

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

DYLAN BRANDT, et al.,

PLAINTIFFS

v.

Case No. 4:21-CV-00450-JM

TIM GRIFFIN, et al.,

DEFENDANTS

PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS

Pursuant to Fed. R. Civ. P. 54(d) and Local Rule 54.1, Plaintiffs hereby move for an award of attorneys' fees and costs as authorized by 42 U.S.C. § 1988 for the following amounts:

- For the ACLU of Arkansas, attorneys' fees in the amount of \$10,123.75 and costs totaling \$402.00;
- For the law firm of Gill Ragon Owen, P.A., attorneys' fees in the amount of \$158,620.00;
- For the Law Office of Breean Walas, attorneys' fees in the amount of \$78,711.00;
- For the ACLU Foundation Inc., attorneys' fees in the amount of \$1,133,987.50 and costs totaling \$114,235.45; and
- For Sullivan & Cromwell LLP, attorneys' fees in the amount of \$1,873,337.50 (and payable to the ACLU Foundation Inc. and ACLU of Arkansas) and costs totaling \$192,585.64.

For the reasons set forth in Plaintiffs' *Brief in Support*, this *Motion* should be granted.

WHEREFORE, Plaintiffs respectfully request the Court grant the *Motion* and award Plaintiffs attorneys' fees and costs for the above-listed amounts.

Dated: September 20, 2023

Respectfully submitted,

Leslie Cooper

Leslie Cooper
Chase Strangio*
James Esseks*
Li Nowlin-Sohl*
American Civil Liberties Union Foundation
125 Broad St.
New York, NY 10004
Telephone: (917) 345-1742
lcooper@aclu.org
cstrangio@aclu.org
jesseks@aclu.org
lnowlin-sohl@aclu.org
Attorneys for the Plaintiffs

Beth Echols, Ark. Bar No. 2002203
Christopher Travis, Ark. Bar No. 97093
Drake Mann, Ark. Bar No. 87108
Gill Ragon Owen, P.A.
425 W. Capitol Avenue, Suite 3800
Little Rock, AR 72201
Telephone: (501) 376-3800
echols@gill-law.com
travis@gill-law.com
mann@gill-law.com
*On behalf of the Arkansas Civil Liberties Union
Foundation, Inc.*
Attorneys for the Plaintiffs

Garrard R. Beeney*
Lauren M. Goldsmith*
Alexander S. Holland*
Maxime D. Matthew*
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
beeneyg@sullcrom.com
goldsmithl@sullcrom.com
hollanda@sullcrom.com
matthewm@sullcrom.com
Attorneys for the Plaintiffs

Sarah Everett, Ark. Bar No. 2017249
Arkansas Civil Liberties Union Foundation,
Inc.
904 W. 2nd Street
Little Rock, AR 72201
Telephone: (501) 374-2842
sarah@acluarkansas.org
Attorney for the Plaintiffs

Daniel J. Richardson*
Sullivan & Cromwell LLP
1700 New York Avenue, N.W.
Suite 700
Washington, D.C. 20006
Telephone: 202-956-7500
richardsond@sullcrom.com
Attorney for the Plaintiffs

Laura Kabler Oswell*
Aviv S. Halpern*
Sullivan & Cromwell LLP
550 Hamilton Avenue
Palo Alto, CA 94301
Telephone: (650) 461-5600
oswelll@sullcrom.com
halperna@sullcrom.com
Attorneys for the Plaintiffs

**Admitted pro hac vice*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing was filed electronically with the Clerk of the Court on September 20, 2023 using the CM/ECF system, which shall send notification to any participants including:

Tim Griffin
tim.griffin@arkansasag.gov
Nicholas J. Bronni
nicholas.bronni@arkansasag.gov
Dylan Jacobs
dylan.jacobs@arkansasag.gov
Michael A. Cantrell
michael.cantrell@arkansasag.gov

Office of the Arkansas Attorney General
323 Center Street, Suite 200
Little Rock, Arkansas 72201
(501) 682-2007

Leslie Cooper

Leslie Cooper

**THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

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DYLAN BRANDT, et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Case No. 4:21-CV-00450-JM
	:	
TIM GRIFFIN, et al.,	:	
	:	
Defendants.	:	
	:	
-----	X	

**BRIEF IN SUPPORT OF PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES AND COSTS**

Pursuant to Fed. R. Civ. P. 54(d) and Local Rule 54.1, Plaintiffs request an award of attorneys' fees and costs as authorized by 42 U.S.C. § 1988. The amounts requested are as follows:

For the ACLU of Arkansas, attorneys' fees in the amount of \$10,123.75 and costs in the amount of \$402, as supported by the Declaration of Sarah Everett ("Everett Decl.") attached as Exhibit 3;

For the law firm of Gill Ragon Owen, P.A., attorneys' fees in the amount of \$158,620.00, as supported by the Declarations of Beth Echols ("Echols Decl."), Drake Mann ("Mann Decl."), and Christopher Travis ("Travis Decl.") attached as Exhibits 4-6;

For the Walas Law Firm, attorneys' fees in the amount of \$78,711.00, as supported by the Declaration of Breean Walas ("Walas Decl.") attached as Exhibit 7;

For the ACLU Foundation Inc. ("ACLU National"), attorneys' fees in the amount of \$1,133,987.50 and costs totaling \$114,235.45, as supported by the Declaration of Leslie Cooper ("Cooper Decl.") attached as Exhibit 8;

For Sullivan & Cromwell LLP (“Sullivan & Cromwell” or “S&C”), attorneys’ fees in the amount of \$1,873,337.50 (and payable to the ACLU Foundation Inc. and the ACLU of Arkansas) and costs totaling \$192,585.64, as supported by the Declaration of Laura Kabler Oswell (“Oswell Decl.”) attached as Exhibit 9.¹

BACKGROUND AND PROCEDURAL HISTORY

On April 6, 2021, the Arkansas General Assembly passed, over the veto of Governor Asa Hutchinson, a law prohibiting doctors from providing “gender transition procedures” to minors. The law, which was codified at Ark. Code Ann. §§ 20-9-1501 to 20-9-1504 and 23-79-164 (the “Healthcare Ban”), was set to take effect on July 28, 2021.

Because of the imminent effective date of the law, Plaintiffs quickly mounted a lawsuit to challenge it and filed a complaint on May 25, 2021. Plaintiffs included three adolescents who were already receiving medical care prohibited by the law, a minor who anticipated needing care prohibited by the law, parents of all four Minor Plaintiffs, and a doctor who was providing care prohibited by the law. Plaintiffs brought federal constitutional claims under the Equal Protection Clause, the Due Process Clause, and the right to free speech protected by the First Amendment.

Plaintiffs moved for a preliminary injunction on June 15, 2021, asking the Court to enjoin the law before it was set to take effect. Plaintiffs’ motion included declarations of two expert witnesses—a pediatric endocrinologist and a medical ethicist—in addition to Plaintiffs’ declarations. Defendants responded to the motion with declarations from four expert witnesses that totaled nearly 300 pages, five fact declarations, and over 600 additional pages of exhibits. Plaintiffs filed a reply including rebuttal declarations from their original two experts and from an

¹ From the inception of this case, S&C agreed to donate all of its fees recovered to ACLU Foundation Inc. and the ACLU of Arkansas after it recovers its costs. Ex. 9 (Oswell Decl.) ¶ 5.

additional expert, a psychiatrist. Defendants then filed supplemental declarations from three of their expert witnesses.

On June 16, 2021, Defendants filed a motion to dismiss for lack of jurisdiction and failure to state a claim. Plaintiffs submitted a brief in response.

On June 21, 2021, after hearing oral argument on Plaintiffs' motion for a preliminary injunction and Defendants' motion to dismiss, the Court issued an order denying the motion to dismiss and granting the preliminary injunction, enjoining the enforcement of the Healthcare Ban.

Defendants appealed the order granting the preliminary injunction. The parties briefed the appeal and presented arguments to the Court of Appeals for the Eighth Circuit. The court affirmed the preliminary injunction on August 25, 2022.

On October 6, 2022, less than two weeks before trial on the merits was scheduled to begin, Defendants filed a petition for rehearing en banc with the Eighth Circuit. Plaintiffs filed a brief in opposition to the petition and, on November 16, 2022, the petition was denied.

While the case on the merits proceeded in this Court, the parties engaged in substantial discovery. Plaintiffs deposed Defendants' four expert witnesses, three of Defendants' fact witnesses (two people who received gender-affirming medical care before later detransitioning and a psychiatrist who had treated transgender adolescent patients for conditions other than their gender dysphoria), a 30(b)(6) witness for Defendant Arkansas State Medical Board, Defendant Dr. Rhys Branman (a member of the Arkansas State Medical Board), and third-party witness Rep. Robin Lundstrum (a lead sponsor of the bill). Defendants deposed Plaintiffs' four experts and three third-party witnesses (two doctors and one therapist who treat adolescents with gender dysphoria in Arkansas).

The State and certain third-party witnesses resisted discovery sought by Plaintiffs. Plaintiffs filed motions to compel the production of documents requested from Defendant Attorney General Rutledge and subpoenaed documents from state legislators. After briefing the motions, the Court granted Plaintiffs' motions in part. Plaintiffs also had to oppose motions to quash their notice of deposition of Defendant Dr. Branman and their subpoena for deposition of Rep. Lundstrum. The Court denied both motions, and Plaintiffs took these depositions.

Additionally, Defendants filed a motion in limine seeking to preclude Plaintiffs from, among other things, submitting evidence of any Defendants' or witnesses' personal beliefs about transgender people. Plaintiffs filed a brief in opposition to the motion, and the Court denied that request.

Prior to trial, Plaintiffs moved to exclude the expert testimony of two of Defendants' expert witnesses—Dr. Patrick Lappert and Professor Mark Regnerus—on the ground that they lacked the qualifications to offer expert testimony about gender dysphoria or the efficacy of medical treatments for gender dysphoria. The Court denied the motions but ruled that “the Court will consider Dr. Lappert’s qualification to testify as an expert on a question-by-question basis.” (Order Denying Motions to Exclude, dated Aug. 30, 2022 (ECF 195, at 3)). While the Court denied Plaintiffs' motion to exclude regarding Professor Regnerus's testimony, it ultimately held that “he lacks the qualifications to offer his opinions and failed to support them.” *Brandt v. Rutledge*, No. 4:21CV00450 JM, 2023 WL 4073727, at *28 (E.D. Ark. June 20, 2023).

The parties submitted pretrial briefs, and trial on the merits commenced on October 17, 2022. The trial spanned eight days and was completed on December 1, 2022. Plaintiffs presented the testimony of their four expert witnesses, the doctor plaintiff, another doctor who previously treated patients at Arkansas Children's Hospital Gender Clinic, four of the Parent Plaintiffs, and

one of the Minor Plaintiffs. Plaintiffs also submitted deposition designations for the 30(b)(6) deposition of the Arkansas State Medical Board, the deposition of Defendant Dr. Branman, and the deposition of Rep. Lundstrum.

At trial, Defendants presented the testimony of four expert witnesses, but after voir dire demonstrating their lack of experience related to the treatment of gender dysphoria, the Court limited the testimony of Dr. Lappert and Professor Regnerus on that basis, and in the case of Professor Regnerus, because his testimony was irrelevant. (Tr. 6 at 1013:7-18:4, 1058:4-61:9, 1067:10-14). Defendants also presented testimony from their fact witnesses—the two individuals who had detransitioned, the psychiatrist who had transgender adolescent patients, and the two doctors and one therapist who treat adolescents with gender dysphoria in Arkansas whom Defendants subpoenaed.

After trial, the parties submitted post-trial briefs and proposed findings of fact. Given the extensive factual record, Plaintiffs proposed over 400 findings of fact.

On June 20, 2023, after making over 300 findings of fact, the Court issued an 80-page opinion that held HB 1570 violated Plaintiffs’ constitutional rights under the Equal Protection Clause, the Due Process Clause, and the First Amendment, and permanently enjoined the enforcement of the Healthcare Ban.

APPLICABLE STANDARD

The Civil Rights Attorneys Fees Awards Act of 1976, 42 U.S.C. § 1988(b), provides: “In any action or proceeding to enforce a provision of sections 1981, 1981a, 1982, 1983, 1985, and 1986 of this title . . . , the court, in its discretion, may allow the prevailing party . . . a reasonable attorney’s fee as part of the costs” Congress enacted section 1988 to encourage private litigation of civil rights claims. “When a plaintiff succeeds in remedying a civil rights violation . . . he serves ‘as a ‘private attorney general,’ vindicating a policy that Congress considered of the

highest priority.” *Fox v. Vice*, 563 U.S. 826, 833 (2011) (quoting *Newman v. Piggie Park Enter., Inc.*, 390 U.S. 400, 402 (1968) (*per curiam*)). Awarding attorneys’ fees to prevailing civil rights plaintiffs “at once reimburses a plaintiff for ‘what it cos[t] [him] to vindicate [civil] rights,’ . . . and holds to account ‘a violator of federal law.’” *Id.* (citations omitted). Because such litigation advances important civil rights, a prevailing plaintiff “‘should ordinarily recover an attorney’s fee’ from the defendant.” *Id.* (citation omitted). Fees should be awarded to a prevailing party “unless special circumstances would render such an award unjust.” *Newman*, 390 U.S. at 402; *see also Williams v. Miller*, 620 F.2d 199, 202 (8th Cir. 1980).

ARGUMENT

I. PLAINTIFFS ARE THE “PREVAILING PARTIES.”

A prevailing party is one that succeeds “on any significant issue in litigation which achieves some of the benefit the parties sought in bringing suit.” *Farrar v. Hobby*, 506 U.S. 103, 109 (1992) (citation omitted and internal quotations omitted). “Where a plaintiff has obtained excellent results, his attorney should recover a fully compensatory fee.” *Hensley v. Eckerhart*, 461 U.S. 424, 435 (1983).

In this case, Plaintiffs prevailed on all of their claims and received the precise relief they sought—the Healthcare Ban has been permanently enjoined. Had the Healthcare Ban taken effect in July 2021, Plaintiffs Dylan Brandt, Parker Saxton, and Sabrina Jennen—and countless other transgender adolescents in Arkansas—would have been forced to discontinue medical care that they, their parents, and their doctors all agreed was medically necessary for them and has significantly benefitted their health and well-being, or leave the state to continue receiving that care. *See Brandt*, 2023 WL 4073727, at *3-5, *12-16, *18, *24-25, *32-33. And Plaintiff Brooke Dennis and other transgender youth who have not yet started puberty would have had the stress of knowing that gender-affirming medical care would not be available to them in their home state

when they need it. *Id.* at *16. Because of Plaintiffs’ success in this litigation, Dylan, Parker, and Sabrina have been able to continue receiving care, Brooke knows care remains available, and these youth and their families have been able to remain in their homes and communities in Arkansas.

II. THE FEES REQUESTED BY PLAINTIFFS ARE REASONABLE.

The starting point for determining an appropriate fee award is to multiply the number of hours reasonably expended on the case by a reasonable hourly rate. *Hensley*, 461 U.S. at 433; *Hanig v. Lee*, 415 F.3d 822, 825 (8th Cir. 2005) (citation omitted). A fee determined by this “lodestar” method is entitled to a “‘strong presumption’ that [it] represents the ‘reasonable’ fee.” *City of Burlington v. Dague*, 505 U.S. 557, 562 (1992) (citation omitted); *see also Perdue v. Kenny A.*, 559 U.S. 542, 552 (2010). Degree of success is “[t]he most critical factor” in setting an appropriate fee award. *Fish v. St. Cloud State Univ.*, 295 F.3d 849, 852 (8th Cir. 2002); *Hensley*, 461 U.S. at 440. A reasonable hourly rate is usually the ordinary rate for similar work in the local community, but, as discussed in section II(B), in some circumstances, a national market rate is appropriate.

A summary of the hours reasonably expended for which reimbursement is sought, the rates, and the total reimbursement sought, by attorney, is represented in the table below.

ATTORNEY	RATE	HOURS	TOTAL
Sarah Everett (ACLU of Arkansas)	\$175 (Ark. rate)	57.85	\$10,123.75
Breean Walas (Walas Law Firm)	\$300 (Ark. rate)	262.37	\$78,711.00
Beth Echols (Gill Ragon Owen)	\$250 (Ark. rate)	243.6	\$60,900.00
Christopher Travis (Gill Ragon Owen)	\$295 / \$325 (Ark. rate)	165.7	\$49,046.50
Drake Mann (Gill Ragon Owen)	\$295 / \$325 (Ark. rate)	164.7	\$48,673.50
Leslie Cooper (ACLU National)	\$750 (national rate)	891.37	\$668,527.50

ATTORNEY	RATE	HOURS	TOTAL
Chase Strangio (ACLU National)	\$600 (national rate)	498	\$298,800.00
Li Nowlin-Sohl (ACLU National)	\$500 (national rate)	121	\$60,500.00
James Esseks (ACLU National)	\$800 (national rate)	132.7	\$106,160.00
Garrard Beeney (S&C)	\$800 (national rate)	89.25	\$71,400.00
Laura Kabler Oswell (S&C)	\$650 (national rate)	237.25	\$154,212.50
Lauren Goldsmith (S&C)	\$550 (national rate)	488.75	\$268,812.50
Arun Bodapati (S&C)	\$450 (national rate)	756.5	\$340,425.00
Daniel Richardson (S&C)	\$430 (national rate)	453.75	\$195,112.50
Aviv Halpern (S&C)	\$400 (national rate)	871.75	\$348,700.00
Duncan Simpson LaGoy (S&C)	\$225 (Ark. rate)	473.5	\$106,537.50
Jonathan Ossip (S&C)	\$200 (Ark. rate)	518.25	\$103,650.00
Alexander Peacocke (S&C)	\$200 (Ark. rate)	259.5	\$51,900.00
Brandyn Rodgerson (S&C)	\$175 (Ark. rate)	537.25	\$94,018.75
Jonathan Lester (S&C)	\$175 (Ark. rate)	294.75	\$51,581.25
Maxime Matthew (S&C)	\$175 (Ark. rate)	170.5	\$29,837.50
Cate Llewellyn (S&C paralegal)	\$100 (Ark. rate)	268.25	\$26,825.00
Kenza Nadifi (S&C paralegal)	\$100 (Ark. rate)	303.25	\$30,325.00
Grand Total		8259.79	\$3,254,779.75

A. The Total Number of Hours Is Reasonable.

The novelty and complexity of the case and the sheer amount of work required to properly litigate it necessitated multiple attorneys expending significant hours of their time. This case involved a constitutional challenge to a state law prohibiting gender-affirming medical care to

minors. Because the Arkansas law being challenged was the first law of its kind in the United States, the case presented novel issues of first impression and required counsel to develop their case—both their legal arguments and the extensive factual record—from scratch without any other cases to draw from.

Counsel had to brief complex constitutional issues at multiple stages of the proceedings. And the case turned significantly on extensive expert testimony about medical issues, including the diagnosis and treatment of gender dysphoria in adolescents and the broader context of medical research and medical decision-making.

Because expert testimony was critical to the resolution of the case, Plaintiffs’ counsel spent many hours identifying potential expert witnesses, working with those experts to submit expert declarations and reports explaining why the Healthcare Ban does not protect children—and actually does just the opposite—and refuting the numerous assertions offered by Defendants’ four expert witnesses. Preparation for the depositions of Defendants’ four expert witnesses required numerous hours of work, including reviewing their experience, their publications, and their many prior statements about the issues involved in the case.

Plaintiffs also needed to engage in significant fact discovery, both through document requests and through depositions of the fact witnesses.

Several litigation decisions made by Defendants required Plaintiffs’ counsel to spend many unnecessary hours.

