart	2.5	\$455	Prepare opposition for formatting and filing.
05/17/19	Kara Ingelhart	2.5	\$455	Facilitate filing of opposition papers.
05/19/19	Kara Ingelhart	2.2	\$455	Prepare for Outserve MTD argument.
05/20/19	Kara Ingelhart	2.3	\$455	Prepare for Outserve MTD argument.
05/21/19	Kara Ingelhart	0.8	\$455	Review pre-trial disclosures.
05/21/19	Kara Ingelhart	2.2	\$455	Prepare for Outserve MTD argument.
05/22/19	Kara Ingelhart	2.5	\$455	Prepare for Outserve MTD argument.
05/23/19	Kara Ingelhart	3.2	\$455	Prepare for Outserve MTD argument.
05/24/19	Kara Ingelhart	2.2	\$455	Prepare for Outserve MTD argument.
05/25/19	Kara Ingelhart	2.7	\$455	Prepare for Outserve MTD argument.
05/28/19	Kara Ingelhart	8	\$455	Prepare for oral argument MTD.
05/28/19	Kara Ingelhart	1	\$455	Moot for MTD argument with J Davidson (counsel at ACLU) re preparation for Outserve MTD argument.
05/29/19	Kara Ingelhart	5	\$455	Prepare for oral argument MTD; moot with team.
05/30/19	Kara Ingelhart	1	\$455	Telephone conference with Scott Schoettes re MTD hearing.
05/31/19	Kara Ingelhart	1	\$455	MTD Outserve hearing. Attend with Peter Perkowski and John Harding.
06/05/19	Kara Ingelhart	0.5	\$455	Participate in weekly team telephone conference re trial preparation.
06/10/19	Kara Ingelhart	1.5	\$455	Participate in weekly team telephone conference re trial preparation.
06/13/19	Kara Ingelhart	0.5	\$455	Call with Schoettes, Perkowski and team re challenge to organizational plaintiff standing
07/07/19	Kara Ingelhart	0.2	\$455	Telephone conference with Peter Perkowski re supplemental briefing on organizational plaintiff standing.
07/08/19	Kara Ingelhart	1.5	\$455	Draft outline for Supplemental Response in Opposition to Renewed Motion to Dismiss
07/09/19	Kara Ingelhart	5.5	\$455	Draft Supplemental Response in Opposition to Renewed Motin to Dismiss.
07/10/19	Kara Ingelhart	2.7	\$455	Edits to Supplemental Response in Opposition to Renewed Motion to Dismiss.
07/11/19	Kara Ingelhart	4.2	\$455	Edits to Supplemental Response in Opposition to Renewed Motion to Dismiss.
07/12/19	Kara Ingelhart	3.8	\$455	Incorporate finale edits to Supplemental brief and support filing.

07/17/19	Kara Ingelhart	2.2	\$455	Draft Reply in Response to D's Supplemental Response to Renewed Motion to Dismiss.
07/18/19	Kara Ingelhart	4.3	\$455	Draft Reply in Response to D's Supplemental Response to Renewed Motion to Dismiss.
07/18/19	Kara Ingelhart	2.8	\$455	Incorporate finale edits to Supplemental brief and support filing.
<b>TOTAL</b>		<b>176.6</b>	<b>\$80,353.00</b>	
01/10/20	Kara Ingelhart	1	\$455	Read and analyze 4th Cir decision upholding PI.
01/15/20	Kara Ingelhart	0.2	\$455	Meeting with Scott Schoettes re client.
01/27/20	Kara Ingelhart	0.7	\$455	Participate in client call for cases.
02/12/20	Kara Ingelhart	0.5	\$455	Participate in weekly team telephone conference re trial preparation.
03/18/20	Kara Ingelhart	0.25	\$455	Participate in weekly team telephone conference re trial preparation.
03/25/20	Kara Ingelhart	0.8	\$455	Participate in weekly team telephone conference re trial preparation.
03/27/20	Kara Ingelhart	1.5	\$455	Read and analyze EDVA decision denying motion to dismiss Outserve.
04/08/20	Kara Ingelhart	0.2	\$455	Participate in weekly team telephone conference re trial preparation.
04/15/20	Kara Ingelhart	0.5	\$455	Participate in weekly team telephone conference re trial preparation.
04/22/20	Kara Ingelhart	0.6	\$455	Participate in weekly team telephone conference re trial preparation.
06/08/20	Kara Ingelhart	0.25	\$455	Telephone conference with Scott Schoettes re attorneys fees research question.
06/09/20	Kara Ingelhart	1.2	\$455	Correspondence with Jason Pessick re Harrison case facts.
06/10/20	Kara Ingelhart	0.8	\$455	Participate in weekly team telephone conference re summary judgment.
06/17/20	Kara Ingelhart	0.3	\$455	Research standards for seeking attorneys fees.
06/22/20	Kara Ingelhart	1.3	\$455	Research standards for seeking attorneys fees.
06/23/20	Kara Ingelhart	1.5	\$455	Research standards for seeking attorneys fees.
06/24/20	Kara Ingelhart	3	\$455	research nondeployable/deployment Qs
07/01/20	Kara Ingelhart	0.5	\$455	Participate in weekly team telephone conference re summary judgment motion.
07/01/20	Kara Ingelhart	0.5	\$455	Review pre-trial disclosures.
07/02/20	Kara Ingelhart	1.1	\$455	Assist team with summary judgment filing.
09/10/20	Kara Ingelhart	2.5	\$455	Prepare for and attend moot for summary judgment hearing.
09/14/20	Kara Ingelhart	1.5	\$455	Remotely attend Harrison & Roe summary judgment hearing.
09/16/20	Kara Ingelhart	0.5	\$455	Participate in weekly team telephone conference re analysis of summary judgment hearing.
<b>TOTAL</b>		<b>21.2</b>	<b>\$9,646.00</b>	
08/18/21	Kara Ingelhart	0.5	\$455	Participate in team meeting re prospective settlement demands.
08/18/21	Kara Ingelhart	0.5	\$455	Conference with Greg Nevins re team meeting.
09/07/21	Kara Ingelhart	0.20	\$455	Review Scott Schoettes email correspondence regarding communication with DOJ.
09/08/21	Kara Ingelhart	0.2	\$455	Review Drew Sommer & John Harding email correspondence regarding communication with DOJ.
09/16/21	Kara Ingelhart	0.3	\$455	Review email correspondence from opposing counsel re scheduling a status conference.
10/13/21	Kara Ingelhart	1	\$455	Participate in team meeting between counsel and clients.
10/15/21	Kara Ingelhart	0.2	\$455	Review email correspondence from Drew Sommer re potential settlement.
10/22/21	Kara Ingelhart	0.5	\$455	Review litigation team email correspondence re potential settlement.
11/09/21	Kara Ingelhart	0.7	\$455	Review litigation team email correspondence re communication plan with defense counsel re potential settlement.

11/09/21	Kara Ingelhart	0.7	\$455	Participate in litigation team meeting with John Harding, Peter Perkowski, and Scott Schoettes re call with defense counsel re potential settlement.
11/10/21	Kara Ingelhart	0.5	\$455	Email correspondence with internal Lambda Legal legal department leadership regarding communication with the DOJ.
11/10/21	Kara Ingelhart	0.2	\$455	Telephone conference with Lambda Dir of Lit re communication with DOJ.
11/10/21	Kara Ingelhart	0.2	\$455	Telephone conference with Scott Schoettes re communication with DOJ.
11/10/21	Kara Ingelhart	0.5	\$455	Telephone conference between counsel for Plaintiffs and Defendants (DOJ) re potential settlement.
11/10/21	Kara Ingelhart	0.2	\$455	Telephone conference with Scott Schoettes and John Harding after conference with DOJ.
11/11/21	Kara Ingelhart	1	\$455	Litigation team meeting with client .
<b>TOTAL</b>		<b>7.4</b>	<b>\$3,367.00</b>	
04/06/22	Kara Ingelhart	1.5	\$455	Review decision and orders granting motion for summary judgment.
04/08/22	Kara Ingelhart	0.5	\$455	Telephone conference with colleague regarding moving for fees and costs.
04/09/22	Kara Ingelhart	0.25	\$455	Review time keeping records.
04/10/22	Kara Ingelhart	2.5	\$455	Review time keeping records.
04/11/22	Kara Ingelhart	2	\$455	Review time keeping records.
04/12/22	Kara Ingelhart	0.5	\$455	Telephone conference with John Harding, Drew Sommer, Scott Schoettes, Bryce Cooper, and Peter Perkowski regarding order.
04/19/22	Kara Ingelhart	0.5	\$455	review email to DOJ re proposed redactions to order
04/20/22	Kara Ingelhart	0.25	\$455	Collecting information and relay via email correspondence Lambda litigation costs to John Harding. Review Lambda team members time keeping records.
04/21/22	Kara Ingelhart	0.5	\$455	Research attorneys fees standards.
04/22/22	Kara Ingelhart	0.25	\$455	Email correspondence with co-counsel re direct appeal.
04/25/22	Kara Ingelhart	0.25	\$455	Research attorneys fees standards.
04/26/22	Kara Ingelhart	0.5	\$455	Email correspondence to co-counsel re fees.
04/28/22	Kara Ingelhart	0.25	\$455	Review email correspondence with opposing counsel re attorneys fees and costs.
05/02/22	Kara Ingelhart	0.25	\$455	Review email correspondence to and from opposing counsel re motion for clarification. Review draft motion for clarification.
05/03/22	Kara Ingelhart	0.25	\$455	Correspondence with Lambda legal colleagues regarding appeal strategy.
05/19/22	Kara Ingelhart	1	\$455	Prepare for and attend meeting with co-counsel re appeal strategy.
05/23/22	Kara Ingelhart	1	\$455	Attend meeting with Civil Appellate DOJ attorneys re direct appeal.
05/23/22	Kara Ingelhart	0.5	\$455	Meeting with co-counsel re appeal strategy.
06/02/22	Kara Ingelhart	0.25	\$455	Telephone conference with DOJ trial counsel to confer regarding fees settlement.
06/03/22	Kara Ingelhart	0.25	\$455	Provide update to co-counsel regarding meeting with DOJ Civil Appellate counsel re direct appeal.
06/07/22	Kara Ingelhart	3.75	\$455	Review communication from DOJ and DoD re 503D letters and DODI new policy.
06/28/22	Kara Ingelhart	0.25	\$455	Email correspondence with co-counsel re fee settlement.
06/29/22	Kara Ingelhart	0.5	\$455	Telephone conference with Lambda colleague re seeking fees and email correspondence to co-counsel re same.
07/01/22	Kara Ingelhart	0.75	\$455	Research regarding seeking fees.
07/08/22	Kara Ingelhart	0.25	\$455	Correspondence with co-counsel re settling with DOJ regarding attorneys fees and costs.

07/11/22	Kara Ingelhart	0.9	\$455	Telephone conference with Lambda colleague re seeking fees; email correspondence to co-counsel re same.
07/19/22	Kara Ingelhart	0.2	\$455	Review draft motion to extend deadline to move for costs and attorneys fees under federal rules.
07/20/22	Kara Ingelhart	2.5	\$455	Correspondence with co-counsel regarding fees motion.
07/26/22	Kara Ingelhart	0.5	\$455	Email correspondence with co-counsel re fee settlement strategy
07/28/22	Kara Ingelhart	1	\$455	Attorneys fees research and co-counsel email communication.
07/29/22	Kara Ingelhart	0.25	\$455	Meet & confer with opposing counsel re costs and attorneys fee settlement efforts and motion to enforce injunction.
07/29/22	Kara Ingelhart	0.25	\$455	Attend meeting with Peter Perkowski, Scott Schoettes, and John Harding in preparation of meet and confer with opposing counsel.
07/29/22	Kara Ingelhart	0.25	\$455	Attend meeting with Peter Perkowski and Scott Schoettes to confer on next steps regarding fees and enforcement after meet and confer with DOJ.
08/02/22	Kara Ingelhart	2	\$455	Draft declaration in support of plaintiffs' fee petition.
08/03/22	Kara Ingelhart	1.5	\$455	Draft declaration in support of plaintiffs' fee petition.
<b>TOTAL</b>		<b>28.1</b>	<b>\$12,785.50</b>	

# Exhibit B

<b>HARRISON V. AUSTIN</b>				
<b>Account description</b>	<b>Vendor name</b>	<b>Invoice date</b>	<b>Amount</b>	<b>Payment date</b>
Expert Fees	William David Hardy MD	12/21/2020	75.00	2/25/2021
Lodging	SCOTT SCHOETTES	11/10/2020	167.28	11/30/2020
Lodging	SCOTT SCHOETTES	11/10/2020	167.27	11/30/2020
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	11/10/2020	23.91	11/30/2020
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	11/10/2020	22.01	11/30/2020
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	11/10/2020	22.19	11/30/2020
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	11/10/2020	35.34	11/30/2020
Meals & Food	SCOTT SCHOETTES	11/10/2020	8.02	11/30/2020
Meals & Food	SCOTT SCHOETTES	11/10/2020	10.87	11/30/2020
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	11/10/2020	156.20	11/30/2020
Meals & Food	SCOTT SCHOETTES	11/10/2020	8.02	11/30/2020
Meals & Food	SCOTT SCHOETTES	11/10/2020	28.99	11/30/2020
Meals & Food	SCOTT SCHOETTES	9/30/2020	12.40	9/22/2020
Meals & Food	SCOTT SCHOETTES	9/30/2020	9.98	9/22/2020
Meals & Food	SCOTT SCHOETTES	9/30/2020	2.75	9/22/2020
Meals & Food	SCOTT SCHOETTES	9/30/2020	1.06	9/22/2020
Office Supplies	SCOTT SCHOETTES	9/30/2020	4.91	9/22/2020
Meals & Food	SCOTT SCHOETTES	9/30/2020	6.96	9/22/2020
Meals & Food	SCOTT SCHOETTES	9/30/2020	22.76	9/22/2020
Meals & Food	SCOTT SCHOETTES	9/30/2020	54.48	9/22/2020
Office Supplies	SCOTT SCHOETTES	9/30/2020	9.33	9/22/2020
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	9/16/2020	226.20	12/1/2020
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	8/13/2020	226.20	11/30/2020
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	8/13/2020	226.20	12/1/2020
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	1/11/2020	319.30	12/6/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	1/11/2020	166.30	12/6/2019
Meals & Food	SCOTT SCHOETTES	10/2/2019	12.91	10/7/2019
Accounts Payable	SCOTT SCHOETTES	10/2/2019	3.51	10/7/2019
Meals & Food	SCOTT SCHOETTES	10/2/2019	17.42	10/7/2019
Meals & Food	SCOTT SCHOETTES	10/2/2019	20.68	10/7/2019
Lodging	SCOTT SCHOETTES	10/2/2019	210.75	10/7/2019
Lodging	SCOTT SCHOETTES	10/2/2019	210.75	10/7/2019
Lodging	SCOTT SCHOETTES	10/2/2019	243.87	10/7/2019
Lodging	SCOTT SCHOETTES	10/2/2019	243.85	10/7/2019
Lodging	SCOTT SCHOETTES	10/2/2019	243.85	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/2/2019	319.30	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	8/5/2019	17.00	8/7/2019
Meals & Food	SCOTT SCHOETTES	8/5/2019	19.00	8/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	8/5/2019	11.47	8/7/2019



Lodging	SCOTT SCHOETTES	7/22/2019	129.23	8/12/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	7/15/2019	26.31	7/19/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	7/15/2019	8.80	7/19/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	7/15/2019	12.28	7/19/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	7/15/2019	17.63	7/19/2019
Expert Fees	TREVOR HOPPE	7/2/2019	37.50	7/10/2019
Expert Fees	TREVOR HOPPE	7/2/2019	750.00	7/10/2019
Expert Fees	TREVOR HOPPE	7/2/2019	23.64	7/10/2019
Expert Fees	TREVOR HOPPE	7/2/2019	48.15	7/10/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/28/2019	372.68	6/5/2019
Employee Training & Prof Develop	SCOTT SCHOETTES	5/16/2019	15.32	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	3.00	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	5.00	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	18.49	5/30/2019
Meals & Food	SCOTT SCHOETTES	5/16/2019	20.84	5/30/2019
Meals & Food	SCOTT SCHOETTES	5/16/2019	12.32	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	9.54	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	11.84	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	7.42	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	1.50	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	14.95	5/30/2019
Meals & Food	SCOTT SCHOETTES	5/16/2019	9.16	5/30/2019
Meals & Food	SCOTT SCHOETTES	5/16/2019	4.40	5/30/2019
Meals & Food	SCOTT SCHOETTES	5/16/2019	1.90	5/30/2019
Meals & Food	SCOTT SCHOETTES	5/16/2019	18.04	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	9.66	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	3.00	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	1.80	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	3.00	5/30/2019
Meals & Food	SCOTT SCHOETTES	5/16/2019	4.86	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	1.00	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	9.15	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	2.00	5/30/2019
Meals & Food	SCOTT SCHOETTES	5/16/2019	13.88	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	2.00	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	10.45	5/30/2019
Meals & Food	SCOTT SCHOETTES	5/16/2019	13.40	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	2.00	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	2.00	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	2.00	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	12.48	5/30/2019
Meals & Food	SCOTT SCHOETTES	5/16/2019	4.91	5/30/2019
Meals & Food	SCOTT SCHOETTES	5/16/2019	11.43	5/30/2019

Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	12.79	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	2.50	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	21.97	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	6.00	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	3.00	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	17.67	5/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	313.00	5/28/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	238.30	5/28/2019
Lodging	SCOTT SCHOETTES	5/16/2019	133.28	5/28/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/16/2019	280.30	5/28/2019
Meals & Food	SCOTT SCHOETTES	5/16/2019	80.92	5/28/2019
Meals & Food	SCOTT SCHOETTES	5/16/2019	14.95	5/28/2019
Lodging	SCOTT SCHOETTES	5/16/2019	374.54	5/28/2019
Lodging	SCOTT SCHOETTES	5/16/2019	374.49	5/28/2019
Lodging	SCOTT SCHOETTES	5/16/2019	374.49	5/28/2019
Lodging	SCOTT SCHOETTES	5/16/2019	374.49	5/28/2019
Lodging	SCOTT SCHOETTES	5/16/2019	374.49	5/28/2019
Lodging	SCOTT SCHOETTES	5/16/2019	374.49	5/28/2019
Lodging	SCOTT SCHOETTES	5/16/2019	374.49	5/28/2019
Lodging	SCOTT SCHOETTES	5/16/2019	215.26	5/28/2019
Lodging	SCOTT SCHOETTES	5/16/2019	215.26	5/28/2019
Expert Fees	TREVOR HOPPE	5/14/2019	2,000.00	6/24/2019
Expert Fees	TREVOR HOPPE	5/14/2019	483.09	6/24/2019
Expert Fees	TREVOR HOPPE	5/14/2019	26.15	6/24/2019
Expert Fees	TREVOR HOPPE	5/14/2019	880.86	6/24/2019
Expert Fees	TREVOR HOPPE	5/14/2019	76.50	6/24/2019
Expert Fees	TREVOR HOPPE	5/14/2019	119.82	6/24/2019
Expert Fees	TREVOR HOPPE	5/14/2019	119.82	6/5/2019
Expert Fees	TREVOR HOPPE	5/14/2019	76.50	6/5/2019
Expert Fees	TREVOR HOPPE	5/14/2019	880.86	6/5/2019
Expert Fees	TREVOR HOPPE	5/14/2019	26.15	6/5/2019
Expert Fees	TREVOR HOPPE	5/14/2019	483.09	6/5/2019
Expert Fees	TREVOR HOPPE	5/14/2019	2,000.00	5/29/2019
Expert Fees	William David Hardy MD	5/10/2019	450.00	5/22/2019
Expert Fees	William David Hardy MD	5/10/2019	1,500.00	5/22/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/7/2019	5.00	5/14/2019
Meals & Food	SCOTT SCHOETTES	5/7/2019	17.73	5/14/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/7/2019	2.00	5/14/2019
Meals & Food	SCOTT SCHOETTES	5/7/2019	9.16	5/14/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/7/2019	3.19	5/14/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/7/2019	12.67	5/14/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/7/2019	7.42	5/14/2019

Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/7/2019	7.00	5/14/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/7/2019	2.00	5/14/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/7/2019	2.00	5/14/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/7/2019	10.08	5/14/2019
Meals & Food	SCOTT SCHOETTES	5/7/2019	10.88	5/14/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/7/2019	7.42	5/14/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/7/2019	20.93	5/14/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/7/2019	2.00	5/14/2019
Meals & Food	SCOTT SCHOETTES	5/7/2019	3.56	5/14/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	5/7/2019	10.47	5/14/2019
Meals & Food	SCOTT SCHOETTES	5/7/2019	12.64	5/14/2019
Expert Fees	TREVOR HOPPE	3/23/2019	1,125.00	3/26/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	7.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	14.61	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	3.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	10.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	16.67	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	21.31	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	3.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	3.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	3.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	23.21	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	4.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	4.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	29.98	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	5.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	19.43	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	3.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	5.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	15.90	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	10.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	39.38	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	2.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	3.50	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	8.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	17.09	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	19.40	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	3.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	50.25	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	8.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	38.02	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	21.36	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	5.00	3/4/2019

Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	37.45	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	6.50	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	17.30	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	10.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	8.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	2.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	43.64	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	36.01	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	10.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	4.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	24.92	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	7.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	18.28	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	7.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	5.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	4.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	10.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	9.33	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	14.70	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	2.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	3.00	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	30.61	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	31.08	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	7.46	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	10.07	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	6.83	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	2.41	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	1.67	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	17.84	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	21.93	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	9.74	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	9.76	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	12.14	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	6.83	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	4.85	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	6.83	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	2.49	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	20.34	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	19.18	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	18.05	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	19.36	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	10.17	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	10.12	3/4/2019

Meals & Food	SCOTT SCHOETTES	3/4/2019	18.00	3/4/2019
Lodging	SCOTT SCHOETTES	3/4/2019	202.96	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	2/25/2019	24.16	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	2/25/2019	7.67	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	2/25/2019	16.70	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	2/25/2019	9.17	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	2/25/2019	37.29	4/2/2019
Meals & Food	SCOTT SCHOETTES	2/25/2019	13.07	4/2/2019
Lodging	SCOTT SCHOETTES	2/25/2019	123.11	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	2/25/2019	11.20	4/2/2019
Meals & Food	SCOTT SCHOETTES	2/1/2019	8.46	2/6/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	2/1/2019	4.00	2/6/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	2/1/2019	47.40	2/6/2019
Meals & Food	SCOTT SCHOETTES	2/1/2019	2.41	2/6/2019
Hosted Services	SCOTT SCHOETTES	2/1/2019	10.00	2/6/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	2/1/2019	3.00	2/6/2019
Meals & Food	SCOTT SCHOETTES	2/1/2019	26.14	2/6/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	2/1/2019	11.00	2/6/2019
Meals & Food	SCOTT SCHOETTES	2/1/2019	20.84	2/6/2019
Meals & Food	SCOTT SCHOETTES	2/1/2019	11.15	2/6/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	2/1/2019	3.00	2/6/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	1/18/2019	371.20	3/1/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	1/18/2019	226.20	3/1/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	1/18/2019	277.20	3/1/2019
Meals & Food	SCOTT SCHOETTES	12/31/2018	15.21	12/31/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	12/31/2018	29.97	12/31/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	12/31/2018	5.00	12/31/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	12/31/2018	18.38	12/31/2018
Meals & Food	SCOTT SCHOETTES	12/31/2018	6.83	12/31/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	12/31/2018	34.29	12/31/2018
Meals & Food	SCOTT SCHOETTES	12/31/2018	23.98	12/31/2018
Meals & Food	SCOTT SCHOETTES	12/31/2018	9.94	12/31/2018
Meals & Food	SCOTT SCHOETTES	12/31/2018	3.57	12/31/2018
Employee Training & Prof Develop	SCOTT SCHOETTES	12/31/2018	1.67	12/31/2018
Meals & Food	SCOTT SCHOETTES	12/31/2018	11.19	12/31/2018
Meals & Food	SCOTT SCHOETTES	12/31/2018	3.88	12/31/2018
Meals & Food	SCOTT SCHOETTES	12/31/2018	24.23	12/31/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	12/31/2018	5.00	12/31/2018
Meals & Food	SCOTT SCHOETTES	12/31/2018	2.49	12/31/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	12/31/2018	6.00	12/31/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	12/31/2018	33.96	12/31/2018
Lodging	SCOTT SCHOETTES	12/31/2018	107.09	1/31/2019
Lodging	SCOTT SCHOETTES	12/31/2018	107.09	1/31/2019

Meals & Food	SCOTT SCHOETTES	12/31/2018	7.65	1/31/2019
Expert Fees	TREVOR HOPPE	12/24/2018	2,175.00	1/30/2019
Expert Fees	TREVOR HOPPE	12/24/2018	750.00	1/30/2019
Expert Fees	TREVOR HOPPE	12/24/2018	225.00	1/30/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	10.28	10/17/2018
Employee Training & Prof Develop	SCOTT SCHOETTES	10/12/2018	10.99	10/17/2018
Meals & Food	SCOTT SCHOETTES	10/12/2018	13.56	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	4.00	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	33.74	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	21.07	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	23.13	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	22.06	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	24.65	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	20.22	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	3.00	10/17/2018
Meals & Food	SCOTT SCHOETTES	10/12/2018	5.61	10/17/2018
Meals & Food	SCOTT SCHOETTES	10/12/2018	8.36	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	2.00	10/17/2018
Meals & Food	SCOTT SCHOETTES	10/12/2018	110.13	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	3.00	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	45.91	10/17/2018
Meals & Food	SCOTT SCHOETTES	10/12/2018	8.90	10/17/2018
Meals & Food	SCOTT SCHOETTES	10/12/2018	129.80	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	5.00	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	4.00	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	5.00	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	18.20	10/17/2018
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/12/2018	43.10	10/17/2018
Meals & Food	SCOTT SCHOETTES	10/12/2018	21.07	10/17/2018
Meals & Food	SCOTT SCHOETTES	10/12/2018	3.87	10/17/2018
<b>TOTAL</b>			<b>\$28,979.73</b>	

ROE V. AUSTIN				
Account description	Vendor name	Invoice date	Amount	Payment date
Meals & Food	SCOTT SCHOETTES	10/3/2019	44.06	10/21/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/3/2019	381.18	10/21/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/3/2019	41.23	10/21/2019
Meals & Food	SCOTT SCHOETTES	10/3/2019	43.77	10/21/2019

Meals & Food	SCOTT SCHOETTES	10/2/2019	9.51	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/2/2019	7.39	10/7/2019
Meals & Food	SCOTT SCHOETTES	10/2/2019	2.94	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/2/2019	30.55	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/2/2019	1.50	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/2/2019	1.50	10/7/2019
Meals & Food	SCOTT SCHOETTES	10/2/2019	11.81	10/7/2019
Meals & Food	SCOTT SCHOETTES	10/2/2019	18.84	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/2/2019	7.39	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/2/2019	21.65	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/2/2019	6.11	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/2/2019	3.00	10/7/2019
Meals & Food	SCOTT SCHOETTES	10/2/2019	16.91	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/2/2019	1.50	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/2/2019	7.48	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/2/2019	17.28	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/2/2019	4.33	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	10/2/2019	6.87	10/7/2019
Meals & Food	SCOTT SCHOETTES	10/2/2019	3.41	10/7/2019
Meals & Food	SCOTT SCHOETTES	9/24/2019	7.73	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	9/24/2019	22.74	10/7/2019
Lodging	SCOTT SCHOETTES	9/24/2019	112.70	10/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	8/6/2019	223.20	8/13/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	8/6/2019	33.93	8/13/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	8/6/2019	48.03	8/13/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	8/6/2019	34.97	8/13/2019
Meals & Food	SCOTT SCHOETTES	8/6/2019	29.00	8/13/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	8/6/2019	38.16	8/13/2019

Meals & Food	SCOTT SCHOETTES	8/5/2019	15.21	8/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	8/5/2019	6.78	8/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	8/5/2019	12.61	8/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	8/5/2019	5.24	8/7/2019
Lodging	SCOTT SCHOETTES	7/22/2019	129.23	8/12/2019
Lodging	SCOTT SCHOETTES	7/22/2019	129.24	8/12/2019
Lodging	SCOTT SCHOETTES	7/22/2019	129.24	8/12/2019
Lodging	SCOTT SCHOETTES	7/22/2019	129.24	8/12/2019
Lodging	SCOTT SCHOETTES	7/22/2019	129.24	8/12/2019
Lodging	SCOTT SCHOETTES	7/22/2019	129.24	8/12/2019
Lodging	SCOTT SCHOETTES	7/22/2019	129.24	8/12/2019
Lodging	SCOTT SCHOETTES	7/22/2019	129.24	8/12/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	7/15/2019	48.60	7/19/2019
Meals & Food	SCOTT SCHOETTES	7/15/2019	17.42	7/19/2019
Meals & Food	SCOTT SCHOETTES	7/2/2019	11.48	7/11/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	7/2/2019	6.65	7/11/2019
Court Fees	SCOTT SCHOETTES	7/2/2019	221.00	7/11/2019
Meals & Food	SCOTT SCHOETTES	7/2/2019	5.32	7/11/2019
Meals & Food	SCOTT SCHOETTES	7/2/2019	8.10	7/11/2019
Meals & Food	SCOTT SCHOETTES	7/2/2019	71.88	7/11/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	7/2/2019	35.40	7/11/2019
Meals & Food	SCOTT SCHOETTES	7/2/2019	9.80	7/11/2019
Meals & Food	SCOTT SCHOETTES	7/2/2019	10.88	7/11/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	7/2/2019	34.00	7/11/2019
Lodging	KARA INGELHART	7/1/2019	282.49	7/3/2019
Lodging	KARA INGELHART	7/1/2019	13.13	7/3/2019
Lodging	KARA INGELHART	7/1/2019	13.13	7/3/2019
Lodging	KARA INGELHART	7/1/2019	366.49	7/3/2019

Meals & Food	KARA INGELHART	7/1/2019	20.00	7/3/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	7/1/2019	3.00	7/3/2019
Meals & Food	KARA INGELHART	7/1/2019	26.26	7/3/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	7/1/2019	6.37	7/3/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	7/1/2019	13.62	7/3/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	7/1/2019	361.30	7/3/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	7/1/2019	39.09	7/3/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	7/1/2019	3.00	7/3/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	7/1/2019	4.12	7/3/2019
Employee Training & Prof Develop	KARA INGELHART	7/1/2019	2.10	7/3/2019
Dues	KARA INGELHART	7/1/2019	221.00	7/3/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	7/1/2019	5.47	7/3/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	7/1/2019	27.49	7/3/2019
Meals & Food	KARA INGELHART	7/1/2019	14.85	7/3/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	7/1/2019	18.35	7/3/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	7/1/2019	36.49	7/3/2019
Employee Training & Prof Develop	KARA INGELHART	7/1/2019	6.27	7/3/2019
Meals & Food	KARA INGELHART	7/1/2019	10.65	7/3/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	7/1/2019	93.99	7/3/2019
Comp. Hardware < \$2,500	KARA INGELHART	7/1/2019	32.64	7/3/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	7/1/2019	42.51	7/3/2019
Meals & Food	KARA INGELHART	7/1/2019	33.00	7/3/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	7/1/2019	7.05	7/3/2019
Meals & Food	KARA INGELHART	7/1/2019	43.62	7/3/2019
Meals & Food	KARA INGELHART	7/1/2019	29.78	7/3/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	5/20/2019	679.96	5/28/2019
Court Fees	VERITEXT LLC	5/17/2019	2,786.35	6/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	4/10/2019	37.80	4/25/2019

Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	4/10/2019		4/25/2019
			28.55	
Meals & Food	KARA INGELHART	4/10/2019		4/25/2019
			30.00	
Lodging	KARA INGELHART	4/10/2019		4/25/2019
			260.45	
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	4/10/2019		4/25/2019
			200.00	
Meals & Food	KARA INGELHART	4/10/2019		4/25/2019
			36.31	
Lodging	KARA INGELHART	4/10/2019		4/18/2019
			290.19	
Lodging	KARA INGELHART	4/10/2019		4/18/2019
			290.17	
Lodging	KARA INGELHART	4/10/2019		4/18/2019
			290.17	
Meals & Food	KARA INGELHART	4/10/2019		4/18/2019
			6.87	
Meals & Food	KARA INGELHART	4/10/2019		4/18/2019
			116.00	
Meals & Food	KARA INGELHART	4/10/2019		4/18/2019
			115.00	
Meals & Food	KARA INGELHART	4/10/2019		4/18/2019
			13.70	
Meals & Food	KARA INGELHART	4/10/2019		4/18/2019
			14.36	
Lodging	KARA INGELHART	4/10/2019		4/18/2019
			189.10	
Lodging	KARA INGELHART	4/10/2019		4/18/2019
			50.07	
Lodging	KARA INGELHART	4/10/2019		4/18/2019
			50.07	
Meals & Food	KARA INGELHART	4/10/2019		4/18/2019
			6.43	
Meals & Food	KARA INGELHART	4/10/2019		4/18/2019
			8.33	
Meals & Food	KARA INGELHART	4/10/2019		4/18/2019
			20.01	
Meals & Food	KARA INGELHART	4/10/2019		4/18/2019
			4.61	
Meals & Food	KARA INGELHART	4/10/2019		4/18/2019
			20.50	
Meals & Food	KARA INGELHART	4/10/2019		4/18/2019
			11.00	
Meals & Food	KARA INGELHART	4/10/2019		4/18/2019
			13.37	
Meals & Food	KARA INGELHART	4/10/2019		4/18/2019
			22.80	
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	4/10/2019		4/18/2019
			28.56	
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	4/10/2019		4/18/2019
			28.95	
Lodging	KARA INGELHART	3/19/2019		3/7/2019
			16.21	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			37.93	

Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	18.00	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	21.22	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	3.00	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	7.00	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	15.87	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	2.00	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	19.78	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	3.00	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	23.22	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	13.30	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	4.00	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	19.00	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	2.00	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	18.64	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	12.39	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	3.00	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	2.00	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	17.99	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	5.00	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	28.90	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	5.00	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	24.53	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	3.20	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	3.00	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	30.03	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	5.00	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	18.54	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019	3.00	4/2/2019

Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			34.82	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			5.00	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			8.90	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			46.80	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			12.00	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			34.36	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			2.00	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			2.00	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			3.00	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			5.00	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			7.74	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			20.88	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			8.19	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			15.02	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			2.00	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			3.00	
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/18/2019		4/2/2019
			4.00	
Meals & Food	SCOTT SCHOETTES	3/18/2019		4/2/2019
			9.74	
Meals & Food	SCOTT SCHOETTES	3/18/2019		4/2/2019
			15.54	
Meals & Food	SCOTT SCHOETTES	3/18/2019		4/2/2019
			13.28	
Meals & Food	SCOTT SCHOETTES	3/18/2019		4/2/2019
			15.46	
Meals & Food	SCOTT SCHOETTES	3/18/2019		4/2/2019
			5.48	
Meals & Food	SCOTT SCHOETTES	3/18/2019		4/2/2019
			24.75	
Meals & Food	SCOTT SCHOETTES	3/18/2019		4/2/2019
			4.00	
Meals & Food	SCOTT SCHOETTES	3/18/2019		4/2/2019
			2.22	
Meals & Food	SCOTT SCHOETTES	3/18/2019		4/2/2019
			4.40	
Meals & Food	SCOTT SCHOETTES	3/18/2019		4/2/2019
			3.23	
Meals & Food	SCOTT SCHOETTES	3/18/2019		4/2/2019
			3.85	

Meals & Food	SCOTT SCHOETTES	3/18/2019	2.70	4/2/2019
Meals & Food	SCOTT SCHOETTES	3/18/2019	24.57	4/2/2019
Meals & Food	SCOTT SCHOETTES	3/18/2019	9.15	4/2/2019
Meals & Food	SCOTT SCHOETTES	3/18/2019	4.32	4/2/2019
Meals & Food	SCOTT SCHOETTES	3/18/2019	19.34	4/2/2019
Meals & Food	SCOTT SCHOETTES	3/18/2019	10.92	4/2/2019
Meals & Food	SCOTT SCHOETTES	3/18/2019	59.80	4/2/2019
Meals & Food	SCOTT SCHOETTES	3/18/2019	1.75	4/2/2019
Meals & Food	SCOTT SCHOETTES	3/18/2019	1.75	4/2/2019
Meals & Food	SCOTT SCHOETTES	3/18/2019	1.75	4/2/2019
Meals & Food	SCOTT SCHOETTES	3/18/2019	5.19	4/2/2019
Meals & Food	SCOTT SCHOETTES	3/18/2019	9.08	4/2/2019
Internet Expense	SCOTT SCHOETTES	3/18/2019	14.00	4/2/2019
Meals & Food	KARA INGELHART	3/7/2019	10.52	3/7/2019
Meals & Food	KARA INGELHART	3/7/2019	-	3/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	3/7/2019	57.86	3/7/2019
Lodging	KARA INGELHART	3/7/2019	157.80	3/7/2019
Meals & Food	KARA INGELHART	3/7/2019	5.26	3/7/2019
Meals & Food	KARA INGELHART	3/7/2019	5.26	3/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	3/7/2019	899.48	3/7/2019
Meals & Food	KARA INGELHART	3/7/2019	73.64	3/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	3/7/2019	52.60	3/7/2019
Meals & Food	KARA INGELHART	3/7/2019	5.26	3/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	3/7/2019	15.78	3/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	3/7/2019	10.52	3/7/2019
Meals & Food	KARA INGELHART	3/7/2019	31.57	3/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	3/7/2019	21.04	3/7/2019
Meals & Food	KARA INGELHART	3/7/2019	10.52	3/7/2019
Meals & Food	KARA INGELHART	3/7/2019	10.52	3/7/2019

Meals & Food	KARA INGELHART	3/7/2019	10.52	3/7/2019
Meals & Food	KARA INGELHART	3/7/2019	5.26	3/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	3/7/2019	252.48	3/7/2019
Lodging	KARA INGELHART	3/7/2019	347.17	3/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	3/7/2019	120.98	3/7/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	3/6/2019	248.98	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	3/6/2019	53.99	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	KARA INGELHART	3/6/2019	629.96	4/2/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	21.40	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	5.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	3.00	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	3.50	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	17.52	3/4/2019
Transportation: Airfare/Rail/Car (Staff Travel Only)	SCOTT SCHOETTES	3/4/2019	29.74	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	20.15	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	5.76	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	82.17	3/4/2019
Meals & Food	SCOTT SCHOETTES	3/4/2019	2.21	3/4/2019
Lodging	SCOTT SCHOETTES	2/25/2019	123.11	4/2/2019
Lodging	SCOTT SCHOETTES	2/25/2019	123.11	4/2/2019
Lodging	SCOTT SCHOETTES	2/25/2019	167.25	4/2/2019
Lodging	SCOTT SCHOETTES	2/25/2019	167.25	4/2/2019
Lodging	SCOTT SCHOETTES	2/25/2019	167.25	4/2/2019
Lodging	SCOTT SCHOETTES	2/25/2019	167.25	4/2/2019
Lodging	SCOTT SCHOETTES	2/25/2019	5.50	4/2/2019
Lodging	SCOTT SCHOETTES	2/25/2019	5.50	4/2/2019
<b>TOTAL</b>			<b>15,242.26</b>	

# Exhibit C

## Kara N. Ingelhart

801 North Wabash Street, Apartment 2N ♦ Chicago, Illinois 60611 ♦ 219-669-1445 ♦ kara.ingelhart@gmail.com

### EXPERIENCE

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#### **Lambda Legal Defense and Education Fund, Chicago, Illinois**

Senior Attorney

February 2022-Present

Staff Attorney

February 2019-February 2022

Law Fellow Attorney

September 2017-January 2019

Skadden Fellow Attorney

September 2015-September 2017

- Active in all facets of cutting-edge impact litigation, public policy, and education on issues involving the rights of lesbian, gay, bisexual, and transgender people and people living with HIV.
- Represent individuals in federal and state litigation, including cases involving equal access to equal access to military service for transgender people and people living with HIV, public health, conditions of confinement for incarcerated individuals, HIV criminalization, the privacy rights of PLWHIV, identity documents for transgender people, housing discrimination, and equal access to sex-segregated facilities for transgender students.
- Participate in federal, state, and municipal policy working groups, prepare formal comments regarding legislation and regulations, educate Congressional staffers, and author presidential transition memoranda.
- Review and assess legal intakes for potential litigation or advocacy opportunities.
- Serve as spokesperson for Lambda Legal, clients, and partners.
- Help develop and execute effective media strategies.
- Collaborate with other Lambda Legal departments including communications and development.
- Conduct trainings and educational programs on all aspects of Lambda Legal's mission.
- Hire and manage law fellows, paralegals, and legal interns.
- Skadden Fellowship designed to serve low-income LGBTQ youth with juvenile or criminal records by addressing barriers that they face in accessing housing, employment, and educational opportunities.

### EDUCATION

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#### **The University of Chicago Law School, Chicago, Illinois**

*Juris Doctor*

June 2015

- Student Attorney, Mandel Legal Aid Clinic Mental Health Project
- Student Leadership: OutLaw, President & Law Students for Reproductive Justice, Vice President

#### **The University of Chicago School of Social Service Administration, Chicago, Illinois**

*Certificate – Graduate Program in Health Administration and Policy, Global Health Concentration*

June 2015

#### **Indiana University, Bloomington, Indiana**

*Bachelor of Arts in Biology & Gender Studies, Highest Honors*

May 2012

- Phi Beta Kappa Society Member
- Research Assistant 2009-12, The Kinsey Institute for Research in Sex, Gender & Reproduction

### REPRESENTATIVE CASES

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#### *Doe v. AJ Boggs & Company* (Superior Court, San Francisco County, California)

Counsel for certified class of 93 low-income Californians living with HIV whose confidential medical records – including their HIV status – were compromised by a data breach of A.J. Boss's California AIDS Drug Assistance Program (ADAP) online enrollment system.

#### *Hicklin v. Precythe* (E.D. Mo.)

Counsel for transgender woman challenging Missouri Department of Corrections (MDOC) "freeze-frame" policy barring access to gender affirming surgery for inmates and others in custody.

*Stinson v. Florida* (Fla. 1st Dist. Ct. of App.; Cir. Ct. 1st Judicial Circuit, Walton Cnty, Fla.)

Counsel for senior citizen seeking post-conviction relief from a more than three-fold sentencing enhancement (twenty-one years over the recommended sentence) based on his HIV-positive status.

*B.L. v. Mahanoy Area School District* (U.S. Sup. Ct.)

Co-authored *amicus* brief regarding schools' obligation to address legitimately harmful speech such as bullying, harassment, and threats of violence – whether or not it occurs on school grounds – but must be very specific and distinct with their actions to not overextend their authority.

*Walter v. Walter* (Ind. Ct. of Appeals)

Co-authored *amicus* brief in support of a lesbian mother appealing a decision (seeking transfer to the state high court) denying her primary custody after her ex-husband argued that she should lose custody because of her lesbian relationship.

*Ray v. McCloud* (S.D. Ohio); *Foster v. Andersen* (D. Kansas); *Arroyo González v. Rosselló* (D. P.R.); & *F.V. v. Jeppesen* (D. Idaho)

Counsel for transgender people challenging Kansas's, Ohio's, Puerto Rico's, and Idaho's refusal to allow transgender people to correct the gender marker on their birth certificates.

*Hobby Lobby v. Ill. Human Rights Comm'n; Ill. Dept. of Human Rights; & Meggan Sommerville* (Ill. App. Ct. 2nd Dist.)

Co-authored *amicus* brief regarding the application of laws barring discrimination because of "sex" to transgender people, including the requirement of equal access to sex-segregated facilities.

*Roe v. Austin* (E.D. Va.); *Harrison v. Austin* (E.D. Va.); *Deese v. Austin* (D. Md.)

Counsel for U.S. military service members and military academy cadets refused commission or facing discharge based on their HIV-positive status.

*Judd v. Judd* (Ill. App. Ct. 2nd Dist.)

Counsel for Illinois non-biological mother whose former spouse appealed determination of shared custody of their daughter.

*Karnoski v. Trump* (W.D. Wash., 9th Cir., U.S. Sup. Ct.)

Counsel for transgender people challenging the constitutionality of the Trump Administration's ban on military service by transgender individuals.

*Dorn v. Michigan Department of Corrections* (W.D. Mich.)

Counsel for formerly incarcerated individual who was disproportionately punished for his HIV-positive status, including spending nearly a year in solitary confinement, under discriminatory Michigan statute and corresponding procedures.

*Wetzel v. Glen St. Andrew Living Community* (N.D. Ill., 7th Cir.)

Counsel for older lesbian woman facing discrimination based on her sex and sexual orientation in independent living community, through claims under the Fair Housing Act and the Illinois Human Rights Act.

*Evancho v. Pine Richland School District* (W.D. Pa.)

Counsel for transgender students in Pine Richland School District challenging a School District resolution that requires transgender student to use restrooms according to their sex assigned at birth.

*Anders v. San Francisco County Superior Court, aka Doe v. Kink.com* (Cal. Ct. App.)

Co-authored *amicus* brief regarding medical privacy rights, HIV-related stigma, public health goals, and statutory intent in the context of HIV testing.

*Erotic Service Provider Legal, Education and Research Project v. Gascón* (9th Cir.)

Co-authored *amicus* brief regarding intersection of due process and criminal prostitution and solicitation laws as they relate to public health and HIV.

*Whole Woman's Health v. Hellerstedt* (U.S. Sup. Ct.)

Co-authored *amicus* brief regarding intersection of fundamental rights and equal protection as they relate to reproductive justice.

## SELECTED PRESENTATIONS, TESTIMONY, & POSTERS

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- University of Chicago Law School** October 2021  
 Presentation: *Harm Reduction Models of Legal Modernization – Sex Worker Rights & Criminalization*
- Lavender Law Conference** July 2021  
 Plenary (with Judge Michael Jacobs, Ezra Young, Alexander Chen, Nancy Marcus, Sarah Warbelow, Josh Blecher-Cohen, Imani Rupert-Gordon, and Bendita Malakia): *Bridging the Gap in LGBTQ+ Rights Litigation: A Community Discussion on Bisexual Visibility in the Law*  
 Presentation (with Arli Christian, Charlie Arrowood, Omar Gonzalez-Pagan, & AC Dumlao): *New Era of Access to IDs for Trans and Non-Binary People*  
 Presentation (with Sean Bland, Benjamin Brooks, & Tamika Spellman): *Protecting LGBTQ+ Sex Workers Through Decriminalization and Intersectional Policy Approaches*
- Connecticut Bar Association** June 2021  
 Presentation: *Discrimination Against Members of the Military Who Are HIV-Positive*
- Schiff Hardin LLP** June 2021  
 Presentation: *Pride Month 2021 Program*
- Chicago Bar Association, Labor & Employment Division** May 2021  
 Sex Discrimination Seminar: Emerging Trends and Issues  
 Presentation: *Non-Discrimination Protections for LGBTQ Employees in Illinois After Bostock*  
 Panel (with Jennifer Jones & Deborah Hamilton): *Recent Trends and Issues in Sex Discrimination*
- University of Chicago Law School** April 2021  
 Diversity Scholar Series: *Transgender Inclusion*
- Indiana University McKinney School of Law, Indianapolis, IN** February 2021  
 Guest Lecture: *Litigating LGBTQ+ Issues – LGBTQ+ Students' Rights*
- Baker McKenzie LLP** November 2020  
 Presentation (with Scott Schoettes & Shelly Skeen): *Improving the Lives of People Living with – And Communities Most Affected by – HIV*
- Illinois State Bar Association Labor & Employment Law Section** October 2020  
 Presentation (with Aaron B. Maduff): *LGBTQ Rights after Bostock v Clayton County (USSC) – Implications for Employees and Employers*
- Lavender Law Conference** August 2020  
 Presentation (with Eric Paulk, Amir Sadeghi, Bamby Salcedo, & Brad Sears): *The Criminalization of Disease – Lessons from HIV, Hepatitis, and COVID-19*
- University of Chicago Law School** January 2020  
 Panelist (with Professors Mary Anne Case & Steve Sanders): *Title VII, Sexual Orientation, & Gender Identity*
- Pritzker Military Library** December 2019  
 Panelist (with Scott Schoettes, Sgt. Nick Harrison, & Sasha Buchert): *Transgender & HIV Military Ban Panel with U.S. Rep. Mike Quigley*
- North Dakota Advisory Committee to the U.S. Commission on Civil Rights Briefing** June 2019  
 Public Hearing Testimony (with North Dakota State Rep. Ruth Buffalo, Hukun Abdullahi, Laetitia Mizero Hellerud, Barry Nelson, Jack Russell Weinstein, & Miriam Zeidman): *Hate Crimes in North Dakota*
- University of Chicago Law School** April 2019  
 Panelist (with Scott Schoettes, Peter Perkowski, & Julie Bauer): *HIV & the Military*

Kara N. Ingelhart 4

- Indiana University Maurer School of Law, Bloomington, IN** March 2019  
Presentation (with Professor Steve Sanders): *LGBTQ Equality in the Courts: An Update on Current Controversies*
- Cook County Board of Commissioners** February 2019  
Public Hearing Testimony: *Resolution Condemning Trump Administration Treatment of Transgender, Gender Non-Conforming, & Intersex Individuals*
- National Asian Pacific American Bar Association Conference** November 2018  
Panelist (with Rachel See, Brynn Tannehill, & Kage Adams): *Stories from the Front Lines: Military Policies Regarding Openly Transgender Americans*
- Ohio State Bar Association** September 2018  
Presentation (with Susan Becker & Alana Jochum): *Seventh Annual LGBTQ & Allies Diversity & Inclusion Conference*
- Defense Research Institute (DRI) Employment & Labor Law Conference** May 2018  
Panelist (with Craig R. Thorstensen): *Addressing Claims of Discrimination Involving the LGBT Community*
- Defense Research Institute (DRI) Retail & Hospitality Litigation Conference** May 2018  
Panelist (with Leon B. Silver, Katina Thornock, & Kristen Wilson): *Transgender Bathrooms: Where Can We Go Wrong?*
- DePaul College of Law** March 2018  
Panelist (with Miles Shultz & Lori Ecker): *Journal of Women, Gender & Law Symposium*
- Chicago Bar Association** February 2018  
Panelist (with John Knight, Lark Mulligan, Maria Pahl, & Mike Ziri): *Serving LGBT Clients in 2018: What You Need to Know*
- Congressional LGBT Equality Caucus Staff Briefing** January 2018  
Panelist (with Shayla Schlossenberg, Preston Mitchum, Magalie Lerman, & Kate D'Adamo): *The Impact of Sex Work Laws on LGBTQ Community*
- Creating Change Conference** January 2018  
Presentation (with Daniel Bruner, Guillaume Bagal III, & Kate D'Adamo): *Criminalizing Sex Work: Exploring the Full Scope of the Law*
- Wake Forest University School of Law** November 2017  
Presentation (with Nii-Quartelai Quartey, Paula Kohut, & Yemi Adegbonmire): *LGBT Advocacy and Aging*
- Lavender Law Conference** August 2017  
Presentation (with Daniel Bruner, Maria Carmen Hinayon, & Richard Saenz): *Sex Workers and the Criminal Law: An LGBT Issue*
- Creating Change Conference** January 2017  
Presentation (with Meghan Maury & Shelby Chestnut): *Reentry: Breaking the Cycle of Incarceration for LGBTQ People and PLHIV*  
Presentation (with Candace Bond-Theriault): *Stop the Stigma: Queer Identity, Abortion Stigma and Politics of the Closet*  
Presentation (with Kate D'Adamo, Victoria Roldriguez-Roldan, & Joanna Cifredo): *Decriminalization of the Sex Trade*
- Coalition for Juvenile Justice Conference** April 2016  
Poster: *LGBTQ Youth & Disproportionate Juvenile & Criminal Justice System Contact: Policing, Prosecution and Sentencing & the Collateral Effects of a Record*
- Creating Change Conference** January 2016

Presentation (with Rachel Brady, Candace Moore, & Geoffrey Winder): *Perspectives on Policing Young People in Schools*

Presentation (with Lam Ho): *Sex Work Decriminalization: A History, Personal Experiences, and Advocacy Tools*

#### ADMISSIONS, AWARDS, & AFFILIATIONS

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- State Bar Admission: Illinois
- U.S. District Courts: Northern District of Illinois & Western District of Michigan
- U.S. Courts of Appeals: Fourth Circuit, Seventh Circuit, & Ninth Circuit
- U.S. Supreme Court
- Illinois State Bar Association
- Chicago Bar Association
- National LGBT Bar Association
- Indiana University College of Arts & Sciences 20 Under 40 Alumni, 2021
- National LGBT Bar Association 40 Best Lawyers Under 40 Award, 2020
- Windy City Times 30 Under 30 Award, 2016  
(awarded for contributions made to the Chicago LGBTQ community)

# EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

RICHARD ROE, ET AL.,

Plaintiffs,

v.

LLOYD J. AUSTIN, ET AL.,

Defendants.

Civil Action No. 1:18-cv-01565

NICHOLAS HARRISON, ET AL.,

Plaintiffs,

v.

LLOYD J. AUSTIN, ET AL.,

Defendants.

Civil Action No. 1:18-cv-00641

**DECLARATION OF NICHOLAS HARRISON**

I, Nicholas Harrison, declare as follows:

1. I am over the age of 18 and competent to make this declaration. I am the plaintiff in the matter *Harrison v. Austin*, No. 1:18-cv-00641, currently pending before this Court. I make this declaration in support of the request for attorney fees and costs as the prevailing party in the litigation.

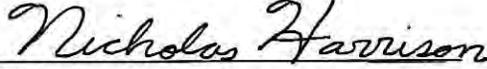
2. I am a private individual, and my net worth at the time this action was filed did not exceed, nor has it ever exceeded, the amount of \$2,000,000.

3. I previously retained Counsel of Record to retain me in this case pro bono. I have not been billed for, nor have I paid, any attorney fees or expenses in this matter. I authorize the recovery of fees and expenses to my attorneys to compensate them for work performed on my behalf and for costs incurred in doing their work.

4. To the best of my knowledge, I do not owe any debt to the United States federal government.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct. Executed on the date below at Washington, District of Columbia.

Dated: August 3, 2022

  
Nicholas Harrison  
Nicholas Harrison

# EXHIBIT 5

Filed Under Seal

# EXHIBIT 6

Filed Under Seal

# EXHIBIT 7

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

RICHARD ROE et al.,  
Plaintiffs,  
v.

LLOYD J. AUSTIN et al.,  
Defendants.

Civil Action No. 1:18-cv-01565

NICHOLAS HARRISON et al.,  
Plaintiffs,  
v.

LLOYD J. AUSTIN et al.,  
Defendants.

Civil Action No. 1:18-cv-00641

**DECLARATION OF PETER E. PERKOWSKI**

I, Peter E. Perkowski, declare as follows:

1. I am an attorney at law and over the age of 18 years old. I am a principal of the law firm of Perkowski Legal, PC, one of the counsel of record for plaintiffs in these matters. The information stated below is of my own personal knowledge.

2. I have represented the plaintiffs in these matters from their inception. I make this declaration in support of plaintiffs' motion for attorney fees and expenses and to provide relevant context and support for the request.

**Summary of Relevant Experience and Qualifications**

***General litigation experience***

3. I graduated with highest honors (often referred to as *magna cum laude*) from George Washington University Law School in 1998, with a grade point average that put me in

the top 3% of over 460 graduating students. Later that year, after passing the California bar exam, I was sworn in to practice before all courts of the State of California and became a member of the California Bar.

4. After law school, I practiced complex civil litigation in Los Angeles at several law firms, including large multi-national “Big Law” firms of Gibson, Dunn & Crutcher and Winston & Strawn. Winston & Strawn made me a partner in 2007. During over 15 years of practice at these firms, I litigated a wide range of large and complex matters, including mass-tort and class-action defense, securities fraud, consumer and business torts, general business litigation, entertainment and intellectual property disputes, and patent infringement and patent invalidity cases. The litigation undertaken on behalf of plaintiffs in the matters before this Court is no less complex than the civil litigation that I practiced at those law firms.

5. Throughout my career, I have litigated cases in federal district courts and courts of appeal across the country. My work has led me to become admitted to practice before numerous courts, including the United States Supreme Court, the U.S. Courts of Appeals for the Third, Fifth, Ninth, and Federal Circuits, and the U.S. District Courts for the Northern, Central, and Southern Districts of California, the Eastern District of Michigan, the Eastern District of Texas, the District of Columbia, and the Southern District of New York. In addition, I have been admitted to practice *pro hac vice* in at least 40 additional litigation matters in federal courts in the District of Connecticut, District of Delaware, Southern District of Indiana, Northern District of Illinois, District of Maryland, District of Massachusetts, Eastern District of Missouri, District of Nevada, District of New Jersey, Southern District of New York, Eastern District of Virginia, and the Western District of Washington.

6. In 2013, I was sworn in by the District of Columbia Court of Appeals and thereby admitted to the District of Columbia Bar.

7. I left Winston & Strawn in 2015, as a partner in the litigation department. At the time, my hourly rate was well over \$900 per hour. After leaving Winston & Strawn, I started my own solo practice, Perkowski Legal, where my work continues to be primarily litigation-based.

8. In 2022, I was sworn in by the Supreme Court of the State of New York, Appellate Division, Third Judicial Department, and thereby admitted to the New York Bar.

9. A copy of my current resume/CV is attached as Exhibit A.

***Specialized knowledge and experience in LGBTQ+ & HIV matters***

10. For well over a decade and a half, my work has included a substantial amount of pro bono work on behalf of lesbian, gay, bisexual, transgender, and queer (LGBTQ+) people and people living with HIV.

11. While at Gibson Dunn and Winston & Strawn, I represented immigrants seeking asylum in the United States: nearly all my clients had either experienced persecution or feared being persecuted in their home countries based on their sexual orientation, gender identity, and/or HIV status.

12. For many years, I also represented civil-rights advocacy groups in support of LGBTQ+ immigrants and immigrants with HIV, preparing and filing amicus briefs in the U.S. Courts of Appeals in several cases. Representative matters are listed on my CV.

13. I also participated—again as amicus counsel—in many of the highest profile LGBTQ+ civil rights cases of the past fifteen years. In 2007, I represented community health organizations before the California Court of Appeal and California Supreme Court, authoring amicus briefs that described the damaging effects that allowing doctors to refuse to provide

reproductive healthcare services would have on health outcomes and welfare of LGBTQ+ people. I participated in two LGBTQ+ marriage-equality cases before the California Supreme Court in 2007 and 2009. In a Fifth Circuit case, I co-authored an amicus brief on behalf of mental-health and child-welfare advocacy groups regarding the informational privacy of LGBTQ+ youth and the harmful effects that involuntary outing by school officials would have on them. These cases and others are reflected in the “Representative Cases” portion of my CV.

14. Because of my specialized knowledge and experience in LGTBQ+ and HIV matters, I have had the opportunity to speak on the subject many times. Those presentations are reflected on the “Select Publications & Presentations” section of my CV.

***Specialized knowledge and experience in military law and policy***

15. I have also developed specialized experience and knowledge in military law and policy, particularly as it relates to issues of discrimination based on sexual orientation, gender identity, or HIV status.

16. In 2012, I joined the Board of Directors of Servicemembers Legal Defense Network, which was established in 1993 as a non-partisan, non-profit, legal services, watchdog and policy organization dedicated to ending discrimination against and harassment of military personnel affected by the policy known as “Don’t Ask, Don’t Tell” (DADT). At the time I joined the Board, DADT had just been repealed, and the organization was focused on the work needed to integrate openly serving lesbian, gay, and bisexual people into our Armed Forces. Not long after I joined the Board, the organization merged with OutServe—a previously “underground” group of actively serving LGBTQ service members advocating for repeal of DADT—to form OutServe-SLDN. (In 2019, OutServe-SLDN merged with American Military Partner Association to form Modern Military Association of America (MMAA), as it is now known.)

17. I served on the Board of OutServe-SLDN for about two years. In 2014, I resigned from the Board and assumed a position as a pro bono legal consultant with some shared responsibilities over the legal services function. My work included responding to inquiries to the Legal Help Desk by LGBTQ+ people who were serving in the military or who had previously served, as well as working with partner law firms to assist LGBTQ+ veterans who had been involuntarily separated under DADT (and prior policies that policed and criminalized their sexual orientation, gender identity, and consensual sexual conduct) with applications to upgrade their discharges.

18. In late 2015, I went on staff for OutServe-SLDN—first as Counsel, then Legal Director, then Legal & Policy Director. I managed and oversaw all aspects of OutServe-SLDN's legal services department, and I am therefore familiar with all its legal programs.

19. During my time at OutServe-SLDN, I directed the legal services function, which focused on addressing the legal needs of LGBTQ+ and HIV+ service members as to equal access, equal treatment, and equal service. My responsibilities included setting and implementing the strategic direction of the organization's legal work, supervising legal and policy staff, and managing relationships with law firms, coalition partners, and other civil rights organizations. My work included advocacy to Congress, the Defense and Veterans Affairs Departments, and state governments on behalf of individuals and the broader LGBTQ/HIV+ military community. I facilitated the organization's participation in impact litigation and amicus briefs in matters implicating the interests of LGBTQ+ military and veterans and their families. I also directly assisted LGBTQ+/HIV+ service members and veterans, including preparing discharge upgrade applications and waivers and exceptions to policy, and providing representation in disciplinary actions, administrative separations, and courts martial.