- Two of Defendants’ expert witnesses—Dr. Lappert and Professor Regnerus—had no experience relevant to the issues before the Court. The Court ultimately prohibited them from offering the testimony that was outside of their expertise, and the testimony they did offer had no bearing on the case and was not relied on by the Court. The Court ultimately

held that Professor Regnerus “lacks the qualifications to offer his opinions and failed to support them.” *Brandt*, 2023 WL 4073727, at *28. Nevertheless, Plaintiffs’ counsel were required to expend significant time reviewing these witnesses’ expert declarations and reports, preparing for and taking their depositions, and preparing for and conducting their cross-examinations at trial.

- Defendants petitioned the Eighth Circuit for rehearing en banc in their appeal of the preliminary injunction even though the trial on the merits was set to begin within weeks and the appeal would be mooted by a decision on the merits. Plaintiffs were required to expend substantial time preparing a response to Defendants’ petition, which was denied. *See Brandt v. Rutledge*, No. 21-2875, 2022 WL 16957734, at *1 (8th Cir. Nov. 16, 2022) (Colloton, J., concurring in the denial of rehearing en banc) (noting “this case is not appropriate for rehearing en banc in its current procedural posture” because it is “in the midst of a trial” and the appeal of the preliminary injunction will be moot).
- Defendants needlessly compounded discovery by providing a 30(b)(6) witness, Amy Embry, who was unprepared to answer questions on certain noticed topics, necessitating motion practice, and ultimately the deposition of an additional 30(b)(6) witness, Dr. Branman.
- Defendants filed motions in limine to prohibit Plaintiffs from questioning certain witnesses regarding their personal beliefs about transgender people even though this case included an equal protection claim alleging unjustified unequal treatment of transgender people and, Plaintiffs argued, among other things, that the law was motivated by animus. Defendants’ motions required Plaintiffs’ counsel to expend time drafting responses to those motions. Those motions were denied by the Court.

- Defendants unreasonably refused to agree to *any* of Plaintiffs’ proposed stipulations before trial, including stipulations as uncontroversial as the ages of Minor Plaintiffs. (*See* Tr. 3 at 507:5-09:25).
- After Plaintiffs rested on the afternoon of the third day of trial, Defendants were unprepared to proceed with their case, refusing to put on even three local witnesses who were available. If Defendants had not wasted nearly two full trial days, Plaintiffs believe that the trial could have concluded in fewer trial days, as the Court intended. (*See* Tr. 1 at 10:20-24).

The S&C attorneys did not all work on the case at the same time; several of them left the firm partway through the litigation and others joined the team to replace departing lawyers. Additionally, in an exercise of billing discretion, Sullivan & Cromwell is seeking reimbursement only for the work of a subset of attorneys and other non-attorney staff who worked on the case. They are not seeking reimbursement for any of the time of numerous attorneys and support staff who devoted time to the case. Ex. 9 (Oswell Decl.) ¶¶ 41-43.

Multiple attorneys in civil rights litigation is common. And as discussed above, a large team of attorneys was necessary to litigate this case given the complexity of the issues, the number of witnesses involved, the breadth of the expert testimony, and Defendants’ litigation decisions. *See, e.g., Bourke v. Beshear*, No. 13-CV-00750-CRS, 2016 WL 164626, at *1, *3 (W.D. Ky. Jan. 13, 2016) (ultimately awarding fees for nine attorneys); *Large v. Fremont Cnty.*, No. 05-CV-0270, 2013 WL 12342417, at *6-8 (D. Wyo. Sept. 20, 2013) (awarding fees to seven attorneys and four paralegals and rejecting objections that multiple attorneys reviewed documents and more than one attorney was present at depositions, reasoning that “[t]he complexity of this case justifies collaboration by all counsel on matters of great importance”).

The time expended to achieve the results in this case was reasonable. Work was divided among the attorneys, each taking specific responsibilities for the tasks at hand. To the extent that there is overlap in the hours expended by counsel for which they are seeking reimbursement, it was only as necessary. Ex. 8 (Cooper Decl.) ¶¶ 44-55; Ex. 9 (Oswell Decl.) ¶ 67.

Counsel also removed many other hours of work from their request for reimbursement, including:

- Time onboarding new members of the Sullivan & Cromwell team;
- Non-productive travel time for out-of-state attorneys to come to Arkansas for court proceedings;
- The many hours Sullivan & Cromwell's attorneys spent on internal weekly associate team calls, which were critical for developing litigation strategy, coordinating the team's various workstreams, and delivering high-caliber work product;
- ACLU National attorneys and S&C attorneys' time on weekly calls with co-counsel and other calls with the full team, with the exception of certain senior Sullivan & Cromwell lawyers who generally did not work on the matter at the same time;
- Time related to media communications;
- Time assigning work to or reviewing the work of summer associates;
- Somewhat ministerial tasks performed by lawyers;
- Work driven by Sullivan & Cromwell lawyers' being barred in jurisdictions outside Arkansas (*e.g.*, *pro hac vice* admissions); and
- Work done by Sullivan & Cromwell after February 1, 2023, including work spent by attorneys pursuing Plaintiffs' fees claim, which are recoverable. *Jones v. MacMillan Bloedel Containers, Inc.*, 685 F.2d 236, 239 (8th Cir. 1982).

Between the exclusion of time spent by numerous Sullivan & Cromwell attorneys and other staff, the exclusion of the above categories of time, and billing discretion to remove additional time, Plaintiffs present this Court with a petition that excludes thousands of hours spent by attorneys and non-attorney support staff. Ex. 3 (Everett Decl.) Decl. ¶ 3; Ex. 8 (Cooper Decl.) ¶¶ 53-55; Ex. 9 (Oswell Decl.) ¶¶ 8-12, 42.

The single most critical issue in determining the reasonableness of a fee award is the degree of success. *Fish*, 295 F.3d at 852. Here, Plaintiffs prevailed on the merits of all of their claims despite a strenuous challenge from Defendants and secured full and complete relief for Plaintiffs and all transgender youth in Arkansas who currently need or will need medical care that would have been prohibited by the Healthcare Ban. This success should be taken into account in assessing the reasonableness of the number of hours for which Plaintiffs seek reimbursement.

B. The Requested Rates Are Reasonable.

The lodestar is normally calculated based on “prevailing market rates.” *Blum v. Stenson*, 465 U.S. 886, 895 (1984); *see also Emery v. Hunt*, 272 F.3d 1042, 1048 (8th Cir. 2001) (finding that “[a] reasonable hourly rate is usually the ordinary rate for similar work in the community where the case has been litigated”). While a reasonable hourly rate is usually the ordinary rate for similar work in the local community, in certain instances involving complex issues, a “national market or a market for a particular legal specialization may provide the appropriate market” and attorneys’ out-of-state rates may be granted. *Casey v. City of Cabool*, 12 F.3d 799, 805 (8th Cir. 1993). *See also id.* (“To limit rates to those prevailing in a local community might have the effect of limiting civil rights enforcement to those communities where the rates are sufficient to attract experienced counsel. Civil rights would be more meaningful, then, in those communities (large cities) where experienced attorneys can command their customary fees. This result would be in direct contravention of the purpose of diffuse enforcement through the ‘private attorneys general’

concept.”) (internal citations omitted); *Libertarian Party of S.D. v. Krebs*, No. CIV 15-4111, 2018 WL 4762966, at *3 (D.S.D. Oct. 2, 2018) (awarding out-of-state rates of \$500 per hour for litigation from 2016).

Here, the litigation involved complex legal issues and scientific evidence and, thus, required out-of-state attorneys who have experience with these legal and scientific issues and the capacity to take on a case of this magnitude. Holly Dickson, Executive Director of the ACLU of Arkansas, stated in her declaration that, after 15 years building litigation teams at the ACLU of Arkansas and given her strong familiarity with the legal community in Arkansas, she knew she “would not be able find an Arkansas law firm that would have the capacity to shoulder on its own such a complex, labor-intensive case on the timetable under which we needed to proceed.” Ex. 1 Declaration of Holly Dickson (“Dickson Decl.”) ¶ 6. Moreover, she explained, “[t]he complex constitutional and factual issues involved in this case – the first of its kind to be tried in the United States – required the significant staffing and other resources of a multinational firm as well as the specialized expertise of our ACLU National attorneys who have experience litigating issues related to access to gender-affirming medical care.” *Id.* at ¶ 7. Beth Echols of Gill Ragon Owen stated in her declaration that “[t]he success of this litigation depended on the expertise of attorneys with the national office of the ACLU as well as the resources and support of attorneys from Sullivan & Cromwell.” Ex. 4 (Echols Decl.) ¶ 1.

ACLU National attorneys Leslie Cooper, Chase Strangio, Li Nowlin-Sohl, and James Esseks bring extensive experience in constitutional litigation concerning access to gender-affirming medical care for individuals with gender dysphoria. Ex. 8 (Cooper Decl.) ¶¶ 7, 19, 29, 36. Sullivan & Cromwell attorneys Garrard Beeney, Laura Kabler Oswell, Lauren Goldsmith, Arun Bodapati, Daniel Richardson, and Aviv Halpern all have complex commercial

litigation, appellate, and/or trial experience and serve a diverse range of clients, including pro bono clients. They each brought their respective backgrounds and expertise to the matter. Ex. 9 (Oswell Decl.) ¶¶ 18, 22-23, 27-29. While Sullivan & Cromwell’s team included several additional lawyers, Plaintiffs are seeking national rates only for this subset of their team. *Id.* at ¶ 38.

C. Plaintiffs Are Entitled to Their Counsel’s Claimed Hourly Rates.

The ACLU of Arkansas’s Sarah Everett’s requested rate of \$175, Breean Walas’s requested rate of \$300, Beth Echols’s requested rate of \$250, Christopher Travis’s requested rates of \$295 and \$325, and Drake Mann’s requested rates of \$295 and \$325 are reasonable for their level of experience in Arkansas. Ex. 2 Declaration of John Burnett (“Burnett Decl.”) ¶ 3-5; Ex. 3 (Everett Decl.) ¶ 4; Ex. 4 (Echols Decl.) ¶ 4; Ex. 5 (Mann Decl.) ¶ 4; Ex. 6 (Travis Decl.) ¶ 4; Ex. 7 (Walas Decl.) ¶ 4. The ACLU National attorneys Leslie Cooper, Chase Strangio, and James Esseks seek compensation at rates at which civil rights lawyers in their home jurisdictions have been awarded attorneys’ fees by federal courts. The rate of \$750 requested by Ms. Cooper, the rate of \$600 requested by Mr. Strangio, and the rate of \$800 requested by Mr. Esseks are equal to, if not lower than, rates charged by—and awarded to—attorneys possessing comparable years of experience in New York where they work. Declaration of Anne Clark (“Clark Decl.”) ¶¶ 7-11. Seven years ago, a federal district court in Kentucky awarded a rate of \$700 for Mr. Esseks and \$325 for Mr. Strangio. *Bourke*, 2016 WL 164626, at *6. Ex. 8 (Cooper Decl.) ¶¶ 57, 59. The rate of \$500 requested by ACLU National’s Ms. Nowlin-Sohl is reasonable in the Seattle market where she practices. Two years ago, a federal district court in Washington State found her then-hourly rate of \$400 to be reasonable when awarding attorneys’ fees. *See Black Lives Matter Seattle-King Cnty. v. City of Seattle*, 516 F. Supp. 3d 1202, 1213 (W.D. Wash. 2021). Last year, the Federal Bureau of Prisons agreed to a rate of \$500 for Ms. Nowlin-Sohl in calculating attorneys’ fees as part of a settlement. Ex. 8 (Cooper Decl.) ¶ 58.

S&C attorneys Garrard Beeney, Laura Kabler Oswell, Lauren Goldsmith, Arun Bodapati, Daniel Richardson, and Aviv Halpern are seeking rates that are consistent with reasonable rates for civil rights litigators in New York, which are substantially lower than the rates they charge to commercial clients and the rates that have been awarded to S&C attorneys by courts. Oswell Decl. ¶¶ 7-12; Clark Decl. ¶¶ 6-11. Mr. Beeney is seeking a rate of \$800; Ms. Oswell is seeking a rate of \$650; Ms. Goldsmith is seeking a rate of \$550; Mr. Bodapati is seeking a rate of \$450; Mr. Richardson is seeking a rate of \$430; and Mr. Halpern is seeking a rate of \$400. The remaining S&C attorneys are requesting rates that would be considered reasonable for attorneys of their levels of experience in Arkansas. Ex. 2 (Burnett Decl.) ¶¶3-5; Ex. 3 (Everett Decl.) ¶ 4; Ex. 4 (Echols Decl.) ¶ 4; Ex. 5 (Mann Decl.) Decl. ¶ 4; Ex. 6 (Travis Decl.) ¶ 4; Ex. 9 (Oswell Decl.) ¶ 38.

III. PLAINTIFFS ARE ENTITLED TO RECOVER THEIR EXPENSES.

Pursuant to Rule 54(d) and § 1988, Plaintiffs seek to recover their expenses totaling \$307,223.09. 28 U.S.C. § 1920 specifically enumerates that the following costs, among others, may be recovered by the prevailing party: the filing fee, fees for transcripts necessary for use in the case, and fees for making copies when the copies are necessary for use in the case. 28 U.S.C. § 1821 provides that witnesses are provided a fee of \$40 per day and reimbursement of their travel expenses as well as subsistence expenses up to the maximum per diem allowance prescribed by the Administrator of General Service.² Federal Rule of Civil Procedure 54(d) has been interpreted as creating a presumption that costs are to be awarded to the prevailing party. *Delta Airlines, Inc. v. August*, 450 U.S. 346, 352 (1981); *Martin v. DaimlerChrysler Corp.*, 251 F.3d 691, 696 (8th Cir. 2001).

² The per diem allowance in Little Rock is \$96 per night for hotels and \$59 per day for meals. *FY 2022 Per Diem Rates for Little Rock, Arkansas*, U.S. GEN. SERVS. ADMIN. (Oct. 14, 2022), https://www.gsa.gov/travel/plan-book/per-diem-rates/per-diem-rates-results?action=perdiems_report&fiscal_year=2022&city=little%20rock&state=AR&zip=.

Attached as Exhibit C to the Oswell Declaration (Ex. 9) is an itemized list of Sullivan & Cromwell's expenses. They include filing fees, fees for court reporters, fees for court transcripts, and travel expenses for attorneys to attend depositions and hearings. It does not include various expenses incurred by the Firm in connection with the Action. For example, the Motion does not seek costs for any transportation to or from S&C's offices or any meals (*i.e.*, weekend or evening transportation or meals) other than in connection with travel to Arkansas relating to the Action. The total expenses for which S&C seeks recovery is \$192,585.64.

Attached as Exhibit E to the Cooper Declaration (Ex. 8) is an itemized list of ACLU National's expenses. They include costs for court reporters, travel expenses for attorneys to attend depositions and court hearings, travel expenses for trial witnesses, and copying and mailing. The total expenses for which ACLU National seeks recovery is \$114,235.45.

All expenses claimed by Plaintiffs are the types of expenses typically billed to a fee-paying client and are therefore recoverable. *See Pinkham v. Camex, Inc.*, 84 F.3d 292, 294-95 (8th Cir. 1996) ("[R]easonable out-of-pocket expenses of the kind normally charged to clients by attorneys . . . [should be] included as part of the reasonable attorney's fees awarded.").

CONCLUSION

For the reasons explained above, Plaintiffs respectfully request an award of their attorneys' fees and expenses.

Dated: September 20, 2023

Respectfully submitted,

Leslie Cooper

Leslie Cooper
Chase Strangio*
James Esseks*
Li Nowlin-Sohl*
American Civil Liberties Union Foundation
125 Broad St.
New York, NY 10004
Telephone: (917) 345-1742

Beth Echols, Ark. Bar No. 2002203
Christopher Travis, Ark. Bar No. 97093
Drake Mann, Ark. Bar No. 87108
Gill Ragon Owen, P.A.
425 W. Capitol Avenue, Suite 3800
Little Rock, AR 72201
Telephone: (501) 376-3800
echols@gill-law.com

lcooper@aclu.org
cstrangio@aclu.org
jesseks@aclu.org
lnowlin-sohl@aclu.org
Attorneys for the Plaintiffs

Garrard R. Beeney*
Lauren M. Goldsmith*
Alexander S. Holland*
Maxime D. Matthew*
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
beeneyg@sullcrom.com
goldsmithl@sullcrom.com
hollandanda@sullcrom.com
matthewm@sullcrom.com
Attorneys for the Plaintiffs

Daniel J. Richardson*
Sullivan & Cromwell LLP
1700 New York Avenue, N.W.
Suite 700
Washington, D.C. 20006
Telephone: 202-956-7500
richardsond@sullcrom.com
Attorney for the Plaintiffs

travis@gill-law.com
mann@gill-law.com
*On behalf of the Arkansas Civil Liberties Union
Foundation, Inc.
Attorneys for the Plaintiffs*

Sarah Everett, Ark. Bar No. 2017249
Arkansas Civil Liberties Union Foundation,
Inc.
904 W. 2nd Street
Little Rock, AR 72201
Telephone: (501) 374-2842
sarah@acluarkansas.org
Attorney for the Plaintiffs

Laura Kabler Oswell*
Aviv S. Halpern*
Sullivan & Cromwell LLP
550 Hamilton Avenue
Palo Alto, CA 94301
Telephone: (650) 461-5600
oswellll@sullcrom.com
halperna@sullcrom.com
Attorneys for the Plaintiffs

**Admitted pro hac vice*

Exhibit 1

Declaration of Holly Dickson

Holly Dickson declares as follows:

1. I serve as the Executive Director of the American Civil Liberties Union (“ACLU”) of Arkansas. I provided legal and other support to counsel and plaintiffs in the matter of Brandt et al vs. Griffin et al, 4:21-cv-00450-JM.

2. I graduated with honors from the University of Arkansas at Little Rock / William H. Bowen School of Law in 1998 where I served as an assistant editor of the law journal and I have been licensed to and actively practicing law in Arkansas since August of 1998. From 1998 through 2006, I was in private practice in Little Rock, Arkansas, and concentrated my practice almost entirely in the areas of employment discrimination and civil rights. I have been on staff as an attorney for the ACLU of Arkansas since June of 2006 and served as legal director until 2021. Starting in 2021, I became Executive Director at the ACLU of Arkansas, and no longer directly litigate cases myself. While I was actively litigating, I litigated numerous complex cases from their inception through their conclusion in state and federal courts, including trial and appellate work. I have also taught trial advocacy or lawyering skills to law students at the Bowen School of Law.

3. In my 15 years litigating at the ACLU of Arkansas, I built, or brought together, numerous legal teams to bring civil rights and civil liberties cases under civil rights statutes, including 42 USC § 1983.

3. I am familiar with the legal resources and expertise available in Arkansas on civil rights and civil liberties issues. Arkansas has a dynamic bar replete with attorneys who are generous with their time and talent to assist clients whose civil rights or civil liberties are in

jeopardy. We engaged some of these very attorneys who played key and invaluable roles in this litigation.

4. Most often, our litigation is carried out through cooperating attorneys licensed in Arkansas who agree to work with us to represent our clients. Occasionally, and certainly more rarely, a case demands an incredible amount of work (sometimes on a compressed timeline) that requires us to engage an out-of-state law firm capable of providing a team of lawyers to help us obtain the relief our clients need. This was one of those cases.

5. My experience in staffing legal teams for complex litigation has been that even Arkansas's largest firms sometimes are not able to dedicate the attorney and staff time required for such cases.

6. I am also well familiar with Arkansas HB1570 of 2021, as the ACLU of Arkansas advocated relentlessly against the bill's passage. At the same time, we anticipated litigation from the time we learned the bill would be filed and began work early to develop a case to challenge the constitutionality of the law, including identifying counsel to help us prepare the litigation. I'm familiar with the work with clients as well as legal work such as briefing, discovery, expert reports and testimony, depositions, and trial preparation required in this type of case. Given my experience with this type of litigation, and with the legal community in Arkansas, I knew we would not be able find an Arkansas law firm that would have the capacity to shoulder on its own such a complex, labor-intensive case on the timetable under which we needed to proceed to obtain an injunction and trial on the merits.

7. The complex constitutional and factual issues involved in this case – the first of its kind to be tried in the United States – required the significant staffing and other resources of a

multinational firm as well as the specialized expertise of our ACLU National attorneys who have experience litigating issues related to access to gender-affirming medical care.

8. Without the resources and expertise of counsel outside Arkansas, the ACLU of Arkansas would not have been able to litigate this case as we needed to in order to obtain the relief we achieved for transgender Arkansans and their families.

I have read the foregoing declaration and swear under penalty of perjury that the matters contained herein are true and correct to the best of my knowledge and belief.

Dated: September 19, 2023

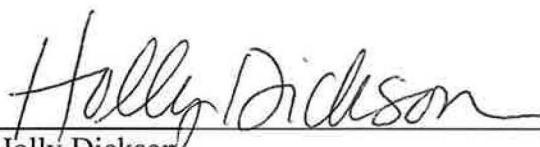

Holly Dickson

Exhibit 2

**THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

	x	
DYLAN BRANDT, et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Case No. 4:21-CV-00450-JM
	:	
TIM GRIFFIN, et al.,	:	
	:	
Defendants.	:	
	:	
	x	

Declaration of John L. Burnett

I declare that the following facts are true, to the best of my knowledge, information, and belief:

1. I am in private practice in Little Rock, Arkansas. My Arkansas Bar Number is 77021. I was first admitted to the Bar of Arkansas in August, 1977, and to the federal bar of the Eastern and Western Districts of Arkansas in September, 1977.

2. I have been regularly engaged in private practice in Arkansas since 1979 following a two-year clerkship with Judge Eisele. My practice is primarily focused on labor, employment, and civil rights law throughout Arkansas. I am regularly involved in litigation in all state and federal courts in Arkansas regarding these issues. As chair of the Legal Committee of the ACLU of Arkansas, I have also authorized, reviewed, and followed all ACLU litigation in Arkansas for over three decades.

3. I am aware of the hourly rates being charged by lawyers in this state, as well as the availability of lawyers to represent individuals in matters similar to those in this case and the quality of those lawyers' work. I am familiar as well with the fees awarded by various judges as a fair "market rate" for this type of work, including a recent review of fee awards in both the Western and Eastern Districts of Arkansas.

4. I have read most of the substantive documents in this case, including the complaint, answer, various motions and supporting documents, together with this Court's June 20, 2023 Order.

5. I have reviewed the declarations of Sarah Everett, Breean Walas, Beth Echols, Christopher Travis, Drake Mann, and Laura Kabler Oswell. In my experience, the in-state rate for each attorney claiming an in-state rate, considering their respective experience and qualifications, is reasonable and consistent with rates awarded by federal courts in Arkansas.

VERIFICATION

I verify under penalty of perjury under the laws of the United States and 28 U.S.C. §1746 that the foregoing information is true and correct.

John L. Burnett
John L. Burnett 77021
LAVEY and BURNETT
904 West Second St.
Little Rock, AR 72201
(501) 376-2269
Fax: (501) 372-1134
jburnett@laveyandburnett.com

Executed on September 19, 2023

Exhibit 3

Declaration of Sarah Everett

Sarah Everett declares as follows:

1. I am an attorney at the American Civil Liberties Union ("ACLU") of Arkansas and co-counsel for the plaintiffs in the matter of *Brandt et al vs. Griffin et al*, 4:21-cv-00450-JM. I have served as co-counsel with attorneys from the ACLU, Walas Law Firm, Gill Ragon Owen, and Sullivan & Cromwell from the inception of the case through the conclusion of trial, which occurred upon the completion and submission of post-trial briefing.

2. I graduated from the University of Minnesota Law School and became licensed to practice in the State of Arkansas in 2017. From the fall of 2017 to the present, I have served as an attorney at the ACLU of Arkansas. My practice has almost exclusively involved civil cases. I have litigated civil cases in federal court involving civil rights and constitutional issues. I also have served as supporting and consulting counsel in civil cases in state and federal court, including those involving constitutional rights protected by the U.S. and Arkansas Constitutions. My litigation experience has included civil rights actions brought under various civil rights statutes, including 42 USC § 1983, and I am currently involved in other § 1983 actions. Through the course of my work and practice of law, I am familiar with the development of civil rights and constitutional law and with the awards of attorney fees to prevailing parties under 42 USC § 1988 and other laws.

3. I have kept track of my work performed on this case and have attached as Exhibit A a breakdown of the hours I have devoted to representing the plaintiffs in their claims on which they have prevailed. The total number of hours for which I am seeking compensation is 57.85. I have excluded approximately 73 hours from the attached summary which were devoted to matters that were cumulative, administrative, nonproductive, or unnecessarily time consuming.

4. I ask that the court award an hourly rate of \$175.00 which is within the normal

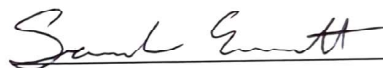
market range charged by attorneys of similar experience and expertise in the practice of civil rights in this jurisdiction. This rate is, in my opinion, reasonable considering my number of years in practice and the nature of my practice.

5. Multiplying the hours reduced as set forth above and as attached in Exhibit A by the rate of \$175 per hour, I am requesting that the sum of \$10,123.75 be considered the lodestar figure herein.

6. I request the amount of \$402 in costs for filing fees as set forth in Exhibit A.

I have read the foregoing declaration and swear under penalty of perjury that the matters contained herein are true and correct to the best of my knowledge and belief.

Dated: September 19, 2023



Sarah Everett AR2017249
Arkansas Civil Liberties Union
904 West 2nd Street
Little Rock, AR 72201
(501) 376-2842
sarah@acluarkansas.org

Exhibit A

Brandt v. Griffin et al 4:21-cv-00450-JM (ED Ark)**Sarah Everett**

<u>Date</u>	<u>Action</u>	<u>Hours</u>
5/3/2021	Client interview-Brandt family	1.0
5/19/2021	Email to client JB re: complaint draft	.25
5/20/2021	Discussion w/clients JB, DB re: complaint draft	.5
6/4/2021	Draft portion of PI brief; review legislative history; draft client declarations for DB and JB	4.25
6/9/2021	Review & edit draft declarations; review draft decl w/clients JB, DB	.7
6/10/2021	Review and edit draft PI brief	1.6
7/12/2021	Draft section of reply to Def's PI opposition	1.8
7/15/2021	Review and edit PI reply brief	.6
9/30/2021	Email to clients re: gathering documents for discovery	.25
12/3/2021	Review Defs' discovery request; email team re: protective order	.5
12/6/2021	Meeting w/clients re: Def's discovery request	1.0
12/17/2021	Review and edit draft protective order	.4
2/23/2022	Email to clients re: scheduling depositions of parents	.25
3/9/2022	Email to clients re: scheduling depositions of parents	.15
6/26/2022	Review discovery documents, flag and summarize for Lundstrum deposition	7.8
6/28/2022	Review and edit Lundstrum deposition outline; finalize documents	2.2

6/29/2022	Final deposition prep – Lundstrum; review documents, outline; prepare exhibits	7.0
6/30/2022	Deposition – Lundstrum	9.5
7/21/2022	Review & mark Lundstrum deposition for draft designation	3.0
7/26/2022	Review and edit fact stipulations	.4
7/31/2022	Emails to and discussion w/ family clients re: verifying facts for pre-trial disclosures	.5
8/5/2022	Discussion w/client KS re: verifying facts for pre-trial disclosures	.3
9/10/2022	Witness prep – DB	1.0
9/12/2022	Witness prep – JB	1.0
9/20/2022	Review and revise outline for JB direct	.7
9/22/2022	Witness prep – JB direct & cross	1.5
9/28/2022	Witness prep – DS direct	1.7
9/30/2022	Witness prep – DS direct & cross	2.1
10/7/2022	Witness prep - JB	1.0
10/10/2022	Witness prep – DS	1.1
10/11/2022	Witness prep – DS	1.0
10/14/2022	Witness prep – DS direct & cross	1.6
10/16/2022	Final prep with DS	1.2
Total:		57.85

Costs: Initial filing fee \$402

Exhibit 4

Declaration of Beth Echols

Beth Echols declares as follows:

1. I am a private attorney working on behalf of the American Civil Liberties Union of Arkansas as counsel for the plaintiffs in the matter of *Brandt et al vs. Rutledge et al*, 4:21-cv-00450-JM.¹ I have served as co-counsel with attorneys from the ACLU, Sullivan & Cromwell, and Walas Law Firm from the inception of the case through the conclusion of trial, which occurred upon the completion and submission of post-trial briefing. The success of this litigation depended on the expertise of attorneys with the national office of the ACLU as well as the resources and support of attorneys from Sullivan & Cromwell.

2. I graduated from the University of Arkansas School of Law and became licensed to practice in the State of Arkansas in 2002. I served as a Deputy Prosecuting Attorney in Benton and Pulaski Counties before entering private practice. I am a shareholder and director with Gill Ragon Owen, P.A. My practice focuses on domestic relations and probate litigation. I have appeared in circuit courts throughout the State of Arkansas representing the interests of parents and children in crisis. I have been recognized by Best Lawyers in America for excellence in family law.

3. I have kept track of my work performed in the instant case. Attached is a detailed summary of the services and the hours I have devoted to representing the plaintiffs in their claims on which they have prevailed. The total time for which I am seeking compensation is 243.6 hours.

4. I ask that the court award an hourly rate of \$250 which is within the normal market range charged by attorneys of similar experience and expertise in this jurisdiction. This rate is, in my opinion, reasonable considering my number of years in practice and the nature of my practice.

¹ Tim Griffin succeeded Leslie Rutledge as Arkansas Attorney General and is now the named party in the litigation.

5. The billing records for me and my colleagues Christopher Travis and Drake Mann are attached to this declaration as Exhibit A. Multiplying the hours reduced as set forth above and in Exhibit A by the rate of \$250 per hour, I am requesting that the sum of \$60,900 be considered the lodestar figure herein.

I have read the foregoing declaration and swear under penalty of perjury that the matters contained herein are true and correct to the best of my knowledge and belief.

Dated: September 19, 2023

A handwritten signature in blue ink, reading "Beth Echols", written over a horizontal line.

Beth Echols

Exhibit A

GILL RAGON OWEN, P.A.
 425 West Capitol Avenue, Suite 3800
 Little Rock, Arkansas 72201
 Telephone (501) 376-3800
 Facsimile (501) 372-3359
 Federal Tax ID# 71-0765286

STATEMENT FOR LEGAL SERVICES

Dylan Brandt
 904 West 2nd Street
 Little Rock AR 72201

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 08/24/2023
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v. Leslie Rutledge, et al.

		Hours
04/21/2021		
SEE	Meeting with Chris Travis to review research outline and expert declarations	1.50
CLT	intraoffice conference with Beth Echols re: outline of arguments for draft complaint; expert declarations; status; next steps; study draft expert declaration of Dr. Adkins and outline of argument for draft complaint;	1.50
04/22/2021		
CLT	telephone conference with Sullivan Cromwell team re: status of arguments for complaint; declarations review and edit; open issues; next steps; legal research re: effective date of legislation in a recess situation as opposed to an adjournment; void for vagueness in Arkansas;	3.10
04/23/2021		
CLT	legal research re: how legislative adjournment and recess affect the effective date of legislation enacted without an emergency clause;	2.40
04/25/2021		
SEE	Review video from legislative hearings on March 9th and 22nd	2.00
04/26/2021		
SEE	telephone conference with with the litigation team	1.50
SEE	Review video from legislative committee hearings;	1.50
CLT	attend weekly team meeting re: complaint drafting; experts; status of various statutes; effective date of	

Dylan Brandt

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v. Leslie Rutledge, et al.

		Hours
	legislation; legal research re: legislative history of various AR acts;	3.50
04/28/2021		
SEE	Review additional videos and transcripts for red flags in the legislative committee meetings and floor debate before vote on 1570 and HR1018; draft bullet pointed notes; exchange electronic correspondence with litigation team re: efforts	3.00
04/29/2021		
SEE	Review notes for plaintiff interviews; exchange electronic correspondence with litigation team re: additions;	1.00
SEE	Pre-meeting discussion with litigation team; Meeting with potential plaintiffs, Gab and Donnie Saxton;	2.00
04/30/2021		
SEE	Pre-meeting with litigation team; Interview with potential plaintiff, Sabrina Jensen and her parents;	1.20
05/02/2021		
CLT	watch legislative hearings and testimony re: HB 1570;	2.00
05/03/2021		
CLT	update chart re: various bills & acts and review of legislative history; attend team meeting call; study draft complaint;	1.50
05/04/2021		
SEE	Appearance at Zoom interview of the Dennis family;	1.50
CLT	review and revision of complaint;	3.00
05/05/2021		
SEE	Appearance at interview of potential plaintiff; Appearance at post-interview meeting with litigation team;	1.50
05/06/2021		
PDM	telephone conference with potential plaintiff Hutchinson	1.60
PDM	telephone conference with team members re potential plaintiff	0.40
05/07/2021		
SEE	Appearance at interview of potential plaintiff and litigation team meeting immediately thereafter;	1.00

Dylan Brandt

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v. Leslie Rutledge, et al.

		Hours
05/08/2021		
SEE	Exchange electronic correspondence with litigation team re: follow up call with Donnie Saxton; telephone conference with Donnie Saxton;	0.40
05/10/2021		
SEE	Appearance at weekly litigation team meeting;	1.50
05/11/2021		
SEE	telephone conference with Amanda Dennis; telephone conference with Donnie Saxton and team members; exchange electronic correspondence with team members;	1.00
05/12/2021		
SEE	exchange electronic correspondence with litigation team and the Jennen and Dennis families; Meeting with Donnie Saxton; exchange electronic correspondence with litigation team re: meeting;	2.00
05/13/2021		
SEE	telephone conferences with Holly Dickson; telephone conference with Donnie Saxton;	1.00
05/17/2021		
SEE	exchange electronic correspondence with litigation team; exchange electronic correspondence with Plaintiff families re: conflict check; Meeting with litigation team;	3.00
PDM	conference with litigation team re complaint	1.40
05/18/2021		
SEE	exchange electronic correspondence with clients and litigation team; meeting with clients and litigation team;	1.50
05/19/2021		
SEE	exchange electronic correspondence with litigation team; telephone conference with Holly Dickson; brief telephone conference with Lacey Jennen; exchange electronic correspondence with the Jennen family re: their section of the Complaint; brief telephone conference with Donnie Saxton; exchange electronic correspondence with the Saxton family re: their section of the Complaint; exchange electronic correspondence with the Dennis family re: their section of the Complaint; review draft Complaint; telephone conference with Leslie Cooper; telephone conference with the Jennen family;	3.50

Dylan Brandt

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v. Leslie Rutledge, et al.

		Hours
05/20/2021		
SEE	exchange electronic correspondence with Leslie Cooper; Review and revise engagement letters; exchange electronic correspondence with Plaintiff families regarding engagement, media training, and other matters	4.00
05/21/2021		
SEE	telephone conference with litigation team; telephone conference with Lacey Jennen;	1.00
05/24/2021		
SEE	weekly litigation team meeting;	1.00
CLT	attend team Zoom call with litigation team; exchange electronic correspondence with counsel for ACH re: review of final complaint portions;	1.80
05/25/2021		
SEE	review proposed revisions to Complaint; exchange electronic correspondence with litigation team; prepare summons and cover sheet; exchange electronic correspondence with Plaintiff families; exchange electronic correspondence with counsel for the Medical Board and its members regarding accepting service;	4.00
CLT	exchange electronic correspondence with team members and other re: final revisions to Complaint; signature blocks; various open issues; telephone conference with Holly Dickson re: same; review final complaint prior to filing;	4.00
05/26/2021		
SEE	telephone conference with Kevin O'Dwyer re: possibility of accepting service; revise motions to appear pro hac vice; exchange electronic correspondence with team;	1.00
05/29/2021		
CLT	review and revision of Dr. Antommara's expert declaration; research ethics articles;	5.90
05/30/2021		
PDM	telephone conference with Ms Cooper and Mr Ossip re Dr Antommara declaration	1.80
06/01/2021		
PDM	telephone conference with team planning	0.90
PDM	telephone conference with Dr. Antommara re declaration.	1.60

Dylan Brandt

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v. Leslie Rutledge, et al.

		Hours
06/04/2021		
SEE	review summary judgment motion; review Declaration of Dr. Adkins; exchange electronic correspondence with Chase Strangio re: edits and questions; review legal standard for preliminary;	2.50
06/06/2021		
PDM	revise/comment Dr Antommara declaration; draft e-mail to Ms Cooper and Mr. Ossip; review other plaintiff declarations	3.50
06/07/2021		
SEE	review Plaintiff's declarations; exchange electronic correspondence with team re: edits, additions, changes;	0.50
SEE	review all Plaintiff declarations except the Brandts; exchange electronic correspondence with team about modifying declarations; review initial Motion for Preliminary Injunction; review background section; review Joanna and Dylan Brandt's declarations; exchange electronic correspondence with Sarah Everett re: her drafts; meeting with litigation team; draft Affidavits of Service; review relevant caselaw;	3.50
06/08/2021		
PDM	review and revision of declaration of Dr Antommara	1.00
06/10/2021		
SEE	review Memorandum of Law in support of Motion for Preliminary Injunction; exchange electronic correspondence with team regarding revisions;	1.00
CLT	review and revision of Brief in Support of Preliminary Injunction;	6.30
PDM	review and revision of or comment to various documents, including Antommara declaration, motion for preliminary injunction; exchange emails and review of other parties' declarations	4.70
06/11/2021		
SEE	exchange electronic correspondence with litigation team and Dennis family; exchange electronic correspondence with team and Saxton family; telephone conference with Dennis family to review their declaration;	0.50
06/12/2021		
SEE	telephone conference with litigation team and the Saxton family to finalize declarations;	0.50

Dylan Brandt

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v. Leslie Rutledge, et al.