20. My association with OutServe-SLDN (as Board member, volunteer, and staff) provided me with specialized knowledge and experience in military law and policy as it applies to LGBTQ+ service members and veterans, and service members and veterans with HIV.

a. My advocacy and policy work included advising and assisting Outserve-SLDN's Executive Director in working with Congress to change or approve legislation and regulations affecting LGBTQ+ service members or those serving with HIV, as well as working directly with the military agencies on these issues.

b. OutServe-SLDN's primary legal-services program was known as Restore Honor, Restore Dignity. This program assisted veterans who were discharged under DADT—or earlier policies that prohibited LGB people from serving in the Armed Forces—in obtaining an “upgrade” to discharge paperwork that (a) reflected a discharge characterization that is less than Honorable, (b) reflected stigmatizing or offensive language as a narrative reason for discharge, or (c) reflected a “re-enlist” code that improperly shows the veteran is ineligible for re-enlistment. Colloquially these were known as “discharge upgrades.” As a result of this program, and the large number of veterans who sought assistance under it, I became familiar with how historical military policies affected LGBTQ+ service members and those who served with HIV.

c. The Legal Help Desk continued while I was on staff, and I supervised other staff members in the legal department (as well as interns and volunteers) in doing intake calls and providing advice and assistance to LGBTQ+ people and people with HIV who called for help. Callers had a wide range of issues: many were veterans looking for help with discharge upgrades, or benefits eligibility issues with the Department of Veterans Affairs because of involuntary discharge under previous discriminatory policies.

Many were still in service and dealing with issues of harassment, discrimination, and other issues. Many others wanted to serve but were prevented from doing so due to discriminatory “bans” against transgender service and HIV enlistment. All calls required a working knowledge of current and previous military policies and regulations as they pertained to LGBTQ+/HIV+ people.

d. In 2015, the Obama Administration announced that it would stop enforcing the policy that banned transgender people from serving in the military while the policy underwent a review. A year later, the Secretary of Defense announced that the policy was rescinded, and that transgender people could serve openly. Many people who called our Help Desk or who were referred to us by other organizations were transgender people who needed our advice and assistance. Later, once the Trump Administration reversed the policy, our work focused on getting as many people as possible eligible to continue serving under the “grandfather” clause of President Trump’s directives.

e. Legal services work also included participating as amicus in cases involving issues of concern to the LGBTQ+/HIV+ military and veteran communities. I directed the organization’s efforts in preparing amicus briefs—and coordinating the sign-on of other military-veteran stakeholder organizations, as well as former Secretaries of the military departments on several occasions—that described the effect of Court rulings on service members, veterans, and their families. Under my direction, the organization participated in many high-profile Supreme Court cases, such as *Masterpiece Cakeshop, Ltd. v. Colorado Civil Rights Commission*, *Bostock v. Clayton County*, *Fulton v. City of Philadelphia*, and *Department of Homeland Security v. Regents of the University of California*. A full list is included in the “Representative Cases” portion of my CV.

f. I also provided direct representation—in administrative, disciplinary, and criminal proceedings—to service members who identify as LGBTQ or who were living with HIV. My work included defending service members with HIV in administrative separation boards and courts martial, as well as providing legal assistance, cultural-competency consultation, education and information, and training to Judge Advocate General (JAG) defense lawyers defending those service members. Representative cases are listed on my CV.

g. My work included filing and litigating impact litigation to change Department of Defense policies. In addition to these two cases, there were others: *Deese v. Austin*, still pending in the District of Maryland, which challenged the military's refusal to commission a Navy midshipman and an Air Force cadet because of their HIV status; and *Karnoski v. Trump*, filed in the Western District of Washington, which challenged the Trump Administration's ban on transgender people serving in the Armed Forces.

h. During my time at OutServe-SLDN, I also co-authored and edited a revised edition of *Freedom to Serve: The Definitive Guide to LGBTQ Military Service*, an online publication that provides critically important information about military service to the populations that OutServe-SLDN serves. The prior edition of *Freedom to Serve* had been published in 2010, *before* the repeal of DADT. Our 2018 edition was extensively revised and updated to include new information about serving openly as LGBTQ+, including critical advice about sex and relationships in the military as well as details about how an HIV diagnosis affects one's service.

21. While I was on staff, OutServe-SLDN expanded its legal and policy work related to HIV. Before their merger in 2012, both SLDN and OutServe had focused primarily on issues facing LGB people in the military—namely, DADT’s prohibition on open military service. After DADT’s repeal, and the merger to form OutServe-SLDN, the organization started to broaden its focus to include additional constituencies: for example, advocating for open and authentic military service by transgender people. But the organization lost all its staff in 2013, temporarily halting any further expansion of programs and services. For a period, OutServe-SLDN was operated by a volunteer board assisted by ad hoc consultants (including myself, as described above). The efforts in 2015 to re-hire permanent staff—in particular legal staff, again including myself—facilitated the expansion of legal services to include not just legacy programs (like Restore Honor, Restore Dignity) but also assisting individual members who were facing issues related to sexual orientation, gender identity, or HIV status.

22. As a result of the increased capacity, the calls to the Legal Help Desk from service members living with HIV steadily increased. Such calls fell into several categories: (a) people being denied entry into the military, or being separated soon after enlistment because of a positive HIV test during initial medical evaluation; (b) people being denied a commission, either from enlisted to officer ranks or after completing education at a military academy, because of a positive HIV test; (c) people being placed on restricted duties, such as losing flight status, because of a positive HIV test; (d) people being denied re-enlistment or being subject to administrative discharge because their HIV status restricts them from deploying; (e) people being unable to obtain the waivers or approvals necessary to deploy or go temporary duty. I advised and assisted these callers directly. Many of these cases are reflected in the “Representative Cases” section of my CV.

23. I left OutServe-SLDN (by then known as MMAA) in February 2021. Through my over five years of experience there, however, I am familiar with its corporate organization. At the time these Complaints were filed, OutServe-SLDN was a Delaware corporation and a non-profit under Section 501(c)(3) of the Internal Revenue Code. Currently, to my knowledge, MMAA is also a Delaware corporation and a non-profit under Section 501(c)(3) of the Internal Revenue Code. For the entire period of this litigation, OutServe-SLDN/MMAA has been based in Washington, D.C. Although it provides legal services to its membership, OutServe-SLDN/MMAA does not and never has charged for such services.

24. My specialized knowledge and experience in military law and policy as it relates to issues of discrimination based on sexual orientation, gender identity, or HIV status has been recognized by others:

a. I have frequently been asked to speak and present about military law and policy as it relates to issues of discrimination based on sexual orientation, gender identity, or HIV status. Those presentations are reflected in the “Select Publications & Presentations” section of my CV.

b. I have also been asked to act as an expert witness to provide historical context of the military treatment of LGBTQ+ servicemembers, demonstrating how systemic bias and personal prejudice may have played a role in negative outcomes they experienced. This experience is reflected in the “Expert Testimony” section of my CV.

c. I have been asked by Congress to provide testimony on issues that relate to LGBTQ+/HIV+ veterans. That testimony is reflected in the “Congressional Testimony” section of my CV. At least some of that testimony has focused on the historical treatment of LGBTQ+/HIV+ people in the military and its ongoing effect on

VA benefit eligibility and negative outcomes for LGBTQ+/HIV+ veterans.

***Other relevant knowledge and experience on HIV***

25. In addition to my legal and policy work described above, I have other relevant knowledge and experience on HIV that is relevant to these matters.

26. First, my personal experiences give me distinctive qualifications to litigate these cases. I have been living with HIV since 1998, and so I came to these matters with extensive knowledge and lived experience regarding HIV, HIV treatment, the transmission of HIV, and the stigma and discrimination—including employment discrimination—that sometimes affect people living with HIV.

27. Second, I have served on the Board of Directors of several non-profit organizations with a primarily focus on HIV and health. In 2013, I joined the Board of AIDS Project Los Angeles, one of the largest non-profit AIDS-service organizations, and a year later joined the Board of its related federally qualified health center APLA Health & Wellness. (The two entities merged in 2018.). APLA Health provides free or low-cost primary medical and oral health care, behavioral health services, HIV specialty care and prevention, and sexual health services, with a focus on low-income gay and bisexual men of color and transgender people—especially those living with, affected by, or at risk of HIV. In 2016, I was elected Chair of the Board of both organizations. I am also Director of non-profit organization with a focus on advocating internationally for equal access to effective HIV prevention, care, treatment, and support services for gay men and other MSM, including those living with HIV, while promoting their health and human rights worldwide.

**Billing and Fees Being Sought**

28. My firm Perkowski Legal uses a computer software program known as Clio to

record and track the billing of time and expenses. I used this program to track my time from inception to the present in these matters, both while I was working as Legal & Policy Director of OutServe-SLDN/MMAA, and when I was not. Though other OutServe-SLDN/MMAA employees or contractors may have devoted time or incurred expenses in these matters, I am the only one seeking fees on behalf of that organization. I am also seeking fees and expenses on behalf of Perkowski Legal.

29. It is my regular practice to keep track of the time spent on tasks for a matter at the time that I work on that task. This has been my practice for at least ten years. I track my time in a Microsoft Word file, where I type the time spent on a task and a detailed description of the work performed. Periodically—usually monthly, but sometimes more frequently—I enter the time into the Clio program using the Microsoft Word document that I had prepared at the time the work was performed.

30. For these matters and all matters for OutServe-SLDN/MMAA, I typically billed in quarter-hour (.25) increments.

31. I similarly kept track of expenses when they were incurred. No less frequently than monthly, I prepared an employee expense reimbursement report that was processed according to the applicable policies of my firm, Perkowski Legal. Approved expenses were entered from the employee reimbursement report into Clio and associated to the relevant matter to which they applied. After the close of each month, an invoice was created containing both the time entries and expenses associated with each matter.

32. For the purposes of this motion, I exported from Clio a spreadsheet containing the time and expense details for each matter from inception to the present. The spreadsheets contained the date of the task or expense, the amount of time spent on the task or the amount of

the expense, a detailed description of the task or expense, the person performing the task or incurring the expense, and other miscellaneous data fields (such as date entered, invoice number, and the like).

33. I carefully reviewed every entry on the spreadsheets. I have exercised billing judgment to ensure that the time for which fees are sought was reasonable and necessary under the circumstances. As part of that process, I eliminated some time entries where I concluded that the work performed could be deemed unnecessary, duplicative, or excessive. On occasion, I also revised the task descriptions to more clearly express or explain the work that was performed.

34. After my review, I combined the spreadsheets into one spreadsheet containing all time entries for both cases. The spreadsheet contains two worksheets: one for time spent on tasks while I was Legal & Policy Director of OutServe-SLDN/MMAA, and one for time spent working for Perkowski Legal. Expenses that OutServe-SLDN/MMAA reimbursed to me are listed on the worksheet for OutServe-SLDN/MMAA. For some expenses, Perkowski Legal incurred the expense and/or reimbursed my out-of-pocket expenses. Those expenses are listed on the worksheet for Perkowski Legal.

35. A copy of the spreadsheet containing my time and expenses is attached as Exhibit B. The time entries on Exhibit B reflect time I actually spent working on this matter, and the expenses reflect actual out-of-pocket costs I incurred. I sometimes did not enter time for quick or routine actions such as reviewing or responding to an email or making a short phone call. I exercised judgment, consistent with ethical obligations, in determining whether time I spent warranted being entered; I also exercised reasonable discretion and judgment to reduce or write off any charges for work when I considered it appropriate.

36. Based on my experience, Exhibit B reflects the time entries and expenses that

ordinarily would be billed—and over many years have been billed—to fee-paying clients in a litigation matter of this type.

### **Reasonableness of Rate**

37. Neither OutServe-SLDN/MMAA nor Perkowski Legal charged the plaintiffs in these cases for any legal services provided, nor did they seek reimbursement from plaintiffs for any out-of-pocket expense. Instead, OutServe-SLDN/MMAA relied on the potential recovery of fees and expenses. The contingent nature of the representation here meant that I needed to invest hundreds of hours without any assurance of compensation. That expenditure of time also necessarily precluded other work, including paid work, that I could have done in its place.

38. I believe that my personal knowledge and experience in military law and policy as it relates to people living with HIV was invaluable to these cases. The bulk of that knowledge and experience was developed even before these cases were filed, and even separate from the cases themselves it deepened while the litigations were ongoing. Even at a national level, I am aware of no other person who, at the time these cases were filed, had the same level of knowledge and experience with the specific issues of this case—namely, military regulations concerning HIV, their history, and their effect on service members with HIV and people with HIV who want to serve. This is because OutServe-SLDN was the only organization whose mission included providing legal services and advocacy to people affected by the military's discriminatory policies related to HIV—and I was the person who developed that capability while at OutServe-SLDN.

39. On Exhibit B, I have sought hourly rates of \$625 for time spent in 2017 and 2018, and \$670 for time spent from 2019 through the present. These are justified as follows:

a. I believe that my invaluable knowledge and experience, described above, entitles me to enhanced rates above those allowed by the Equal Access to Justice Act.

b. To determine my enhanced rate, I used the guidance commonly referred to as the “*Vienna Metro Matrix*,” which reflect the prevailing rates within the jurisdiction for non-EAJA attorney fee awards. (A chart of the *Vienna Metro Matrix* is reflected in the Affidavit of Charles Molster III, filed concurrently, and shown below.)

<b>Years of Experience</b>	<b>Paralegal</b>	<b>1-3</b>	<b>4-7</b>	<b>8-10</b>	<b>11-19</b>	<b>20+</b>
<b>Hourly Rate</b>	<b>\$130-350</b>	<b>\$250-435</b>	<b>\$350-600</b>	<b>\$465-640</b>	<b>\$520-770</b>	<b>\$505-820</b>

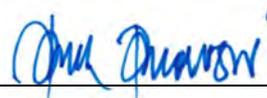
In 2017 and 2018, I had 18 and 19 years of experience, respectively, so for time billed in those years I selected an hourly rate of \$625, which is below the middle of the range of \$520-770 in the Matrix. In 2019 and after, I had 20 years or more of experience, so I selected an hourly rate of \$670, which is approximately in the middle of the Matrix’s range of \$505-820.

c. I understand that the *Vienna Metro Matrix* rates are from 2011, and hourly rates have risen in the last 11 years. Accordingly, my enhanced rate is within the range of prevailing rates—and likely the low range—in this jurisdiction.

d. This is consistent with my personal experience: when I left practice with Winston & Strawn in 2015, as a litigation partner of over seven years (albeit in the Los Angeles office), my regular hourly rate was well above \$950 per hour.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct.

Dated: August 5, 2022



# Exhibit A

**PETER E. PERKOWSKI**

515 S. Flower St. Suite 1800 | Los Angeles, CA 90071 | 213-340-5796  
*peter@perkowskilegal.com*

**EXPERIENCE**

- PERKOWSKI LEGAL, PC**, Los Angeles, CA *July 2015–present*  
*Founder* of solo practice serving the legal needs of individuals and businesses in the creative-cultural industries, including entertainment, sports, technology, art, and photography, among others; consult and advise on legal issues arising in context of new and growing businesses; negotiate and prepare contracts and other deal work; assist with the protection, monetization, and enforcement of intellectual property; and provide representation in litigation matters.
- OKULARITY, INC.**, Los Angeles, CA *Sept. 2017–present*  
*General Counsel* of information technology services company using specially designed software to protect intellectual property from unauthorized uses online; advise on internal legal matters as well as intellectual-property enforcement matters for company clients.
- MINORITY VETERANS OF AMERICA** *Mar. 2021–present*  
*Legal Counsel & Policy Manager* (2021-2022), *Legal & Policy Director* of non-profit organization representing veterans from historically marginalized communities. Advocate before Congress and federal agencies on matters affecting minority and underserved veterans; prepare and submit draft legislation and policy guidance, written testimony on pending legislation, comments on proposed regulations, and other materials; work with Congressional staff on legislative and policy initiatives.
- LEGAL SERVICES CENTER OF HARVARD LAW SCHOOL**, Jamaica Plain, MA *Apr. 2021–Dec. 2021*  
*Clinical Instructor* in the Veterans Legal Clinic, providing free legal representation to low-income disabled veterans, including discharge upgrades, federal court and administrative appeals, and policy advocacy. Served as lead or co-counsel in Clinic cases, trained and supervised law students and summer law interns, and supported other Clinic lawyers and instructors.
- MODERN MILITARY ASSOC. OF AM. f/k/a OUTSERVE-SLDN, INC.**, Washington, DC *Nov. 2015–Feb. 2021*  
*Counsel, Legal Director, and Legal & Policy Director* of non-profit civil-rights organization dedicated to ending discrimination and harassment of military personnel based on sexual orientation, gender identity, or HIV status. Led and directed the legal services function, addressing the legal needs of members as to equal access, equal treatment, and equal service. Set and implemented the strategic direction of the organization’s legal work, supervised staff, and managed relationships with law firms, coalition partners, and other civil rights organizations. Engaged in advocacy before Congress, the Defense and Veterans Affairs Departments, and state governments on behalf of individuals and the community. Facilitated participation in impact litigation and amicus briefs in matters implicating liberty and equality for the LGBTQ/HIV+ military community. Directly assisted service members and veterans, including preparing discharge upgrades, clemency petitions, and waivers and exceptions to policy, and provided representation in disciplinary actions, administrative separations, and courts martial.
- CALIFORNIA STATE UNIVERSITY, LONG BEACH**, Long Beach, CA *Aug. 2011–Feb. 2021*  
*Adjunct Faculty* in the Graduate Program in Sport Management, teaching *Legal & Ethical Issues in Sport*, a survey course on legal principles as they apply in the sports and entertainment industry.
- WINSTON & STRAWN LLP**, Los Angeles, CA *Apr. 2005–June 2015*  
*Partner* (2007–2015) in the litigation department; managed all aspects of litigation, including appellate work. Duties involved working closely with in-house counsel and coordinating and supervising teams of lawyers.  
*Associate* (2005–2007): managed day-to-day aspects of legal matters, including supervising case teams, interacting with clients and counsel, and appearing in court.

**GIBSON, DUNN & CRUTCHER, LLP**, Los Angeles, CA

*Feb. 2001–Mar. 2005*

**Associate**; litigated complex cases in federal and state courts with a focus on commercial disputes, class and mass actions, securities fraud, intellectual property, and writs and appeals.

**TROOP STEUBER PASICH REDDICK & TOBEY, LLP**, Los Angeles, CA *Summer 1997; Aug. 1998– Dec. 2000*

**Associate** (1998–2000) and **Summer Associate** (1997); litigated commercial cases with a focus on entertainment disputes, including intellectual property matters, film and television rights and contracts, talent performance issues, and license and distribution valuation disputes.

**GOLDSTEIN & ASSOCIATES**, Washington, DC

*Sept. 1997–July 1998*

**Law Clerk**; researched and prepared pleadings, briefs, and communications to clients, opposing counsel, and third parties; worked part time while taking classes as well as almost full time while studying for the bar and in the weeks leading up to the bar exam.

**U.S. DEPT. OF JUSTICE, CIVIL RIGHTS DIVISION**, Washington, DC

*Summer 1996*

**Intern** in Special Litigation Section; researched Eighth Amendment and due process protections for inmates and institutionalized youth, prepared attorney-reference tool on the ADA in state prison context, and evaluated complaints against state law enforcement.

### EDUCATION

**THE GEORGE WASHINGTON UNIVERSITY LAW SCHOOL**, Washington, DC

J.D., *with highest honors*, May 1998, GPA: 3.791, Rank 13/467 (top 3%), Order of the Coif

**Activities:** Managing Editor, Volume 66, *The George Washington Law Review*

Moot Court Board: Finalist, Government Contracts Moot Court Competition 1998

**CALIFORNIA STATE UNIVERSITY, LONG BEACH**, Long Beach, CA

M.A., Kinesiology (Sport Management option), May 2011, GPA: 4.0

**Recognition:** Outstanding Capstone Project

**UNIVERSITY OF ROCHESTER**, Rochester, NY

B.A., Mathematics (Statistics and Economics concentrations), May 1992, Dean's List

### REPRESENTATIVE CASES

*L.V. v. McDonough, J.K v. McDonough, F.M. v. McDonough* (Ct. App. Vet. Claims). Representing survivors of deceased veterans being denied veterans benefits because historical state laws prevented them from meeting marriage-related eligibility requirements.

*Nat'l Coalition for Men v. Selective Serv. Sys.* (U.S.). Led coalition of military and veteran advocacy groups in *amicus* brief on the effect of "male only" selective-service registration on women and transgender people.

*Dept. of Homeland Sec. v. Regents of the Univ. of Cal.* (U.S.). Led coalition of military and veteran advocacy groups and former Service Secretaries in *amicus* brief supporting the DACA program regarding important military interests in recruiting foreign nationals for military service.

*Fulton v. City of Philadelphia* (U.S.). Co-counsel for military and veteran service organization and former Service Secretaries on *amicus* brief regarding the effect of religious-based discrimination on LGBTQ service members and families.

*In re B.C., In re B.W., In re D.R.* Advise and assist service members seeking waivers or exceptions to policy because of duty restrictions and other limitations imposed due to HIV status.

*Kuang v. Dept. of Defense* (9th Cir., U.S.). Led coalition of interest groups and individuals in an *amicus* brief urging reversal of a procedural ruling that could limit future legal challenges to military policies.

*Roe v. Austin* (E.D. Va., 4th Cir.), *Harrison v. Austin* (E.D. Va., 4th Cir.), *Deese v. Austin* (D. Md.). Co-counsel for U.S. service members denied equal opportunity and involuntarily separated based on HIV status.

*United States v. M.L., United States v. B.G.* Civilian defense co-counsel in courts martial involving criminal charges against service members based on non-disclosure of HIV status.

*United States v. L.N.* Civilian defense co-counsel in court martial of gay man accused of abusive sexual contact.

*Bostock v. Clayton County* (U.S.). Led coalition of military and veteran advocacy groups in *amicus* brief on the effect of LGBTQ discrimination on service members, families, and veterans and the need to extend Title VII to prohibit such discrimination.

*Karnoski v. Trump* (W.D. Wash., 9th Cir., U.S.). Co-counsel for transgender service members challenging Trump Administration's ban on military service by transgender people.

*In re J.J.B.* Represented Army NCO in administrative separation board based on accusation of failure to follow a safe sex order pertaining to HIV.

*In re E.P.* Advised and assisted Marine NCO facing criminal charges and involuntary separation based on false accusations by a disgruntled ex-boyfriend that the NCO failed to disclose his HIV status.

*In re R.C., In re M.B., In re J.D., In re B.G.* Advised and assisted gay men facing disciplinary actions, including administrative separation, based on alleged misconduct related to sexual orientation or HIV status.

*Masterpiece Cakeshop, Ltd. v. Colo. Civil Rights Comm'n* (U.S.). Co-counsel for military and veteran groups as *amici* regarding the effect of LGBTQ discrimination on service members, veterans, and their families.

*U.S. v. Forbes* (Ct. App. Armed Forces). Authored *amicus* brief to the Court of Appeals for the Armed Forces regarding legal and policy justifications for overturning conviction on charges based on the non-disclosure of HIV status and ending criminalization of HIV under the Uniform Code of Military Justice.

*Hernandez v. Lynch* (9th Cir.), *Moreno v. Holder* (9th Cir.), *Hernandez v. Holder* (9th Cir.), *Garcia-Reyes v. Holder* (9th Cir.). Authored *amicus* brief for civil-rights organizations on the persecution of LGBTQ people in Mexico and its effect on transgender woman's asylum request.

*Bringas-Rodriguez v. Holder* (9th Cir.), *Bibiano v. Holder* (9th Cir.), *Lopez Berera v. Holder* (9th Cir.). Authored *amicus* brief for civil-rights organizations on the persecution of LGBTQ people and people living with HIV in Mexico and its effect on asylum requests by a gay man and trans women with HIV/AIDS.

*Wyatt v. Fletcher* (5th Cir.). Co-authored *amicus* brief on behalf of mental-health and child-welfare advocacy groups regarding the informational privacy of LGBTQ youth and the harmful effects of their involuntary outing by school officials.

*Strauss v. Horton* (Cal. Supr. Ct.). Counsel for coalition of faith organizations and religious leaders as *amici* in support of challenge to California Prop 8, which outlawed marriage by members of the same sex.

*Winter v. Nat. Res. Def. Council* (U.S.). Co-authored *amicus* brief on the harmful effects on marine mammals of military exercises using high-frequency sonar without sufficient mitigation efforts.

*In re Marriage Cases* (Cal. Supr. Ct.). Co-counsel for national LGBTQ organization in *amicus* brief supporting the equal access to marriage by same-sex couples in California.

*N. Coast Women's Care Med. Group, Inc. v. Superior Court (Benitez)* (Cal. Ct. App., Cal. Supr. Ct.). Authored *amicus* brief on behalf of community-health advocacy organizations regarding religious-based objections to providing reproductive healthcare to LGBTQ couples and the effect of such discrimination on health outcomes.

### **SELECT PUBLICATIONS & PRESENTATIONS**

"Legal Empowerment Strategies to Expand Military Opportunities for People Living with HIV," Lavender Law (panel), July 27, 2022.

"Emerging Civil Rights Issues: How Past Victories Inform New Challenges," ABA HIV Law & Practice Conference (panel), May 10, 2022

"Invisible No More: A Transgender Day of Visibility Conversation," N.Y. State Veterans' Services (panel), Mar. 31, 2022

"Trans(cending) Hate: The Fight Ahead," Minority Veterans of America (panel), Mar. 12, 2022

"Veterans Lived Experience Series: Bad Paper Discharges," Veterans Health & Wellness Foundation (panel), Dec. 14, 2021

- “Minority Veterans & Public Policy,” Minority Veterans of America Equity, Inclusion & Justice Summit (panel), Nov. 13, 2021
- “Moving the Military’s HIV Policies Out of the 1990s,” ABA HIV Impact Project (panel), Mar. 16, 2020
- “Fighting For Our Lives: What the Trans Military Ban Means for the Broader Trans Rights Movement,” Trans Law Institute (panel), Lavender Law: LGBTQ+ Bar Annual Conference, Aug. 8, 2019
- “Open and Authentic Service: Update and Strategies re Transgender Service Members,” Lavender Law: LGBTQ+ Bar Annual Conference (panel), Aug. 7, 2019
- “What Do You Mean My HIV Prevents Me From Serving My Country?” Lavender Law (panel), Aug. 7, 2019
- “Litigating LGBT Civil Rights in Military Service,” Queens County Bar Association (panel), May. 16, 2019
- “Trump’s Transgender Military Ban: What’s Next?” Univ. of LaVerne Law School (panel), Mar. 21, 2019
- “Transgender People in the Military: A Legal Update,” Lavender Law: LGBTQ+ Bar Annual Conference (panel), Aug. 9, 2018
- OutServe-SLDN, *Freedom to Serve: The Definitive Guide to LGBTQ Military Service* (2018) (co-author and editor).
- “Law, Politics, & Person: LGBTQ/HIV Activism Then and Now,” University of Rochester, Oct. 2018
- “Battling for Equality: LGBTQ & HIV Legal Issues in the Military,” University of Rochester, Mar. 1, 2018
- “Framing the Issues: U.S. Military Policies,” ABA HIV Law & Practice Conference: Symposium on HIV and Criminal Law (panel), Feb. 22, 2018
- “Karnoski v. Trump: Battling the Transgender Military Ban,” Cornell Law School, Nov. 15, 2017
- “What Every LGBT Servicemember Needs to Know: A Review of our Lawsuit ‘Karnoski v. Trump,’” OutServe-SLDN Leadership Conference (panel), Oct. 20, 2017
- “Giving Our Positive Servicemembers Support and Access to Care,” OutServe-SLDN Leadership Conference (panel), Oct. 20, 2017
- “A Dynamic ‘Trans’-ition: A Path Forward on the Recognition of Transgender Rights, Employment Equality, and Integration of Transgender Troops Into the U.S. Military,” American Bar Association, Young Lawyers Division (panel), Aug. 5, 2016
- “HIV Advocacy for the Hardest Hit and Hardest to Reach: Working Within Systems that Manage the Marginalized,” Lavender Law: LGBTQ+ Bar Annual Conference (panel), Aug. 5, 2015
- “LGBT & the Military: Challenges & Opportunities,” Battlemind to Home V Conference (panel), Purdue University, Aug. 21, 2014

### **SELECT CONGRESSIONAL TESTIMONY**

- Open Session Legis. Hearing Before the Subcomm. on Oversight & Investigations of the H. Comm. on Veterans’ Affairs*, 117th Cong. (Sept. 22, 2021) (written statement and oral testimony of Peter Perkowski on the effects of prior military policies on LGBTQ+ veterans’ eligibility and access to VA benefits).
- Statement for the Record: Open Session Legis. Hearing Before the Subcomm. on Disab. & Mem’l Affairs of the H. Comm. on Veterans’ Affairs*, 117th Cong. (Mar. 29, 2022) (statement of Minority Veterans of America).
- Open Session Legis. Hearing Before the Subcomm. on Oversight & Investigations of the H. Comm. on Veterans’ Affairs*, 117th Cong. (Mar. 30, 2022) (written statement of Minority Veterans of America).
- Open Session Legis. Hearing Before the Subcomm. on Health of the H. Comm. on Veterans’ Affairs*, 117th Cong. (June 22, 2022) (written statement of Minority Veterans of America).

### **EXPERT TESTIMONY**

- In re A.V.* Provide expert opinion in support of gay veteran convicted under U.C.M.J. in 1993 to provide historical context of the military treatment of LGB servicemembers, demonstrating how systemic bias and personal prejudice may have played a role in the conviction.

### **SELECT HONORS & AWARDS**

Managing Intellectual Property, *IP Stars*, 2013 (Cal.), 2014 (U.S.), 2015-2017, 2018/19 (Global), 2019/20 (Cal.), 2020/21 (Cal.), 2022 (Trademarks)  
Intellectual Asset Management *IAM Patent 1000*: Bronze rating, 2012, 2013, 2014, 2015  
*Super Lawyers Magazine*, Southern California Super Lawyer, 2012–2015, 2019-2022; “Rising Star,” 2008–2010  
National LGBTQ+ Bar Association *Best LGBT Lawyers Under 40*, 2010 (inaugural year)

### **SELECT VOLUNTEER & PRO BONO ACTIVITIES**

Board of Directors, *AIDS Project Los Angeles*, 2013–2018; *APLA Health & Wellness*, 2014–present.  
Director of one of the largest non-profit AIDS-service organizations and related federally qualified health center (merged in 2018), providing free or low-cost primary medical and oral health care, behavioral health services, HIV specialty care and prevention, and sexual health services, with a focus on low-income gay and bisexual men of color and transgender people. Elected Chair of the Board of both organizations in 2016.  
Board of Directors, *MPact f/k/a Global Forum on MSM and HIV*, 2014–present.  
Director of non-profit organization with a focus on advocating for equal access to effective HIV prevention, care, treatment, and support services for gay men and other MSM, including those living with HIV, while promoting their health and human rights worldwide.  
Board of Directors, *OutServe-SLDN f/k/a Servicemembers Legal Defense Network*, 2012–2014  
Pro bono representation of veterans separated under Don’t Ask Don’t Tell, and prior policies policing and criminalizing sexual orientation, gender identity, consensual sexual conduct, and gender non-conforming behavior, preparing and submitting applications for discharge upgrade and clemency.

### **BAR AND COURT ADMISSIONS**

California, New York, and District of Columbia  
U.S. Supreme Court  
U.S. Courts of Appeals for the Third, Fifth, Ninth, and Federal Circuits  
U.S. Court of Appeals for Armed Forces  
U.S. Court of Appeals for Veterans Claims  
U.S. District Courts for the Central, Northern & Southern Districts of California, the Eastern District of Texas, the Eastern District of Michigan, for the Southern District of New York, and for the District of Columbia

# Exhibit B

TOTAL FEES AND EXPENSES BY ENTITY					
FEES			EXPENSES		
Billor:	Peter Perkowski	Peter Perkowski	Firm/Entity	OutServe-SLDN/MMAA	Perkowski Legal
Firm/Entity:	OutServe-SLDN/MMAA	Perkowski Legal			
Experience:	1998	1998			
2017 Hours	2.5		2017	\$ -	\$ -
2017 Rate	625		2018	\$ 454.90	\$ 67.23
2017 Fees	\$ 1,562.50		2019	\$ -	\$ 6,161.23
2018 Hours	124.8		2020	\$ -	\$ -
2018 Rate	625		2021	\$ -	\$ -
2018 Fees	\$ 78,000.00		2022	\$ -	\$ 105.41
2019 Hours	502.3		<b>EXPENSE TOTALS</b>	<b>\$ 454.90</b>	<b>\$ 6,333.87</b>
2019 Rate	670				
2019 Fees	\$ 336,541.00				
2020 Hours	32.75				
2020 Rate	670				
2020 Fees	\$ 21,942.50				
2021 Hours		8			
2021 Rate		670			
2021 Fees	\$ -	\$ 5,360.00			
2022 Hours		51.75			
2022 Rate		670			
2022 Fees	\$ -	\$ 34,672.50			
<b>FEE TOTALS</b>	<b>\$ 438,046.00</b>	<b>\$ 40,032.50</b>			

OUTSERVE-SLDN/MMAA						
Date	Hours	Total	Description	Expense	Total	User
<b>2017</b>						
11/2/2017	0.25		Call with S. Schoettes (Lambda Legal) re potentially coordinating HIV accession litigation			Peter Perkowski
11/6/2017	0.25		Email Winston re coordinating with Lambda on HIV accession			Peter Perkowski
11/17/2017	1.25		Strategy and planning conference with Lambda and Winston re coordinating HIV accessions litigation			Peter Perkowski
12/20/2017	0.75		Email to S. Schoettes of Lambda Legal re potential HIV lawsuit			Peter Perkowski
<b>TOTAL 2017</b>		<b>2.5</b>				
<b>2018</b>						
1/8/2018	0.25		Call with S. Schoettes re strategy for challenging accessions regulations re HIV			Peter Perkowski
1/15/2018	0.5		Email with Winston re collaborating with Lambda; email introductions with Winston and Lambda			Peter Perkowski
1/22/2018	0.25		Emails with co-counsel re litigation planning			Peter Perkowski
1/25/2018	0.25		Planning and strategy emails with co-counsel re preparing and filing lawsuit			Peter Perkowski
2/17/2018	0.5		Emails to case teams re case development status, planning and coordination			Peter Perkowski
2/26/2018	2		Work on co-counsel agreements; exchange emails with team re planning, next steps			Peter Perkowski
3/1/2018	1		Participate in team planning and strategy teleconference re preparing and filing lawsuit			Peter Perkowski
3/17/2018	0.75		Work on co-counsel agreement			Peter Perkowski
3/21/2018	0.75		Telephone call with team and N. Harrison re next steps for preparing and opening case			Peter Perkowski
4/27/2018	0.75		Work on co-counsel agreement; email to team re timing and venue			Peter Perkowski
4/25/2018	0.5		Call with Greg McConnell re co-counsel agreement			Peter Perkowski
5/3/2018	0.5		Work on co-counsel agreement			Peter Perkowski
5/7/2018	0.75		Emails with S. Schoettes and Winston re co-counsel agreement			Peter Perkowski
5/8/2018	0.5		Telephone call with G. McConnell re co-counsel agreement			Peter Perkowski
5/8/2018	1.25		Team strategy and planning call re case development and filing			Peter Perkowski
5/9/2018	0.75		Call with S. Schoettes re HiV cases			Peter Perkowski
5/14/2018	0.5		Work on co-counsel agreement			Peter Perkowski
5/15/2018	0.75		Finalize and circulate co-counsel agreement			Peter Perkowski
5/16/2018	1.25		Strategy and planning call with co-counsel			Peter Perkowski
5/19/2018	1		Call with S. Schoettes; communicate internally re case strategy; communicate with team re planning and strategy			Peter Perkowski

5/20/2018	1	Communicate internally re strategy; emails with S. Schoettes re claims strategy		Peter Perkowski
5/20/2018	1.5	Review and comment on revised draft complaint		Peter Perkowski
5/21/2018	0.25	Planning call with co-counsel re finalizing and complaint		Peter Perkowski
5/21/2018	0.75	Communicate internally and with co-counsel re OutServe as plaintiff; communicate internally re timing of filings		Peter Perkowski
5/22/2018	0.25	Communicate with team re planning, finalizing complaints, filing		Peter Perkowski
5/23/2018	0.5	Communicate with co-counsel re OutServe as plaintiff		Peter Perkowski
5/25/2018	2.25	Participate in strategy and planning all-call; follow-up emails; follow-up re complaints, status, strategy		Peter Perkowski
5/25/2018	3	Prepare factual allegations for OutServe as organizational plaintiff; research and factual investigation re same; review and comment on revised draft complaint		Peter Perkowski
5/29/2018	2	Planning and strategy all-call with co-counsel for filing complaint; follow-up re same		Peter Perkowski
5/29/2018	0.75	Prepare pro hac vice motion for admission; engagement letter; financial disclosure for OutServe as plaintiff		Peter Perkowski
5/30/2018	2	Attention to filing complaints; communicate internally re same; follow-up re internal issues and filings		Peter Perkowski
6/1/2018	1	Call with co-counsel re preliminary injunction strategy		Peter Perkowski
6/4/2018	0.5	Communicate with team re expert witnesses		Peter Perkowski
6/5/2018	0.5	Communicate with co-counsel re strategy of adding plaintiffs		Peter Perkowski
6/5/2018	0.5	Call with Roe re Redacted; follow-up re same		Peter Perkowski
6/6/2018	1	Communicate internally and with co-counsel re plaintiff issues, strategy, next steps		Peter Perkowski
6/8/2018	0.5	Strategy call with co-counsel re filing PI motion		Peter Perkowski
6/15/2018	0.75	HIV cases strategy all call with co-counsel		Peter Perkowski
6/17/2018	0.5	Email to G. McConnell re staffing and administrative issues		Peter Perkowski
6/17/2018	0.75	Receive and analyze documents from Redacted re pending separation due to HIV; follow-up call with Redacted		Peter Perkowski
6/18/2018	0.25	Email to co-counsel re scheduling weekly meeting		Peter Perkowski
6/19/2018	0.5	Review and analyze additional documents from Redacted re pending separation due to HIV		Peter Perkowski
6/25/2018	0.25	Research re right to amend as of right; communicate with co-counsel re same		Peter Perkowski
6/26/2018	0.25	Call with Redacted re pending separation due to HIV		Peter Perkowski
7/2/2018	0.25	Communicate with team re preliminary injunction strategy		Peter Perkowski
7/9/2018	1	Emails re preliminary injunction planning and strategy		Peter Perkowski
7/10/2018	0.25	SOFA research for preliminary injunction		Peter Perkowski
7/11/2018	0.5	Participate in strategy call re HIV cases		Peter Perkowski
7/12/2018	3.5	Research and writing on SOFA issue for preliminary injunction		Peter Perkowski

7/17/2018	0.25	Work on preliminary injunction brief			Peter Perkowski
7/17/2018	1	Call with team re strategy and planning; follow-up			Peter Perkowski
7/18/2018	2.5	Work on preliminary injunction brief			Peter Perkowski
7/19/2018	0.75	Emails re strategy, preliminary injunction			Peter Perkowski
7/24/2018	0.5	Communicate re HIV policies			Peter Perkowski
7/25/2018	0.25	Email to team re Air Force memo re fitness determinations/HIV			Peter Perkowski
7/31/2018		Westlaw research (2018 July)	151.96		Peter Perkowski
8/1/2018	0.75	Team strategy call re HIV cases			Peter Perkowski
8/2/2018	0.25	Review and comment on opposition to motion to consolidate			Peter Perkowski
8/4/2018	0.25	Call with Tom Carpenter re assistance with lawsuit			Peter Perkowski
8/13/2018	0.25	Discuss evidence and argument filed by government with client			Peter Perkowski
8/15/2018	0.5	Participate in team strategy and planning all-call			Peter Perkowski
8/17/2018	1.75	Read government's opposition/motion papers; analyze Army and Air Force declarations; participate in team strategy call re same			Peter Perkowski
8/22/2018	1.25	Communicate with team re draft brief, arguments, and strategy			Peter Perkowski
8/29/2018	0.5	Team strategy call re completing PI briefing			Peter Perkowski
8/31/2018	0.75	Read and analyze brief in opposition to motion to dismiss and in support of preliminary injunction			Peter Perkowski
9/1/2018	0.25	Emails with team re PI			Peter Perkowski
9/4/2018	0.75	Team strategy and planning teleconference re PI motion, and follow-up			Peter Perkowski
9/5/2018	0.25	Team strategy and planning all call			Peter Perkowski
9/5/2018	0.5	Read research memo re organizational standing and emails with law clerk re same			Peter Perkowski
9/10/2018	1.75	Team strategy call; email follow-up; research for brief insert for sur-reply; prepare insert for sur-reply brief			Peter Perkowski
9/11/2018	3.5	Work on insert for sur-reply brief; emails re same; follow-up; research re organizational standing and emails with law clerk re same			Peter Perkowski
9/11/2018		Uber - home to LAX (hearing in federal court Alexandria)	29.28		Peter Perkowski
9/12/2018	0.25	Emails re organizational standing			Peter Perkowski
9/13/2018	1.75	Participate in moot argument			Peter Perkowski
9/13/2018	5	Travel to DC/VA for hearing			Peter Perkowski
9/13/2018	0.25	Confer with S. Schoettes re oral argument prep			Peter Perkowski
9/14/2018	3	Hearing on motion to dismiss and motion for preliminary injunction; follow-up			Peter Perkowski
9/14/2018		Hotel - hearing in Alexandria federal court	222.81		Peter Perkowski
9/14/2018		Uber - LAX to home (Harrison trip - federal court hearing)	46.07		Peter Perkowski
9/14/2018		Metro fare to/from hotel (hearing in fed court Alexandria)	4.8		Peter Perkowski
9/18/2018	0.25	Communicate with external stakeholders re summary of hearing			Peter Perkowski
9/19/2018	0.5	Participate in all-call strategy and planning conference			Peter Perkowski
10/3/2018	0.5	All-teams strategy and planning teleconference			Peter Perkowski

10/10/2018	0.5	Telephone call with Drew Sommer re OutServe organizational documents and standing issues		Peter Perkowski
10/17/2018	0.5	All-teams strategy and planning teleconference		Peter Perkowski
10/24/2018	0.75	All-team strategy call		Peter Perkowski
10/30/2018	1	Document collection for production to DOJ; call with Winston re same		Peter Perkowski
10/31/2018	1	All-team strategy call		Peter Perkowski
11/9/2018	0.5	Texts and emails with client re SAF decision; review and analyze SAF decision re separation		Peter Perkowski
11/13/2018	1	Calls and texts re strategy for addressing separation decision; follow-up re same		Peter Perkowski
11/14/2018	1	Texts, emails, and call with client Voe re <b>Redacted</b>		Peter Perkowski
11/14/2018	1	All-team planning and strategy teleconference		Peter Perkowski
11/15/2018	1	Emails with team re update and potential strategy for AF separation matter		Peter Perkowski
11/16/2018	0.5	Further emails re strategy for challenging AF separation actions		Peter Perkowski
11/17/2018	0.25	Review and comment on discovery requests		Peter Perkowski
11/19/2018	0.5	Review and comment on motion to compel		Peter Perkowski
11/19/2018	1.5	Call with A. Sommer re strategy re AF separations; follow-up re same; emails to client		Peter Perkowski
11/20/2018	1.75	Planning and strategy call with full team re AF separations; follow-up call with S. Schoettes and A. Sommer re strategy		Peter Perkowski
11/21/2018	0.5	Follow-up email to AF client re strategy and next steps		Peter Perkowski
11/21/2018	1.25	All-team strategy and planning teleconference		Peter Perkowski
11/23/2018	0.25	Email to team and AF clients re introduction and scheduling all-team conference		Peter Perkowski
11/26/2018	1	Planning call with Winston team re AF separations case		Peter Perkowski
11/28/2018	0.25	Emails with team re planning and strategy for injunctive relief [AF]		Peter Perkowski
11/28/2018	0.5	Emails with team re injunctive relief strategy [AF]		Peter Perkowski
11/28/2018	0.75	Participate in team strategy and planning call (all cases)		Peter Perkowski
11/29/2018	1	Work on Bevins declaration; emails re motion to compel		Peter Perkowski
11/30/2018	0.5	Team call re motion to compel hearing summary and next steps re same		Peter Perkowski
11/30/2018	0.25	Emails re injunctive relief strategy; review draft Voe declaration		Peter Perkowski
12/1/2018	1	Review and revise draft AF plaintiff declarations		Peter Perkowski
12/5/2018	1.5	All team strategy and planning call		Peter Perkowski
12/7/2018	1.5	Team strategy and planning call for PI motion; emails and texts re same [Roe]		Peter Perkowski
12/8/2018	1.5	Review and analyze APA claims [Roe]		Peter Perkowski
12/9/2018	3.25	Call with clients re <b>Redacted</b> ; revise declarations; miscellaneous emails re same [Roe]		Peter Perkowski

12/10/2018	1	Emails and texts with client re <b>Redacted</b> ; emails with team [Roe]			Peter Perkowski
12/13/2018	2	Review and edit/revise draft complaint [Roe]			Peter Perkowski
12/14/2018	0.25	Emails with team re discovery matters [Harrison]			Peter Perkowski
12/15/2018	1.5	Review and edit revised complaint; research re APA [Roe]			Peter Perkowski
12/16/2018	3.25	Review and edit further revised draft complaint; work on plaintiff declarations [Roe]			Peter Perkowski
12/17/2018	1.5	Team call re strategy and planning for finalizing and filing complaint and working on PI motion [Roe]			Peter Perkowski
12/18/2018	7	Calls and emails with clients and team; prep and follow-up; review and finalize complaint [Roe]			Peter Perkowski
12/19/2018	1.5	Follow-up work re filing of complaint; telephone calls with additional Airman affected by separation policy [Roe]			Peter Perkowski
12/19/2018	0.75	All-team strategy and planning teleconference [Harrison/Roe]			Peter Perkowski
12/22/2018	2	Work on chart/list of follow-on clients re AF HIV separation issue [Roe]			Peter Perkowski
12/26/2018	1	Team strategy and planning teleconferences [Harrison/Roe]			Peter Perkowski
12/26/2018	0.5	Emails re strategy, planning [Roe]			Peter Perkowski
12/27/2018	2	Edit and revise plaintiff declarations for PI motion; email to clients; work on OutServe declaration [Roe]			Peter Perkowski
12/28/2018	1	Review and revise plaintiff declarations for PI motion, circulate to team [Roe]			Peter Perkowski
<b>TOTAL 2018</b>	<b>124.8</b>				
<b>EXP 2018</b>				<b>454.9</b>	
<b>2019</b>					
1/2/2019	0.5	Email to follow-on clients re assisting with case [Roe]			Peter Perkowski
1/3/2019	1.75	Calls and emails to additional follow-on clients; communicate internally re discovery consolidation issue			Peter Perkowski
1/4/2019	0.25	Work on declaration in support of preliminary injunction motion; communicate internally re consolidation issue			Peter Perkowski
1/5/2019	1.5	Work on Blevins declaration in support of preliminary injunction [Roe]			Peter Perkowski
1/7/2019	2.5	Review clients comments re PI motion and discuss same; work on PI motion [Roe]			Peter Perkowski
1/7/2019	1	Team strategy call re PI motion; follow-up [Roe]			Peter Perkowski
1/8/2019	2.5	Work on PI motion and supporting docs; work on OutServe declaration; call with additional follow-on clients; follow-up emails re same [Roe]			Peter Perkowski
1/9/2019	3.5	Work on PI motion and supporting documents [Roe]			Peter Perkowski
1/10/2019	3.75	Team call and follow-up; call with additional follow-on client and follow-up re same; work on declaration in support of PI; review and edit PI brief [Roe]			Peter Perkowski

1/11/2019	2.5	Assist with finalizing preliminary injunction brief and declarations [Roe]		Peter Perkowski
1/12/2019	0.25	Communicate with team re PI motion status and planning [Roe]		Peter Perkowski
1/16/2019	0.5	Team strategy call re finalizing and filing PI motion [Roe]		Peter Perkowski
1/18/2019	0.25	Work on co-counseling agreement		Peter Perkowski
1/22/2019	0.75	Review proposed redactions for filing; emails with team re strategy, planning		Peter Perkowski
1/23/2019	0.75	Team strategy call [NH/Roe]		Peter Perkowski
1/27/2019	0.5	Read government's brief ISO motion to dismiss and opposition to motion for preliminary injunction [Roe]		Peter Perkowski
1/28/2019	1.75	Team strategy call re response to government brief; research, follow-up re same [Roe]		Peter Perkowski
1/29/2019	7	Review and comment on draft discovery; communicate with plaintiffs and review their comments to government brief; discuss re same; work on declarations in support of response; review and comment on government's proposed redactions [NH/Roe]		Peter Perkowski
1/30/2019	7	Work on declarations in support of response brief; assist with research and other matters for response brief; communicate with clients re arguments, strategy, and facts [Roe]		Peter Perkowski
1/31/2019	8	Review and edit draft response brief; work on revising declarations [Roe]		Peter Perkowski
2/1/2019	2	Attend to discovery and planning tasks; emails re same		Peter Perkowski
2/5/2019	0.5	Email to team re strategy [NH/Roe]		Peter Perkowski
2/6/2019	0.25	Communicate with client re questions re case status and next steps [Roe]		Peter Perkowski
2/6/2019	0.25	Call with Scott re prep for hearing re discovery matter [Harrison]		Peter Perkowski
2/6/2019	0.75	Participate in team strategy and planning call [NH/Roe]		Peter Perkowski
2/11/2019	0.5	Texts and emails with team re deposition planning		Peter Perkowski
2/12/2019	1.25	Participate in team planning call; follow-up call re strategy		Peter Perkowski
2/13/2019	6.5	Travel to DC for preliminary injunction hearing and team strategy meeting [Roe]		Peter Perkowski
2/13/2019	1.5	Attend to deposition scheduling and planning issues; emails with clients re same; attend to discovery		Peter Perkowski
2/13/2019	0.25	Read ABCMR decision [Harrison]		Peter Perkowski
2/14/2019	4	Team meeting, moot court, prep for hearing, and strategy discussion [Roe]		Peter Perkowski
2/15/2019	9.5	Attend preliminary injunction hearing; participate in team strategy meeting; follow-up re same; read PI opinion and follow-up [Roe]		Peter Perkowski
2/16/2019	10.5	Return travel to LA; emails and texts with clients; deposition prep; communicate with team re strategy		Peter Perkowski

2/17/2019	1	Communicate internally, with team and clients, re strategy, planning for discovery			Peter Perkowski
2/17/2019	1	Attend to discovery and document collection issues			Peter Perkowski
2/18/2019	3.5	Work on reply brief re motion to modify; emails re Q.S./Guard strategy [Roe]			Peter Perkowski
2/19/2019	4.75	Work on reply re motion to modify preliminary injunction; emails with team re Guard/Q.S. strategy; communicate re preparing witness kit for Dr. Okulicz; analyze AFGM re 1332.45 and prepare summary for team; communicate with team and clients re planning, strategy, tasks [Roe]			Peter Perkowski
2/20/2019	1	Review newly issued NAVINST 5300.30, prepare email summary; communicate with team re planning, strategy			Peter Perkowski
2/21/2019	3.5	Attend to discovery matters; communicate with team re planning, deposition scheduling, strategy; teleconference with co-counsel re document collection and production issues; follow-up re same			Peter Perkowski
2/22/2019	1	Planning re discovery and depositions			Peter Perkowski
2/23/2019	1	Communicate with team re planning for discovery and depositions			Peter Perkowski
2/24/2019	7	Travel to DC for deposition prep meetings; communicate with team planning			Peter Perkowski
2/25/2019	5.75	Meeting with Andy Blevins re deposition prep; follow-up re same; telephone call with clients re prep, strategy; follow-ups re various tasks			Peter Perkowski
2/26/2019	2.25	Communicate with team and witnesses re deposition planning etc.; attend to deposition prep tasks			Peter Perkowski
2/27/2019	1	Call with K. Ingelhart re witness prep; communicate with team re deposition and discovery issues			Peter Perkowski
2/28/2019	10.5	Defend deposition of A. Blevins; prep and follow-up re same; prepare and send summary of deposition to team; travel to Detroit for deposition of Q.S.			Peter Perkowski
3/1/2019	6	Defend deposition of Q.S.; follow-up; prepare summary for team			Peter Perkowski
3/1/2019	6.5	Return travel from DTW to LAX			Peter Perkowski
3/3/2019	2.75	Team strategy meeting; deposition planning and prep matters			Peter Perkowski
3/4/2019	7.5	Travel from LA to MIA; meet with D.L. to prep for deposition			Peter Perkowski
3/5/2019	5	Defend deposition of D.L.; work on written discovery responses; prepare letter to DOJ re A. Blevins deposition and supplemental document production			Peter Perkowski
3/5/2019	9.5	Return travel to LA			Peter Perkowski
3/6/2019	6	Call with Office of Airmen's Counsel re injunction, client matters; attend to deposition prep and planning; work on written discovery responses; telephonic meeting to prep N. Harrison for deposition			Peter Perkowski
3/7/2019	0.75	Miscellaneous discovery tasks, planning for depositions			Peter Perkowski

3/8/2019	13	Travel to DC for depositions, meetings; review draft written discovery responses; communicate with client re deposition planning			Peter Perkowski
3/9/2019	1	Continue preparing written discovery responses			Peter Perkowski
3/10/2019	3.5	Work on written discovery responses; participate in strategy call; communicate with client re deposition planning; communicate internally re strategy and planning			Peter Perkowski
3/11/2019	3.25	Attend to deposition planning, preparation, other discovery matters; calls and emails re same; review and finalize discovery responses			Peter Perkowski
3/13/2019	6	Meet with Roe and Voe <b>Redacted</b>			Peter Perkowski
3/14/2019	6	Defend deposition of Roe; prep and follow-up re same; prepare and send summary of deposition to team; review and summarize deposition kit materials for LtC Okulicz			Peter Perkowski
3/15/2019	5.5	Attend and defend deposition of Voe; prep and follow-up re same; prepare summary of deposition for team			Peter Perkowski
3/16/2019	10.5	Return travel to LA			Peter Perkowski
3/23/2019	9	Travel to DC for deposition and meetings			Peter Perkowski
3/24/2019	5	Meet with client to prepare for deposition; prep and follow-up re same			Peter Perkowski
3/25/2019	6	Defend deposition of K.R.; prep and follow-up re same; prepare deposition summary and email to team; communicate internally re modification of preliminary injunction order; attend to deposition transcript review and signature issues;			Peter Perkowski
3/26/2019	0.5	Emails re representation of J.B., modifications to PI order; communicate with team re deposition transcript signatures			Peter Perkowski
3/26/2019	10	Return travel to LA			Peter Perkowski
3/27/2019	1.5	Emails re deposition transcript signatures; communicate re modification to PI order; prepare supplemental response to ROG1			Peter Perkowski
3/29/2019	1	Communicate re deposition transcript issue, PI order modification; communications re strategy and planning			Peter Perkowski
4/17/2019	1	Participate in team strategy and planning teleconference			Peter Perkowski
4/23/2019	0.25	Emails re administrative issues			Peter Perkowski
4/25/2019	0.5	Call re expert rebuttal case; emails re same			Peter Perkowski
4/25/2019	0.25	Gather material for expert deposition			Peter Perkowski
4/29/2019	0.5	Call with potential rebuttal expert			Peter Perkowski
5/5/2019	1.25	Read standing motion; telephone call with K. Ingelhart and emails re same; review keys documents and emails re same			Peter Perkowski
5/6/2019	1	Team strategy and planning call re motion to dismiss; follow-up research; call with J. Harding re same			Peter Perkowski
5/7/2019	0.5	Miscellaneous trial prep			Peter Perkowski
5/9/2019	2	Team trial prep strategy call; work on brief and declarations in opposition to motion to dismiss			Peter Perkowski
5/12/2019	6	Work on brief in opposition to motion to dismiss			Peter Perkowski

5/13/2019	6.5	Work on brief in opposition to motion to dismiss		Peter Perkowski
5/14/2019	3	Work on brief; conduct research for same; work on declarations in support of opposition		Peter Perkowski
5/15/2019	6.75	Work on declarations in support of opposition to motion to dismiss; team prep and strategy call		Peter Perkowski
5/16/2019	7.5	Work on declarations; participate in team strategy meeting; work on brief in opposition to motion to dismiss		Peter Perkowski
5/17/2019	1.5	Final edits to brief; texts and emails re finalizing and filing brief and declarations		Peter Perkowski
5/22/2019	1	Team trial strategy and preparation call; prep and follow-up re same		Peter Perkowski
5/25/2019	0.5	Emails re prep for hearing on motion to dismiss		Peter Perkowski
5/29/2019	1.25	Moot argument re motion to dismiss; team strategy discussion		Peter Perkowski
5/30/2019	8	Travel to DC for hearing on motion to dismiss; prep for hearing		Peter Perkowski
5/31/2019	13.5	Hearing on motion to dismiss; travel to/from hearing; return travel to Los Angeles		Peter Perkowski
5/31/2019	0.5	Emails re prep for hearing on motion to dismiss		Peter Perkowski
6/3/2019	0.75	Discovery follow-up; call with co-counsel re same		Peter Perkowski
6/4/2019	0.5	Discuss potential outreach for amicus support on appeal [Roe]		Peter Perkowski
6/5/2019	0.25	Call with Ray Mabus re potential amicus support [Roe]		Peter Perkowski
6/5/2019	1	Call with cilent and A Blevins re document collection and discovery project; participate in team strategy call		Peter Perkowski
6/7/2019	1	Texts, emails, and phone calls re standing-related discovery		Peter Perkowski
6/10/2019	1.75	Team planning and strategy call; email to A. Blevins re document collection		Peter Perkowski
6/11/2019	3.25	Call re standing-related discovery; prep and follow-up; call re appeal; trial planning call; attend to document collection re standing		Peter Perkowski
6/14/2019	1	Attend to OutServe document collection		Peter Perkowski
6/13/2019	0.5	Call with co-counsel re strategy for challenge to OutServe's standing		Peter Perkowski
6/14/2019	1	Emails re strategy; call with A. Blevins re standing-related discovery; prep and follow-up re same		Peter Perkowski
6/17/2019	2	Prepare objections to standing-related interrogatories and document requests.		Peter Perkowski
6/18/2019	2.75	Continue preparing objections to interrogatories and document requests		Peter Perkowski
6/19/2019	1.75	Team call re discovery planning and follow-up		Peter Perkowski
6/19/2019	3.75	Attend to document collection; review and redact documents for production		Peter Perkowski
6/20/2019	3.75	Call with Lambda co-counsel re assisting with document production; attend to document collection and preparation; prepare written objections		Peter Perkowski

6/21/2019	1.5	Strategy call re amicus outreach for appeal [Roe]; conduct research for standing-related discovery objections			Peter Perkowski
6/22/2019	2.5	Attend to discovery and document production; prepare interrogatory responses			Peter Perkowski
6/23/2019	3.5	Attend to discovery and document production issues; prepare interrogatory responses			Peter Perkowski
6/24/2019	4.5	Attend to discovery and document production matters; prepare interrogatory responses; emails with Lambda team re document production issues			Peter Perkowski
6/25/2019	2.5	Attend to document collection and preparation; prepare interrogatory responses			Peter Perkowski
6/26/2019	3.75	Prepare responses to interrogatory and requests for production			Peter Perkowski
6/27/2019	1.5	Attend to document production and discovery matters			Peter Perkowski
6/28/2019	3.5	Attend to document production; prepare supplemental interrogatory responses			Peter Perkowski
6/30/2019	12.5	Travel to DC for deposition of A. Blevins; continue preparing supplement interrogatory responses			Peter Perkowski
7/1/2019	6.5	Meeting with A Blevins re deposition prep			Peter Perkowski
7/2/2019	7.5	Defend deposition of Andy Blevins; follow-up			Peter Perkowski
7/3/2019	9.5	Return travel to LA (Blevins deposition)			Peter Perkowski
7/4/2019	1.5	Review outline for military leaders amicus brief [Roe]			Peter Perkowski
7/5/2019	0.5	Emails with team re strategy, planning			Peter Perkowski
7/6/2019	1.5	Read and analyze appeal opening brief; review and comment on draft opposition brief [Roe]			Peter Perkowski
7/7/2019	2	Confer with Kara Ingelhart re supplement briefing on OutServe standing; attend to collecting additional documents re standing			Peter Perkowski
7/7/2019	0.5	Emails re coordinating amicus efforts in support of appeal [Roe]; review outline for summary judgment motion			Peter Perkowski
7/8/2019	0.75	Review and comment on outline for supplemental briefing re OutServe standing			Peter Perkowski
7/8/2019	0.5	Review revised outline re military leaders amicus [Roe]			Peter Perkowski
7/9/2019	0.25	Correspond with team re strategy, planning re motion to dismiss and appeal			Peter Perkowski
7/9/2019	0.25	Communicate with counsel re military leaders amicus [Roe]			Peter Perkowski
7/10/2019	0.5	Team strategy and planning teleconference re appeal [Roe]			Peter Perkowski
7/10/2019	5.5	Communicate internally re briefing on DOJ's motion to dismiss OutServe; revise and edit supplement brief re OutServe standing			Peter Perkowski
7/11/2019	2.75	Work on supplemental brief re OutServe standing; emails re same			Peter Perkowski
7/11/2019	1	Emails re appeal strategy; review and comment on appeal brief [Roe]			Peter Perkowski
7/12/2019	2.5	Work on/final comments on supplemental brief re OutServe standing			Peter Perkowski
7/12/2019	0.25	Emails re military leaders amicus, sign-ons [Roe]			Peter Perkowski