		Hours
PDM	review and revision of Motion for Preliminary Injunction (ACLU); includes research and file review	4.00
06/13/2021		
SEE	review Brief in support of Motion for Preliminary Injunction to confirm citations in Plaintiff family declarations; exchange electronic correspondence with litigation team; research 8th circuit cases on parental autonomy;	1.00
06/15/2021		
CLT	review revised final versions of Preliminary Injunction brief and prepare plaintiff declarations; exchange electronic correspondence with Breean Walas re: filing details and procedures;	2.90
06/16/2021		
SEE	exchange electronic correspondence with litigation team; review entries of appearance, motion to dismiss, and brief in support; exchange electronic correspondence with plaintiff families regarding filings;	1.00
06/17/2021		
SEE	review Statement of Interest of the United States; meeting with litigation team; exchange electronic correspondence with Plaintiff families;	2.00
06/19/2021		
PDM	legal research re: motion to dismiss response	4.70
06/21/2021		
SEE	conference with litigation team;	0.50
PDM	intraoffice conferences and email exchanges re extension, briefing, and communications with the court	1.40
CLT	intraoffice conference re: deadline extensions, and briefing plan & schedule;	0.90
06/22/2021		
SEE	review Motion for Extension of Time; exchange electronic correspondence with State attorneys, litigation team, and Plaintiff families re: same;	1.50
CLT	legal research re: informed consent by a minor	2.00
06/24/2021		
SEE	exchange electronic correspondence with litigation team; research for response to motion to dismiss; review draft response;	1.00

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		Hours
	CLT draft Section I of opposition to motion to dismiss; legal research re: decision standards on 12(b)(6) motion;	5.90
06/28/2021	SEE review revisions to Section 1 of Brief in Support of opposition to motion to dismiss as well as response to motion to dismiss as a whole;	0.50
07/08/2021	CLT exchange electronic correspondence with litigation team re: upcoming PI/MOD hearing;	0.90
07/09/2021	SEE exchange electronic correspondence with litigation team; review Response and Brief in Opposition of the Motion for Preliminary Injunction;	1.00
	CLT study opposition to Motion for Preliminary Injunction;	3.50
07/10/2021	PDM includes reading opposition to Motion for dismissal, research authorities, telephone conference with team, additional research, and exchange electronic correspondence with Ms Cooper and Mr Ossip	7.50
	CLT attend Zoom litigation team call re: rebuttal to opposition to Motion for preliminary injunction;	1.00
07/11/2021	PDM work on file; includes continued review of opposition and exhibits; telephone conference with Ms Cooper, Mr Ossip, and Dr Antommara	3.00
07/12/2021	SEE conference with litigation team;	0.50
	SEE review Brief in Response to Motion for Preliminary Injunction;	1.00
	CLT attend Zoom litigation team call re: preparing for hearing on 7/21;	1.00
	PDM work on file; includes team conference, legal research on standard of review, and additional file review	2.60
07/13/2021	SEE review Brief in Response to Motion for Preliminary Injunction; review drafts of Reply; review Amicus for multiple states; meeting with litigation team;	4.00
	CLT review and revision of standard of review; irreparable damage; equal protection; other portions of reply to	

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		Hours
	opposition to preliminary injunction motion;	4.00
07/14/2021		
PDM	review and revision of various documents	2.00
07/15/2021		
SEE	review Reply Brief; exchange electronic correspondence with litigation team re: same; telephone conference with Sarah Everett re: coordinating client meeting to prepare for hearing;	1.00
CLT	study Revised version 1 reply to opposition to PI motion;	2.00
PDM	review and revision of various documents re reply and intraoffice conferences re hearing	2.40
07/17/2021		
SEE	telephone conference with Plaintiff families to prepare for hearing;	1.00
07/20/2021		
SEE	conference with litigation team to prepare for hearing;	2.50
CLT	prepare for hearing; attend conference with litigation team to prepare for hearing;	4.70
07/21/2021		
SEE	conference with plaintiff families; appearance at hearing on motion to dismiss and motion for preliminary injunction; appearance at press conference following hearing;	4.50
CLT	prepare for and attend PI/MTD hearing and litigation meeting thereafter;	6.50
CLT	prepare for and attend PI/MTD hearing and meetings thereafter;	6.50
07/22/2021		
CLT	exchange electronic correspondence with litigation team re: Rule 65(d); preliminary LR re: Rule 65(d) and its requirements;	1.50
07/26/2021		
SEE	conference with litigation team;	1.00
PDM	attend team meeting litigation re strategy	0.70
08/02/2021		
CLT	telephone conference with litigation team meeting re: possible appeal of preliminary injunction; scheduling order; discovery needs;	1.30
PDM	telephone conference with team litigation re planning	0.70

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		Hours
08/16/2021		
CLT	attend Weekly litigation Team Zoom meeting re: possible Appeal by State;	0.80
08/18/2021		
SEE	exchange electronic correspondence with Holly Dickson re: public education material related to case; review material; exchange electronic correspondence with plaintiff families re: material;	0.20
08/20/2021		
SEE	review Notice of Appeal; exchange electronic correspondence with Plaintiff families re: notice of appeal;	0.40
08/23/2021		
SEE	conference with litigation team; review notice of appeal and scheduling order;	1.00
08/26/2021		
PDM	conference with team (Cooper, Rodgeron, Ossip, and Walas) re expert planning	1.00
08/30/2021		
PDM	conference with team re amicus and appeal strategies	0.70
SEE	appearance at litigation team meeting;	0.50
09/23/2021		
SEE	review State's response to Motion for Scheduling Order; exchange electronic correspondence with Plaintiff families re: state's response;	0.40
09/27/2021		
SEE	weekly litigation team meeting;	0.50
10/01/2021		
PDM	telephone conference with expert witness team	0.80
10/04/2021		
PDM	telephone conference with team re status meeting	0.60
SEE	meeting of litigation team;	0.40
10/06/2021		
SEE	appearance at Discovery team meeting; draft Authorizations for Disclosure of Health Information for Plaintiffs' signatures;	1.50

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		Hours
10/09/2021		
PDM	work on file; reading/file review; legal research	3.00
10/11/2021		
PDM	telephone conference with litigation team re State's requested change to schedule, document sharing system, and updates from amicus, experts, and plaintiffs/discovery working groups.	0.50
CLT	attend weekly litigation Team Call re: experts; discovery plan; Amici; document share technology; various other issues;	1.00
SEE	review and revision of Authorizations; exchange electronic correspondence with plaintiff families regarding the authorizations and request for specific medical information; brief telephone conference with Duncan Simpson LaGory; draft letters to accompany authorizations for Sabrina Jennen; exchange electronic correspondence with Duncan Simpson LaGory re: same; weekly Meeting;	2.00
10/12/2021		
SEE	telephone conference with Dylan Brandt's medical care providers; draft letters to accompany authorizations for Brandt family;	1.50
10/13/2021		
SEE	brief telephone conference with care providers re: authorization; draft letters requesting Brooke Dennis' records to Living Tree Pediatrics, Freeman-Burchfield Institute, and Arkansas Children's Hospital; exchange electronic correspondence with the Dennises re: requested records;	1.00
10/18/2021		
CLT	telephone conference with litigation team re: status reports on open issues;	0.70
SEE	appearance at litigation team meeting; review medical records provided pursuant to request; exchange electronic correspondence with Ms. Dennis re: records;	0.50
10/19/2021		
CLT	review revised 26(f) Report; review email from various team members re: thoughts on discovery and deposition limits;	0.90

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		Hours
10/20/2021		
PDM	telephone conference with Ms. Cooper and Mr Ossip re Antommara preparation	0.80
10/22/2021		
CLT	review several emails with litigation Team re: 26(f) Report; review latest draft of 26(f) Report;	1.30
10/27/2021		
PDM	telephone conference with discovery team re strategy	1.00
PDM	intraoffice conference re: Board members as witnesses;	0.40
CLT	telephone conference with litigation discovery team re: status of discovery requests, etc.;	1.00
11/01/2021		
PDM	conference with discovery team re planning	0.50
11/02/2021		
PDM	study draft subpoenas for legislators	0.20
11/10/2021		
PDM	telephone conference with discovery team re status and planning	0.80
PDM	review and revision of Dr. Antommara expert report	3.00
SEE	appearance at discovery team meeting; revise Authorizations to include Arkansas Children's Hospital;	0.50
11/12/2021		
PDM	telephone conference with expert Dr Antommara, Ms Cooper, and Mr Loevinsohn re report preparation	1.30
PDM	draft comments to revisions of Dr. Antommara expert report	0.90
11/15/2021		
PDM	study supplemental information from Dr Antommara	1.30
PDM	attend meeting of discovery team re response to brief, planning re experts, and anticipated response to legislators subpoenas	0.60
SEE	appearance at litigation team meeting;	0.50
11/17/2021		
PDM	review and comment on report of Dr Antommara	1.60
PDM	review and comment on expert reports (Dr. Adkins and Dr. Turban)	2.20

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		Hours
11/22/2021		
PDM	review and revision of Dr. Antommara expert report and exhibits; make notes for exams of Medical Board defendants	2.40
11/23/2021		
PDM	additional review and comment of Dr Antommara report; make notes on Med Bd witness exams	2.40
PDM	study emails among team re briefing schedules and further expert revisions	0.20
PDM	exchange electronic correspondence with litigation team re briefing	0.80
PDM	intraoffice conference re: ACH;	0.40
11/29/2021		
PDM	telephone conference with expert (Armand Antommara)	2.00
PDM	telephone conference with litigation team re status and plans	0.40
PDM	review and comment on Dr Antommara report	0.60
PDM	review and comment on other expert reports	1.00
CLT	intraoffice conference re: ACH;	0.40
12/03/2021		
PDM	telephone conference among Mr Loevinsohn, Ms Cooper, Mr Ossip, and expert witness Dr Antommara re expert report	0.80
12/06/2021		
PDM	telephone conference among expert team	0.70
SEE	appearance at weekly litigation team meeting; review discovery propounded upon the Plaintiffs; appearance at discovery discussion meeting with Plaintiff families;	1.00
12/09/2021		
PDM	exchange electronic correspondence with Cooper, Ossip, and Loevinsohn re revisions to expert report; includes review of revisions to expert report	0.50
SEE	review and revision of Authorization to meet Western Arkansas Counseling and Guidance Center requirements; draft letter to Cathy Campbell to accompany authorization;	1.00
12/16/2021		
PDM	telephone conference among team;	1.50
SEE	exchange electronic correspondence with litigation team; appearance at videoconference with litigation team; telephone conference with Dennis, Saxton, and Jennen	

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		Hours
	Families;	2.50
CLT	attend litigation team meeting;	2.00
12/17/2021		
PDM	exchange electronic correspondence with Mr. Travis, Ms Echols, Mr Sullivan, Ms Dickson;	1.20
SEE	telephone conference with Holly Dickson; exchange electronic correspondence with litigation team; telephone conference with Holly Dickson and Gary Sullivan;	2.00
12/22/2021		
CLT	review and revision of 8th Circuit Appellee Brief;	4.00
12/27/2021		
SEE	telephone conference with Cathy Campbell re: Sabrina's records request; intraoffice conference re: Ms. Campbell's concerns;	0.40
12/29/2021		
SEE	review Sabrina Jennen's counseling records; exchange electronic correspondence with Duncan Simpson-Lagory and Gregory Smith re: records;	1.50
12/30/2021		
CLT	telephone conference with Ed Lowther; Brent Thompson; Duncan Simpson-LaGoy re: discovery responses from ACH/UAMS doctors;	0.80
01/03/2022		
SEE	appearance at weekly litigation team meeting;	0.50
01/10/2022		
SEE	appearance at litigation team meeting;	0.10
01/31/2022		
SEE	appearance at litigation team meeting;	0.40
02/01/2022		
PDM	telephone conference with expert team	1.00
02/07/2022		
PDM	review of revised Dr. Antommara declaration	0.50
PDM	attend meetings of litigation team and expert team for Dr Antommara	2.00
CLT	attend weekly litigation team call;	1.00

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		Hours
02/10/2022		
CLT	review email from AG's office re: discovery dispute; deadlines; depositions of doctor clients;	0.90
02/11/2022		
SEE	telephone conference with Western Arkansas Counseling; exchange electronic correspondence with attorney Gregory Smith re: Sabrina Jennen's records; review medical record;	0.50
02/14/2022		
SEE	appearance at weekly litigation meeting; review Sabrina Jensen's records;	1.00
02/15/2022		
SEE	exchange electronic correspondence with litigation team re: discovery; review Dylan Brandt's children's hospital records;	0.20
03/03/2022		
SEE	appearance at discovery team meeting; exchange electronic correspondence with team regarding State's requests for hospital records not otherwise disclosed;	0.50
03/04/2022		
SEE	exchange electronic correspondence with discovery team re: informed consent;	0.40
03/07/2022		
PDM	work on file; includes exchanging emails with Ms. Cooper and researching MPA and rules regarding gender affirming healthcare	2.20
03/08/2022		
SEE	exchange electronic correspondence with litigation team re: compliance with order to compel and other discovery matters;	0.20
CLT	exchange electronic correspondence with discovery team re: follow up questions and objections from defendants; research re: what email system and archive system does state legislature use and how does its search function work related to "near" searches;	4.90
03/10/2022		
PDM	legal research re: communication with treating physicians	1.00

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		Hours
03/14/2022		
SEE	exchange electronic correspondence with opposing counsel; appearance at litigation meeting;	0.50
04/04/2022		
SEE	appearance at weekly litigation meeting; telephone conference with opposing counsel; exchange electronic correspondence with litigation team;	1.00
CLT	attend weekly litigation team zoom meeting; interoffice conference re: possible topics for Med. Board's 30(b)(6) witness; call with opposing counsel;	2.30
04/05/2022		
CLT	exchange electronic correspondence with litigation team re: Laura Perry deposition and hearing on motion to compel;	1.50
04/06/2022		
CLT	begin researching internet for interviews or podcasts with Robin Lundstrum re: why she sponsored the SAFE Act;	3.50
04/18/2022		
PDM	attend meeting; deposition preparation Dr Antommara	1.70
04/26/2022		
PDM	exchange electronic correspondence with Mr. Richardson re Medical Board witnesses	0.70
04/28/2022		
PDM	prepare for deposition of Dr. Antommara	2.00
04/29/2022		
PDM	exchange electronic correspondence with Ms. Echols re Medical Board witnesses	0.40
05/02/2022		
PDM	attend weekly litigation meeting	1.00
PDM	prepare for deposition of Dr Antommara	1.50
SEE	appearance at litigation team meeting;	1.00
05/05/2022		
SEE	appearance at deposition of State's expert Professor Regnerus;	8.00
05/06/2022		
SEE	appearance at deposition of State's expert Dr. Patrick Lappert;	8.00

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		Hours
05/09/2022		
PDM	attend weekly litigation meeting;	1.00
PDM	prepare for deposition of Dr Antommara	1.70
05/10/2022		
SEE	appearance at deposition of Amy Embry, Director of State Medical Board;	4.00
CLT	attend weekly litigation team meeting re: discovery issues; strategy; next steps; open issues;	1.00
05/11/2022		
PDM	travel to attend deposition of Dr. Antommara;	8.00
PDM	conference with Messrs. Ossip and Holland	1.00
05/12/2022		
PDM	attend deposition of Dr. Antommara	8.00
05/13/2022		
PDM	travel from Cincinnati to Little Rock;	6.00
05/23/2022		
SEE	appearance at weekly litigation meeting;	1.00
05/25/2022		
SEE	appearance at deposition of Dr. Hruz;	7.00
05/26/2022		
SEE	preparation of exhibits for deposition of Dr. Levine;	
	appearance at deposition of Dr. Levine;	2.50
06/02/2022		
SEE	appearance at first in-house moot in preparation for oral argument to 8th circuit;	1.50
06/06/2022		
PDM	study Regnerus testimony and motion	2.00
SEE	appearance at weekly litigation team meeting;	0.50
CLT	attend weekly trial team zoom meeting; begin reviewing deposition transcripts re: Evidentiary Designations;	1.90
06/08/2022		
CLT	participate in second 8th circuit moot re: preparation for 8th circuit arguments;	2.00

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		Hours
06/15/2022		
SEE	listen to oral argument and participate in conference call with team thereafter;	1.00
06/20/2022		
PDM	prepare for deposition of Rhys Branman, M.D.	5.00
CLT	continue research re: Robin Lundstrum's post-legislative interviews/podcasts;	3.90
06/21/2022		
CLT	exchange electronic correspondence with ACLU Team re: motions and brief to exclude Regnerus and Lappert; review draft motions and briefs;	1.00
06/23/2022		
CLT	review Motions and briefs in Support to exclude Lappert and Regnerus as experts;	2.50
06/24/2022		
PDM	prepare for deposition of Branman;	2.00
PDM	attend deposition of Branman	4.50
06/27/2022		
PDM	attend weekly litigation meeting re status, strategy	0.50
SEE	appearance at weekly litigation team meeting;	0.50
07/11/2022		
SEE	appearance at weekly litigation team meeting;	0.80
07/18/2022		
PDM	attend weekly litigation meeting;	1.00
SEE	appearance at weekly litigation team meeting;	1.00
CLT	attend weekly litigation team meeting; study State's Responses to Motions to exclude Regenerus and Lappert;	2.30
07/25/2022		
SEE	appearance at weekly litigation team meeting;	0.50
07/27/2022		
CLT	review Opposition to Defendants' Motion in limine;	3.50
07/28/2022		
PDM	draft electronic correspondence to Ms Cooper re trial availability	0.40

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		Hours
08/01/2022		
SEE	appearance at weekly team meeting; review and revise Motions to Appear Pro Hac Vice for three additional Sullivan lawyers with supporting documentation;	1.00
CLT	attend weekly litigation team meeting re: pre-trial disclosures; fact stipulations; trial brief process; discussions with Plaintiffs and plaintiff families;	1.00
08/08/2022		
CLT	attend weekly litigation team meeting re: pre-trial disclosures; fact stipulations; defendants' refusal to even discuss our proposed fact stipulations; trial brief; strategy; review draft trial brief;	3.00
08/22/2022		
SEE	appearance at weekly litigation team meeting;	0.50
08/23/2022		
SEE	review documents produced by legislators;	2.00
08/24/2022		
PDM	legal research re: Bureau of Legislative Research and Legislative Council information-sharing rules	1.50
08/25/2022		
SEE	review order and opinion of the 8th Circuit Court of Appeals on State's appeal of injunction;	0.40
08/29/2022		
SEE	appearance at weekly litigation team meeting;	1.00
09/06/2022		
CLT	attend weekly litigation team meeting: possible petition for en banc rehearing; logistics for trial; pre-trial order; coordination of witness preparation;	1.00
09/12/2022		
PDM	review material received from co-counsel - claims, trial preparation materials, expert analyses	1.00
PDM	attend group planning call	1.00
PDM	draft memo re group meeting issues	0.30
09/14/2022		
SEE	review outline for Amanda Dennis; exchange electronic correspondence with prep team re: additional information about Amanda and some of the questions;	

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		Hours
	videoconference with prep team;	1.50
CLT	attend weekly litigation team meeting re: draft pre-trial order;	1.00
09/19/2022		
PDM	prepare for meeting with Dr. Antommara;	1.50
PDM	telephone conference; Dr Antommara preparation	2.00
SEE	prepare direct examination outline for Aaron Jennen; review summary exhibit regarding Sabrina's counseling and medical records; review records; participate in witness preparation for Dylan Brandt;	6.00
CLT	attend weekly litigation team meeting re: trial preparation; open issues; trial strategy; next steps;	1.00
09/20/2022		
SEE	appearance at meeting to prepare Amanda Dennis; appearance at meeting to prepare Aaron Jennen;	2.50
09/23/2022		
SEE	prepare Donnie Saxton's direct examination outline;	1.00
09/24/2022		
SEE	review revisions and suggestions to Donnie Saxton's direct outline; appearance at videoconference to prepare Donnie Saxton for his testimony; appearance at videoconference to prepare Dylan Brandt for his testimony;	2.20
09/29/2022		
SEE	attend witness prep session with Amanda and Shayne Dennis;	1.00
09/30/2022		
SEE	attend meeting with Donnie Saxton to prepare for testimony;	2.00
10/03/2022		
PDM	telephone conference with litigation team--specific trial prep items	0.90
SEE	miscellaneous; appearance at weekly team meeting; review and revision of Donnie Saxton's direct examination; appearance at meeting to prepare Mr. Saxton for his testimony;	1.50
10/04/2022		
PDM	draft electronic correspondence re: third party witnesses;	0.40
CLT	telephone conference with Beth Echols; review email from	