7/12/2019	0.5	Emails with team re strategy, planning [Harrison/Roe]		Peter Perkowski
7/13/2019	0.5	Read defendants' supplement brief re motion to dismiss OutServe		Peter Perkowski
7/15/2019	0.5	Review and comment on draft outline of reply to supplemental briefing on motion to dismiss OutServe		Peter Perkowski
7/17/2019	3.25	Review, edit draft reply brief re motion to dismiss OutServe; emails, texts, and call with co-counsel		Peter Perkowski
7/17/2019	0.5	Team strategy all call (all cases)		Peter Perkowski
7/18/2019	10	Continue working on reply brief re motion to dismiss OutServe		Peter Perkowski
7/19/2019	0.5	Review and approve proposed redactions (OutServe filings)		Peter Perkowski
7/19/2019	3.5	Final review and comments on reply brief re motion to dismiss OutServe; review and approve exhibits		Peter Perkowski
7/19/2019	1.25	Read final appeal opposition brief; emails re coordinating amicus brief in response, and emails with counsel re draft military leaders amicus, sign ons re same [Roe]		Peter Perkowski
7/21/2019	0.5	Read and comment on draft summary judgment motion		Peter Perkowski
7/22/2019	3.25	Continue working on MSJ brief; follow-up emails re same; strategy call with team and follow-up		Peter Perkowski
7/22/2019	3.5	Strategy discussions re protecting Reserve/Guard in summary judgment, trial; review and edit draft opposition to motion to stay		Peter Perkowski
7/22/2019	0.25	Emails re sign-ons for military leaders amicus [Roe]		Peter Perkowski
7/22/2019	0.25	Review, communicate internally re trial witness assignments		Peter Perkowski
7/23/2019	1.75	Team strategy call re trial prep and witness assignments		Peter Perkowski
7/25/2019	0.5	Attend to final push for military leaders amicus sign-ons [Roe]		Peter Perkowski
7/24/2019	1	Emails and texts re shepherding military leaders amicus and sign-ons [Roe]		Peter Perkowski
7/24/2019	2	Review DOJ proposed redactions; call with co-counsel re deposition, trial strategy, and policy issues; communicate with clients (Roe/Voe) re summary judgment and stay; review and comment on draft motion in limine		Peter Perkowski
7/24/2019	0.5	Team strategy all-call (all cases)		Peter Perkowski
7/26/2019	2	Review proposed redactions; communicate re amicus filings; read stigma amicus; read medical amicus; read military leaders amicus		Peter Perkowski
8/1/2019	0.5	Communicate with clients re stay decision		Peter Perkowski
8/21/2019	0.5	Strategy call re oral argument [Roe]		Peter Perkowski
9/3/2019	8	Travel to Chicago for appellate oral argument prep and moot [Roe]		Peter Perkowski
9/4/2019	3.5	Moot court appellate oral argument prep [Roe]		Peter Perkowski
9/5/2019	7	Return travel to LA from Chicago (appellate moot court prep) [Roe]		Peter Perkowski
9/10/2019	0.5	Research for and email to Geoff for appellate oral argument [Roe]		Peter Perkowski
9/11/2019	2	Telephonic moot court appellate oral argument prep [Roe]		Peter Perkowski
9/17/2019	9.5	Travel to Richmond for appellate oral argument [Roe]		Peter Perkowski
9/18/2019	13	Appellate oral argument; follow-up; return travel to LA [Roe]		Peter Perkowski

10/8/2019	0.5		Texts with client K.R. re reenlistment and retraining issues [Roe]			Peter Perkowski
11/19/2019	0.25		Texts with client Q.S. re update on status; email to team re update [Roe]			Peter Perkowski
<b>TOTAL 2019</b>		<b>502.3</b>				
<b>2020</b>						
1/10/2020	2		Read and analyze Fourth Circuit opinion; emails with team re same; emails with amicus and amicus counsel re outcome of appeal [Roe]			Peter Perkowski
1/21/2020	1		Team planning and strategy call re post-appeal next steps			Peter Perkowski
1/27/2020	0.5		Strategy and update call with clients			Peter Perkowski
2/5/2020	0.25		Participate in team call re post-appeal planning for trial and MSJ			Peter Perkowski
2/26/2020	0.25		Participate in team strategy call			Peter Perkowski
3/4/2020	1		Participate in team strategy call re Harrison/Roe cases			Peter Perkowski
3/5/2020	0.75		Court hearing/telephonic status conference in Harrison/Roe cases; communicate internally re MMAA party substitution			Peter Perkowski
3/18/2020	0.25		Participate in team Harrison/Roe strategy call			Peter Perkowski
3/29/2020	0.5		Read decision on motion to dismiss MMAA for lack of standing			Peter Perkowski
4/15/2020	0.5		Team strategy call for Harrison/Roe/Voe MSJ			Peter Perkowski
4/22/2020	0.5		Harrison/Roe team strategy call re MSJ			Peter Perkowski
4/22/2020	7.25		Work on draft motion for summary judgment			Peter Perkowski
4/29/2020	0.5		Harrison/Roe team strategy call re MSJ tasks			Peter Perkowski
6/5/2020	0.75		Team call re DOJ summary judgment brief and strategy for opposition/reply			Peter Perkowski
6/10/2020	0.25		Team strategy and planning call re MSJ			Peter Perkowski
6/24/2020	7		Review and edit draft opposition/reply brief re summary judgment			Peter Perkowski
6/25/2020	0.25		Communicate with team re draft opposition/reply for summary judgment			Peter Perkowski
6/30/2020	1.5		Review and edit draft opposition/reply re summary judgment			Peter Perkowski
7/1/2020	1.75		Work on MSJ brief; research re standing issue; participate in strategy call			Peter Perkowski
7/24/2020	2		Team prep for MSJ hearing			Peter Perkowski
9/9/2020	0.25		Legal team strategy call re MSJ hearing			Peter Perkowski
9/10/2020	1.75		Moot court practice in preparation for oral argument on summary judgment motions			Peter Perkowski
9/14/2020	1.5		Listen in on oral argument; follow-up/post mortem re same			Peter Perkowski
9/16/2020	0.5		Legal team post mortem re oral argument			Peter Perkowski
<b>TOTAL 2020</b>		<b>32.75</b>				

PERKOWSKI LEGAL						
Date	Hours	Total	Description	Expense	Total	User
<b>2018</b>						
10/17/2018			Westlaw charges (Sept 2018) - Harrison research	67.23		Peter Perkowski
<b>EXP 2018</b>					<b>67.23</b>	
<b>2019</b>						
1/31/2019			Westlaw research (Jan) - PI motion	146.03		Peter Perkowski
2/13/2019			Lyft home to LAX (PI hearing, strategy meetings)	34.86		Peter Perkowski
2/16/2019			Lyft LAX to home	30.82		Peter Perkowski
2/16/2019			Metro fare to/from DCA and hotel	5.40		Peter Perkowski
2/28/2019			Westlaw charges (Feb 2019)	130.03		Peter Perkowski
5/21/2019			American Airlines: LA-DC for hearing on motion to dismiss OutServe	650.60		Peter Perkowski
5/30/2019			Lyft from home to LAX (hearing on motion to dismiss OutServe)	31.52		Peter Perkowski
5/30/2019			Metro fare: DCA to hotel (hearing on motion to dismiss OutServe)	3.00		Peter Perkowski
5/31/2019			Westlaw charges (May 2019)	126.31		Peter Perkowski
5/31/2019			The Dupont Circle: Lodging for hearing on motion to dismiss OutServe	238.18		Peter Perkowski
5/31/2019			Lyft to courthouse (hearing on motion to dismiss OutServe)	16.95		Peter Perkowski
5/31/2019			Lyft from courthouse to hotel (hearing on motion to dismiss OutServe)	17.35		Peter Perkowski
5/31/2019			Metro fare: to airport from hotel (hearing on motion to dismiss OutServe)	2.55		Peter Perkowski
5/31/2019			Lyft from LAX to home (hearing on motion to dismiss OutServe)	30.44		Peter Perkowski
6/27/2019			LA-DC for Blevins preparation and deposition	757.12		Peter Perkowski
6/27/2019			Travel agent service fee	50.00		Peter Perkowski
6/30/2019			Lyft to LAX (Blevins dep)	35.08		Peter Perkowski
7/2/2019			Lyft - Blevins deposition back to hotel (rain)	9.44		Peter Perkowski
7/3/2019			Hotel for Blevins preparation and deposition	746.84		Peter Perkowski
7/3/2019			Metro fare to/from hotel and airport	5.10		Peter Perkowski
7/3/2019			Lyft LAX back to home	31.75		Peter Perkowski
9/1/2019			AA: airfare LAX-ORD for trip to moot-court prep for oral argument	960.74		Peter Perkowski
9/3/2019			Loews (Chicago): hotel stay for moot-court prep	746.40		Peter Perkowski
9/1/2019			Travel agency service fee (LAX-ORD)	50.00		Peter Perkowski
9/7/2019			AA: LAX-RIC for oral argument re appeal	611.52		Peter Perkowski
9/7/2019			Travel agency service fee (LAX-RIC)	50.00		Peter Perkowski
9/3/2019			Lyft from home to LAX (Chicago-moot court)	38.40		Peter Perkowski
9/4/2019			Metro fare to/from ORD (moot court prep)	10.00		Peter Perkowski
9/5/2019			Lyft LAX to home (Chicago-moot court prep)	33.94		Peter Perkowski
9/5/2019			Travel meals (Chicago trip)	77.03		Peter Perkowski
9/17/2019			American Airlines: LA-DC for hearing on motion to dismiss OutServe	31.66		Peter Perkowski
9/17/2019			Lyft RIC to hotel (appellate oral arg)	19.61		Peter Perkowski
9/18/2019			Lyft from hotel to RIC (appellate oral arg)	16.79		Peter Perkowski

9/18/2019			Lyft from LAX to home (appellate oral arg)	44.06		Peter Perkowski
9/18/2019			Travel meals (Richmond trip)	54.65		Peter Perkowski
9/19/2019			Marriott (Richmond): hotel stay for appellate oral argument	316.96		Peter Perkowski
<b>EXP 2019</b>					<b>6161.13</b>	
<b>2020</b>						
<b>NONE</b>						
<b>2021</b>						
5/10/2021	1		Review documents from Army 2LT threatened with separation from GPN program due to HIV; prepare summary of same and email co-counsel re potential request to modify injunction			Peter Perkowski
5/17/2021	0.5		Emails re scheduling call with plaintiffs re <b>Redacted</b>			Peter Perkowski
5/19/2021	0.5		Call with plaintiffs re <b>Redacted</b>			
8/18/2021	0.5		Team all-call re strategy for moving case forward			Peter Perkowski
9/15/2021	0.25		Emails with co-counsel and opposing counsel re scheduling a status conference			Peter Perkowski
10/22/2021	0.25		Emails with team re potential settlement			Peter Perkowski
11/4/2021	0.25		Emails re scheduling a meeting to discuss settlement			Peter Perkowski
11/5/2021	1.25		Call with plaintiffs re <b>Redacted</b> ; follow-up re same			Peter Perkowski
11/9/2021	1		Team allcall re settlement strategy; email follow-up re same			Peter Perkowski
11/10/2021	0.5		Settlement call with DOJ lawyers			Peter Perkowski
11/29/2021	0.5		Emails re DOJ response to settlement, and proposed reply			Peter Perkowski
11/30/2021	0.5		Follow-up emails re response to DOJ email on settlement			Peter Perkowski
12/21/2021	0.5		Review and comment on draft status update to submit to court; emails re same			Peter Perkowski
12/22/2021	0.5		Follow-up emails re finalizing status update to submit to court			Peter Perkowski
<b>TOTAL 2021</b>			<b>8</b>			
<b>2022</b>						
4/6/2022	3.25		Read court opinion in Harrison/Roe; prepare proposed redactions; communicate with clients and internally; internal call re strategy and next steps			Peter Perkowski
4/8/2022	2		Communicate with clients re <b>Redacted</b> [Harrison/Roe]			Peter Perkowski
4/12/2022	0.5		Team call re next steps post judgment and planning for appeal and enforcement [Harrison/Roe]			Peter Perkowski
4/21/2022	4		Collect and compile fees and cost information for OSSLDN/MMAA and Perkowski Legal for EAJA fee request			Peter Perkowski
4/25/2022	1		Re-review opinion and injunction orders and follow-up with team re deployment issue [Harrison/Roe]			Peter Perkowski
4/28/2022	1.25		Conduct research and analyze cases re amending injunction; communicate with team re same [Harrison/Roe]			Peter Perkowski

4/30/2022			Westlaw research (modifying injunction) - April 2022	105.41		Peter Perkowski
5/7/2022	2		Communicate with clients and potential clients, co-counsel, and counsel and advocates in other cases re summary judgment opinion and permanent injunction [Harrison/Roe]			Peter Perkowski
5/9/2022	0.5		Emails with co-counsel re draft filings (status report, request for clarification) [Harrison/Roe]			Peter Perkowski
5/19/2022	1		Team strategy and prep call for call with DOJ appellate folks [Harrison/Roe]			Peter Perkowski
5/23/2022	1		Call with DOJ appellate team re appeal [Harrison/Roe]			Peter Perkowski
6/7/2022	2		Review DOJ 530B letters; follow-up and communicate with team re same			Peter Perkowski
6/8/2022	0.75		Call with N. Harrison re <b>Redacted</b> ; follow-up email re same			Peter Perkowski
6/9/2022	0.5		Emails with team re issues with NH's commissioning			Peter Perkowski
6/10/2022	1		Review revised and reissued policies re retention and deployment, and DOD Public Information summary re same; email team re same; emails with team re NH's issues with commissioning			Peter Perkowski
6/17/2022	1		Call with N. Harrison and co-counsel re <b>Redacted</b>			Peter Perkowski
7/26/2022	1		Additional work compiling fees and costs information for EAJA motion			Peter Perkowski
7/31/2022	2.5		Update resume for EAJA motion; work on declaration re same			Peter Perkowski
8/1/2022	6.5		Work on declaration in support of fee motion; update resume to make current and reflect relevant experience and knowledge; work on time sheet			Peter Perkowski
8/2/2022	5		Prepare declarations for plaintiffs in support of fee motion; work on my declaration; continue revising resume and time sheet			Peter Perkowski
8/3/2022	9		Continue working on declaration in support of fee motion and finalizing time entries; emails with team re fee motion tasks			Peter Perkowski
8/4/2022	6		Review and edit draft motion for fees; telephone conference with team to plan re finalizing and filing motion and supporting documents; continue working on declaration; finalize declaration and supporting exhibits			Peter Perkowski
<b>TOTAL 2022 EXP 2022</b>		<b>51.75</b>			<b>105.41</b>	

# EXHIBIT 8

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

RICHARD ROE, ET AL.,

PLAINTIFFS,

v.

LLOYD AUSTIN, ET AL.,

DEFENDANTS.

CIVIL ACTION NO. 1:18-cv-01565

NICHOLAS HARRISON, ET AL.,

PLAINTIFFS,

v.

LLOYD AUSTIN, ET AL.,

DEFENDANTS.

CIVIL ACTION NO. 1:18-CV-00641

**DECLARATION OF JULIE A. BAUER**

I, Julie A. Bauer, hereby declare as follows:

1. I am an attorney licensed to practice in the State of Illinois and in various United States district courts. If called upon to testify about this declaration, I can and will do so.

2. I have personal knowledge of the statements contained herein. The statements are true and correct to the best of my knowledge, information, and belief.

3. I submit this declaration in support of Plaintiffs Nicholas Harrison, Richard Roe, and Victor Voe's motion for attorneys' fees as prevailing parties in these actions. Richard Roe and Victor Voe are aliases for two of my clients.

4. I am currently Of Counsel with the law firm of Winston & Strawn LLP, attorneys for Plaintiffs in the actions identified in the caption. I graduated from the University of Illinois

College of Law *magna cum laude* in 1985. I clerked for the Hon. Charles P. Kocoras on the United States District Court for the Northern District of Illinois from 1985-1987. I then joined the law firm of Winston & Strawn LLP where I practiced as an associate and partner handling litigation from 1987-2017. In 2018, I became of counsel to the firm, handling pro bono litigation, including impact litigation, and supervising associates handling pro bono litigation.

5. I began working on these matters in the fall of 2018, shortly before the filing of the complaint in *Roe et al. v. Austin*, No. 18 CV 1565. I also supervised numerous associates, paralegals, summer associates and other timekeepers who worked on these cases, in particular, Laura Cooley, Lauren Gailey, Allie Hemmings, Jason Pesick and Mike Trucco.

6. I have reviewed the billing records for the Winston & Strawn timekeepers for these cases. The time entries appear to consistent with the tasks they performed on these cases.

7. It is my regular practice to enter my time spent on a matter at or shortly after the time I work on a particular task. This has been a regular part of my billing practices for as long as I can remember. My time entries reflect time I actually spent working on this matter. In some instances I did not enter small amounts of time spent on these matters, such as reviewing email correspondence or brief phone calls. I exercised reasonable billing judgment consistent with my ethical duties in determining whether time I spent warranted being entered.

8. For many years, it has been the policy of Winston & Strawn to require timekeepers to submit client-billable and pro bono time on a matter on a regular basis. The Winston & Strawn timekeepers did so on these cases.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: August 5, 2022

By: Julie A. Bauer  
JULIE A. BAUER 8-5-22

# EXHIBIT 9

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

RICHARD ROE, ET AL.,  
PLAINTIFFS,  
v.

LLOYD AUSTIN, ET AL.,  
DEFENDANTS.

CIVIL ACTION NO. 1:18-cv-01565

NICHOLAS HARRISON, ET AL.,  
PLAINTIFFS,  
V.

LLOYD AUSTIN, ET AL.,  
DEFENDANTS.

CIVIL ACTION NO. 1:18-CV-00641

**DECLARATION OF ANDREW R. SOMMER**

I, Andrew R. Sommer, hereby declare as follows:

1. I am an attorney licensed in Virginia and the District of Columbia. If I called upon to testify about this declaration, I can and will do so.

2. I am currently a Shareholder with the law firm of Greenberg Traurig, LLP, attorneys for Plaintiffs in the actions identified in the caption. I have held my position since May 2019. Greenberg Traurig is a law firm with 33 offices in the United States, five offices in Europe, three offices in Asia, an office in Mexico City, Mexico, and an office in Tel Aviv, Israel. Greenberg Traurig has over 2500 attorneys spread across these offices, though the majority practice in the United States. Greenberg Traurig placed 15<sup>th</sup> on the American Lawyer's 2022 Am Law 200 rankings.

3. Before joining Greenberg Traurig I was a Partner at the law firm of Winston & Strawn LLP when these cases were filed in 2018. I have been continuously practicing civil litigation and before the United States Patent & Trademark Office for almost 18 years except for a thirteen-month period in 2006-2007 during which I worked as a law clerk for the Honorable Kimberly A. Moore, Chief Judge, United States Court of Appeals for the Federal Circuit.

4. I have personal knowledge of the statements contained herein. The statements are true and correct to the best of my knowledge, information, and belief.

5. I submit this declaration of Plaintiff Nicholas Harrison, Richard Roe, and Victor Voe's motion for attorneys' fees as a prevailing party in these actions. Richard Roe and Victor Voe are aliases for two of my clients.

6. Attached as Exhibit A to this declaration is a true and correct copy of my billing records for these cases from the time I arrived at Greenberg Traurig in May 2019 to the present.

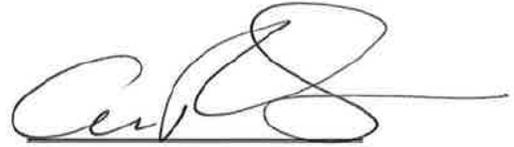
7. I have reviewed Exhibit A to the declaration of John W. Harding. Exhibit A to Mr. Harding's declaration includes true and correct copies of my time entries for these cases from the pre-filing stages through my departure from Winston & Strawn LLP at the end of April 2019.

8. It is my regular practice to enter my time spent on a matter at the time I work on a particular task. This has been a regular part of my billing practices for as long as I can remember. My time entries reflect time I actually spent working on this matter. There were instances in which I had spent time on these actions, such as, for instance in the review of certain email correspondence, mentoring younger attorneys, or having telephone conversations related to general matter management, where I did not enter time. I exercised reasonable billing judgment consistent with my ethical duties in determining whether time I spent warranted being entered.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed August 2, 2022 in McLean, VA

By:

A handwritten signature in black ink, appearing to read 'Andrew R. Sommer', with a long horizontal line extending to the right.

ANDREW R. SOMMER

# Exhibit A

<u>Date</u>	<u>TKPR Name</u>	<u>Client</u>	<u>Matter</u>	<u>Bs Hrs</u>	<u>Narrative</u>
5/2/2019	Sommer, Drew	44444	802900	2.8	Confer with J. Bauer re trial preparation and case management tasks
5/3/2019	Sommer, Drew	44444	802900	2.1	Analyze deposition transcript of C. Murray; confer with team re status of document production from C. Murray
5/7/2019	Sommer, Drew	44444	802900	1.9	Prepare for pre-trial conference; analyze memorandum re potential summary judgment motions; correspond with team re trial preparation
5/6/2019	Sommer, Drew	44444	802900	1	Prepare for and participate in telephone conference re government's motion to dismiss
5/8/2019	Sommer, Drew	44444	802900	3.4	Trial preparation conference call with J. Bauer; analyze issues for trial and consider trial presentation; attend team telephone conference re case status and strategy
5/9/2019	Sommer, Drew	44444	802900	3.1	Prepare for and attend telephone conference re meet and confer re Dr. Murray's files and searches of same;
5/10/2019	Sommer, Drew	44444	802900	2.5	confer with team re decisions to be made before final pre-trial conference
5/13/2019	Sommer, Drew	44444	802900	3.8	Analyze Supreme Court case law re equal protection claims
5/15/2019	Sommer, Drew	44444	802900	0.5	Analyze Supreme Court cases related to equal protection; coordinate meetings related to final pre-trial conference and trial strategy; confer with J. Bauer re trial strategy; analyze motion re amending pre-trial filing deadlines and confer with team re same
5/14/2019	Sommer, Drew	44444	802900	3.7	Prepare and participate for team meeting re case status and strategy, strategy for final pre-trial conference
5/16/2019	Sommer, Drew	44444	802900	7.9	Continue analyzing equal protection case law and preparing for trial; prepare for and attend meet and confer re trial preparation; and confer with J. Bauer re trial strategy
5/17/2019	Sommer, Drew	44444	802900	1.4	Prepare for and appear at final pre-trial conference; prepare for and attend team meeting re trial strategy
5/22/2019	Sommer, Drew	44444	802900	1.5	Analyze opposition to motion to dismiss OutServe for lack of standing and correspond with team re comments on same
5/28/2019	Sommer, Drew	44444	802900	0.9	Confer with J. Harding re order re production of documents being withheld on privilege grounds; trial preparation call with P. Perkowski and J. Bauer; attend team telephone conference re case status and strategy
5/29/2019	Sommer, Drew	44444	802900	3.4	Confer with J. Bauer re exhibit list; analyze email re meet and confer over deliberative process privilege and AF documents and respond to same
5/30/2019	Sommer, Drew	44444	802900	1.2	Prepare for and attend moot court session related to standing issues; prepare for and attend team telephone conference re case status and strategy; confer with team re exhibit list
6/5/2019	Sommer, Drew	44444	802900	0.8	Telephone conference re trial exhibits
6/9/2019	Sommer, Drew	44444	802900	5.7	Attend team telephone conference re case status and strategy
6/8/2019	Sommer, Drew	44444	802900	5.2	Analyze recently-produced documents from defendants and consider adding same to exhibit list; confer with J. Bauer re trial tasks and preparation for same
6/15/2019	Sommer, Drew	44444	802900	3.4	Analyze recently-produced documents from defendants and consider adding same to exhibit list
6/11/2019	Sommer, Drew	44444	802900	2.4	Analyze final set of objections to trial exhibits and provide comments on same to team; review proposed supplemental exhibit list and prepare email re additional deposition testimony
6/14/2019	Sommer, Drew	44444	802900	5.7	Analyze pleadings and various exhibits to prepare for motion for summary judgment in Roe / Voe case telephone conference with L. Gailey to discuss summary judgment strategy
6/13/2019	Sommer, Drew	44444	802900	5.9	Analyze draft objections to trial exhibits and correspond with team re same
6/10/2019	Sommer, Drew	44444	802900	3.2	Continue analyzing Defendants' trial exhibits and review draft objections to same; correspond with team re same
6/12/2019	Sommer, Drew	44444	802900	2.6	Prepare draft exhibit objections; confer with team re objections to exhibit list and strategy for same; confer with case team re trial schedule and preparation tasks
					Attend telephone conference re case status and strategy; confer with L. Cooley re supplementing exhibit list; analyze draft objections and correspond with team re same

6/16/2019	Sommer, Drew	44444	802900	3.4	Continue analysis and review of remaining trial exhibits and objections to same; correspond with team re finalization of objections to exhibit list
6/21/2019	Sommer, Drew	44444	802900	1.8	Telephone conference with team re amicus brief to be filed related to mail-order HIV meds; analyze brief re same
6/19/2019	Sommer, Drew	44444	802900	3.7	Analyze additional potential trial exhibits; telephone conference with team re case status and strategy; telephone conference with J. Bauer re witnesses and deposition designations and trial strategy
7/9/2019	Sommer, Drew	44444	802900	5.2	Analyze documents identified for potential use as trial exhibits from Government's recent production and correspond with team re same; confer with L. Gailey re motion for summary judgment
7/10/2019	Sommer, Drew	44444	802900	4.3	Prepare trial witness allocation summary; analyze additional documents for potential inclusion on trial exhibit list; analyze draft supplemental expert report of C. Hendrix; attend team meeting re case status and strategy
7/8/2019	Sommer, Drew	44444	802900	0.2	Analyze additional documents produced by the government for potential inclusion on trial exhibit list
7/11/2019	Sommer, Drew	44444	802900	6.4	Review and respond to emails re Fourth Circuit brief; analyze and revise draft reply in support of motion to compel deposition testimony after close of discovery; research for summary judgment motion and draft section of same; review and consider motion to compel documents withheld on DPP basis
7/14/2019	Sommer, Drew	44444	802900	3.1	Research re summary judgment
7/12/2019	Sommer, Drew	44444	802900	0.8	Analyze draft supplemental brief in support of standing for OutServe and correspond with team re same
7/15/2019	Sommer, Drew	44444	802900	5.1	Continue analysis of case law and evidence re summary judgment and draft section of summary judgment brief and revise portions received from L. Gailey and L. Cooley; confer with J. Bauer re trial preparations and summary judgment issues
7/16/2019	Sommer, Drew	44444	802900	2.6	Analyze supplemental report of C. Hendrix and provide comments to team on same; prepare outline for Dr. Shell deposition; confer with G. Eaton re appeal status and mootness issue; confer with S. Schoettes re upcoming tasks and preparation for trial
7/18/2019	Sommer, Drew	44444	802900	4.2	Analyze proposed deposition designations and make comments on same
7/21/2019	Sommer, Drew	44444	802900	1.4	Draft opposition to motion to stay in both Roe and Harrison cases and research re same
7/19/2019	Sommer, Drew	44444	802900	1.9	Analyze Defendants' motion to stay and prepare response to same; analyze and revise draft reply in support of OutServe's standing
7/3/2019	Sommer, Drew	44444	802900	3.8	Review and revise draft motions to take discovery out of time; attend team telephone conference re case status and strategy; conference with J. Bauer re status of trial preparations; analyze new filings and status of OutServe discovery
7/23/2019	Sommer, Drew	44444	802900	5	Revise draft motion for summary judgment and correspond with team re same; prepare for deposition of Col. Downes; telephone conference re witness assignments and scheduling
7/22/2019	Sommer, Drew	44444	802900	7.9	Continue reviewing deposition designations for trial witnesses; continue drafting opposition to motion to stay and send same to team; analyze and revise draft motion for summary judgment
7/24/2019	Sommer, Drew	44444	802900	6.1	Prepare for and take deposition of K. Downes; attend team telephone conference re case status and strategy
7/25/2019	Sommer, Drew	44444	802900	1.3	Correspond with team re deposition designations; analyze proposed designations from Cron
7/27/2019	Sommer, Drew	44444	802900	2.5	Analyze documents to prepare for deposition of P. Danaher; analyze deposition of Dr. Ciminera for deposition designations
7/28/2019	Sommer, Drew	44444	802900	1.6	Continue analyzing documents to prepare for deposition of P. Danaher
7/31/2019	Sommer, Drew	44444	802900	7.2	Prepare for and take de bene esse deposition of Col. Danaher; analyze and revise draft deposition designations
7/30/2019	Sommer, Drew	44444	802900	8.4	Prepare for de bene esse deposition of Col. Danaher; continue review of deposition designations

7/29/2019	Sommer, Drew	44444	802900	3.5	Analyze deposition designations and provide comments re same; analyze request for enlargement by defendants and confer with team re same
8/1/2019	Sommer, Drew	44444	802900	1.1	Continue analysis of deposition designations
8/5/2019	Sommer, Drew	44444	802900	0.5	Confer with J. Bauer re stay of case and tasks re ensuring work product is preserved during stay
9/10/2019	Sommer, Drew	44444	802900	3.4	Prepare for 4th Circuit moot court argument for preliminary injunction appeal
9/11/2019	Sommer, Drew	44444	802900	5.5	Prepare for moot 4th Circuit argument; attend and participate in moot hearing
10/22/2019	Sommer, Drew	44444	802900	0.5	Telephone conference with J. Bauer re case status and strategy
1/10/2020	Sommer, Drew	44444	802900	1.3	Analyze Fourth Circuit opinion affirming preliminary injunction and correspond with team re same
1/21/2020	Sommer, Drew	44444	802900	1	Attend team telephone conference re case status and strategy
1/29/2020	Sommer, Drew	44444	802900	1.1	Telephone conference with J. Bauer re summary judgment and trial preparations
2/12/2020	Sommer, Drew	44444	802900	0.5	Attend team telephone conference re case status and strategy
2/19/2020	Sommer, Drew	44444	802900	0.6	Attend telephone conference re trial strategy
3/4/2020	Sommer, Drew	44444	802900	1.6	Telephone conference with J. Bauer re summary judgment strategy and case management strategy; attend team telephone conference re case status and strategy
3/5/2020	Sommer, Drew	44444	802900	0.6	Prepare for and conduct telephone hearing with Judge Brinkema re scheduling and case status
3/11/2020	Sommer, Drew	44444	802900	0.4	Telephone conference with case team re case status and strategy
3/25/2020	Sommer, Drew	44444	802900	0.6	Telephone conference with case team re strategy for motion for summary judgment
4/17/2020	Sommer, Drew	44444	802900	3.2	Analyze brief in support of motion for summary judgment and correspond with team re comments on same; confer with J. Bauer re thoughts about draft motion
6/5/2020	Sommer, Drew	44444	802900	0.8	Telephone conference re opposition for motion for summary judgment and reply in support of same
6/10/2020	Sommer, Drew	44444	802900	0.4	Telephone conference with team re opposition to motion for summary judgment and motion to exclude; consider order denying motion to exclude
6/30/2020	Sommer, Drew	44444	802900	6.4	Analyze summary judgment briefing and draft reply brief; telephone conference with Lambda legal re same
7/1/2020	Sommer, Drew	44444	802900	1.2	Analyze issues regarding unsupported and undisclosed expert opinions from Dr. Blaylock
7/24/2020	Sommer, Drew	44444	802900	1.2	Participate in summary judgment moot argument
9/2/2020	Sommer, Drew	44444	802900	0.5	Analyze opinion from district of Maryland re commissioning of academy cadets with HIV in preparation for oral argument for summary judgment
9/9/2020	Sommer, Drew	44444	802900	0.2	Participate in telephone conference to submit supplemental authority from Deese case
9/10/2020	Sommer, Drew	44444	802900	1.3	Participate in moot argument to prepare for summary judgment hearing
9/14/2020	Sommer, Drew	44444	802900	3.7	Prepare for and appear at summary judgment hearing and drive to and from courthouse
7/21/2021	Sommer, Drew	44444	802900	0.5	Participate in team telephone conference re recent case developments and efforts to change policies within administration
10/13/2021	Sommer, Drew	44444	802900	1	Confer with case team re approaching the court re status conference and potential for settlement or resolution
<b>Total hours/fees:</b>				<b>206.5</b>	

Date	TKPR Name	Client	Matter	Bs Hrs	Narrative
4/6/2022	Sommer, Drew	044444	802900	0.60	Analyze opinion and confer with team re grant of summary judgment
4/26/2022	Sommer, Drew	044444	802900	0.40	Analyze correspondence related to attorneys' fees and correspond with team re same
4/27/2022	Sommer, Drew	044444	802900	0.20	Analyze draft email to DOJ re discussion of attorneys' fees and settlement offer re same and correspond with team re same
5/4/2022	Sommer, Drew	044444	802900	0.40	Analyze orders and correspond with team re impact of same on motions for fees and costs
5/13/2022	Sommer, Drew	044444	802900	1.20	Analyze correspondence from Winston team re motions for fees, notice of appeal, and amending judgment and correspond with team re same
5/27/2022	Sommer, Drew	044444	802900	0.70	Consider issues concerning potential motion to enforce injunction and correspond with Winston & Strawn team re same
6/17/2022	Sommer, Drew	044444	802900	1.80	Attend telephone call with litigation team and N. Harrison re <b>Redacted</b>
6/15/2022	Sommer, Drew	044444	802900	0.40	Analyze letter from D.C. National Guard to N. Harrison re attempt to comply with injunctive relief and correspond with team re same
6/3/2022	Sommer, Drew	044444	802900	0.40	Analyze draft status report and revise same
6/24/2022	Sommer, Drew	044444	802900	0.50	Confer with defendants' counsel re court-ordered Harrison relief
7/27/2022	Sommer, Drew	044444	802900	0.40	Confer with C. Molster re service as expert witness on reasonableness of fee spend
				<b>7.00</b>	

# EXHIBIT 10

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

RICHARD ROE, ET AL.,

PLAINTIFFS,

v.

LLOYD AUSTIN, ET AL.,  
DEFENDANTS.

CIVIL ACTION NO. 1:18-cv-01565

NICHOLAS HARRISON, ET AL.,

PLAINTIFFS,

v.

LLOYD AUSTIN, ET AL.,  
DEFENDANTS.

CIVIL ACTION NO. 1:18-CV-00641

**DECLARATION OF SCOTT A. SCHOETTES**

I, Scott A. Schoettes, hereby declare as follows:

1. I am an attorney licensed in Illinois. If called upon to testify about this declaration, I can and will do so.
2. I have personal knowledge of the statements contained herein. The statements are true and correct to the best of my knowledge, information, and belief.
3. I submit this declaration in support of Plaintiffs Nicholas Harrison, Richard Roe, Victor Voe, and the Modern Military Association of America's motion for attorneys' fees as prevailing parties in these actions.
4. From October 2007 until November 2021, I was employed by Lambda Legal Defense and Education Fund, Inc. ("Lambda Legal"), a 501(c)(3) nonprofit organization "committed to achieving the full civil rights of lesbians, gay men, bisexuals, transgender people

and everyone living with HIV through impact litigation, public policy work and education.”

During my 14 years at Lambda Legal, I focused almost exclusively on protecting and advancing the rights of people living with HIV, serving as the HIV Project Staff Attorney for a little over two years and the HIV Project Director for the final 12 years. Prior to Lambda Legal, I worked for four years as a litigation associate at Latham & Watkins LLP in its Chicago office. I clerked for Judge Frederick J. Motz of the U.S. District Court for the District of Maryland for one year after graduating *magna cum laude* from Georgetown University in Spring 2002.

5. The very first case on which I was staffed at Lambda Legal was *Taylor v. Rice*, 451 F.3d 898 (D.C. Cir. 2006), a challenge to the U.S. State Department’s policy of refusing to employ foreign service officers living with HIV, primarily because the State Department’s belief that such individuals were not world-wide deployable. Over the following thirteen years, I successfully litigated multiple important cases on behalf of people living with HIV, including halting health insurers’ efforts to prevent lower-income people living with HIV from enrolling in their plans during the roll-out of the Affordable Care Act (*East v. Blue Cross and Blue Shield of Louisiana*, No. 14-cv-00115 (M.D. La. dismissed July 2, 2014))), challenges to refusals to employ first responders and healthcare workers living with HIV because they purportedly presented a “direct threat” to the health and safety of others (*see, e.g., Pierce v. Ackal*, No. 17-cv-01365 (W.D. La. Dismissed June 30, 2020); *Moore v. Air Evac EMS, Inc.*, No. 15-cv-01395 (E.D. Mo. dismissed Feb. 1, 2017), and the first state supreme court reversal of a (felony) conviction for exposing a person to HIV through sexual contact (*Rhoades v. State*, 848 N.W.2d 22 (Iowa 2014). I also authored or co-authored multiple amicus briefs in cases involving issues of import to people living with HIV, including in each of the three challenges to the Affordable Care Act to reach the U.S. Supreme Court.

6. In addition to my litigation work, I spent a significant portion of my time at Lambda Legal on policy and legislative matters. I was Lambda Legal's point person for the repeal of the HIV travel and immigration ban (which required all U.S. visitors living with HIV to secure a special waiver before entering the country), worked in multiple states to reform laws criminalizing conduct that is otherwise legal if not for the person's HIV-positive status, and am considered a leading voice in advocacy to eliminate the bar to blood donation for gay and bisexual men. In 2014, President Obama appointed me to the Presidential Advisory Council on HIV/AIDS, where I served as the co-chair of the Disparities Committee until leading a group resignation in protest shortly after President Trump took office.

7. My personal and professional experience made me uniquely qualified to litigate these cases on behalf of Nicholas Harrison, MMAA, and the pseudonymous plaintiffs in *Roe/Voe*. As a person living with HIV since 1999, I came to Lambda Legal with a substantial amount of lived experience and therefore knowledge regarding HIV, HIV treatment, and the manner by which HIV is and is not transmitted. That base of knowledge grew exponentially in the years that followed as I began advocating and litigating on behalf of people living with HIV. I can confidently state that there is no other attorney in this country who has litigated more cases involving the rights of people living with HIV and that I enjoy a national reputation as the leading attorney on these issues. My extensive experience working with infectious disease specialists and public health professionals—as experts, colleagues, and clients—married with my understanding of the law (including equal protection law—thanks to my place of employment) is what prompted the filing of these cases and undergirded my confidence that we would prevail.

8. As an attorney actively participating in the prosecution of these cases, I was able to bring that experience and knowledge to bear in real-time in substantial ways. Among other

things, I took or defended twenty depositions in this case, including those of all the experts and most of the lay witnesses for whom we thought an intimate knowledge and understanding of HIV would be useful.

9. I have had specialized training on the subjects of HIV law and LGBTQAI+ law. When I started at Lambda Legal, I was asked to move to New York City to work under the tutelage of Bebe Anderson, the HIV Project Director at that time; until she departed a little more than two years later, Ms. Anderson provided a substantial amount of on-the-job training regarding all of the then-existing HIV-related law and policy issues. Also during my time at Lambda Legal, once every approximately nine months I participated in the LGBTQ Litigators Roundtable—a 3½ -day conference (if the Lambda Legal internal meeting before the Roundtable is included) where colleagues across the LGBTQ and HIV movements presented on relevant subjects, discussed the cutting- edge casework being done, and debated strategy for the movements more broadly. Given the expertise in those rooms, I cannot think of better training than those experiences, and that training assisted me greatly in developing and working on these cases. I also attended (and usually presented) at Lavender Law, the annual conference of the National LGBTQ Bar Association, eight or nine times while I was at Lambda Legal, and I participated in the Public Health Boot Camp, a certificated program about the basics of public health sponsored by Northwestern University and AIDS Foundation Chicago.

10. I am seeking to recover fees for my time at hourly rate of \$625 for each of the years in this litigation (2018-2022). This rate is justified by the special knowledge and experience described above, which entitles me to rates above those allowed under the Equal Access to Justice Act (EAJA). To determine my enhanced rate, I used the guidance commonly referred to as the “Vienna Metro Matrix” rates. A chart of the Vienna Metro matrices is reflected

in the affidavit of Charles Molster III, filed concurrently. The Vienna Metro matrices reflect the prevailing rates within the jurisdiction for non-EAJA attorneys' fees awards. These rates are from 2011, and hourly rates have risen since that time, so my enhanced rate is within the range of prevailing rates within the jurisdiction.

11. Attached as Exhibit A to this declaration is a true and correct copy of my curriculum vitae as of November 2021.

12. Attached as Exhibit B to this declaration are my time entries and corresponding tasks for my work on these cases from January 1, 2018, through July 31, 2022. This document was constructed based on contemporaneous records of my work in the above-captioned cases, including time-stamped email correspondence, filing records, a list of deposition dates and their lengths, and my colleagues' time entries. In reconstructing my time in this way, I exercised billing judgment. For example, when the precise amount of time spent on a particular task was not readily discernable based on available information, I made a conservative estimate. I am confident my time entries are an underestimate—and possibly a significant underestimate—of the hours I worked on these cases. Though the precise dates on which I engaged in certain activities may not be perfectly accurate, the vast majority of the dates are correct, and I undoubtedly spent *at least* the amount of time entered in this reconstructed time log working on the tasks identified.

13. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

August 5, 2022

By:



SCOTT A. SCHOETTES

# Exhibit A

## SCOTT A. SCHOETTES

4728 N. Malden Street, Unit 2 South • Chicago, IL 60640  
773.474.9250 • schoettes@me.com

### PROFESSIONAL EXPERIENCE

#### **Lambda Legal Defense & Education Fund**

<i>HIV Project Director</i>	12/10-11/21	Chicago, IL
<i>Counsel</i>	7/15-11/21	
<i>Senior Attorney</i>	11/10-7/15	

- Manage all HIV-related work of the organization. Duties include:
  - Select new impact litigation matters for departmental consideration and approval
  - Engage in all aspects of trial level and appellate litigation; draft and edit *amicus* briefs
  - Collaborate with colleague attorneys and *pro bono* counsel on HIV-related matters
  - Supervise one attorney and two paralegals (currently)
  - Advocate for policy change at the federal and state levels
  - Create public education materials
  - Present at conferences and meetings; speak at development events
  - Review and edit grant proposals and reports
- Significant accomplishments include:
  - Obtained preliminary injunction preventing the U.S. Air Force from discharging service members living with HIV, upheld in ground-breaking opinion of the Fourth Circuit (*Roe v. Dept. of Defense*, 947 F.3d 207 (4th Cir. 2020)). Litigation ongoing.
  - Member of legal team that secured preliminary injunction halting implementation of Trump executive order blocking federal contractors and grantees from engaging in race equity trainings involving discussion of structural racism, white supremacy, and implicit bias.
  - Conceived and secured funding for “Cut the Stigma” campaign in collaboration with the Black AIDS Institute, anchored by recurring events at historically black colleges and universities (HBCUs) featuring Lambda Legal client Nikko Briteramos and his experience of HIV discrimination and criminalization.
  - Co-authored U.S. Supreme Court *amicus* brief detailing effects upon communities of color of eliminating Affordable Care Act subsidies in states with federal exchanges (*King v. Burwell*)
  - Litigated first-of-its-kind, successful appeal of an HIV-based criminal conviction to a state supreme court (*Rhoades v. Iowa*); co-authored bill that changed the law at issue in this case
  - Secured access to health insurance for low-income people living with HIV in Louisiana, and across the country, during roll out of the ACA (*East v. BCBS of Louisiana et al.*)
  - Co-authored U.S. Supreme Court *amicus* brief describing new ability to fight the HIV/AIDS epidemic under the Affordable Care Act, arguing for its constitutionality (*NFIB v. Sebelius*)
  - Prevailed in appeal to U.S. Court of Appeals for the Eleventh Circuit on behalf of an HIV-positive man denied the opportunity to serve on Atlanta police force (*Roe v. City of Atlanta*)
  - Provided key assistance in securing decision from high court of NY holding a natural bodily fluid cannot be classified as a “dangerous instrument” under assault law (*People v. Plunkett*)
  - Authored and launched comprehensive “HIV Know-Your-Rights” hub for Lambda Legal website, and assisted in securing \$50,000 to promote this new resource
  - Secured \$650,000 grant from Gilead and \$200,000 grant from the Elton John AIDS Foundation to support the work of the HIV Project in 2019-20.

#### **Presidential Advisory Council on HIV/AIDS (PACHA)**

<i>Member/Co-Chair of the Disparities Committee</i>	09/14-06/17	Washington, DC
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- Served as a special government employee on this 25-member body that advised the Obama Administration on HIV/AIDS-related policy and implementation of the National HIV/AIDS Strategy.

**Scott A. Schoettes**

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- Disparities Committee focuses on reducing HIV-related health disparities, which most disproportionately affect black gay and bisexual men, heterosexual women of color, transgender women, and low-income people across the South.
  - Led two-day Stigma Reduction Summit, bringing advocates, experts, federal partners and people living with HIV together to shape stigma reduction recommendations for PACHA.
  - Shepherded letter recommending implementation of standardized performance measures
  - Provided input on updated National HIV/AIDS Strategy (NHAS)
  - Shaped recommendations on safe and voluntary disclosure of HIV status mandated by NHAS
- Led six-person protest resignation due to President Trump's lack of attention to the issue of HIV and his attempts to repeal the Affordable Care Act, authoring an op-ed published in Newsweek that garnered worldwide coverage and required a response from the White House.
  - [Trump Doesn't Care About HIV. We're Outta Here](#) (*Newsweek*)
  - [Trump 'simply does not care' about HIV/AIDS, say 6 experts who just quit his advisory council](#) (*Washington Post*)
  - [Segment on "The Late Late Show with James Corden"](#) (CBS)

**Lambda Legal Defense & Education Fund**

*HIV Project Staff Attorney*

10/07-12/10

Chicago, IL/New York, NY

- Performed full range of assignments for an attorney within the HIV Project (described above)
- Led or participated in successful litigation or advocacy involving:
  - Denial of medical care to incarcerated woman living with HIV in Wisconsin (*Rose v. Cahee*)
  - Eviction of HIV-positive senior from assisted living facility (*Franke v. Parkstone Living Ctr.*)
  - Lifting State Dept. ban on hiring people with HIV for U.S. Foreign Service (*Taylor v. Rice*)
  - Elimination of the U.S. policy barring entry of people living with HIV into the country

**Latham & Watkins LLP**

*Associate (5th Year)*

11/03-10/07

Chicago, IL

- Engaged primarily in litigation-related activities:
  - Drafted and responded to written discovery
  - Defended and took depositions
  - Worked with expert witnesses to craft reports
  - Drafted dispositive motions
  - Supervised other attorneys and handled client relations
  - Argued in Circuit Courts of Illinois, U.S. District Courts, & Seventh Circuit Court of Appeals
  - Drafted petition for writ of certiorari to U.S. Supreme Court
  - *Pro bono* activities included immigration, political asylum, and LGBT civil rights matters

**The Honorable J. Frederick Motz**

*Judicial Clerk*

09/02-09/03

Baltimore, MD

- Served as law clerk to former U.S. Attorney for Maryland, who serves as a judge in the U.S. District Court for the District of Maryland
  - Conducted research; drafted bench memoranda and opinions
  - Interacted with attorneys appearing before the court
  - Observed hearings and trials, both civil and criminal

**Professional Actor and Director**

1989-1999

United States

- Performed in theatrical productions throughout U.S., successfully. A sampling of jobs:
  - National Tour of *West Side Story* (349 performances in 103 cities over one year period)
  - Directed new musicals for Lehman Engel Musical Theatre Workshop, guiding writers through re-writing process.
  - Background Choreographer for NewLine Cinema's *The Wedding Singer*, starring Adam Sandler.

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## **HONORS**

ABA's Alexander D. Forger Award for Sustained Excellence in the Provision of HIV Legal Services and Advocacy, ABA's HIV/AIDS Impact Project, April 2020.

Positive Leadership Award, presented by AIDSWatch (sponsored by the Elizabeth Taylor AIDS Foundation in partnership with AIDS United, the Treatment Access Expansion Project and the US People Living With HIV Caucus) in 2015, in Washington, DC.

"POZ 100," selected by POZ magazine in November 2013, as one of the "unsung heroes" committed to ending the epidemic.

## **MEDIA APPEARANCES**

**Publications/websites:** Associated Press (AP), Reuters, CNN, ABC News, Fox News, MSNBC, NBC News, *Newsweek*, *Time*, *Chicago Tribune*, *The Independent*, *L.A. Times*, *The New York Times*, *Washington Post*, *USA Today*, *The Daily Mail* (UK), *Atlanta Journal-Constitution*, *Baltimore Sun*, *Bay Area Times*, *Boston Globe*, *Dallas Observer*, *The Hill*, *Mercury News*, *New Orleans Times-Picayune*, *New York Post*, *Philadelphia Inquirer*, *Star Tribune*, *St. Louis Dispatch*, *Tampa Bay Times*, *Washington Examiner*, *The Advocate*, *Gay Times* (UK), *LGBTQ Nation*, *Windy City Times*, *The Dallas Voice*, *Metro Weekly*, *Star Observer* (Aus.), *Washington Blade*, *Positively Aware*, *POZ* (magazine), *HIV Plus* (magazine), *A&U: America AIDS Magazine*, *Frontiers*, ABA Journal, Axios, Bloomberg (online), Bloomberg BusinessWeek, Business Insider, BuzzFeed News, The Body.com, The Daily Beast, Daily Kos, ET Online, Europe World News, Forbes, The Georgia Voice, HuffPost, Instinct, Law360, Logo, MetroWeekly, Mic.com, Moyers on Democracy, NerdWallet, Out.com, Pink News (UK), ProPublica, Q Voice News, Queerty, RH Reality Check, The Root, Rolling Stone, Salon, Slate, them.com, Towleroad, Truthout, The Verge, Vice, Voice of America, Wire.

Coverage of remarks at plenary session of Lavender Law 2013, "HIV/AIDS and the Gay Community: A (Belated) Report from Lavender Law" (Sept. 14, 2013), available at <http://www.towleroad.com/2013/09/lavlaw/>

Feature interview by POZ magazine: "Full Court Press on HIV Criminal Laws" (July 20, 2012), available at <https://www.poz.com/article/Schoettes-HIV-Plunkett-22698-2663>.

Work on Affordable Care Act amicus brief for U.S. Supreme Court featured in blog on Towleroad, "The Constitutionality of the Affordable Care Act, Gay Edition" (Mar. 28, 2012), available at <http://www.towleroad.com/2012/03/acagay/>.

### **TV/Radio (select):**

*Reset with Jenn White* (NPR-WBEZ), interview regarding military policies with respect to people living with HIV (Dec. 2019)

Mic: "HIV-Positive Soldiers Under the Trump Administration" (May 2019), available at <https://www.youtube.com/watch?v=nI6v7WEXDJ0>

*VICE News Tonight* (HBO): "AIDS Activists Feel Abandoned by Trump" (Sept. 2017), available at [https://video.vice.com/en\\_nz/video/hivaids-activists-feel-abandoned-by-the-trump-administration/5A203E2E177DD4071F44791E](https://video.vice.com/en_nz/video/hivaids-activists-feel-abandoned-by-the-trump-administration/5A203E2E177DD4071F44791E)

*Here and Now* (NPR), "Former Member of Trump's HIV/AIDS Advisory Council on Why He Resigned" (June 2017), available at <https://www.wbur.org/hereandnow/2017/06/19/trump-hiv-aids-council>

*PBS NewsHour*, interview regarding protest resignation from PACHA (June 2017), available at <https://www.facebook.com/newshour/videos/10155504912733675/>

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## **MEDIA APPEARANCES (cont'd)**

### **TV/Radio (select) (cont'd)**

*Democracy Now!* (PBS), *Advisers Resign En Masse from Trump's HIV/AIDS Council: Trump 'Simply Does Not Care' About HIV*" (June 2017), available at [https://www.democracynow.org/2017/6/19/advocates\\_resign\\_en\\_masse\\_from\\_trumps](https://www.democracynow.org/2017/6/19/advocates_resign_en_masse_from_trumps)

*Sanjay Gupta: MD* (CNN), "When Consensual Sex Is a Crime" (Dec. 2012), available at <https://www.cnn.com/videos/health/2012/12/04/sgmd-gupta-sex-hiv-crime.cnn>

## **PUBLICATIONS**

### **Essays and Book Chapters**

*AIDS and the Law* (2018-2020) Co-authored update to chapter on prisons and jails each year, specially updated in 2020 to include discussion of COVID-19.

*Love Unites Us* (2016) Authored essay on future of advocacy on behalf of people living with HIV in book detailing the battle for marriage equality.

*ABA HIV/AIDS Bench Book* (2014) Authored chapter on federal and state antidiscrimination protections and reviewed/edited chapter on HIV criminalization.

### **Articles and Blog Posts (Select)**

"Positively Aware" bi-monthly column on HIV-related legal and policy issues

<https://www.positivelyaware.com/articles/poz-advocate-covid-preparedness-people-living-hiv>; <https://www.positivelyaware.com/articles/poz-advocate>;  
<https://www.positivelyaware.com/articles/poz-advocate-it's-new-day-people-living-hiv-america>

*The Supreme Court Hears a Case About Obamacare...Again*, Lambda Legal (blog), Nov. 11, 2020, available at [https://www.lambdalegal.org/blog/20201111\\_scotus-affordable-care-act](https://www.lambdalegal.org/blog/20201111_scotus-affordable-care-act)

*Justice Ginsburg's Legacy and The Rights of People Living With HIV*, Lambda Legal (blog), Sept. 30, 2020, [https://www.lambdalegal.org/blog/20200930\\_ginsburg-legacy-hiv](https://www.lambdalegal.org/blog/20200930_ginsburg-legacy-hiv)

*The Current Pandemic Underscores That We Still Haven't Resolved the Last One*, Lambda Legal (blog), Mar. 27, 2020, available at [https://www.lambdalegal.org/blog/20200327\\_coronavirus-pandemic-hiv](https://www.lambdalegal.org/blog/20200327_coronavirus-pandemic-hiv)

*Trump Doesn't Care About HIV. We're Outta Here*, Newsweek, June 16, 2017,

<https://www.newsweek.com/trump-doesnt-care-about-hiv-were-outta-here-626285>

*SB 239: A Long-Overdue Update of CA's Discriminatory HIV Criminalization Laws*, Lambda Legal (blog), May 15, 2017, available [https://www.lambdalegal.org/blog/20170515\\_updating-hiv-criminal-laws-will-improve-public-health](https://www.lambdalegal.org/blog/20170515_updating-hiv-criminal-laws-will-improve-public-health)

*Still Protesting: Honoring Larry Kramer's Legacy*, May 1, 2017, available at

[https://www.lambdalegal.org/blog/20170501\\_still-protesting-honoring-larry-kramer](https://www.lambdalegal.org/blog/20170501_still-protesting-honoring-larry-kramer)

*Toward a Fairer, More Sensible Blood Donation Policy*, Lambda Legal (blog), Dec. 1, 2016, available at

[https://www.lambdalegal.org/blog/20161201\\_blood-donation](https://www.lambdalegal.org/blog/20161201_blood-donation)

*The FDA (Finally) Opens the Door to a More Enlightened Blood Donation Policy*, Lambda Legal (blog), Aug. 2, 2016, available at [http://www.lambdalegal.org/blog/20160802\\_fda-finally-opens-door-blood-donation-policy](http://www.lambdalegal.org/blog/20160802_fda-finally-opens-door-blood-donation-policy)

*Health Equity "Next" for Lambda Legal's HIV Project*, Lambda Legal (blog), Dec. 10, 2015, available at [http://www.lambdalegal.org/blog/20151210\\_eoy-hiv](http://www.lambdalegal.org/blog/20151210_eoy-hiv)

*Things You Should Know Before Discussing Charlie Sheen's HIV Status* (blog), Nov. 17, 2015, available at [http://www.lambdalegal.org/blog/20151117\\_charlie-sheen-hiv](http://www.lambdalegal.org/blog/20151117_charlie-sheen-hiv)

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## **PUBLICATIONS (cont'd)**

### **Articles and Blog Posts (Select) (cont'd)**

*A Win-Win Policy That Puts Blood Supply Safety First*, The Daily Journal (a California legal publication) Dec. 15, 2014

*HIV Criminalization Is Bad Public Policy*, The Daily Journal (a California legal publication), Jan. 10, 2014

*Vote As If Your Life Depends On It . . . or At Least As If Mine Does*, Huffington Post (blog), Nov. 2, 2012, available at <http://www.huffingtonpost.com/scott-schoettes/>

*Criminalizing HIV Does Not Make Us Safer*, Huffington Post (blog) (with Christopher Clark), June 18, 2012, available at [http://www.huffingtonpost.com/scott-schoettes/criminalizing-hiv-does-no\\_b\\_1601616.html](http://www.huffingtonpost.com/scott-schoettes/criminalizing-hiv-does-no_b_1601616.html)

*Turning the Tide Together on HIV/AIDS*, Lambda Legal (blog), July 23, 2012, available at <http://www.lambdalegal.org/blog/turning-the-tide-together-on-hiv-aids>

*The Affordable Care Act: Our Second Most Important Tool for Combating HIV and Ending AIDS*, Lambda Legal (blog), Mar. 26, 2012, available at <http://www.lambdalegal.org/blog/affordable-care-act-and-combating-hiv-ending-aids>

## **SPEAKING ENGAGEMENTS/PRESENTATIONS**

**Cut the Stigma Campaign**, Black AIDS Institute and Lambda Legal, recurring events at historically Black colleges and universities (HBCUs) featuring Lambda Legal client Nikko Briteramos and his experience of HIV criminalization (conceived and funded)

**American Bar Association (ABA) HIV Impact Project** (formerly AIDS Coordinating Committee) (Dec. 2020), “Celebrating World AIDS Day: A Roundtable Discussion of Current and Emerging Legal and Policy Issues” (panelist)

**Hepatitis Virtual Collaborative**, The AIDS Institute and National Alliance of State and Territorial AIDS Directors (NASTAD) (October 2020), “Eliminating Discriminatory Military Policy Through Impact Litigation and Congressional Advocacy” (panelist)

**GLMA: LGBTQ Healthcare Professionals Advancing Justice Annual Conference** (September 2020), “The Blood Donation Ban: Discrimination Is Only Part of the Story” (panelist)

**Philadelphia FIGHT Community Health Centers Annual Conference** (June 2020), “Restrictions Without a Cause” (presenter)

**American Bar Association (ABA) HIV Impact Project** (formerly AIDS Coordinating Committee) (Mar. 2020), “Moving the Military’s HIV Policies Out of the 1990’s” (presenter)

**Biomedical HIV Prevention Summit**, National Minority AIDS Council (NMAC) (Dec. 2019), “HIV and Criminalization” (plenary panelist)

**Pritzker Military Museum & Library World AIDS Day Event**, hosted by U.S. Representative Mike Quigley (Dec. 2019), “Trans/HIV+ Military Ban Panel” (panelist)

**American Medical Association Mid-Year Conference** (Nov. 2019), “HIV Criminalization Reform: The Road to Justice” (keynote presenter to LGBTQ section)

**Lavender Law 2019** (annual conference of the National LGBT Bar Association) (August 2019)

“What Do You Mean My HIV Prevents Me From Serving My Country?” (panelist)

“Moving the Legislative Ball on HIV Criminalization Reform at the State Level” (panelist)

**State Bar of Texas—LGBT Section Conference** (December 2018), “The Criminalization of HIV (and the Road to Reform)” (sole presenter)

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**SPEAKING ENGAGEMENTS/PRESENTATIONS (cont'd.)**

**Transforming Care Conference for LGBTQ Health Equity** (October 2018), “Trumping Apathy with Truth and Fierce Resistance” (keynote/plenary speaker)

**Transforming Care Conference for LGBTQ Health Equity** (October 2018), “Principles Into Action: Transforming the Landscape of HIV Criminalization” (workshop presenter)

**GLMA: LGBTQ Healthcare Professionals Advancing Justice Annual Conference** (October 2018), “Legal Obstacles to PrEP” (panelist)

**Lavender Law 2018** (annual conference of the National LGBT Bar Association) (August 2018), “U=U and Treatment as Prevention” (panelist)

**2018 Illinois Reentry Conference**, Public Health Institute of Metropolitan Chicago and Illinois Department of Public Health (July 2018), “Over-Policing of Black, Brown, and Queer Bodies Through HIV Criminalization” (plenary)

**2018 Illinois Reentry Conference**, Public Health Institute of Metropolitan Chicago and Illinois Department of Public Health (July 2018), “HIV Criminalization Reform: The Road to Justice” (workshop panelist)

**American Bar Association (ABA) AIDS Coordinating Cmte. HIV Law & Practice Conf.** (Feb. 2018)

“HIV Criminalization Current Approaches: California” (plenary presenter)

“Legal Issues Raised by HIV Treatment as Prevention” (workshop panelist)

“The Affordable Care Act” (plenary presenter)

**Lavender Law 2017** (annual conference of the National LGBT Bar Association) (August 2017), “Federal HIV Policy Under the Trump Administration”

**GLMA: Healthcare Professionals Advancing LGBT Equality** (Sept. 2016), “The (De Facto) Blood Donation Ban for Gay and Bisexual Men: Working Together to End a Discriminatory Policy” (sole presenter)

**State Bar of Texas Annual Conference (June 2016)**, “HIV and the Law: Trending Issues” (sole presenter)

**American Bar Association (ABA) AIDS Coordinating Committee, HIV Law & Practice Conference** (Feb. 2016), “HIV Criminalization” (panelist)

**Creating Change** (Jan. 2016): “Another Closet: Confronting HIV Stigma & Disclosure Dilemmas” (co-facilitator)

**Marion Miner Cook Athenaeum Lecture Series at Claremont McKenna College** (Nov. 2015), “When Will We Have a Cure for AIDS? (We Already Have It!)” (featured speaker) available at <https://www1.claremontmckenna.edu/mmca/athvideos.php?vid=148513029>

**Damien Center** (Indiana HIV/AIDS Service Organization) (Dec. 2015), “When Sex Is a Crime and *Spit* Is a Dangerous Weapon: How HIV Criminalization Fuels Stigma and Discrimination” (featured co-speaker)

**CDC National HIV Prevention Conference** (Dec. 2015), “Tackling HIV Criminalization: Public Health Advocates Working Together to Reduce Stigma and Discrimination” (panelist)

**Association of Nurses in AIDS Care (ANAC) Annual Meeting** (Oct. 2015), “Reflections on the National HIV AIDS Strategy: Conversations with the Presidential Advisory Council on HIV/AIDS (PACHA)” (panelist)

**Black Lives Matter, “I Shocked the Sheriff”** (counter conference to meeting of International Association of Chiefs of Police (IACP) in Chicago) (Oct. 2015), “What’s the Tea: HIV Criminalization Laws, Race and Criminal Justice.” (featured panelist)

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**SPEAKING ENGAGEMENTS/PRESENTATIONS (cont'd.)**