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		Hours
	Attorney General re: opening statements; time for Dr. Cathey's testimony;	1.40
SEE	appearance at session to prepare Aaron Jennen for his testimony;	1.00
10/05/2022		
SEE	review and revision of direct examination of Donnie Ray Saxton and Aaron Jennen;	2.00
10/06/2022		
SEE	appearance at team meeting;	1.00
SEE	appearance at prep meeting with Amanda and Shayne Dennis;	1.50
10/07/2022		
CLT	attend emergency team Zoom meeting Re: 8th Circuit's request that we file response to Defendant's petition for <i>en banc</i> review by October 17, 2022; review 8th Circuit request for response to petition for <i>en banc</i> review; review Defendants' petition for <i>en banc</i> review;	2.10
10/08/2022		
CLT	review draft response to petition for <i>en banc</i> review at 8th circuit; review email from various team members re: thoughts;	4.00
10/10/2022		
SEE	review and revision of direct examination of Aaron Jennen; prepare anticipatory cross examination of Aaron Jennen; meeting to prepare Aaron Jennen; Appearance at Litigation team meeting; Meeting with Aaron and Lacey Jennen to discuss trial logistics; Meeting with the Dennis family to testimony with Brooke Dennis and to discuss trial logistics with her parents; Meeting with Donnie and Parker Saxton to public testimony with Parker Saxton and to discuss trial logistics with both;	6.00
10/11/2022		
SEE	review and revision of Donnie Saxton's direct examination; prepare anticipatory cross; meeting with Donnie and Parker Saxton to prepare;	2.00
10/12/2022		
SEE	prepare for cross examination of Aaron Jennen and Donnie Saxton;	1.00
CLT	exchange electronic correspondence with litigation team	

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		Hours
	members re: response to petition for en banc review at 8th Circuit; possible extension of Oct. 17 filing deadline; review revised version of response to petition for en banc review;	2.90
10/13/2022	SEE prepare for trial;	1.00
10/14/2022	SEE prepare for trial;	2.50
10/17/2022	SEE preparation for and appearance at first day of trial;	12.00
	CLT attend part of the morning of first day of trial;	2.50
10/18/2022	SEE preparation for and appearance at trial; meeting with Ms. Dennis to prepare her for her testimony;	10.00
10/19/2022	SEE appearance at trial;	8.00
	CLT attend post-resting litigation team meeting re: plan for remainder of trial; 8th Circuit issues and strategy; Defendants' experts;	2.00
10/20/2022	SEE discuss plaintiff privacy concerns re: certain testimony; appearance at meeting with the Jennens;	0.50
10/21/2022	SEE prepare for and appearance at trial;	4.00
10/24/2022	SEE appearance at weekly litigation team meeting;	0.50
10/31/2022	SEE appearance at weekly litigation team meeting;	0.50
11/07/2022	SEE appearance at weekly litigation team meeting;	0.50
11/14/2022	SEE appearance at weekly litigation team meeting;	0.40
11/28/2022	PDM attend trial	0.70
	PDM attend post-trial meeting	0.70

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		Hours
	SEE appearance at trial;	8.00
11/29/2022		
	PDM attend trial	4.00
	PDM attend post-trial meeting	0.50
	SEE appearance at trial;	5.00
11/30/2022		
	PDM attend trial	4.50
	PDM post-trial conference with team	0.70
	SEE appearance at trial;	5.00
12/01/2022		
	PDM attend trial	4.00
	SEE appearance at trial; telephone conference with the Dennises;	8.00
	CLT attend trial;	7.50
12/02/2022		
	SEE telephone conference with Leslie Cooper;	0.40
12/05/2022		
	SEE appearance at litigation team meeting;	0.50
12/07/2022		
	CLT review email exchanges with AG's office re: schedule for post-trial briefing;	0.80
12/08/2022		
	CLT review email exchanges with AG's office re: schedule for post-trial briefing;	0.80
01/09/2023		
	PDM attend team meeting; draft short email summarizing same for Ms Echols	1.00
01/17/2023		
	CLT exchange electronic correspondence with Leslie Cooper;	0.40
01/31/2023		
	SEE telephone conference with Drake Mann and Chris Travis to prepare for videoconference; appearance at videoconference with national ACLU;	1.00
05/23/2023		
	SEE review findings of fact and conclusions of law for citation to	

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		Hours
	PX and nature of same; exchange electronic correspondence with local members of litigation team; exchange electronic correspondence with lawclerk re: findings;	0.50
05/25/2023		
SEE	videoconference with Leslie Cooper and Sarah Everett re: communicating with clients re: updates;	0.50
05/31/2023		
SEE	attend video conference with Joanna and Dylan Brandt;	0.50
06/01/2023		
SEE	attend videoconference with Dennises, LEslie Cooper, and Sarah Everett;	1.00
06/02/2023		
SEE	attend videoconference with Sarah Everett, Leslie Cooper, and the Jennen family; attend videoconference with Leslie Cooper and Donnie Saxton;	1.00
06/20/2023		
SEE	review Judge Moody's opinion; telephone conference with Amanda Dennis; exchange electronic correspondence with plaintiff families; exchange electronic correspondence with litigation team;	1.50
CLT	review District Court's Findings of Fact and Conclusions of Law; intraoffice conference re: bases for conclusions of law; possible appealable points; next steps procedurally;	3.50
PDM	legal research re: Court's authority to grant attorneys' fees; study District Court's decision	2.00
06/22/2023		
PDM	telephone conference with team re further action	0.70
CLT	attend weekly litigation team meeting re: appellate procedure and post-order motion practice;	1.00
06/27/2023		
CLT	exchange electronic correspondence re: motion for extension of deadline for filing petition for attorney's fees; exchange electronic correspondence re: meeting with Arkansas Children's Hospital general counsel;	0.80
06/28/2023		
CLT	attend weekly litigation team meeting re: possible motion for stay; impacts; effect of Judge Moody's order on local	

Dylan Brandt

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 7

v. Leslie Rutledge, et al.

	healthcare providers and clinics;	Hours 1.00	
06/29/2023			
PDM	review and revision of motion to extend deadline for attorney's fee motion;	0.20	
	TOTAL FEES	574.00	158,636.50
	TOTAL THIS STATEMENT		158,636.50
	PREVIOUS BALANCE		\$200.00
	TOTAL AMOUNT DUE		<u>\$158,836.50</u>

To pay by credit card: <https://secure.lawpay.com/pages/gillragonowenpa/operating>

Exhibit 5

Declaration of Drake Mann

Drake Mann declares as follows:

1. I am a private attorney working on behalf of the American Civil Liberties Union of Arkansas as counsel for the plaintiffs in the matter of *Brandt et al vs. Rutledge et al*, 4:21-cv-00450-JM.¹ I have served as co-counsel with attorneys from the ACLU, Sullivan & Cromwell, and Walas Law Firm from the inception of the case through the conclusion of trial, which occurred upon the completion and submission of post-trial briefing. The success of this litigation depended on the expertise of attorneys with the national office of the ACLU as well as the resources and support of attorneys from Sullivan & Cromwell.

2. I am a graduate of the University of Arkansas School of Law and became licensed to practice in the State of Arkansas in 1987. I served as a law clerk to associate justice M. Steele Hays of the supreme court of Arkansas and as a staff attorney for the Arkansas Securities Department before entering private practice. I am a shareholder and director with Gill Ragon Owen, P.A. I have litigated civil cases in both state and federal courts and hold an AV Preeminent[®] rating by Martindale-Hubbell[®] Peer Review Ratings[™] system. Since 2022, I have been recognized in Best Lawyers[®] in the practice areas of Administrative/Regulatory Law and Appellate Advocacy.

3. I have kept track of my work performed in the instant case. Attached is a detailed summary of the services and the hours I have devoted to representing the plaintiffs in their claims on which they have prevailed. The total time for which I am seeking compensation is 164.7 hours.

4. I ask that the court award my hourly rate of \$295 for 161.8 hours and \$325 for 2.9 hours which is within the normal market range charged by attorneys of similar experience and expertise in this jurisdiction. This rate is, in my opinion, reasonable considering my

¹ Tim Griffin succeeded Leslie Rutledge as Arkansas Attorney General and is now the named party in the litigation.

number of years in practice and the nature of my practice.

5. My billing records are attached to the declaration of Beth Echols as Exhibit A. Multiplying 161.8 hours as set forth above and in Exhibit A by the rate of \$295 per hour, I am requesting \$47,731. Multiplying 2.9 hours as set forth above and in Exhibit A by the rate of \$325 per hour, I am requesting \$942.50. I am requesting that the sum of \$48,673.50 be considered the lodestar figure herein.

I have read the foregoing declaration and swear under penalty of perjury that the matters contained herein are true and correct to the best of my knowledge and belief.

Dated: September 19, 2023

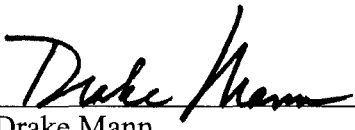

Drake Mann

Exhibit 6

Declaration of Christopher L. Travis

Christopher L. Travis declares as follows:

1. I am a private attorney working on behalf of the American Civil Liberties Union of Arkansas as counsel for the plaintiffs in the matter of *Brandt et al vs. Rutledge et al*, 4:21-cv-00450-JM.¹ I have served as co-counsel with attorneys from the ACLU, Sullivan & Cromwell, and Walas Law Firm from the inception of the case through the conclusion of trial, which occurred upon the completion and submission of post-trial briefing. The success of this litigation depended on the expertise of attorneys with the national office of the ACLU as well as the resources and support of attorneys from Sullivan & Cromwell.

2. I graduated from UALR William H. Bowen School of Law and became licensed to practice law in the State of Arkansas in 1997. I am a shareholder and director with Gill Ragon Owen, P.A. Although during my 26 years of practice my interests have ranged from real estate law to cybersecurity law, for at least the last 14 years my practice has included federal district court practice, state court appellate practice, and state court litigation. I hold an AV Preeminent® rating by Martindale-Hubbell® Peer Review Ratings™ system.

3. I have kept track of my work performed in the instant case. Attached is a detailed summary of the services and the hours I have devoted to representing the plaintiffs in their claims on which they have prevailed. The total time for which I am seeking compensation is 165.7 hours. 160.2 of these hours were billed at the rate of \$295 and the remaining 5.5 hours were billed at the rate of \$325.

4. I ask that the court award an hourly rate of \$295 and of \$325 which is within the normal market range charged by attorneys of similar experience and expertise in this jurisdiction.

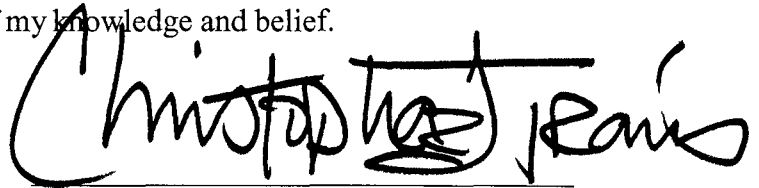
¹ Tim Griffin succeeded Leslie Rutledge as Arkansas Attorney General and is now the named party in the litigation.

This rate is, in my opinion, reasonable considering my number of years in practice and the nature of my practice.

5. Multiplying 160.2 hours as set forth above and as attached in Exhibit A by the rate of \$295 per hour, I am requesting the sum of \$47,259. Multiplying 5.5 hours as set forth above and as attached in Exhibit A by the rate of \$325 per hour, I am requesting the sum of \$1,787.50. I am requesting the total sum of \$49,046.50.

I have read the foregoing declaration and swear under penalty of perjury that the matters contained herein are true and correct to the best of my knowledge and belief.

Dated: September 19, 2023

A handwritten signature in black ink, reading "Christopher L. Travis". The signature is stylized with a large initial "C" and a prominent "T".

Christopher L. Travis

Exhibit 7

Declaration of Breean Walas

Breean Walas declares as follows:

1. I am a private attorney who has been working on behalf of the American Civil Liberties Union of Arkansas as counsel for the plaintiffs in the matter of *Brandt et al vs. Rutledge et al*, 4:21-cv-00450-JM.¹ I have served as co-counsel with attorneys from the ACLU, Gill Ragon Owen, and Sullivan & Cromwell from the inception of the case through the conclusion of trial, which occurred upon the completion and submission of post-trial briefing.

2. I graduated from the University of Cincinnati School of Law and became licensed to practice in the State of Illinois in 2005 and in the State of Arkansas in 2006. From the fall of 2005 through the spring of 2008, I served as a law clerk for Associate Justice Donald L. Corbin of the Arkansas Supreme Court. I have been in private practice since 2008. My practice has almost exclusively involved civil cases. I have litigated civil cases in both state and federal courts, including litigation involving civil rights and constitutional issues. I also have served as supporting and consulting counsel in civil cases, including those involving constitutional rights protected by the U.S. and Arkansas Constitutions. I am familiar with the development of the law in the area of civil rights out of personal interest and because civil rights issues have arisen in my practice on many occasions throughout my career. My litigation experience has included civil rights actions brought under various civil rights statutes, including 42 USC § 1983, and I am currently involved in other § 1983 actions. I am familiar with the award of attorney fees to prevailing parties under § 1983 and other statutes.

¹ Tim Griffin succeeded Leslie Rutledge as Arkansas Attorney General and is now the named party in the litigation.

3. I have kept track of my work performed in the instant case. Attached is a detailed summary of my services and the hours I have devoted to representing the plaintiffs in their claims on which they have prevailed. The total time I am seeking compensation is 262.37 hours. I have excluded approximately 80.05 hours from the attached summary the time I spent on matters that were cumulative, administrative, nonproductive, or unnecessarily time consuming.

4. I ask that the court award an hourly rate of \$300.00 which is within the normal market range charged by attorneys of similar experience and expertise in the practice of civil rights in this jurisdiction. This rate is, in my opinion, reasonable considering my number of years in practice and the nature of my practice.

5. Multiplying the hours reduced as set forth above and as attached in Exhibit A by the rate of \$300 per hour, I am requesting that the sum of \$78,711.00 be considered the lodestar figure herein.

I have read the foregoing declaration and swear under penalty of perjury that the matters contained herein are true and correct to the best of my knowledge and belief.

Dated: August 5, 2023

/s/ 
Breean Walas

Exhibit A



Walas Law Firm, PLLC

711 W. 3rd Street
 Little Rock, AR 72201
 United States
 Phone: 5012461067
 Email: breean@walaslawfirm.com
 www.walaslawfirm.com

INVOICE

Invoice # 202300015
 Date: 08/05/2023
 Due On: 10/19/2023

ACLU of Arkansas

ACLU of Arkansas

Brandt et al v Rutledge et al Case No. 4:21-cv-00450-JM (ED Ark)

Type	Date	Notes	Quantity	Rate	Total
Service	05/16/2021	Legal Writing: Analysis + Research: Initial Pleading: Complaint 1. research and review potential claims/issues, etc.	1.29	\$300.00	\$387.00
Service	07/17/2021	Litigation Strategy: Mooting: Plaintiffs Motion for Preliminary Injunction and Defendants' Motion to Dismiss 1. Review issues & prepare questions for argument 2. argument & analysis of issues	2.27	\$300.00	\$681.00
Service	07/20/2021	Litigation Strategy: Plaintiff's Motion for Prelim Injunction + Defendants MTD 1. Hearing prep: research and provide memo re C. Strangio questions	0.82	\$300.00	\$246.00
Service	07/21/2021	Hearing: Plaintiffs' Mot for Prelim Injunction + Defendants' MTD	2.50	\$300.00	\$750.00
Service	11/23/2021	Meeting: Discovery Team 1. Meet & Confer Meeting w/ AG 2. Post meeting breakdown w/ co-counsel	0.91	\$300.00	\$273.00
Service	11/29/2021	Legal Research: Discovery - Legislative Subpoenas Duces Tecum 1. Research caselaw re: objections raised, legislative	0.27	\$300.00	\$81.00

EXHIBIT

A

discovery w/in AR + 8th Cir					
Service	11/30/2021	Legal Analysis: Discovery - Legislator Subpoenas Duces Tecum	0.54	\$300.00	\$162.00
		1. Review objections and make notes for meet-and-confer w/ the state, circulate to cocounsel			
Service	11/30/2021	Litigation Strategy: Discovery - Legislator Subpoena Duces Tecum	0.61	\$300.00	\$183.00
		1. Prep for call 2. Meet-and-confer			
Service	01/05/2022	Legal Writing: Analysis + Research: Discovery - Legislator Subpoena Duces Tecum	0.50	\$300.00	\$150.00
		1. Review Case Law 2. Letters/Objections -- Identify main objections + points to rebut in argument			
Service	01/05/2022	Legal Writing: Analysis + Research: Discovery - Motion re: Legislator Failure to Respond to SDT	0.94	\$300.00	\$282.00
		1. Research - type of motion; issues raised (relevance, proportionality, privilege)			
Service	01/10/2022	Legal Writing: Analysis + Research: Discovery - MTC Legislator Responses to SDT	1.98	\$300.00	\$594.00
		1. Review research + notes for motion & brief 2. BIS - Begin Draft 1			
Service	01/13/2022	Legal Writing: Analysis + Research: Discovery - MTC (Legislator Subpoena Responses)	2.00	\$300.00	\$600.00
		1. Review draft 1 - update + edit w/ facts & applicable law (relevance + proportionality)			
Service	01/14/2022	Legal Writing: Analysis + Research: Discovery - MTC (legislator subpoenas)	0.68	\$300.00	\$204.00
		1. Review draft 2 + update draft 3			
Service	01/19/2022	Legal Writing: Analysis + Research: Discovery - SDT to Legislators	1.42	\$300.00	\$426.00
		Motion for Contempt + Compel Docs 1. BIS - Review draft 3 & update with analysis; review S&C edits of draft 3 & finalize draft 4 for team review; 2. Motion - Draft + finalize for team review			
Service	02/21/2022	Legal Writing: Analysis + Research: Discovery - Legislator SDT	1.96	\$300.00	\$588.00

		1. Review Legislators Response to Motion - Identify Issues for Reply			
		2. Research Issues for Reply			
		3. Write Reply (drafts 1, 2			
Service	02/22/2022	Legal Writing: Analysis + Research: Discovery - Legislator SDT	3.91	\$300.00	\$1,173.00
		1. Write Reply (draft 3)			
		2. Circulate DRAFT Reply to S&C discovery team for review			
Service	03/07/2022	Legal Writing: Analysis + Research: Discovery - MTC AG Responses	1.06	\$300.00	\$318.00
		1. Review S&C Final + Confirm Ready to File			
		2. Finalize for Filing			
		3. File MTC w/ exhibits; File BIS			
Service	03/17/2022	Litigation Strategy: Discovery - Third Party Depositions	0.48	\$300.00	\$144.00
		1. Hiatt - review SDT schedule A + make suggestions			
Service	03/30/2022	Litigation Strategy: Discovery - Third Parties (RFPs + Depos/SDTs)	1.32	\$300.00	\$396.00
		1.			
Service	04/03/2022	Litigation Strategy: Discovery - MTC AG Production	0.70	\$300.00	\$210.00
		1. Prep for hearing			
Service	04/05/2022	Hearing: Discovery - MTC AG Responses	1.50	\$300.00	\$450.00
Service	04/05/2022	Litigation Strategy: Discovery - MTC AG Responses	1.22	\$300.00	\$366.00
		1. Hearing Prep			
Service	04/13/2022	Litigation Strategy: Discovery - Depositions (3rd Party)	0.50	\$300.00	\$150.00
		1. Hiatt - Strategy Meeting (see notes)			
Service	04/14/2022	Litigation Strategy: Discovery - Deposition (3rd Party)	1.31	\$300.00	\$393.00
		1. Hiatt - research			
Service	04/14/2022	Legal Writing: Analysis + Research: Discovery - Compel AG Production - Mot 4 Atty Fees + Costs	1.55	\$300.00	\$465.00
		1. Review draft + circulate edits; update + split into motion + brief			
Service	04/18/2022	Litigation Strategy: Discovery - Depositions (3rd Party)	2.56	\$300.00	\$768.00