- “**Blood Mirror**,” a panel on the gay blood donation ban in conjunction with an exhibition at the American University Museum at the Katzen Arts Center (Oct. 2015) (panelist)
- Positive Living Conference**, Network Empowerment Pre-Conference (Sept. 2015), “What’s So Bad About These Laws? An Overview of State Statutes” (sole presenter)
- U.S. Conference on AIDS** (conference of the National Minority AIDS Council) (Sept. 2015), session featuring interactive discussion with PACHA members, presented on recent work of Disparities Committee (panelist)
- National AIDS Housing Coalition Bi-Annual Conference** (Sept. 2015), PACHA Town Hall (panelist presenting as co-chair of PACHA’s Disparities Committee)
- Lavender Law 2015** (annual conference of the National LGBT Bar Association) (Aug. 2015)
- “The Affordable Care Act and HIV: How Ensuring Access to Nondiscriminatory Care, Treatment, and Prevention (Including PrEP) Could Pave the Way to an AIDS-Free Generation” (panelist)
- “Don’t I Have a RIGHT to Know? Examining the Criminal Law as a Means of Preventing HIV Transmission” (lead panelist)
- “LGBTQ Privacy” (panelist)
- Equality Federation Summer Meeting** (July 2015), “HIV in the State House: The Legislative Work That Will Help End AIDS” (lead panelist)
- Democratic Attorneys General Association (DAGA) Spring Policy Conference** (May 2015), “How AGs Can Help Modernize State HIV Criminalization Laws” (featured co-speaker)
- University of Chicago Law School, LGBT and the Law Week** (April 2015), “Access to HIV-Related Care: The Beginning of the End of AIDS” (featured speaker)
- Lambda Legal**, teleconference for major donors and other supporters after oral arguments in *King v. Burwell* (March 2015) (co-speaker)
- Northwestern Medical School**, class for second year medical students on LGBT issues in the practice of medicine (Jan. 2015) (panelist)
- AIDS Drug Assistance Program (ADAP) Advocacy Association webinar** (Dec. 2014), “Affordable Care Act: Update on Discriminatory Marketplace Exchange Practices” (featured presenter)
- Health Foundation of Greater Indianapolis**, sponsored event at Marion County Public Health Dept. (Nov. 2014), “HIV Law and Policy: Opportunities and Challenges in a Shifting Landscape” (featured speaker)
- ViiV Healthcare’s 16th Annual Community Summit** (Oct. 2014), “Access to Care, Free from Stigma and Discrimination” (featured speaker)
- Northwestern University Law School** (Oct. 2014), “When Sex Is a Crime and Spit Is a Dangerous Weapon How HIV Criminalization Fuels Stigma and Discrimination” (featured speaker)
- U.S. Conference on AIDS** (conference of the National Minority AIDS Council) (Sept.-Oct. 2014)
- “Preventing Old Tricks in the New World: East v. Blue Cross Blue Shield of Louisiana” (presenter)
- “HIV Is Not a Crime: The Latest Facts on HIV Criminalization and What They Mean to You” (presenter)
- Lavender Law 2014** (annual conference of the National LGBT Bar Association) (Aug. 2014), “Vindicating the Rights of People Living with HIV: Lessons from Litigation” (panelist)

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### **SPEAKING ENGAGEMENTS/PRESENTATIONS (cont'd.)**

**HIV Is Not a Crime: The Grinnell Gathering** (June 2014), “Developing Talking Points Against HIV Criminalization” (presenter)

**American Bar Association (ABA) AIDS Coordinating Committee, HIV Law & Practice Conference** (Mar. 2014), “HIV Litigation—Updates and Trends” (panelist)

**Minnesota LGBT Bar Association** (Jan. 2014), “Reuniting Our Community to Fight AIDS: Why Lawyers Must Help Lead the Way” (keynote speaker)

**LGBT Litigators Roundtable** (Nov. 2013), “An Afternoon (Living) with HIV” (organizer and master of ceremonies/moderator/presenter for full afternoon of Litigators Roundtable devoted to HIV)

**U.S. Conference on AIDS** (conference of the National Minority AIDS Council) (Sept. 2013), “15 Ways HIV Criminalization Laws Harm Us All” (presenter)

**Lavender Law 2013** (annual conference of the National LGBT Bar Association) (Aug. 2013), “25 Years of Lavender Law” (plenary speaker)

**University of Mississippi School of Law, Third Annual LGBT Law Symposium** (Mar. 2013), “Rooting Out Misconceptions, Legal Barriers, and Entrenched Forms of Discrimination Against People Living with HIV” (panelist)

**U.S. Conference on AIDS (Sept. 2012)**, “Disclosing Your HIV Status: Legal Obligations, Rights, Protections and Limitations” (lead presenter)

**Presidential Advisory Council on HIV/AIDS, 48th Meeting** (October 2012), “HIV Disclosure Workgroup,” presenting results of HIV Disclosure Summit (co-presenter)

**Chicago Bar Association** (Oct. 2011), “When Sex Is a Crime and *Spit* Is a Dangerous Weapon: How HIV Criminalization Fuels Stigma and Discrimination” (featured speaker)

**UN AIDS, Global Commission on HIV and the Law, High Income Countries Dialogue** (Sept. 2011), presented untitled written comments (participant)

“**The Graying of HIV,**” an institute at Johns Hopkins University sponsored by the AIDS Education and Training Center of Baltimore (Mar. 2011), “Home, (Not So) Sweet Home: HIV Discrimination in Long-Term Care Facilities,” (featured speaker)

**Lavender Law 2010** (annual conference of the National LGBT Bar Association) (Aug. 2010), “HIV/AIDS in the U.S. in 2010: Forming New National Policies, Scaling Up Prevention Efforts, and Fighting Criminal Prosecutions”

**Arkansas Ninth Annual Fair Housing Conference** (Apr. 2010), “Home, (Not So) Sweet Home: HIV Discrimination in Long-Term Care Facilities,” (featured speaker)

**American Bar Association (ABA) AIDS Coordinating Committee, HIV Law & Practice Conference** (Mar. 2008), “*Taylor v. Rice*: Framing the Issues to Affect the Outcome” (presenter)

**National Black HIV/AIDS Awareness Day**, event at Morris Brown College in Atlanta (Feb. 2008), “HIV/AIDS in the Black Community: Testing, Stigma and Discrimination” (presenter)

### **TEACHING**

**Northwestern University/AIDS Foundation of Chicago Public Health Boot Camp** (annually 2015-present), guest lecturer on HIV/AIDS and the law.

**New York University School of Law**, guest lecturer for seminar on LGBTQ Rights Externship Seminar (Feb. 2021) (taught by Hayley Gorenberg, the Marc and Julie Platt LGBTQ Rights Externship Instructor)

**University of Pennsylvania, Carey School of Law**, guest lecturer on HIV criminalization for seminar on Law and Sexuality (taught by Tobias Barrington Wolff, the Jefferson Barnes Fordham Professor of Law)

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**BOARD MEMBERSHIP**

Vice President, Chicago Center for Spiritual Living (dba Bodhi Spiritual Center) (2015-2018), a transdenominational spiritual community with an annual budget of over \$600,000. Co-chair for committed giving campaign, which is main source of funding.

**EDUCATION**

**GEORGETOWN UNIVERSITY LAW CENTER**

*Washington, DC*

Juris Doctor, May 2002

*GPA:* 3.68 *magna cum laude* (Order of the Coif)

*Law Review:* Georgetown Law Journal

*Honors:* Dean's List, Reynolds Scholarship, Bernstein Scholarship

**UNIVERSITY OF SOUTHERN CALIFORNIA**

*Los Angeles, CA*

Bachelor of Fine Arts - Acting, May 1989

*GPA:* 3.74 *magna cum laude*

*Honors:* Trustee Scholar (full academic scholarship)

# Exhibit B

Date	Name	Hours	Amount	Description
11/02/17	Scott Schoettes	0.4	\$625.00	Prep for and call with P. Perkowski re potential case(s) to challenge HIV service restrictions
11/17/17	Scott Schoettes	1.3	\$625.00	Call with P. Perkowski (OutServe) and Winston attorneys re coordinating litigation efforts on behalf of service members with HIV
<b>TOTAL</b>		<b>1.7</b>	<b>\$1,062.50</b>	
01/04/18	Scott Schoettes	1.7	\$625.00	Conduct in-depth interview with N. Harrison
01/08/18	Scott Schoettes	0.7	\$625.00	Call with P. Perkowski re coordination of cases/combining teams
01/19/18	Scott Schoettes	1.2	\$625.00	Draft retainer agreement for N. Harrison and send to C. Taylor for review
01/23/18	Scott Schoettes	0.9	\$625.00	Respond to P. Perkowski email re combining teams; revise retainer agreement and send to N. Harrison for review
01/25/18	Scott Schoettes	0.9	\$625.00	Emails with P. Perkowski and Winston team to coordinate meeting; discuss retainer agreement with N. Harrison
01/30/18	Scott Schoettes	0.2	\$625.00	Obtain N. Harrison's confirmation <span style="background-color: black; color: black;">Redacted</span>
02/22/18	Scott Schoettes	0.4	\$625.00	Check in with N. Harrison to provide status update
03/01/18	Scott Schoettes	1.3	\$625.00	Prep for and participate in teleconference re strategy and initial assignments
03/21/18	Scott Schoettes	0.7	\$625.00	Meeting to introduce N. Harrison to Winston team and P. Perkowski
03/23/18	Scott Schoettes	1.6	\$625.00	Review initial draft of complaint for companion case, as guidance for claims that could be presented in Harrison.
03/26/18	Scott Schoettes	1.5	\$625.00	Research relevant DOD Instructions and Army Regulations
03/27/18	Scott Schoettes	0.8	\$625.00	Assign A. Pinggera to provide memo on potential equal protection claims; have conversation with C. Taylor re same
04/02/18	Scott Schoettes	0.3	\$625.00	Update N. Harrison <span style="background-color: black; color: black;">Redacted</span>
04/03/18	Scott Schoettes	0.6	\$625.00	At S. McGowan's request, speak with her and S. Bagenstos to obtain his buy-in to seek heightened scrutiny and to disconnect, for constitutional purposes, PLWH from people with disabilities in general
04/05/18	Scott Schoettes	3.1	\$625.00	Research other potential claims under APA
04/11/18	Scott Schoettes	2.4	\$625.00	Review memo on equal protection claims in the military context; provide feedback and assign additional research on subject
04/13/18	Scott Schoettes	2.2	\$625.00	Conduct further research on equal protection and attempt to distill essence of the argument in writing
05/02/18	Scott Schoettes	1.3	\$625.00	Consult with potential expert re factual allegations regarding PLWH, care in a deployed setting, and risk of transmission on the battlefield
05/03/18	Scott Schoettes	2.0	\$625.00	Conduct independent research re risks of transmission
05/07/18	Scott Schoettes	1.2	\$625.00	Consult with second potential expert re factual allegations regarding PLWH, care in a deployed setting, and risk of transmission on the battlefield
05/08/18	Scott Schoettes	1.2	\$625.00	Team call re strategy and filing of complaint
05/09/18	Scott Schoettes	3.8	\$625.00	Draft factual allegations re progression of medical care for people living with HIV and heightened scrutiny factors; speak with P. Perkowski re draft complaint
05/10/18	Scott Schoettes	3.5	\$625.00	Draft factual allegations re N. Harrison and relevant regulations, policies, and practices; share draft complaint with Winston.
05/14/18	Scott Schoettes	2.5	\$625.00	Revise factual allegations; discuss framing of equal protection claim with C. Taylor; check in with K. Upton re same CF reviewing draft complaint.
05/15/18	Scott Schoettes	5.3	\$625.00	Further discuss framing of equal protection claim with C. Taylor; correspond with C. Frelinghuysen re medical waiver and exhaustion of remedies; draft/revise equal protection claim; send first draft of complaint to team for review.

05/16/18	Scott Schoettes	1.1	\$625.00	Team call re strategy and drafting of complaint.
05/20/18	Scott Schoettes		\$625.00	Emails with P. Perkowski to discuss complaint
05/21/18	Scott Schoettes	2.3	\$625.00	Call with team to discuss status of complaint and plans for filing; incorporate feedback from Winston attorneys; discuss adding OutServe as plaintiff; send complaint with transmittal email to C. Taylor for review
05/22/18	Scott Schoettes	1.6	\$625.00	Redacted; revise factual allegations; emails with team.
05/23/18	Scott Schoettes	1.8	\$625.00	Incorporate input from C. Taylor and send to team for approval; emails re OutServe as plaintiff
05/25/18	Scott Schoettes	3.2	\$625.00	Revise complaint per team input; review and revise factual allegations re OutServe as plaintiff; make other minor revisions; send with transmittal email to S. McGowan for review; call with team; correspond with A. Sommer re mootness and other issues.
05/27/18	Scott Schoettes	2.5	\$625.00	Incorporate input on complaint from S. McGowan and make other revisions
05/28/18	Scott Schoettes		\$625.00	Incorporate input from all team members and make additional revisions.
05/29/18	Scott Schoettes	3.2	\$625.00	Call with team re filing and media strategy; reviewing and incorporating additional changes from A. Sommer and C. Frelinghuysen.
05/30/18	Scott Schoettes	2.9	\$625.00	Additional revisions traded back and forth with Winston team; final proofing of complaint.
06/01/18	Scott Schoettes	1.0	\$625.00	Call with team to discuss plans for a preliminary injunction motion
06/04/18	Scott Schoettes	0.6	\$625.00	Email with P. Perkowski regarding potential experts.
06/05/18	Scott Schoettes	1.4	\$625.00	Call re adding Air Force plaintiffs; learn of and review "Deploy or Get Out" memo from Undersecretary Wilke; discuss its potential application to Harrison and possible need for injunctive relief.
06/06/18	Scott Schoettes	0.3	\$625.00	Email with P. Perkowski and team re potential new plaintiff.
06/08/18	Scott Schoettes	0.5	\$625.00	Team call re strategy and drafting of motion for PI.
06/15/18	Scott Schoettes	0.8	\$625.00	Call with teams on both cases re strategy moving forward; plans for PI.
06/25/18	Scott Schoettes	3.8	\$625.00	Begin drafting sections of PI motion related to HIV background; interview C. Del Rio regarding subjects to be covered in his declaration.
06/26/18	Scott Schoettes	2.4	\$625.00	Review and comment on Del Rio affidavit and send for his review
06/27/18	Scott Schoettes	4.7	\$625.00	Draft/revise memo ISO PI on HIV background and equal protection; incorporate Del Rio's changes to his affidavit; review and revise Hendrix declaration.
06/28/18	Scott Schoettes	2.4	\$625.00	Draft section on Nick's personal experience for P.I.; continue work on other sections.
06/29/18	Scott Schoettes	2.2	\$625.00	Complete first draft of my sections of brief; send to team for review.
07/02/18	Scott Schoettes	0.3	\$625.00	Brief team call.
07/03/18	Scott Schoettes	0.4	\$625.00	Review and respond to emails from C. Frelinghuysen re memo in support of PI.
07/05/18	Scott Schoettes	2.3	\$625.00	Have conversation with Dr. Hendrix and co-counsel; revise Hendrix' affidavit and send to him and team for review.
07/06/18	Scott Schoettes	2.3	\$625.00	Review and revise sections of PI drafted by Winston.
07/09/18	Scott Schoettes	2.3	\$625.00	Communicate with team re status of preliminary injunction; revise brief.
07/10/18	Scott Schoettes	1.3	\$625.00	Make additional revisions to brief and send to Winston/Perkowski for review.
07/11/18	Scott Schoettes	0.5	\$625.00	Call with team re briefing strategy.
07/12/18	Scott Schoettes	2.2	\$625.00	Incorporate feedback from Winston and Perkowski; make other revisions to brief; send to C. Taylor (Director of Constitutional Litigation) for review;

07/13/18	Scott Schoettes	1.3	\$625.00	Incorporate Del Rio's changes to affidavit and send to Winston/Perkowski for review
07/14/18	Scott Schoettes	0.4	\$625.00	Confer with C. Frelinghuysen re memo in support of PI
07/16/18	Scott Schoettes	4.0	\$625.00	Incorporate feedback from C. Taylor for team review; further revise brief; send brief to Winston/P. Perkowski for further review; send brief to S. McGowan (Legal Director) for simultaneous review; continue work on expert affidavits.
07/17/18	Scott Schoettes	4.3	\$625.00	Incorporate feedback from S. McGowan; incorporate feedback from Winston; make other revisions in line with feedback; continue work on expert affidavits; review and edit Harrison affidavit.
07/18/18	Scott Schoettes	2.2	\$625.00	Finalize contents of brief and send to paralegals for assist in finding citations; obtain final sign off and signature from Dr. Hendrix; obtain final sign off and signature from Dr. Del Rio.
07/19/18	Scott Schoettes	0.6	\$625.00	Assist with final proofing; motion for preliminary injunction filed.
08/01/18	Scott Schoettes	1.1	\$625.00	Review newly-issued DODI 1332.45 to determine its potential effect on our clients; team call to consider ways to secure clarification of applicability to servicemembers with HIV and other case-related matters.
08/02/18	Scott Schoettes	0.7	\$625.00	Review and comment on opposition to motion to consolidate motions for briefing.
08/15/18	Scott Schoettes	0.5	\$625.00	Team call re status of case
08/17/18	Scott Schoettes	1.8	\$625.00	Read/digest government's motion to dismiss and opposition to preliminary injunction; discuss same with team.
08/20/18	Scott Schoettes	3.2	\$625.00	Conduct research for opposition to MTD and reply for motion for P.I.; begin drafting responsive arguments on equal protection
08/21/18	Scott Schoettes	1.3	\$625.00	Finish drafting responsive arguments on equal protection.
08/22/18	Scott Schoettes	1.5	\$625.00	Team call and communications via email re Government's briefs and evidence in support, discussion of responsive arguments; incorporate P. Perkowski's changes to my sections of brief.
08/27/18	Scott Schoettes	3.8	\$625.00	Review/revise arguments drafted by Winston on P.I. factors; send to Winston/P.Perkowski for further review; incorporate team feedback, make additional changes, and send to C. Taylor for review.
08/28/18	Scott Schoettes	2.4	\$625.00	Further revise brief; Incorporate feedback from C. Taylor and send to D. Flynn (Litigation Director) for review; send back to Winston and P. Perkowski for review;
08/29/18	Scott Schoettes	2.3	\$625.00	Incorporate feedback from D. Flynn; incorporate Winston's changes; further revise brief; send to Winston attorneys for final review
08/30/18	Scott Schoettes	2.5	\$625.00	Incorporate A. Sommer's final changes; finalize brief and send to paralegals for preparation for filing; assist with proof-reading.
09/03/18	Scott Schoettes		\$625.00	Email team re preliminary injunction and motion to dismiss
09/04/18	Scott Schoettes	1.4	\$625.00	Team call and correspondence with A. Sommer regarding strategy for oral argument
09/05/18	Scott Schoettes	0.4	\$625.00	Team call
09/06/18	Scott Schoettes	2.5	\$625.00	Review memo on organizational standing; review case law for oral argument.
09/07/18	Scott Schoettes	3.2	\$625.00	Prepare for oral argument
09/10/18	Scott Schoettes	2.5	\$625.00	Team call to discuss potential request for continuance or motion to file sur-reply; prepare for oral argument.
09/11/18	Scott Schoettes	2.6	\$625.00	Review and comment on draft motion for leave to file a sur-reply; prepare for and participate in first moot for oral argument on motion for preliminary injunction and motion to dismiss.
09/12/18	Scott Schoettes	6.3	\$625.00	Fly to DC for oral argument; prepare for oral argument.
09/13/18	Scott Schoettes	6.2	\$625.00	Prepare for and participate in second moot for oral argument; confer with P. Perkowski re oral argument; prepare for oral argument

09/14/18	Scott Schoettes	2.4	\$625.00	Prepare for and argue motion for PI and MTD; engage with media at courthouse; follow-up with team and client.
09/19/18	Scott Schoettes	0.3	\$625.00	Call with team to discuss denial of PI and moving into discovery.
10/03/18	Scott Schoettes	0.3	\$625.00	Call re discovery strategy in Harrison
10/10/18	Scott Schoettes	0.5	\$625.00	Confer with D. Sommer and team regarding Rule 26 conference.
10/19/18	Scott Schoettes	0.3	\$625.00	Discuss and approve proposed discovery plan.
10/24/18	Scott Schoettes	0.4	\$625.00	Team call re RFP'S and RFA's and protective order.
10/31/18	Scott Schoettes	2.3	\$625.00	Team call re discovery and case status; review and revise RFP's and RFA's
11/01/18	Scott Schoettes	1.2	\$625.00	Review and revise draft PO and motion for PO
11/09/18	Scott Schoettes	2.4	\$625.00	Review and revise draft interrogatories.
11/14/18	Scott Schoettes	0.5	\$625.00	Team planning call interrogatories, RFA's and RFP's,
11/15/18	Scott Schoettes	1.7	\$625.00	Team call regarding AF members being discharged and potential plans to add as plaintiffs in current lawsuit or file new lawsuit; confer with C. Frelinghuysen re discovery issues and motion to compel.
11/16/18	Scott Schoettes	1.3	\$625.00	Emails with team regarding potential new lawsuit; reach out to Trevor Hoppe regarding potentially serving as an expert.
11/19/18	Scott Schoettes	1.0	\$625.00	Review and revise motion to compel
11/20/18	Scott Schoettes	2.1	\$625.00	Team call to strategize about hearing on motion to compel and potential new lawsuit; subsequent call with A. Sommer and P. Perkowski to discuss strategy on new lawsuit; review/approve final changes to motion to compel.
11/21/18	Scott Schoettes	1.0	\$625.00	Team call regarding new case, potential renewal of motion for PI
11/26/18	Scott Schoettes	1.5	\$625.00	Call with team re new lawsuit; call with Voe and Roe
11/27/18	Scott Schoettes	1.3	\$625.00	Discuss with Dr. Hoppe potential topics to be addressed in his expert report
11/28/18	Scott Schoettes	2.7	\$625.00	Team call; emails with team re new lawsuit and motion for PI; review and revise reply for motion to compel in Harrison; confer with CF re schedule for Hendrix expert report.
11/29/18	Scott Schoettes	1.0	\$625.00	Review and edit final changes to Reply to Motion to Compel Production; confer with team re same.
11/30/18	Scott Schoettes	2.5	\$625.00	Confer with hearing attendees regarding hearing on motion to compel; strategy call on APA claims in Voe/Roe; review and comment on draft Hoppe report
12/03/18	Scott Schoettes	0.4	\$625.00	Reach out to D. Hardy re potentially serving as expert in cases.
12/04/18	Scott Schoettes	1.7	\$625.00	Confer with C. Frelinghuysen re expert report from Dr. Hendrix; articulate topics to be covered in Hendrix expert report
12/05/18	Scott Schoettes	1.1	\$625.00	Team call re new case and discovery in Harrison.
12/06/18	Scott Schoettes		\$625.00	Confer with C. Frelinghuysen re Government's objections to rogs and expert reports; review and comment upon Dr. Hoppe's changes to expert report and new sections.
12/07/18	Scott Schoettes	1.3	\$625.00	Team call for Roe/Voe.
12/09/18	Scott Schoettes	1.2	\$625.00	Roe/Voe team call with clients, discussion of declarations.
12/10/18	Scott Schoettes	1.6	\$625.00	Emails with team re upcoming filing; assist Dr. Hardy in preparing his expert report.
12/11/18	Scott Schoettes	2.4	\$625.00	Team call re complaint; confer with C. Frelinghuysen re Hendrix report; review and comment on draft of expert report from Dr. Hardy.
12/12/18	Scott Schoettes	2.7	\$625.00	Review and revise draft complaint
12/13/18	Scott Schoettes	1.4	\$625.00	Confer with C. Frelinghuysen re Hendrix expert report; comment on draft Hendrix report

12/14/18	Scott Schoettes	2.5	\$625.00	Review and revise Motion to Compel Responses to Interrogatories; confer with A. Sommer and C. Frelinghuysen re G's Objections to Magistrate's ruling on motion to compel production of documents; review and comment on Hoppe expert report.
12/16/18	Scott Schoettes	2.4	\$625.00	Review and revise latest version of complaint.
12/17/18	Scott Schoettes	3.8	\$625.00	Call with team in advance of filing of second complaint; second call with team in advance of filing of second complaint; review and revise motion to proceed under pseudonyms; finalize Hoppe expert report.
12/18/18	Scott Schoettes	3.2	\$625.00	Review and revise draft complaint; review motion to extend expert discovery deadlines; review and revise response to G's Objections to Magistrate's ruling.
12/19/18	Scott Schoettes	1.2	\$625.00	Review and approve final changes to complaint and related papers; review and approve changes to response to Objections to Magistrate's ruling.
12/20/18	Scott Schoettes	6.5	\$625.00	Fly to DC for hearing; participate in meeting to discuss strategy/approach for oral argument review and revise J. Harding's oral argument notes; email J. Harding re preparations for oral argument.
12/21/18	Scott Schoettes	4.2	\$625.00	Attend hearing on Government's Objections to Magistrate's Ruling on Motion to Compel; follow up with team re same; review and comment on Hendrix expert report;
12/22/18	Scott Schoettes	5.5	\$625.00	Fly home to Chicago
12/26/18	Scott Schoettes	3.2	\$625.00	Team calls to discuss strategy and plans for a motion for a preliminary injunction; discussions via email re same; confer with C. Frelinghuysen re expert reports; participate in meet and confer with DOJ attorneys.
12/27/18	Scott Schoettes	1.6	\$625.00	Confer with C. Frelinghuysen re G's objections to deposition topics; emails and calls with J. Bauer and team re motion for PI.
12/28/18	Scott Schoettes	2.3	\$625.00	Review and revise client declarations for Pi; communicate with J. Bauer and team re PI.
<b>TOTAL</b>		<b>227.4</b>	<b>\$142,125.00</b>	
01/02/19	Scott Schoettes	4.3	\$625.00	Review and revise motion for preliminary injunction
01/04/19	Scott Schoettes	0.4	\$625.00	Confer with D. Sommer re motion to consolidate discovery
01/07/19	Scott Schoettes	4.8	\$625.00	Review documents and prepare outline for Lute deposition; team strategy call.
01/08/19	Scott Schoettes	9.5	\$625.00	Fly Chicago to DC; prepare outline for Lute deposition; prepare documents for Lute deposition.
01/09/19	Scott Schoettes	8.2	\$625.00	Take deposition of L. Lute; confer with team regarding Lute deposition.
01/10/19	Scott Schoettes	7.2	\$625.00	Team call to update re Lute deposition and discuss motion for P.I.; confer with C. Frelinghuysen re motion to compel (DPP); review and revise motion for PI; review and revise final declarations from clients
01/11/19	Scott Schoettes	2.4	\$625.00	Approve final changes to Motion for Preliminary Injunction and related papers; emails with team.
01/16/19	Scott Schoettes	0.3	\$625.00	Team call re preparations for second motion to dismiss and P.I. reply; discovery issues.
01/18/19	Scott Schoettes	3.1	\$625.00	Review draft motion to DPP compel and examples of documents at issue.
01/23/19	Scott Schoettes	0.8	\$625.00	Team strategy call on motion to compel (DPP) and briefing on PI.
01/25/19	Scott Schoettes	0.8	\$625.00	Review and approve changes to motion to compel (DPP).
01/26/19	Scott Schoettes	4.3	\$625.00	Read/digest government's motion to dismiss and opposition to preliminary injunction; outline response.
01/28/19	Scott Schoettes	6.8	\$625.00	Team call to plan response to motion to dismiss and reply on PI; draft opposition to MTD and reply for motion for PI.
01/29/19	Scott Schoettes	4.3	\$625.00	Draft opposition to MTD and reply for motion for PI.

01/30/19	Scott Schoettes	4.8	\$625.00	Finish first draft of opposition to MTD and reply for motion for PI; send to team members for review; review G's opposition to motion to compel over DPP assertion; confer with D. Sommer re same argument on DPP motion.
01/31/19	Scott Schoettes	6.1	\$625.00	Incorporate feedback on opposition to MTD and reply ISO PI from various team members, including C. Taylor; further revise brief.
02/01/19	Scott Schoettes	3.5	\$625.00	Make final changes to Opposition to Motion to Dismiss & Reply in Support of Motion for Preliminary Injunction; review and approve final version of brief.
02/04/19	Scott Schoettes	3.5	\$625.00	Prepare for oral argument
02/05/19	Scott Schoettes	3.2	\$625.00	Prepare for and do first (internal) moot of oral argument on PI and MTD
02/06/19	Scott Schoettes	5.4	\$625.00	Team call in advance of two arguments; short call with P. Perkowski in preparation for hearing on motion to compel; prepare for oral argument on PI and MTD
02/07/19	Scott Schoettes	6.5	\$625.00	Fly to DC for second hearing on DPP before Magistrate Davis (Drew not available to second chair); review JWH's oral argument notes on plane and provide guidance via email.
02/08/19	Scott Schoettes	9.2	\$625.00	Attend oral argument on Motion to Compel Documents and Information Withheld on Basis of Deliberative Process Privilege; confer with J. Harding re selection of documents for in camera review; fly home to Chicago
02/11/19	Scott Schoettes	7.2	\$625.00	Collect and review documents for Tumminello deposition; draft deposition outline
02/12/19	Scott Schoettes	12.4	\$625.00	Team call; draft/revise Tumminello deposition outline; prepare documents for deposition; fly to DC for deposition and oral argument.
02/13/19	Scott Schoettes	8.7	\$625.00	Take deposition of P. Tumminello; email team re same; revise arguments for PI/MTD hearing; confer with C. Frelinghuysen re Government's production of documents.
02/14/19	Scott Schoettes	12.2	\$625.00	Meeting at Winston for strategy discussions, second moot, and preparations for hearing on PI and motion to dismiss; revise arguments in preparation for oral argument.
02/15/19	Scott Schoettes	6.3	\$625.00	Argue Motion for Preliminary Injunction and Motion to Dismiss; follow-up with clients; debrief with team; read opinion granting PI; discuss potential motion to modify
02/16/19	Scott Schoettes	6.8	\$625.00	Travel DC to Chicago
02/17/19	Scott Schoettes	0.5	\$625.00	Emails with team re strategy and motion to modify
02/18/19	Scott Schoettes	0.8	\$625.00	Review/edit draft of reply on motion to modify; reach out to Lambda connection in Michigan to deal with National Guard issue for Q.S.
02/19/19	Scott Schoettes	3.2	\$625.00	Review newly-issued DODI implementing "Deploy or Get Out;" review key documents for upcoming depositions.
02/20/19	Scott Schoettes	5.0	\$625.00	Team call; emails re strategy and discovery plans; collect documents and begin drafting outline for deposition of A. Wiesen
02/21/19	Scott Schoettes	6.1	\$625.00	Team call re Blaylock deposition; emails re deposition scheduling and strategy; collect documents and draft outline for A. Wiesen deposition; prepare documents for deposition.
02/22/19	Scott Schoettes	8.6	\$625.00	Prepare for and take deposition of A. Wiesen Deposition; email team re same.
02/23/19	Scott Schoettes	0.4	\$625.00	Emails with team to plan for upcoming discovery responses and depositions
02/24/19	Scott Schoettes	0.4	\$625.00	Emails with team to plan for upcoming discovery responses and depositions
02/25/19	Scott Schoettes	7.1	\$625.00	Review documents and prepare outline for Blaylock deposition.
02/26/19	Scott Schoettes	5.7	\$625.00	Communication with team re upcoming motion to compel; review and revise deposition outline for J. Blaylock; prepare documents for deposition

02/27/19	Scott Schoettes	11.4	\$625.00	Take deposition of J. Blaylock; debrief from team re oral argument on DPP; collect and review documents for A. Taylor deposition
02/28/19	Scott Schoettes	5.3	\$625.00	Finish deposition outline for A. Taylor; prepare documents for deposition
03/01/19	Scott Schoettes	7.2	\$625.00	Take deposition of A. Taylor email team re same
03/03/19	Scott Schoettes	3.8	\$625.00	Team meeting re strategy and upcoming depositions; collect documents related to Ciminera and start to draft deposition outline
03/04/19	Scott Schoettes	4.5	\$625.00	Call with DOJ attorneys; draft/revise Ciminera deposition and prepare documents for deposition
03/05/19	Scott Schoettes	8.6	\$625.00	Take deposition of P. Ciminera; email team re same.
03/06/19	Scott Schoettes	10.3	\$625.00	Take deposition of M. Soper; prepare N. Harrison for his deposition (drop in on prep at break and join after Soper deposition).
03/07/19	Scott Schoettes	8.4	\$625.00	Defend deposition of N. Harrison; email team re same; prepare deposition outline and documents for Shell deposition; confer with J. Pesick re expert report from Hendrix.
03/08/19	Scott Schoettes	9.1	\$625.00	Take deposition of D. Shell; email team re same
03/10/19	Scott Schoettes	2.2	\$625.00	Team strategy call; review and comment upon discovery responses
03/11/19	Scott Schoettes	5.8	\$625.00	Call re expert reports; emails with team re upcoming tasks; prepare outline and documents for deposition of P. Aswell; participate in team call re expert reports.
03/12/19	Scott Schoettes	5.8	\$625.00	Take deposition of P. Aswell; email team re same.
03/13/19	Scott Schoettes	6.0	\$625.00	Prepare deposition outline and documents for G. Brown deposition
03/14/19	Scott Schoettes	6.5	\$625.00	Take deposition of G. Brown; email team re same
03/15/19	Scott Schoettes	8.5	\$625.00	Travel to Florida for deposition of Lt. Cron; assist J. Bauer at Cron deposition
03/16/19	Scott Schoettes	7.1	\$625.00	Travel Florida to Chicago.
03/18/19	Scott Schoettes	5.1	\$625.00	Collect and review documents for J. Okulicz and G. Palumbo outlines; prepare documents for deposition; begin to draft Okulicz deposition.
03/19/19	Scott Schoettes	7.8	\$625.00	Fly to San Antonio for depositions; prepare deposition outlines.
03/20/19	Scott Schoettes	6.8	\$625.00	Take depositions of J. Okulicz and G. Palumbo.
03/21/19	Scott Schoettes	7.2	\$625.00	Review/edit motion to compel production of documents withheld under DPP; review and comment on all three expert reports.
03/22/19	Scott Schoettes	4.2	\$625.00	Assist with completion of expert reports, including identifying and collecting documents upon which experts relied.
03/25/19	Scott Schoettes	0.4	\$625.00	Meet with J. Pesick and others re N. Harrison's medical evaluations and other discovery issues.
03/26/19	Scott Schoettes	1.6	\$625.00	Review/edit Opposition to Motion to Stay Compliance with Magistrate's Order
04/02/19	Scott Schoettes	2.1	\$625.00	Review/edit response to Rule 72 Objections to Magistrate's Non-Dispositive Ruling Regarding DPP.
04/11/19	Scott Schoettes	6.6	\$625.00	Email J. Harding re oral argument on Rule 72 Objections; fly to DC for oral argument.
04/12/19	Scott Schoettes	3.2	\$625.00	Attend oral argument on Rule 72 Objections to Magistrate's Non-Dispositive Ruling Regarding DPP.
04/13/19	Scott Schoettes	6.1	\$625.00	Fly DC to Chicago
04/17/19	Scott Schoettes	0.7	\$625.00	Team call re trial prep and appeal
04/26/19	Scott Schoettes	4.3	\$625.00	Review topics identified in expert disclosure regarding Dr. Murray expert; draft Dr. Murray deposition outline
04/28/19	Scott Schoettes	6.2	\$625.00	Fly to DC for expert depositions; work on Dr. Murray's deposition outline
04/29/19	Scott Schoettes	7.1	\$625.00	Complete deposition outline for Dr. Murray; prepare documents for deposition
04/30/19	Scott Schoettes	9.2	\$625.00	Take deposition of Dr. Murray; email team re same.

05/01/19	Scott Schoettes	5.2	\$625.00	Review topics identified in the expert disclosure regarding S. Peel; begin drafting deposition outline.
05/02/19	Scott Schoettes	7.1	\$625.00	Complete deposition outline for S. Peel; prepare documents for deposition
05/03/19	Scott Schoettes	7.7	\$625.00	Take deposition of S. Peel; email team re same.
05/05/19	Scott Schoettes	5.4	\$625.00	Review Dr. Hardy's expert report; begin Dr. Hardy's dep prep via videoconference;
05/06/19	Scott Schoettes	7.1	\$625.00	Call re motion to dismiss OutServe for lack of standing; call re trial prep; prepare Dr. Hardy for his deposition at Winston (Hardy Report-25.0)
05/07/19	Scott Schoettes	9.5	\$625.00	Prepare for and defend Dr. Hardy's deposition; email team re same; discuss potential supplemental expert report from Dr. Hardy or rebuttal report to S. Peel; research latest technology used for viral load testing
05/08/19	Scott Schoettes	8.2	\$625.00	Review Hendrix expert report; travel to Hendrix office (DC to Baltimore); prepare Dr. Hendrix for his deposition
05/09/19	Scott Schoettes	7.6	\$625.00	Team call re trial prep; prepare Dr. Hendrix for his deposition in Winston offices.
05/10/19	Scott Schoettes	10.2	\$625.00	Defend Dr. Hendrix' deposition
05/11/19	Scott Schoettes	1.7	\$625.00	Review and comment upon brief in opposition to MTD
05/12/19	Scott Schoettes	1.3	\$625.00	Continue commenting upon brief in opposition to motion to dismiss and email team
05/13/19	Scott Schoettes	5.8	\$625.00	Review Hoppe report; prepare Dr. Hoppe for his deposition.
05/14/19	Scott Schoettes	8.2	\$625.00	Defend Dr. Hoppe's deposition; email team re same; review latest draft of opposition to motion to dismiss; meet and email with G. Eaton re appeal.
05/15/19	Scott Schoettes	7.9	\$625.00	Team call re upcoming tasks and trial strategy; review and comment upon brief in opposition to motion to dismiss OutServe/MMAA; fly home to (Chicago) from expert depositions.
05/16/19	Scott Schoettes	0.9	\$625.00	Team strategy meeting
05/22/19	Scott Schoettes		\$625.00	Team trial strategy call
05/23/19	Scott Schoettes	2.4	\$625.00	Begin work on document that will be used to create trial brief.
05/24/19	Scott Schoettes	3.1	\$625.00	Work on pre-trial brief.
05/27/19	Scott Schoettes	2.3	\$625.00	Begin trial prep for Dr. Hendrix
05/28/19	Scott Schoettes	2.1	\$625.00	Work on trial prep for Dr. Hendrix
05/29/19	Scott Schoettes	2.1	\$625.00	Prepare for and participate in moot for hearing on motion to dismiss OutServe/MMAA for lack of standing.
05/30/19	Scott Schoettes	1.5	\$625.00	Call with Kara regarding argument on motion to dismiss; call with G. Eaton and working group re appellate brief.
05/31/19	Scott Schoettes	2.4	\$625.00	Review and revise statement of undisputed facts for trial.
06/04/19	Scott Schoettes	2.6	\$625.00	Review and comment on other pre-trial disclosures; review revised statement of undisputed facts.
06/05/19	Scott Schoettes	3.0	\$625.00	Work on outline for Dr. Hardy's trial testimony
06/07/19	Scott Schoettes	0.5	\$625.00	Call with G. Eaton, L. Gailey, and P. Perkowski re amici.
06/10/19	Scott Schoettes	1.5	\$625.00	Team planning call
06/11/19	Scott Schoettes	1.2	\$625.00	Review outline for appellate brief and participate in call with G. Eaton and working group re same.
06/13/19	Scott Schoettes	0.5	\$625.00	Call with P. Perkowski, K. Ingelhart and others re strategy on challenge to standing
06/17/19	Scott Schoettes	1.4	\$625.00	Review and revise objections to exhibit list/witness list
06/19/19	Scott Schoettes	1.2	\$625.00	Team call re trial prep and other outstanding issues; follow up tasks re same.
07/01/19	Scott Schoettes	5.2	\$625.00	Review and comment upon draft appellate brief.

07/02/19	Scott Schoettes	5.0	\$625.00	Review and revise appellate brief.
07/03/19	Scott Schoettes	0.7	\$625.00	Email with G. Eaton regarding significant revisions to structure/focus of brief.
07/10/19	Scott Schoettes	0.5	\$625.00	Call with team regarding trial prep and appeal
07/11/19	Scott Schoettes	0.3	\$625.00	Email with G. Eaton re current version of appellate brief.
07/12/19	Scott Schoettes	3.6	\$625.00	Email communications with team on plans for SJ motion, next steps toward trial, and appeal; assist Dr. Hendrix in preparing his supplemental expert report.
07/14/19	Scott Schoettes	3.0	\$625.00	Review and revise latest version of appellate brief.
07/15/19	Scott Schoettes	2.3	\$625.00	Review and revise draft brief in support of motion fo partial summary judgment
07/16/19	Scott Schoettes	6.2	\$625.00	Fly to DC for Shell II deposition and to meet with Dr. Hendrix; review and comment on supplemental brief on motion to dismiss OutServe
07/17/19	Scott Schoettes	6.1	\$625.00	Prepare for and take second deposition of D. Shell; team call re motion for partial SJ; review and revise appellate brief; various communications with P. Perkowski and other team members; further assist Dr. Hendrix in preparing his supplemental expert report.
07/18/19	Scott Schoettes	4.3	\$625.00	Review/revise appellate brief; travel to Baltimore to meet with Dr. Hendrix to begin prep for trial testimony.
07/19/19	Scott Schoettes	6.4	\$625.00	Fly Baltimore to Chicago; work on Hardy trial prep.
07/22/19	Scott Schoettes	2.7	\$625.00	Team call on finalizing motion for partial SJ; review near final version of brief in support of motion for partial summary judgment.
07/23/19	Scott Schoettes	1.2	\$625.00	Review and comment on opposition to motion to stay summary judgment
07/24/19	Scott Schoettes	0.9	\$625.00	Team call regarding trial prep and witness assignments.
08/21/19	Scott Schoettes	0.5	\$625.00	Team call re oral argument in 4th Circuit
09/03/19	Scott Schoettes	1.3	\$625.00	Prepare for appellate moot
09/04/19	Scott Schoettes	3.3	\$625.00	Appellate argument moot in Chicago (in-person Winston-Chicago)
09/10/19	Scott Schoettes	0.4	\$625.00	Email with G. Eaton re second moot
09/11/19	Scott Schoettes	2.0	\$625.00	Participate in second appellate argument moot (via video)
09/17/19	Scott Schoettes	6.3	\$625.00	Fly to Richmond for oral argument (prepare notes/suggestions for G. Eaton for argument)
09/18/19	Scott Schoettes	2.3	\$625.00	Attend and second chair oral argument in Fourth Circuit; engage with members of press at courthouse; interface with clients re argument.
09/19/19	Scott Schoettes	6.1	\$625.00	Fly Richmond to Chicago
<b>TOTAL</b>		<b>572.1</b>	<b>\$357,562.50</b>	
01/10/20	Scott Schoettes	2.2	\$625.00	Read and digest opinion of the Fourth Circuit; engage with press re same.
01/15/20	Scott Schoettes	0.2	\$625.00	Speak with K. Ingelhart re Voe.
01/21/20	Scott Schoettes	0.6	\$625.00	Team call re 4th Circuit decision and trial strategy
01/27/20	Scott Schoettes	0.7	\$625.00	Speak with clients regarding plans moving forward
02/05/20	Scott Schoettes	0.3	\$625.00	Team call re potential omnibus motion for SJ
02/12/20	Scott Schoettes	0.5	\$625.00	Team call re trial prep
02/19/20	Scott Schoettes	0.7	\$625.00	Call with J. Bauer and A. Sommer re strategy on SJ.
02/26/20	Scott Schoettes	0.3	\$625.00	Team call to discuss new SJ strategy
03/04/20	Scott Schoettes	1.0	\$625.00	Team strategy call to discuss approach at status conference
03/05/20	Scott Schoettes	0.5	\$625.00	Telephonic hearing/status conference
03/11/20	Scott Schoettes	1.3	\$625.00	Conference with the Court to inform of plans to move for summary judgment and to set schedule for cross-motions.

03/18/20	Scott Schoettes	0.3	\$625.00	Short team call re trial preparation
03/25/20	Scott Schoettes	0.6	\$625.00	Team call re motion for SJ
03/27/20	Scott Schoettes	0.7	\$625.00	Review and analyze court order denying Government's motion to dismiss OutServe/MMAA for lack of standing.
04/08/20	Scott Schoettes	0.2	\$625.00	Short team call re trial preparation
04/09/20	Scott Schoettes	2.1	\$625.00	Outline brief in support of motion for SJ
04/10/20	Scott Schoettes	3.3	\$625.00	Begin drafting brief ISO SJ
04/13/20	Scott Schoettes	4.3	\$625.00	Draft brief ISO SJ
04/14/20	Scott Schoettes	3.5	\$625.00	Draft brief ISO SJ
04/15/20	Scott Schoettes	4.5	\$625.00	Team call; draft brief ISO SJ
04/16/20	Scott Schoettes	5.3	\$625.00	Finish first draft of brief; send to A. Sommer (GT) for review.
04/20/20	Scott Schoettes	4.5	\$625.00	Incorporate feedback on brief from A. Sommer; revise brief.
04/21/20	Scott Schoettes	3.7	\$625.00	Revise brief; send to P. Perkowski for review.
04/22/20	Scott Schoettes	0.6	\$625.00	Team call re trial prep and potential motion for SJ
04/23/20	Scott Schoettes	4.2	\$625.00	Incorporate feedback from P. Perkowski; revise brief; send to C. Taylor for review.
04/24/20	Scott Schoettes		\$625.00	Assist C. Angelaccio in finding supportive statements in depositions and other parts of record
04/26/20	Scott Schoettes	3.4	\$625.00	Input feedback from C. Taylor (Director of Constitutional Litigation)
04/27/20	Scott Schoettes	5.0	\$625.00	Conversations with C. Taylor re equal protection; revise brief; send parts back to C. Taylor for further review.
04/28/20	Scott Schoettes	3.4	\$625.00	Incorporate feedback from C. Taylor; revise brief; send to D. Flynn for review.
04/29/20	Scott Schoettes	4.3	\$625.00	Find support for factual statements in brief; incorporate feedback from D. Flynn; revise brief.
04/30/20	Scott Schoettes	5.8	\$625.00	Revise brief; assist in combing record for supportive statements in depositions
05/01/20	Scott Schoettes	6.2	\$625.00	Incorporate feedback from J. Harding; revise brief; assist C. Angelaccio in finding citations to supportive statements in depositions.
05/04/20	Scott Schoettes	1.7	\$625.00	Finalize motion for SJ; assist as necessary to file.
06/04/20	Scott Schoettes	2.4	\$625.00	Read and analyze G's brief in opposition to SJ and ISO SJ for Defendants
06/05/20	Scott Schoettes	0.9	\$625.00	Team call re Government's SJ motion and planned opposition; consider response to motion to exclude; decide to seek extension of deadlines to respond.
06/08/20	Scott Schoettes	0.2	\$625.00	Call with K. Ingelhart re attorneys' fees research
06/09/20	Scott Schoettes	4.2	\$625.00	Read and analyze extensive new material contained in exhibits to motion for SJ
06/10/20	Scott Schoettes	0.6	\$625.00	Team call re Government's motion and opposition brief
06/12/20	Scott Schoettes	4.4	\$625.00	Develop outline for Opposition to SJ and Reply ISO SJ; search depositions for statements to refute Defendants' arguments.
06/15/20	Scott Schoettes	4.1	\$625.00	Draft opposition to SJ and reply ISO SJ
06/16/20	Scott Schoettes	4.6	\$625.00	Draft opposition to SJ and reply ISO SJ
06/17/20	Scott Schoettes	3.4	\$625.00	Draft opposition to SJ and reply ISO SJ
06/18/20	Scott Schoettes	5.4	\$625.00	Draft opposition to SJ and reply ISO SJ
06/19/20	Scott Schoettes	3.5	\$625.00	Draft opposition to SJ and reply ISO SJ
06/21/20	Scott Schoettes	2.5	\$625.00	Draft opposition to SJ and reply ISO SJ; work on disputed facts.
06/22/20	Scott Schoettes	5.3	\$625.00	Draft opposition to SJ and reply ISO SJ; work on disputed facts.
06/23/20	Scott Schoettes	4.1	\$625.00	Finish first draft of brief; send to P. Perkowski for review.

06/24/20	Scott Schoettes	3.2	\$625.00	Work on disputed facts; assist C. Angelaccio in finding supportive statements.
06/25/20	Scott Schoettes	3.3	\$625.00	Incorporate feedback from P. Perkowski; revise brief; send to J. Harding for review.
06/26/20	Scott Schoettes	4.4	\$625.00	Incorporate feedback from J. Harding; revise brief; send to C. Taylor (Director of Constitutional Litigation) for review.
06/28/20	Scott Schoettes	3.2	\$625.00	Incorporate feedback from C. Taylor; revise brief; send to D. Flynn (Litigation Director) for review.
06/29/20	Scott Schoettes	4.1	\$625.00	Incorporate feedback from D. Flynn; revise brief; send to A. Sommer for review; work on support for factual disputes.
06/30/20	Scott Schoettes	5.3	\$625.00	Work on facts; Incorporate feedback from A. Sommer; revise brief; send to team; give to paralegals for creation of tables and formatting.
07/01/20	Scott Schoettes	2.5	\$625.00	Call with team in advance of filing; incorporate final feedback from P. Perkowski.
07/02/20	Scott Schoettes	0.8	\$625.00	Provide final approval for filing of Opposition to Def's Motion for Summary Judgment and Reply in Support of Pl's Motion for SJ.
07/20/20	Scott Schoettes	2.2	\$625.00	Begin preparing for oral argument
07/21/20	Scott Schoettes	2.7	\$625.00	Review and digest G's reply on motion for summary judgment; review allegedly disputed facts.
07/22/20	Scott Schoettes	2.4	\$625.00	Craft detailed outline for oral argument
07/23/20	Scott Schoettes	4.1	\$625.00	Review relevant case law; prepare arguments and answers to questions for first moot for oral argument on SJ motions
07/24/20	Scott Schoettes	2.0	\$625.00	Prepare for and participate in first moot for oral argument on SJ
07/27/20	Scott Schoettes	2.4	\$625.00	Revise arguments based on feedback/learning from first moot; email with team regarding potential need to postpone SJ hearing due to likely COVID diagnosis.
07/28/20	Scott Schoettes	1.9	\$625.00	Further prep for second moot
08/12/20	Scott Schoettes	0.8	\$625.00	Email team regarding second positive COVID test result and low likelihood of a negative test prior to August 18; communication with opposing counsel and clerk re same.
09/04/20	Scott Schoettes	2.1	\$625.00	Review briefs and exhibits in preparation for in-person hearing on SJ
09/08/20	Scott Schoettes	2.2	\$625.00	Review and revise arguments for hearing on SJ
09/09/20	Scott Schoettes	1.1	\$625.00	Team call; further review and revision of arguments
09/10/20	Scott Schoettes	3.1	\$625.00	Prepare for and engage in second moot of oral argument on SJ
09/11/20	Scott Schoettes	6.5	\$625.00	Fly to DC for oral argument; prepare for oral argument.
09/12/20	Scott Schoettes	6.2	\$625.00	Prepare for oral argument
09/13/20	Scott Schoettes	6.4	\$625.00	Prepare for oral argument
09/14/20	Scott Schoettes	3.4	\$625.00	Appear for and argue motions for SJ; meet with client for debrief
09/15/20	Scott Schoettes	7.1	\$625.00	Fly home to Chicago from DC
09/16/20	Scott Schoettes	0.5	\$625.00	Team meeting to debrief on oral argument
<b>TOTAL</b>		<b>205.3</b>	<b>\$128,312.50</b>	
02/14/21	Scott Schoettes	0.9	\$625.00	Communicate with clients regarding the change in my employment and implications for the case.
<b>TOTAL</b>		<b>0.9</b>	<b>\$562.50</b>	
07/13/21	Scott Schoettes	0.5	\$625.00	Phone call with N. Harrison [Redacted]
07/14/21	Scott Schoettes	0.5	\$625.00	Team meeting regarding orders to agree on redactions and next steps in terms of potential appeal
08/18/21	Scott Schoettes	0.5	\$625.00	Team call re potential settlement demands
09/07/21	Scott Schoettes	0.3	\$625.00	Email team regarding communication with DOJ

10/06/21	Scott Schoettes	0.4	\$625.00	Text with Roe regarding Redacted
10/13/21	Scott Schoettes	0.7	\$625.00	Prep and participate in call with clients and the whole legal team regarding their desire to obtain the ruling on summary judgment or otherwise move things along.
10/21/21	Scott Schoettes	0.4	\$625.00	Email team regarding potential settlement
10/24/21	Scott Schoettes	0.5	\$625.00	Draft and obtain approval of email to R. Cutri-Kohart seeking a meeting to discuss settlement
10/25/21	Scott Schoettes	0.1	\$625.00	Text with Roe regarding lack Redacted
11/01/21	Scott Schoettes	0.3	\$625.00	Suggest to team that a video call would be preferable and offer to draft settlement demands
11/04/21	Scott Schoettes	0.4	\$625.00	Schedule meeting to discuss settlement with attendees
11/05/21	Scott Schoettes	1.2	\$625.00	Team call with plaintiffs regarding settlement; debrief with N. Harrison after meeting.
11/07/21	Scott Schoettes	1.9	\$625.00	Draft proposed list of asks in settlement discussions and send to team and clients; text with Roe Redacted; text with all three plaintiffs Redacted.
11/08/21	Scott Schoettes	1.1	\$625.00	Follow up with DOJ regarding meeting date/time; confer with N. Harrison and Roe via text Redacted
11/09/21	Scott Schoettes	0.5	\$625.00	Speak with N. Harrison Redacted; meet with team members participating in settlement discussions to discuss proposed asks and to strategize for call
11/10/21	Scott Schoettes	1.3	\$625.00	Correspond with Roe; lead call with DOJ to discuss potential settlement; short debrief with team
11/11/21	Scott Schoettes	0.3	\$625.00	Correspond with plaintiffs regarding Redacted
11/23/21	Scott Schoettes	0.2	\$625.00	Respond to Roe's inquiry Redacted
11/29/21	Scott Schoettes	0.4	\$625.00	Review response from DOJ to settlement demands; discuss proposed response via email
11/30/21	Scott Schoettes	0.8	\$625.00	Review and comment upon proposed response to DOJ; communicate with clients re above.
12/01/21	Scott Schoettes	0.4	\$625.00	Approve response; obtain sign-off to response from P. Perkowski.
12/03/21	Scott Schoettes	0.5	\$625.00	Further communication with N. Harrison re Redacted
12/06/21	Scott Schoettes	0.9	\$625.00	Check in with J. Harding regarding plan for submission of status update to court and request for a status conference
12/07/21	Scott Schoettes	0.3	\$625.00	Respond to A. Sommer's email regarding tempering expectations of the clients
12/22/21	Scott Schoettes	0.9	\$625.00	Review and comment upon status update for the Court and the request to hold a status conference; implement changes from two other reviewers; respond to inquiry from Roe Redacted.
12/23/21	Scott Schoettes	0.3	\$625.00	Provide additional information and sign-off on final version of request for a status conference
<b>TOTAL</b>		<b>15.6</b>	<b>\$9,750.00</b>	
01/09/22	Scott Schoettes	0.1	\$625.00	Respond to Roe's inquiry Redacted
01/26/22	Scott Schoettes	0.2	\$625.00	Respond to Roe's inquiry regarding Redacted
01/28/22	Scott Schoettes	0.2	\$625.00	Advise Roe Redacted
03/25/22	Scott Schoettes	0.5	\$625.00	Communicate with N. Harrison regarding Redacted
04/06/22	Scott Schoettes	1.8	\$625.00	Read and digest opinion; communicate results to clients; review P. Perkowski's proposed redactions

04/11/22	Scott Schoettes	0.3	\$625.00	Text with N. Harrison regarding Redacted
04/12/22	Scott Schoettes	0.5	\$625.00	Team meeting regarding orders to agree on redactions and next steps in terms of potential appeal
04/18/22	Scott Schoettes	0.2	\$625.00	Communicate with N. Harrison via email Redacted
04/19/22	Scott Schoettes	0.3	\$625.00	Comment upon and approve email to be sent to the Court re redactions
04/20/22	Scott Schoettes	1.2	\$625.00	Deal with potential redactions; have conversation with N. Harrison Redacted; communicate with N. Harrison regarding Redacted
04/21/22	Scott Schoettes	0.5	\$625.00	Review emails regarding eligibility for fees; send total time total for 2018-2021 to J. Harding.
04/26/22	Scott Schoettes	0.3	\$625.00	Review and approve email to DOJ regarding fees; suggest additional points to make.
04/27/22	Scott Schoettes		\$625.00	Review and suggest one small change to email response to DOJ's email.
04/29/22	Scott Schoettes	0.4	\$625.00	Review emails and analyze identified ambiguity in the Court's ruling; weigh in via email regarding appropriate course of action.
05/01/22	Scott Schoettes	0.2	\$625.00	Review and suggest minor changes to Joint Status Report
05/02/22	Scott Schoettes	0.1	\$625.00	Review DOJ response re motion to amend order and weigh in with team via email.
05/05/22	Scott Schoettes	0.4	\$625.00	Review and suggest changes to motion to clarify
05/06/22	Scott Schoettes	0.3	\$625.00	Research review Voe's current status within AF and send information to team.
05/12/22	Scott Schoettes	0.2	\$625.00	Review email from L. Gailey regarding G's time for appeal.
05/15/22	Scott Schoettes	0.9	\$625.00	Review email from N. Harrison Redacted; have call with N. Harrison Redacted.
05/20/22	Scott Schoettes	1.0	\$625.00	Prepare for and participate in meeting to prep for call with DOJ appellate counsel.
05/23/22	Scott Schoettes	0.6	\$625.00	Participate in call with S. Harrington (DOJ Appellate Division) and others re DOD's decision about appealing; advocate for them not to appeal; debrief with team.
05/31/22	Scott Schoettes	0.2	\$625.00	Review email from S. McGowan re response from DOJ to our requests to secure N. Harrison's commission.
06/03/22	Scott Schoettes		\$625.00	Review information conveyed by S. McGowan regarding DOJ's obligation to inform Congress of any decision it might make not to appeal a constitutional decision.
06/07/22	Scott Schoettes	1.3	\$625.00	Review emails regarding actions of DOJ on 503D letters; review and analyze memorandum from Sec. Austin changing the DODI's; review and respond to email N. Harrison sent Redacted.
06/08/22	Scott Schoettes	0.8	\$625.00	Call with client to discuss Redacted.
06/09/22	Scott Schoettes	0.6	\$625.00	Emails regarding DOJ's response regarding Nick's commission and our interactions with Nick about this.
06/10/22	Scott Schoettes	1.5	\$625.00	Email regarding potential settlement of Nick's commission and any effect on the availability of attorneys' fees; email team regarding deficiency in DOD's changes to the regulations.
06/15/22	Scott Schoettes	0.7	\$625.00	Confer via email with team regarding Redacted; speak with J. Harding re same.
06/16/22	Scott Schoettes	1.0	\$625.00	Email team re assessment of N. Harrison Redacted; email team re planned call with N. Harrison and need to address broader deficiencies in regulatory changes in any motion to enforce.
06/17/22	Scott Schoettes	0.5	\$625.00	Participate in call with N. Harrison.

06/20/22	Scott Schoettes	0.2	\$625.00	Review and approve email to DOJ regarding Nick's commission.
06/24/22	Scott Schoettes	0.5	\$625.00	Prepare for and participate in meet and confer with DOJ attorneys; raise broader concerns about compliance with the injunction; consult with C. Hendrix re "asymptomatic HIV" and its redundancy with an undetectable viral load.
06/30/22	Scott Schoettes	2.4	\$625.00	Review regulatory changes and draft letter to opposing counsel outlining changes required by the injunction and additional changes Plaintiffs' attorneys would like to discuss.
07/05/22	Scott Schoettes	1.5	\$625.00	Draft letter of recommendation for N. Harrison to commission
07/07/22	Scott Schoettes	0.0	\$625.00	Review and revise J. Harding's proposed email to DOJ attorneys regarding fees.
07/11/22	Scott Schoettes	0.3	\$625.00	Email team regarding difficulty N. Harrison is having putting together his renewed application in time to make the July accessions board and need to get him to re-enlist.
07/14/22	Scott Schoettes	0.2	\$625.00	Review and respond to L. Gailey's draft motion regarding timing of fee application.
07/19/22	Scott Schoettes	0.2	\$625.00	Review and suggest a change to motion re timing of fee petition.
07/20/22	Scott Schoettes	0.3	\$625.00	Email team regarding the lack of response from DOJ and Redacted
07/24/22	Scott Schoettes	0.2	\$625.00	Email J. Harding re latest email from N. Harrison.
07/25/22	Scott Schoettes	0.2	\$625.00	Email J. Abbuhl regarding lack of response to letter re deficiency in changes to regulations and to suggest we schedule a meet-and-confer
07/27/22	Scott Schoettes	0.2	\$625.00	Review emails regarding fee "negotiations" and Redacted
07/29/22	Scott Schoettes	0.7	\$625.00	Participate in meet-and-confer; debrief with K. Ingelhart and P. Perkowski; send email to team to debrief re same.
<b>TOTAL</b>		<b>23.7</b>	<b>\$14,812.50</b>	

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

RICHARD ROE, ET AL.,

PLAINTIFFS,

v.

MARK T. ESPER, ET AL.,  
DEFENDANTS.

CIVIL ACTION NO. 1:18-cv-01565

NICHOLAS HARRISON, ET AL.,

PLAINTIFFS,

v.

MARK T. ESPER, ET AL.,  
DEFENDANTS.

CIVIL ACTION NO. 1:18-CV-00641

**[PROPOSED] ORDER**

Plaintiffs' Motion for Attorney's Fees and Costs is hereby GRANTED. Defendants are ordered to pay attorneys' fees in the amount of \$\_\_\_\_\_ and costs in the amount of \$\_\_\_\_\_.

Entered this \_\_\_ day of \_\_\_\_\_, 2022

\_\_\_\_\_  
Leonie M. Brinkema  
United States District Judge