		1. Hiatt -- research and prepare outline;			
Service	04/18/2022	Litigation Strategy: Discovery - Depositions (3rd Parties)	3.87	\$300.00	\$1,161.00
		1. Burleigh - fu w/ a. land 2. Hiatt -- call w/ D. Greenberg (Hiatt's counsel); research re: deposition; draft deposition outline			
Service	04/24/2022	Litigation Strategy: Discovery - Depositions (3rd Parties)	12.13	\$300.00	\$3,639.00
		1. Hiatt -- review discovery production, research, etc. + develop deposition outline + identify exhibits; email Hiatt's counsel; circulate zoom link			
Service	04/25/2022	Litigation Strategy: discovery - depositions (3rd party)	6.80	\$300.00	\$2,040.00
		1. hiatt - review documents; update outline questions			
Service	04/25/2022	Litigation Strategy: Discovery - depositions (3rd parties)	10.69	\$300.00	\$3,207.00
		1. Hiatt -- prepare exhibits; update draft outline			
Service	04/26/2022	Deposition: Discovery - Depositions (3rd Party) - Dr. Hiatt	10.37	\$300.00	\$3,111.00
Service	04/29/2022	Legal Writing: Analysis + Research: Discovery - Depositions (Third Parties)	1.90	\$300.00	\$570.00
		1. Lundstrum - prepare deposition notice, subpoena			
Service	05/11/2022	Legal Writing: Analysis + Research: Review motion to compel legislator privilege draft	0.50	\$300.00	\$150.00
Service	05/12/2022	Legal Writing: Discovery - MTC Legislator "Privileged" Docs	0.39	\$300.00	\$117.00
		1. Review + edit; circulate comments			
Service	05/18/2022	Litigation Strategy: Discovery - Depositions - Third Parties	0.90	\$300.00	\$270.00
		1. Lundstrum - Deposition Prep - Research			
Service	05/19/2022	Legal Writing: Analysis + Research: Discovery - MTC Leg Docs (Privilege) -- Reply	0.62	\$300.00	\$186.00
		1. review draft 1 and circulate edits.			
Service	05/19/2022	Legal Writing: Analysis + Research: Discovery - Deposition - Third Party (Lundstrum)	0.24	\$300.00	\$72.00
		1. Research re response to MTQ			
Service	05/20/2022	Legal Writing: Analysis + Research: Discovery - Depositions - third parties (lundstrom) - MTQ --	4.84	\$300.00	\$1,452.00

		Response in Opposition			
		1. review draft and edit; circulate edits			
Service	05/23/2022	Legal Writing: Analysis + Research: Discovery - Depositions - Third Parties (Lundstrum)	2.78	\$300.00	\$834.00
		1. Review proof + update draft opposition with citations			
Service	06/03/2022	Legal Writing: Analysis + Research: Discovery - Third Party Documents - MTC Leg Docs (Privilege)	2.03	\$300.00	\$609.00
		1. review + edit reply, circulate comments			
		2. review + edit updated reply, circulate comments			
		3. finalize + file			
Service	06/22/2022	Legal Writing: Motions - Daubert --	4.63	\$300.00	\$1,389.00
		1. Lappert - edit and update draft, recirculate			
		2. Regnerus - edit and update draft, recirculate			
Service	06/26/2022	Litigation Strategy: Discovery - Depositions - Third Party - Lundstrum	3.23	\$300.00	\$969.00
		1. Review documents produced (folders 3) & flag documents for deposition			
Service	06/27/2022	Litigation Strategy: Discovery - Depositions - Third Party - Lundstrum	11.56	\$300.00	\$3,468.00
		1. Review documents produced (folders 3+4) & flag documents for deposition; print potential exhibits			
		2. Review S.Everett's review of documents and print potential exhibits			
		3. prepare deposition outline			
Service	06/28/2022	Litigation Strategy: Discovery - Depositions - Third Parties - Lundstrum	10.18	\$300.00	\$3,054.00
		1. Deposition Outline -- review documents identified & formulate/organize questions			
Service	06/28/2022	Litigation Strategy: Discovery - Depositions - Third Parties - Lundstrum	1.71	\$300.00	\$513.00
		1. review folder 5 notes & update deposition outline			
		2. update deposition outline			
Service	06/29/2022	Litigation Strategy: discovery - deposition - third parties - lundstrum	20.68	\$300.00	\$6,204.00
		1. review comments and update deposition outline 2.			

deposition prep: exhibit review + designation					
Service	06/30/2022	Litigation Strategy: Discovery - depositions - third parties (lundstrum)	7.50	\$300.00	\$2,250.00
1. final deposition prep					
Service	06/30/2022	Deposition: deposition - third parties - lundstrum	9.48	\$300.00	\$2,844.00
1. take deposition					
Service	07/15/2022	Legal Writing: PreTrial Motions - Ds Motion to Exclude Plaintiffs' Evidentiary Deposition Designations - Response	0.46	\$300.00	\$138.00
1. review & edit response draft					
Service	07/22/2022	Legal Writing: PreTrial Motions - Daubert - Ps Motions	1.12	\$300.00	\$336.00
1. Reply re Lappert - reivew & finalize for filing; file					
2. Reply re Regnerus - review & finalize for filing; file					
Service	07/25/2022	Litigation Strategy: PreTrial - Witnesses - Deposition Designation	5.59	\$300.00	\$1,677.00
1. Robin Lundstrum - review & mark deposition; circulate to team					
Service	07/26/2022	Litigation Strategy: PreTrial - Witnesses - Deposition Designation	2.22	\$300.00	\$666.00
1. Robin Lundstrum - update designations and recirculate					
Service	07/27/2022	Legal Writing: PreTrial Motions - Ds MIL - Ps Response	1.43	\$300.00	\$429.00
1. review & edit draft; circulate comments					
Service	07/27/2022	Legal Writing: Analysis + Research: PreTrial Disclosures	0.57	\$300.00	\$171.00
1. prepare initial draft					
Service	07/28/2022	Legal Writing: Analysis + Research: PreTrial Disclosures	2.24	\$300.00	\$672.00
1.update draft & circulate					
Service	08/01/2022	Legal Writing: PreTrial Disclosures	1.57	\$300.00	\$471.00
1. Review edits to draft; update & recirculate to team					
Service	08/02/2022	Legal Writing: Analysis + Research: Pretrial disclosures	0.40	\$300.00	\$120.00
1. fact stipulations - review hearing transcripts; circulate thoughts.					

Service	08/02/2022	Legal Writing: PreTrial Disclosures 1. prepare first draft & circulate	2.19	\$300.00	\$657.00
Service	08/04/2022	Legal Writing: PreTrial - Trial Brief 1. Review and edit brief; circulate comments.	1.32	\$300.00	\$396.00
Service	08/06/2022	Litigation Strategy: PreTrial Disclosures 1. review draft and respond to comments; recirculate	1.43	\$300.00	\$429.00
Service	08/14/2022	Legal Writing: pretrial motions - motion to exclude testimony of Lundstrum 1. review motion + notes re: response	0.49	\$300.00	\$147.00
Service	08/15/2022	Legal Writing: PreTrial Brief 1. review current draft & circulate comments/edits	0.16	\$300.00	\$48.00
Service	08/15/2022	Legal Writing: pretrial motions 1. response to defendants' motion re; lundstrum - review and circulate comments/edits	0.53	\$300.00	\$159.00
Service	08/15/2022	Legal Writing: pretrial 1. trial brief - review & circulate edits.	0.57	\$300.00	\$171.00
Service	08/16/2022	Legal Writing: Pretrial Motions 1. response to Ds motion on lundstrum - review draft & exhibits, circulate comments	0.74	\$300.00	\$222.00
Service	08/18/2022	Meeting: discovery - legislator documents 1. internal call re: meet and confer about production in response to order	0.24	\$300.00	\$72.00
Service	08/18/2022	Meeting: 1. call with legislators counsel 2. call with co-counsel debrief, plan ahead	1.31	\$300.00	\$393.00
Service	08/18/2022	Litigation Strategy: Discovery - Legislator Documents - Production re: Aug 4 Order Legal Analysis 1. Prep for conference call with the Court // review case law; procedural case history; points in response to Legislators attempt to avoid production 2.	2.68	\$300.00	\$804.00
Service	08/19/2022	Litigation Strategy: Discovery - Legislator Documents - Production re: Aug 4 Order	1.80	\$300.00	\$540.00

		1. Internal conference call			
		2. update argument and prep for call with court			
Service	08/24/2022	Litigation Strategy: Discovery - Legislator Documents	0.89	\$300.00	\$267.00
		1. Prep for court call w/ internal team			
Service	09/02/2022	Litigation Strategy: Trial - Witnesses - Internal Prep	2.26	\$300.00	\$678.00
		1. J. Brandt: prepare for meeting, meeting with team (see notes)			
		2. Lundstrum: prepare for meeting, meeting with team (see notes)			
Service	09/08/2022	Litigation Strategy: Trial - Witnesses - Lundstrum	1.09	\$300.00	\$327.00
		1. review produced documents.			
Service	09/09/2022	Litigation Strategy: Trial - Witnesses	0.50	\$300.00	\$150.00
		1. J.Brandt - internal prep call			
Service	09/10/2022	Litigation Strategy: Trial - Witnesses	0.97	\$300.00	\$291.00
		1. D. Brandt - prep call			
Service	09/11/2022	Litigation Strategy: Trial - Witnesses	0.48	\$300.00	\$144.00
		1. J. Brandt - prep for first prep call (review declarations, hearing transcripts + prepare outline)			
Service	09/12/2022	Litigation Strategy: Trial - Witnesses	1.22	\$300.00	\$366.00
		1. J. Brandt - prep session with team			
Service	09/12/2022	Litigation Strategy: Trial - Witnesses -	1.32	\$300.00	\$396.00
		1. Lundstrum - review counterdesignations & identify defendant's counterexhibits			
Service	09/16/2022	Litigation Strategy: Trial - Witnesses	1.40	\$300.00	\$420.00
		1. Rep Lundstrum - prep for team call and team call			
Service	09/18/2022	Litigation Strategy: Trial - Witnesses - Prep	3.05	\$300.00	\$915.00
		1. Lundstrum - review designations & circulate updates			
Service	09/19/2022	Litigation Strategy: trial - witnesses - prep	0.95	\$300.00	\$285.00
		1. d. brandt - team prep			
Service	09/19/2022	Litigation Strategy: Trial - Witnesses - Prep	2.31	\$300.00	\$693.00
		1. Lundstrum - review designations & circulate updates			

Service	09/20/2022	Litigation Strategy: Trial - Witnesses - Prep 1. Hiatt - review depo + production; identify potential exhibits	0.58	\$300.00	\$174.00
Service	09/20/2022	Litigation Strategy: Trial - Witnesses - Prep 1. Lundstrum - review designations & compare with exhibits; finalize for exchange	2.02	\$300.00	\$606.00
Service	09/21/2022	Litigation Strategy: Trial - Witnesses - Prep 1. Lundstrum - finalize designations + exhibits; circulate final 2. Joanna - second prep outline; circulate to team	1.05	\$300.00	\$315.00
Service	09/21/2022	Litigation Strategy: Trial - Exhibits + Witnesses 1. List Exchange - finalize Lundstrum depo designations and send to defense	0.59	\$300.00	\$177.00
Service	09/22/2022	Litigation Strategy: trial - witnesses 1. j. brandt - prep	1.61	\$300.00	\$483.00
Service	10/10/2022	Litigation Strategy: Trial - Witnesses 1. J. Brandt - prepare for witness prep; witness prep	2.36	\$300.00	\$708.00
Service	10/13/2022	Litigation Strategy: trial - witnesses - prep 1. j. brandt - review med records; attend d. brandt prep	1.10	\$300.00	\$330.00
Service	10/15/2022	Litigation Strategy: trial - witnesses - prep 1. joanna -- review docs; work on potential cross questions; rework direct	2.64	\$300.00	\$792.00
Service	10/16/2022	Litigation Strategy: Trial - Witnesses - Experts Legal Writing: Analysis + Research 1. Adkins - Memo re: Expert Qualifications: research 8th cir law; draft key talking points with legal support; circulate to expert teams 2. Turban - Memo re: Expert Qualifications: research 8th cir law; draft key talking points with legal support; circulate to expert teams	2.53	\$300.00	\$759.00
Service	11/02/2022	Litigation Strategy: Trial - Witnesses - Cross 1. Dr. hiatt -- review deposition; identify cross questions	4.35	\$300.00	\$1,305.00
Service	11/03/2022	Litigation Strategy: Trial - Witnesses - Cross 1. Dr. Hiatt - team meeting re: cross; develop outline	2.00	\$300.00	\$600.00

Service	11/08/2022	Litigation Strategy: Trial - Witnesses - Defendants	2.50	\$300.00	\$750.00
		1. Hiatt -- review & update cross outline; recirculate			
Service	11/17/2022	Litigation Strategy: Trial - Witnesses	0.59	\$300.00	\$177.00
		1. Hiatt - Cross outline -- review comments and recirculate to team			
Service	11/18/2022	Litigation Strategy: Trial - Witnesses	1.11	\$300.00	\$333.00
		1. Hiatt - cross outline - update draft and recirculate			
Service	11/28/2022	Trial - Day 6 - Defense Case	8.00	\$300.00	\$2,400.00
		1. Levine			
Service	11/29/2022	Trial - Day 7 - Defense Case	6.00	\$300.00	\$1,800.00
		1. Regnerus 2. Lappert			
Service	11/29/2022	Litigation Strategy: Trial - Witnesses - Defense Case	6.71	\$300.00	\$2,013.00
		1. Hiatt -- review cross outline + update; review + prep documents; final prep			
Service	11/30/2022	Trial: Trial - Day 8 - Defense Case	3.88	\$300.00	\$1,164.00
		1. Hiatt 2. Smalltz 3. Burleigh			
Service	12/01/2022	Trial: Trial - Day 9 - Defense Case	5.42	\$300.00	\$1,626.00
		1. Hruz			
				Total	\$78,711.00

Please make all amounts payable to: Walas Law Firm, PLLC

Please pay within 75 days.

Exhibit 8

**THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

-----X	X	
DYLAN BRANDT, et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Case No. 4:21-CV-00450-JM
	:	
TIM GRIFFIN, et al.,	:	
	:	
Defendants.	:	
	:	
-----X	X	

**DECLARATION OF LESLIE COOPER IN SUPPORT OF
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS**

I, Leslie Cooper, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I submit this declaration in support of the motion filed by Plaintiffs for an award of attorneys' fees and costs arising from the work performed by attorneys at the American Civil Liberties Union Foundation ("ACLU National") in litigating the above-captioned case. ACLU National seeks an award of attorneys' fees in the amount of \$1,133,987.50 for my work and the work of Chase Strangio, Li Nowlin-Sohl, and James Esseks. We seek an award of costs in the amount of \$114,235.45.

Professional Background of Leslie Cooper

2. I received a J.D. degree from New York University School of Law in 1995. I received a B.A. degree *summa cum laude* from the University of Pennsylvania in 1986.

3. I am licensed to practice law in New York State and in New Jersey. I am also admitted to practice before the United States Supreme Court; the United States Courts of Appeals for the Third, Fourth, Sixth, Eighth, and Eleventh Circuits; the United States District Courts for the Eastern District of Arkansas, the Northern District of Florida, the Eastern and Western Districts of Michigan, the District of New Jersey, and the Eastern and Southern Districts of New York.

4. From 1995 until 1998, I was an associate at Robinson, Silverman, Pearce, Aronsohn & Berman LLP, a private law firm in New York City that subsequently became part of the law firm Bryan Cave.

5. Since 1998, I have been an attorney at the ACLU's LGBTQ & HIV Project based in New York, New York, first as a staff attorney, then a senior staff attorney, and, currently, a Deputy Project Director.

6. Through my work with the LGBTQ & HIV Project, I have developed a specialty in constitutional litigation generally and specifically in constitutional claims about the rights of LGBTQ people.

7. I have been counsel and supervised the work of other lawyers in numerous federal constitutional and other cases about the rights of transgender people to access gender-affirming medical care including the following: *Seeger v. Norris*, 2010 WL 2384268, No. 5:10CV00081 BSM/BD (E.D. Ark. Apr. 9, 2010) (Eighth Amendment challenge to prison policy denying transgender female prisoner with gender dysphoria hormone therapy); *Keohane v. Fla. Dep't of Corrections*, 952 F.3d 1257 (11th Cir. 2020) (Eighth Amendment challenge to denial of hormone therapy and permission to follow female grooming standards); *Thomas v. Georgia Dep't of Community Health*, Case No. 1:21-cv-02558 (N.D. Ga.) (challenge to exclusion of gender-

affirming surgeries from state Medicaid coverage); *Iglesias v. Federal Bureau of Prisons*, Case No. 19-cv-00415-JPG (S.D. Ill.) (Eighth Amendment challenge to denial of gender-confirmation surgery for prisoner with gender dysphoria); *Zayre-Brown v. North Carolina Dep't of Public Safety*, Case No. 3:22-cv-191-MOC-DCK (W.D.N.C.) (same); and *L.W. v. Skrmetti*, Case No. 3:23-cv-00376, 2023 WL 4232308 (M.D. Tenn. June 28, 2023) (granting preliminary injunction enjoining enforcement of state law banning gender-affirming medical care for minors), *stayed*, *L.W. v. Skrmetti*, 73 F.4th 408 (6th Cir. July 8, 2023).

8. I have also been counsel and supervised other lawyers in numerous constitutional cases about the rights of transgender people in various other contexts. *See, e.g., Grimm v. Gloucester Cty. Sch. Bd.*, 972 F.3d 586 (4th Cir. 2020), *cert. denied*, 141 S. Ct. 2878 (2021) (holding that school policy prohibiting transgender boy from using boys' facilities was unlawful); *Doe v. Boyertown Unified Sch. Dist.*, 276 F. Supp. 3d 324 (E.D. Pa. 2017), *aff'd* 897 F.3d 518 (3rd Cir. 2018), *cert. denied*, 139 S. Ct. 2636 (2019) (rejecting challenge to school policy allowing transgender students to use facilities according with their gender identity); *L.E. v. Lee*, Case No. 3:21-cv-00835 (M.D. Tenn.) (challenge to state law prohibiting transgender students from participating in school sports in accordance with their gender identity).

9. In addition, in my nearly 25 years at the ACLU LGBTQ & HIV Project, I have been counsel in a wide range of civil rights cases affecting the legal rights for lesbian, gay, and bisexual people, including:

- a. Cases challenging state laws and policies excluding gay people from adopting or fostering children. (*In re Matter of Adoption of X.X.G. and N.R.G.*, 43 So.3d 79 (Fla. 3d Dist. Ct. App. 2010); *Howard v. Child Welfare Agency Review Bd.*, 238 S.W.3d 1 (Ark. 2006); *Arkansas Dep't of*

Human Servs. v. Cole, 380 S.W.3d 429 (Ark. 2011); *Stewart v. Heineman*, 892 N.W.2d 542 (Neb. 2017).)

- b. Cases seeking the right to marry for same-sex couples in three states. (*Whitewood v. Wolf*, 992 F. Supp. 2d 410 (M.D. Pa. 2014); *Waters v. Ricketts*, 48 F. Supp. 3d 1271 (D. Neb. 2015); *Brenner v. Scott*, 999 F. Supp. 2d 1278 (N.D. Fla. 2014).) I was also on the Supreme Court teams in *Obergefell v. Hodges*, 576 U.S. 644 (2015), establishing the right to marry for same-sex couples nationwide, and *U.S. v. Windsor*, 570 U.S. 744 (2013), invalidating the federal “Defense of Marriage Act” prohibiting the federal government from recognizing marriages of same-sex couples.
- c. Cases challenging restrictions on gay parents when exercising their rights of custody or visitation with their children. (*Moix v. Moix*, 2013 Ark. 478 (2013).)
- d. Cases defending the rights of governments to enforce laws prohibiting discrimination based on sexual orientation. (*Fulton v. City of Philadelphia*, 141 S. Ct. 1868 (2021); *Hyman v. City of Louisville*, 132 F. Supp. 2d 528 (2021), vacated on other grounds 53 F. App’x 640, 6th Cir. 2002).)
- e. Cases challenging government authorization of discrimination against same-sex couples by agencies providing government services. (*Dumont v. Lyon*, 341 F. Supp. 3d 706 (E.D. Mich. 2018); *Rogers v. McMaster*, 6:19-cv-01567-JD (D.S.C.).)

10. Over the past 24 years, I have been direct counsel or have supervised litigation in at least 15 cases in federal circuit courts, more than 50 cases in federal district courts, and more than a dozen cases in state courts, including several before state high courts.

11. I have argued before the United States Courts of Appeals for the Third and Sixth Circuits, and in the Arkansas, Florida, and New Jersey Supreme Courts, in addition to arguing motions and trying cases before many lower state and federal courts.

12. I received the Dan Bradley Award from the National LGBTQ Bar Association in 2003, which is the organization's highest honor.

13. I have guest lectured on LGBT rights at Columbia Law School, Fordham Law School, and New York Law School.

Professional Background of Chase Strangio

14. Chase Strangio received his J.D. degree from Northeastern University School of Law in 2010 and his B.A. degree from Grinnell College in 2004.

15. Mr. Strangio is licensed to practice law in New York State. He is also admitted to practice before the United States Supreme Court; the United States Courts of Appeals for the Fourth, Sixth, Seventh, Eighth, and Ninth Circuits; and the Southern District of New York.

16. From 2010 to 2012, Mr. Strangio was Director of Prisoner Justice Initiatives at the Sylvia Rivera Law Project in New York City.

17. Since 2013, he has been an attorney at the ACLU's LGBTQ & HIV Project based in New York, New York, first as a staff attorney, and, currently, as a Deputy Project Director.

18. Through his work with the LGBTQ & HIV Project, Mr. Strangio developed a specialty in constitutional litigation generally and specifically in constitutional claims about the rights of LGBTQ people.

19. Mr. Strangio has been counsel in numerous federal constitutional cases concerning the rights of transgender people to access gender-affirming medical care including the following: *L.W. v. Skrmetti*, Case No. 3:23-cv-00376, 2023 WL 4232308 (M.D. Tenn. June 28, 2023) (granting preliminary injunction enjoining enforcement of state law banning gender-affirming medical care for minors), *stayed*, *L.W. v. Skrmetti*, 73 F. 4th 408 (6th Cir. July 8, 2023); *K.C. v. Individual Members of Medical Licensing Bd. of Indiana*, Case No. 1:23-cv-00595-JPH-KMB, 2023 WL 4054086 (S.D. Ind. June 16, 2023) (same), appeal pending; *Poe v. Drummond*, Case No. 23-cv-00177-JFH-SH (N.D. Okla.) (challenge to state law banning gender-affirming medical care for minors); *Manning v. Carter*, Case No. 1:14-cv-01609-CKK (D.D.C.) (challenge to denial of care to prisoner with gender dysphoria); *Oakleaf v. Martinez*, 297 F. Supp. 3d 1221 (D. N.M. 2014) (same).

20. Mr. Strangio has also been counsel in cases about the rights of transgender people in various other contexts, including: *Grimm v. Gloucester Cty. Sch. Bd.*, 972 F.3d 586 (4th Cir. 2020), *cert. denied*, 141 S. Ct. 2878 (2021) (holding that school policy prohibiting transgender boy from using boys' facilities was unlawful); *Hecox v. Little*, Case No. 20-35813, 2023 WL 5283127 (9th Cir. Aug. 17, 2023) (upholding injunction barring enforcement of statutory ban on trans women participating on women's sports teams); *Carcano v. Cooper*, 203 F. Supp. 3d 615 (M.D. N.C. 2016) (challenge to state law banning trans people from using public restrooms aligning with their gender identity); *Stone v. Trump*, 280 F. Supp. 3d 747 (D. Md. 2017) (challenge to military policy excluding transgender service members); *Short v. Delaware*, Case No. N13A-08-006 MJB, 2014 WL 11048190 (Sup. Ct. Del. Aug. 5, 2014) (challenge to denial of name change for transgender prisoner).

21. In addition, in Mr. Strangio's 10 years at the ACLU LGBTQ & HIV Project, he has been counsel in a range of civil rights cases affecting the legal rights for lesbian, gay, and bisexual people, including cases seeking the right to marry for same-sex couples. *See Obergefell v. Hodges*, 576 U.S. 644 (2015); *Love v. Beshear*, 989 F. Supp. 2d 536 (W.D. Ky. 2014); *Baskin v. Bogan*, 766 F.3d 648 (7th Cir. 2014). He was on the Supreme Court team in *Obergefell*, establishing the right to marry for same-sex couples nationwide, and supported the team in *U.S. v. Windsor*, 570 U.S. 744 (2013), invalidating the federal "Defense of Marriage Act" that prohibited the federal government from recognizing the marriages of same-sex couples.

22. Mr. Strangio has been direct counsel in litigation in at least 10 cases in federal circuit courts and more than 15 cases in federal district courts.

23. Mr. Strangio has argued before the United States Courts of Appeals for the Eighth and Ninth Circuits and has argued motions in lower state and federal courts.

24. Mr. Strangio received the Stonewall Award from the American Bar Association, honoring his work on behalf of LGBTQ people, in 2020, and in 2018 was recognized as a top LGBTQ lawyer under 40 by the LGBT Bar Association. He also received honorary Doctor of Law degrees from Grinnell College in 2018 and Bates College in 2020. In addition to these awards, Mr. Strangio has been honored in numerous spaces as a leader in the transgender community.

Professional Background of Li Nowlin-Sohl

25. Li Nowlin-Sohl received a J.D. degree from New York University School of Law in 2011. She received a B.A. degree *magna cum laude* from Seattle University in 2006.

26. Ms. Nowlin-Sohl is licensed to practice law in Washington and California (inactive status). She is admitted to practice before the United States Court of Appeals for the

Ninth Circuit and the United States District Courts for the Western and Eastern Districts of Washington and the District of Columbia.

27. From 2011–2014, Ms. Nowlin-Sohl was a litigation associate at Paul Hastings LLP, a global law firm, in its Washington, D.C. office. She served as a judicial law clerk for the Honorable Gladys Kessler at the United States District Court for the District of Columbia from 2014–2016. After clerking, she was a complex litigation associate at Keller Rohrback, LLP, in Seattle, Washington from 2016–2017, and was a Staff Attorney with the ACLU of Washington from 2017–2022.

28. Since 2022, Ms. Nowlin-Sohl has been a Senior Staff Attorney with the ACLU’s LGBTQ & HIV Project. Through her over six years of work with the ACLU and prior pro bono work, she has developed expertise in constitutional litigation, including litigation regarding the rights of LGBTQ people.

29. Ms. Nowlin-Sohl has been counsel and has supervised the work of other lawyers in numerous federal constitutional and other cases, including cases about the rights of LGBTQ people: *Iglesias v. Bureau of Prisons*, No. 19-cv-00415 (S.D. Ill.) (achieved settlement for incarcerated transgender woman to receive gender-affirming surgeries); *Zayre-Brown v. North Carolina Dep’t of Public Safety*, No. 22-cv-191 (W.D. N.C.) (challenge to denial of gender-affirming surgery to incarcerated transgender woman as violative of the Eighth Amendment), *L.E. v. Lee*, No. 21-cv-00835 (M.D. Tenn.) (challenge to statewide ban on transgender students’ participation in interscholastic sports); *Black Lives Matter Seattle-King Cty. v. City of Seattle*, No. 2:20-cv-00887 (W.D. Wash. 2020) (achieved preliminary injunction to protect the rights of protesters against police violence); *Kortlever v. Whatcom Cty.*, No. 2:18-cv-00823 (W.D. Wash. 2019) (class action challenging ban on medication-assisted treatment in county jail); *Does v.*

Trump, No. C17-0178 (W.D. Wash.) (challenge to the United States' ban on the entry of certain refugees); *Enstad v. PeaceHealth*, No. 2:17-cv-01496 (W.D. Wash. 2019) (challenge to medical plan's exclusion of transition-related care for transgender individuals); and *Robbins v. Swedish Health Servs.*, No. 17-2-32900-2 (Wash. Superior Ct. 2017) (challenging discriminatory actions against transgender patient).

Professional Background of James D. Esseks

30. James Esseks received a J.D. degree *cum laude* in 1991 from Harvard Law School, where he was the editor-in-chief of the *Harvard Civil Rights-Civil Liberties Law Review*. He received a B.A. degree *magna cum laude* from Yale College in 1987, with distinction in linguistic anthropology.

31. Mr. Esseks is licensed to practice law in New York State and in California. He is also admitted to practice before the United States Supreme Court; the United States Courts of Appeals for the Second, Third, Fourth, Sixth, Seventh, Ninth, and Eleventh Circuits; the United States District Courts for the Eastern District of Arkansas, the Northern District of Texas, the Eastern District of Michigan, the Eastern and Southern Districts of New York, and the Northern and Central Districts of California.

32. Mr. Esseks served as a judicial law clerk for the Honorable Robert L. Carter, United States District Judge for the Southern District of New York, from 1991 to 1992, and for the Honorable James R. Browning, United States Circuit Judge for the Ninth Circuit, from 1992 to 1993.

33. From 1993 until 1997, Mr. Esseks was an associate, and then from 1998 through 2001 he was a partner, at Vladeck, Waldman, Elias & Engelhard, P.C., a private law firm in New York City specializing in employment and labor law. While at Vladeck Waldman, he tried cases

in federal and state courts and before various arbitration tribunals, argued appeals, and pursued claims primarily under federal civil rights statutes and the federal constitution.

34. From 2001 through 2010, Mr. Esseks was Litigation Director of the ACLU Foundation's LGBTQ & HIV Project, based in New York, New York. From 2010 until the present, he has been Director of the Project, overseeing both its legal program and other aspects of its advocacy, including lobbying, administrative advocacy, organizing, and education of the public about issues affecting LGBTQ people or people living with HIV.

35. Through his work with the LGBTQ & HIV Project, Mr. Esseks has developed a specialty in constitutional litigation generally, and specifically in constitutional claims about the rights of LGBTQ people.

36. Mr. Esseks has been counsel in, and supervised other lawyers in, numerous constitutional cases about the rights of transgender people, including *Bostock v. Clayton Cty., Ga.*, 140 S. Ct. 1731 (2020) (ruling that Title VII of the Civil Rights Act protects transgender people from employment discrimination); *Hecox v. Little*, Case No. 20-35813, 2023 WL 5283127 (9th Cir. Aug. 17, 2023) (upholding injunction barring enforcement of statutory ban on trans women participating on women's sports teams); *Grimm v. Gloucester Cty. Sch. Bd.*, 972 F.3d 586 (4th Cir. 2020), *cert. denied*, 141 S. Ct. 2878 (2021) (holding that school policy prohibiting transgender boy from using boys' facilities was unlawful); *Doe v. Boyertown Unified Sch. Dist.*, 276 F. Supp. 3d 324 (E.D. Penn. 2017), *aff'd* 897 F.3d 518 (3rd Cir. 2018), *cert. denied*, 139 S. Ct. 2636 (2019) (rejecting challenge to school policy allowing transgender students to use facilities that accord with their gender identity); *L.W. v. Skrmetti*, Case No. 3:23-cv-00376, 2023 WL 4232308 (M.D. Tenn. June 28, 2023) (granting preliminary injunction enjoining enforcement of state law banning gender-affirming medical care for minors), *stayed*,

L.W. v. Skrmetti, 73 F.4th 408 (6th Cir. July 8, 2023); *Schroer v. Billington*, 577 F. Supp. 2d 293 (D.D.C. 2008) (holding that the federal ban on sex discrimination in employment bars discrimination against a transgender woman).

37. Mr. Esseks has been counsel and supervised other lawyers in cases involving the freedom to marry for same-sex couples, including *Obergefell v. Hodges*, 576 U.S. 644 (2015) (declaring the freedom to marry for same-sex couples); and *United States v. Windsor*, 570 U.S. 744 (2013) (striking down the Defense of Marriage Act).

38. Mr. Esseks has been counsel in, and supervised other lawyers in, cases challenging state laws barring lesbians and gay men from being adoptive or foster parents. Those cases include *In re Matter of Adoption of X.X.G. and N.R.G.*, 43 So.3d 79 (Fla. 3d Dist. Ct. App. 2010), which struck down Florida's ban on adoption by lesbian, gay, or bisexual people as violative of the Florida Constitution; *Howard v. Child Welfare Agency Review Bd.*, 238 S.W.3d 1 (Ark. 2006), which struck down Arkansas's ban on placement of a foster child in any household that included a gay person; and *Arkansas Dep't of Human Servs. v. Cole*, 380 S.W.3d 429 (Ark. 2011), which struck down Arkansas's ban on adoption or foster parenting by any unmarried couple as violative of the Arkansas Constitution.

39. Mr. Esseks has been counsel in and supervised other lawyers in cases defending the right of government to enforce laws prohibiting discrimination based on sexual orientation or gender identity, including *Fulton v. City of Philadelphia*, 141 S. Ct. 1868 (2021), and *Masterpiece Cakeshop v. Colorado Civil Rights Comm'n*, 138 S. Ct. 1719 (2018).

40. Over the past 32 years, Mr. Esseks has been direct counsel, or supervised litigation, in 11 federal circuit courts, 30 federal district courts, and the state courts of 34 states, including 18 state high courts.

41. Mr. Esseks has argued appeals in the United States Courts of Appeals for the Fourth and Seventh Circuits, in the Kansas Supreme Court, in the New York Court of Appeals, and in the Appellate Division of the New York Supreme Court, in addition to arguing motions and trying cases before many lower state and federal courts.

42. Mr. Esseks has received a number of awards for his work, including the 2013 Dan Bradley Award from the National LGBT Bar Association, which is the organization's highest honor. He also received the 2012 Community Vision Award from the LGBT Bar Association of New York, was a Wasserstein Public Interest Fellow at Harvard Law School in 2009, and was the 2013–2014 Vanderbilt Law School Social Justice Fellow.

43. Mr. Esseks has lectured on constitutional law, LGBT rights, and employment law at Columbia Law School, Fordham Law School, New York Law School, and the Wharton School of the University of Pennsylvania.

Time Spent by ACLU National Attorneys on this Case

44. Chase Strangio and I have been counsel in this case since its inception in the spring of 2021 and have led the legal team, together with lead attorneys at Sullivan & Cromwell, throughout the course of this case. Together, given our extensive experience litigating issues related to discrimination against transgender people and, specifically, the denial of access to gender-affirming medical care, we led the development of the case plan and the strategic planning at every stage of this case and were closely involved in every aspect of this case.

45. My specific responsibilities on this case included the following:

- a. Taking a major role in the drafting of, or closely reviewing, all major filings at the district court including the complaint, the preliminary injunction papers, the motions to exclude expert testimony, the opposition

to the motion *in limine*, the pretrial brief, the post-trial brief, and the proposed findings of fact, and all Eighth Circuit filings;

- b. leading the development of the expert case and vetting expert witnesses;
- c. working with Plaintiffs' expert witnesses on their preparation of expert declarations and reports;
- d. preparing Plaintiffs' expert witnesses for deposition;
- e. defending the depositions of Plaintiffs' experts Dr. Dan Karasic and Dr. Jack Turban;
- f. working with the Physician Plaintiffs on the preparation of their declarations and preparing them for deposition;
- g. defending the Physician Plaintiffs' depositions;
- h. deposing the 30(b)(6) witness for the Defendant Arkansas State Medical Board;
- i. deposing one of the Defendants' expert witnesses, Dr. Stephen Levine;
- j. assisting in the preparation for the depositions of the Defendants' other three expert witnesses and the Defendants' fact witnesses;
- k. attending the depositions of Dr. Ho, Dr. Cathey, and Cathey Campbell: three providers of care subpoenaed for deposition by Defendants;
- l. preparing Dr. Michele Hutchison for her trial testimony;
- m. preparing Plaintiffs' expert Dr. Dan Karasic for his trial testimony and conducting his direct examination at trial;
- n. cross-examining Dr. Levine at trial; and
- o. assisting in the preparation of Plaintiffs for their trial testimony.

46. Chase Strangio's specific responsibilities on the case included the following:
- a. taking a major role in the drafting of the complaint, the preliminary injunction briefing in the district court, the briefing in the appeal of the preliminary injunction, the pre-trial brief, the post-trial brief, the proposed findings of fact, and all Eighth Circuit filings;
 - b. vetting expert witnesses;
 - c. working with Plaintiffs' expert witnesses on their preparation of expert declarations and reports;
 - d. preparing two of Plaintiffs' expert witnesses (Dr. Adkins and Dr. Turban) for deposition;
 - e. defending the deposition of Dr. Adkins;
 - f. deposing one of the Defendants' expert witnesses, Dr. Paul Hruz;
 - g. preparing Dr. Adkins and Dr. Turban for their trial testimony and conducting their direct examinations at trial;
 - h. cross-examining Defendants' expert witness Dr. Hruz at trial;
 - i. preparing Minor Plaintiff Dylan Brandt for trial;
 - j. conducting Dylan Brandt's direct examination at trial;
 - k. arguing in opposition to the motion to dismiss at trial; and
 - l. arguing the appeal of the preliminary injunction at the Eighth Circuit.

47. James Esseks has been on the litigation team since the beginning of the case but the bulk of his time was devoted to the case in relation to trial planning and participation in the trial. Mr. Esseks prepared Plaintiff Dr. Stambough for her trial testimony and conducted her

direct examination at trial. He also brought his significant trial experience to assist the team in planning for trial and assisting with the preparation of other witnesses for trial.

48. Li Nowlin-Sohl joined the litigation team as we began to prepare for trial. Her responsibilities on the case included preparing Plaintiffs' expert witness Dr. Armand Antommaria for trial and conducting his direct examination at trial, in addition to assisting with the preparation of other expert witnesses for trial.

49. ACLU National is seeking reimbursement for a total of 891.37 hours I devoted to this case. The attorney time records attached as Exhibit A detail the time I spent on the representation. These hours are based on the contemporaneous records I maintained during the course of my involvement in this case. The attorney time records are a true and accurate reflection of professional services reasonably rendered by me to Plaintiffs in this litigation, minus time omitted based on billing discretion.

50. ACLU National is seeking reimbursement for a total of 498 hours that Chase Strangio devoted to this case. The attorney time records attached as Exhibit B detail the time Mr. Strangio spent on the representation. Mr. Strangio's hours are based on the contemporaneous records he maintained during the course of his involvement in this case. His attorney time records are a true and accurate reflection of professional services reasonably rendered to Plaintiffs in this litigation, minus time omitted based on billing discretion.

51. ACLU National is seeking reimbursement for a total of 121 hours that Li Nowlin-Sohl devoted to this case. The attorney time records attached as Exhibit C detail the time that she spent on the representation. Ms. Nowlin-Sohl's hours are based on the contemporaneous records she maintained during the course of her involvement in this case. Her

attorney time records are a true and accurate reflection of professional services reasonably rendered to Plaintiffs in this litigation, minus time omitted based on billing discretion.

52. ACLU National is seeking reimbursement for a total of 132.7 hours that James Esseks devoted to this case. The attorney time records attached as Exhibit D detail the time Mr. Esseks spent on the representation. Mr. Esseks' hours are based on the contemporaneous records he maintained during the course of his involvement in this case. Mr. Esseks' attorney time records are a true and accurate reflection of professional services reasonably rendered to Plaintiffs in this litigation, minus time omitted based on billing discretion.

53. I have reviewed all of my time records and those of Mr. Strangio, Mr. Esseks, and Ms. Nowlin-Sohl and have eliminated non-productive and duplicative time.

54. I have exercised reasonable billing judgment in determining the amount of attorney fees ACLU National counsel are requesting for their services to ensure the time for which we are seeking compensation is reasonable in light of the tasks counsel were required to perform.

55. As part of that billing discretion, I am not seeking payment for any of the ACLU National attorneys' participation in the weekly co-counsel team meetings over the course of the litigation, unproductive travel time, time spent related to communications and press regarding this case, and time spent by support staff.

Hourly Rates

56. I request a rate of \$750 per hour for my legal services, which is consistent with the market rate for lawyers of my level of skill and experience practicing civil rights law in New York City. Exhibit F (Clark Decl.) ¶ 10.

57. I request a rate of \$600 per hour for the legal services of Mr. Strangio, which is consistent with the market rate for lawyers of his level of skill and experience practicing civil rights law in New York City. Exhibit F (Clark Decl.) ¶ 11. Seven years ago, a federal district court in Kentucky awarded a rate of \$325 for Mr. Strangio. *Bourke v. Beshear*, 2016 WL 164626, No. 3:13-CV-00750-CRS (W.D. Ky. Jan. 13, 2016).

58. I request a rate of \$500 per hour for the legal services of Ms. Nowlin-Sohl. In settling *Iglesias v. Bureau of Prisons*, No. 19-cv-415-NJR (S.D. Ill.) in 2022, the Bureau of Prisons agreed to her requested rate of \$500 when calculating attorneys' fees. In *Black Lives Matter Seattle-King County v. City of Seattle*, a federal judge found Ms. Nowlin-Sohl then-hourly rate of \$400 for work done in 2020 to be reasonable when awarding attorneys' fees. No. 2:20-cv-00887, Dkt. No. 189 (W.D. Wash. 2020). In *Banks v. City of Tacoma*, a Washington state judge found Ms. Nowlin-Sohl then-hourly rate of \$325 for work done in 2017 and 2018 to be reasonable when awarding attorneys' fees. No. 16-2-05416 (Wa. Sup. Ct. June 25, 2018). The experience and expertise in constitutional litigation Ms. Nowlin-Sohl has acquired in the years since *Black Lives Matter* and *Banks* justify her requested hourly rate of \$500.

59. I request a rate of \$800 per hour for the legal services of Mr. Esseks, which is consistent with the market rate for lawyers of his level of skill and experience who practice civil rights law in New York City. Exhibit F (Clark Decl.) ¶¶ 8-9. Seven years ago, a federal district court in Kentucky awarded a rate of \$700 for Mr. Esseks. *Bourke v. Beshear*, 2016 WL 164626, No. 3:13-CV-00750-CRS (W.D. Ky. Jan. 13, 2016).

Fees requested

60. ACLU National is seeking the following attorneys' fees:

- a. For me, 891.37 hours at the rate of \$750, equaling \$668,527.50.
- b. For Chase Strangio, 498 hours at the rate of \$600, equaling \$298,800.
- c. For Li Nowlin-Sohl, 121 hours at the rate of \$500, equaling \$60,500.
- d. For James Esseks, 132.7 hours at the rate of \$800, equaling \$106,160.
- e. The total amount of fees requested by ACLU National is \$1,133,987.50.

Costs

61. Exhibit E hereto lists case expenses incurred by ACLU counsel for which we seek reimbursement, which come to a total of \$114,235.45. Those expenses include court reporter fees for depositions; court transcript costs; mailing and printing costs; attorney travel for depositions, hearings, and trial; and travel costs for expert witnesses to come to trial.

I declare under the penalty of perjury that the foregoing is true and correct.

DATE: September 20, 2023

Leslie Cooper

Leslie Cooper

Exhibit A

Project/Time entry	User	Start date	Time (decimal)
Brandt v. Rutledge (GB026)			261.617
preparing notes from team meeting	Lcooper	04/10/2021	0.333
Coordinating plaintiff interviews	Lcooper	04/22/2021	0.667
Writing notes of team meeting and tasks and sending to team	Lcooper	04/27/2021	0.333
drafting plaintiff interview questions	Lcooper	04/28/2021	0.833
Meeting with Saxtons, pre-meeting with interview team	Lcooper	04/29/2021	1.600
Meeting with Jennens, pre-meeting with interview team	Lcooper	04/30/2021	1.500
Call with Dr. Stambough	Lcooper	05/02/2021	1.000
writing team meeting notes and sending to team	Lcooper	05/03/2021	0.250
call with Dennises	Lcooper	05/04/2021	0.500
reviewing plaintiff interview summaries; interview Dr. H	Lcooper	05/06/2021	1.500
Drafting meeting notes and sending to team	Lcooper	05/10/2021	0.250
Revising draft complaint	Lcooper	05/11/2021	7.600
Call with expert - Dr. A.	Lcooper	05/12/2021	1.000
Case management email to team	Lcooper	05/13/2021	0.500
revising section of complaint	Lcooper	05/14/2021	0.500
Call with J. Ossip re Antommara dec	Lcooper	05/15/2021	0.500
Reviewing revised complaint	Lcooper	05/15/2021	0.667
Client zoom meeting, reviewing revised draft complaint	Lcooper	05/17/2021	5.300
Notes from team meeting to team	Lcooper	05/18/2021	0.700
Revision of draft complaint	Lcooper	05/19/2021	0.700
Reviewing revised plaintiff allegations, evaluating claims	Lcooper	05/20/2021	1.500
Going over allegations with plaintiffs; revising complaint	Lcooper	05/21/2021	2.400
Revision of full draft complaint	Lcooper	05/23/2021	0.667
Discussion with team re claims; finalizing complaint,; email to clients; discussion with DSL re MPI	Lcooper	05/24/2021	4.667
Discussion with some of team re PI motion; planning email to team	Lcooper	05/26/2021	1.667
commenting on Adkins draft dec; revising EP section of PI brief	Lcooper	05/27/2021	1.667
Creating chart of team point people on trial witnesses	Lcooper	05/27/2021	0.833
Team meeting; email to team with notes; meeting with AA re expert dec	Lcooper	06/01/2021	3.500
Editing/drafting section of PI brief/reviewing AA dec.	Lcooper	06/02/2021	3.600
Reviewing/commenting on draft Antommara dec	Lcooper	06/04/2021	0.833
Reviewing draft declarations	Lcooper	06/07/2021	5.200
Reviewing draft MPI brief	Lcooper	06/08/2021	2.500
Reviewing revised MPI brief	Lcooper	06/11/2021	1.667
Meeting with Dr. Stambough regarding dec	Lcooper	06/11/2021	1.000
Reviewing revised draft of MPI brf	Lcooper	06/14/2021	2.500
Reviewing final edits of MPI brief	Lcooper	06/15/2021	3.100
Reviewing and revising part of draft opp MTD	Lcooper	06/22/2021	0.600
Reviewing opp MTD	Lcooper	06/27/2021	1.000
Reviewin and revising opp MTD	Lcooper	06/29/2021	2.500
reviewing state's opp MPI and decs	Lcooper	07/10/2021	7.667
Outlining topics for Turban, reviewing reply brief outline	Lcooper	07/10/2021	6.833
Review Adkins draft rebuttal dec, outline topics for Antommara rebuttal, draft sectino of reply brief ISO MPI	Lcooper	07/11/2021	9.333
REviewing revised adkins rebuttal dec; revising background and EP sections of brief	Lcooper	07/12/2021	6.500

Reviewing/commenting on draft Antommara rebuttal and Turban rebuttal dec	Lcooper	07/13/2021	2.667
Drafting reply brief	Lcooper	07/14/2021	2.600
Call with Turban; drafting reply	Lcooper	07/15/2021	2.500
Commenting on PI argument opening	Lcooper	07/16/2021	0.500
Moot for PI hearing and discussion with CS	Lcooper	07/17/2021	2.500
Collecting hard questions for oral arg prep	Lcooper	07/19/2021	1.500
reviewing Defs' supplemental expert declarations	Lcooper	07/20/2021	4.667
PI hearing; meeting with clients and team	Lcooper	07/21/2021	4.000
Reviewing and revising proposed scheduling order	Lcooper	08/09/2021	0.500
Emails to team re working groups and proposed schedule	Lcooper	08/12/2021	0.500
email to HOLLAND and Everett re amicus planning	Lcooper	08/19/2021	1.167
Drafting outline of points for experts to cover	Lcooper	10/07/2021	3.833
Collecting files on state's expert witnesses	Lcooper	10/11/2021	4.333
Reviewing RFP	Lcooper	10/14/2021	0.667
call with D. Karasic	Lcooper	10/19/2021	1.000
Developing topics for expert reports	Lcooper	10/25/2021	4.000
developing topics for antommara expert report	Lcooper	10/27/2021	1.333
Working on topics for expert reports.	Lcooper	10/30/2021	1.500
Drafting proof chart	Lcooper	10/31/2021	2.667
Call with Antommara; reviewing Turban and Antommara drafts	Lcooper	11/03/2021	2.500
reviewing turban expert report	Lcooper	11/04/2021	2.500
Review deft expert reports; managing staffing of tasks	Lcooper	11/10/2021	2.400
Reviewing Antommara report	Lcooper	11/12/2021	1.333
Planning staffing for depositions; comments on AA report	Lcooper	11/13/2021	2.583
Reviewing State's 8th circuit brief and references cited	Lcooper	11/14/2021	3.500
Reviewing Turban draft report, AA materials, outlining brief	Lcooper	11/15/2021	3.000
Developing new topics for AA report	Lcooper	11/17/2021	0.000
Meeting with A. Holland re Burleigh and Perry deps	Lcooper	11/18/2021	0.500
Reviewing outline of EP section of respondents' brief	Lcooper	11/21/2021	3.200
reviewing draft karasic report	Lcooper	11/23/2021	2.667
Drafting statement of case	Lcooper	11/27/2021	4.200
Drafting statement of case	Lcooper	11/28/2021	2.200
reviewing revised turban report	Lcooper	11/30/2021	1.000
Drafting statement of case	Lcooper	12/01/2021	3.100
Drafting statement of case; reviewing EP section	Lcooper	12/03/2021	2.600
Drafting statement of case; reviewing EP section	Lcooper	12/03/2021	2.500
review and revise draft EP section of CA8 brief	Lcooper	12/05/2021	4.000
call with karasic re report	Lcooper	12/06/2021	1.000
Revising statement of case; reviewing karasic draft report; reviewing Antommara draft report	Lcooper	12/06/2021	7.000
commenting on expert reports	Lcooper	12/07/2021	3.200
commenting on draft expert reports	Lcooper	12/08/2021	4.000
Review state's expert reports	Lcooper	12/10/2021	6.500
Reviewing draft CA8 brief	Lcooper	12/12/2021	16.333
revising draft brief	Lcooper	12/13/2021	3.500
Reviewing opposing experts' reports; revising brief	Lcooper	12/18/2021	5.300
Reviewing opposing experts' reports; outlining rebuttal points	Lcooper	12/19/2021	4.500
Outlining rebuttal points;	Lcooper	12/20/2021	2.200
Call with Hutch	Lcooper	12/20/2021	0.500

call with expert working group; outline for rebuttal report	Lcooper	12/22/2021	2.500
Reviewing draft discovery responses; outline for rebuttal reports	Lcooper	12/23/2021	0.700
Working up topics for rebuttal reports.	Lcooper	12/29/2021	7.500
Working up topics for rebuttal reports	Lcooper	12/31/2021	8.200
Reviewing revised CA8brief	Lcooper	12/31/2021	4.500
Total			261.617
Project/Time entry	User	Start date	Time (decimal)
Brandt v. Rutledge (GB026)	User	Date	595.233
Reviewing Antommara draft rebuttal report, call with Dr. S, reviewing draft discovery responses	Lcooper	1/3/2022	2.667
reviewing revised CA8 brief	Lcooper	1/7/2022	1.833
Reviewing defs' response to our RFP	Lcooper	1/13/2022	0.500
Reviewing Turban draft rebuttal report	Lcooper	1/21/2022	1.500
Revising draft Adkins and Antommara rebuttal reports	Lcooper	1/25/2022	4.333
reviewing karasic draft rebuttal	Lcooper	1/29/2022	3.333
Call with Turban re rebuttal report	Lcooper	2/3/2022	1.000
Call with Karasic re rebuttal	Lcooper	2/4/2022	1.000
Review revised Karasic rebuttal report; call with Karasic	Lcooper	2/7/2022	2.500
meeting with D. Karasic and expert team re report	Lcooper	2/7/2022	1.000
Review revised Antommara rebuttal report.	Lcooper	2/9/2022	0.667
Call with Stambough	Lcooper	2/10/2022	0.667
Review studies cited in Adkins rebuttal	Lcooper	2/10/2022	0.833
call with Dr. S re case	Lcooper	2/14/2022	0.500
Organizing expert materials for expert teams	Lcooper	2/23/2022	1.333
Drafting 30b6 topics and questions	Lcooper	3/3/2022	2.600
Prepping for expert depositions	Lcooper	3/8/2022	3.500
Researching Ark State Medical Board	Lcooper	3/9/2022	1.800
Prepping for Levine depo	Lcooper	3/10/2022	2.500
Prep for Regnerus dep	Lcooper	3/11/2022	2.300
call with Hutch	Lcooper	3/11/2022	0.500
Prep for regnerus dep	Lcooper	3/13/2022	3.667
Prepping for Levine depo	Lcooper	3/14/2022	2.600
Prepping for Levine depo	Lcooper	3/16/2022	4.400
Prepping for Levine depo	Lcooper	3/17/2022	3.500
Prepping for Levine depo	Lcooper	3/18/2022	4.400
Prepping for our expert depositions	Lcooper	3/24/2022	3.600
reviewing Hiatt dec and making notes for dep prep	Lcooper	3/24/2022	2.333
Reviewing Lappert materials	Lcooper	3/25/2022	3.600
Reviewing Levine materials; call with Rodgerson and Armbruster re plaintiff depositions, prep for PLTF depositions	Lcooper	3/28/2022	4.500
Reviewing perry dep outline, reviewing draft motion to compel, prep re third party witness depositions, prep for lappert depo	Lcooper	3/28/2022	3.667
Karasic dep prep; doctors' dep prep	Lcooper	3/30/2022	2.500
Prep for Hutch depo	Lcooper	4/3/2022	2.667
Hutch dep prep	Lcooper	4/4/2022	1.000
attend perry dep	Lcooper	4/5/2022	3.000
reviewing draft 30b6 notice	Lcooper	4/7/2022	0.500
Stambough dep prep	Lcooper	4/10/2022	1.000

Reviewing Lappert depo outline	Lcooper	4/11/2022	3.167
Reviewing Hruz and Burleigh dep outlines	Lcooper	4/11/2022	2.333
Hutch dep prep	Lcooper	4/11/2022	1.000
Reviewing Regnerus depo outline	Lcooper	4/11/2022	2.300
Dr. Ho deposition; Stambough dep prep	Lcooper	4/15/2022	4.300
stambough dep prep	Lcooper	4/19/2022	1.500
stambough and hutch dep prep; campbell deposition	Lcooper	4/22/2022	6.500
prep hutchison and stambough	Lcooper	4/24/2022	6.400
Stambough dep; hutchison prep; review Hiatt outline	Lcooper	4/25/2022	9.300
Hutchison dep; review Lappert outline	Lcooper	4/26/2022	8.800
prep for 30b6, karasic prep; meet and confer re 30b6	Lcooper	4/27/2022	5.400
Turban prep; Antommara prep; expert discussion	Lcooper	4/28/2022	6.600
Antommara dep prep	Lcooper	5/2/2022	1.500
Adkins depo	Lcooper	5/3/2022	8.000
Drafting 30b6 outline	Lcooper	5/3/2022	4.333
Karasic dep prep	Lcooper	5/4/2022	2.000
Regnerus depo; notes on Adkins depo for team	Lcooper	5/5/2022	10.500
Lappert depo	Lcooper	5/6/2022	7.500
Karasic dep prep	Lcooper	5/9/2022	3.000
30b6 depo	Lcooper	5/10/2022	6.200
Antommara dep prep	Lcooper	5/11/2022	4.200
Reviewing Levine report from another case and memo to team	Lcooper	5/12/2022	1.833
Karasic dep prep	Lcooper	5/13/2022	2.000
Dr. Cathey deposition	Lcooper	5/16/2022	3.000
Prep for Karasic dep; prep for Levine dep	Lcooper	5/17/2022	6.300
prepping Karasic; prepping Turban; working on Levine dep	Lcooper	5/18/2022	8.400
Turban dep	Lcooper	5/19/2022	8.000
Karasic deposition	Lcooper	5/20/2022	8.300
Reviewing Hruz depo outline	Lcooper	5/21/2022	2.800
Revising Levine dep outline	Lcooper	5/22/2022	1.833
reviewing opp to motion to quash	Lcooper	5/24/2022	0.333
Hruz deposition	Lcooper	5/25/2022	8.500
Levine deposition	Lcooper	5/26/2022	9.000
Moot for CA8; reviewing reply ISO motion to compel docs from legislators	Lcooper	6/2/2022	2.200
preparing hard questions for CA8 arg; reviewing draft opening for argument	Lcooper	6/4/2022	3.167
meeting with Matthews re third party doctors	Lcooper	6/6/2022	0.500
Moot for CA8, reviewing materials to help with arg prep	Lcooper	6/8/2022	2.800
Reviewing Daubert motion re Regnerus	Lcooper	6/9/2022	3.600
Reviewing revised Regnerus motion; moot for CA8	Lcooper	6/10/2022	3.400
CA8 arg prep with CS, reviewing daubert motions	Lcooper	6/14/2022	4.600
CA8 argument and post-arg team debrief	Lcooper	6/15/2022	3.500
Reviewing and revising motion to exclude lappert	Lcooper	6/15/2022	2.667
revising Lappert motion	Lcooper	6/17/2022	1.700
revising regnerus daubert motion	Lcooper	6/18/2022	2.200
Reviewing Branman depo outline	Lcooper	6/19/2022	0.600
revising motion to exclude lappert	Lcooper	6/21/2022	1.833
Revising draft 30b6 depo designations	Lcooper	6/23/2022	1.667
Reviewing Lundstrom dep outline; trial prep chart	Lcooper	6/28/2022	2.700

Reviewing deposition designation	Lcooper	6/29/2022	0.500
creating trial prep chart	Lcooper	7/5/2022	13.333
reviewing depositions for designations	Lcooper	7/12/2022	0.833
Reviewing response to objection to deposition designations	Lcooper	7/14/2022	2.600
Meeting with Esseys re trial planning	Lcooper	7/15/2022	1.000
drafting outline for trial brief; revising reply ISO motion to exclude regnerus	Lcooper	7/20/2022	4.000
revising reply ISO motion to exclude lappert	Lcooper	7/21/2022	1.333
drafting EP section of trial brief	Lcooper	7/22/2022	3.167
reviewing pretrial disclosure	Lcooper	7/26/2022	0.500
Revising trial brief, reviewing response to motion in limine and fact stip	Lcooper	7/26/2022	7.333
reviewing pretrial disclosure	Lcooper	8/4/2022	2.600
reviewing pretrial disclosure	Lcooper	8/5/2022	0.600
Reviewing draft trial brief	Lcooper	8/6/2022	2.600
Reviewing draft trial brief	Lcooper	8/12/2022	2.200
revising response to Ds' motion to exclude Lundstrom depo designations	Lcooper	8/13/2022	2.333
Call with Walas re trial planning; revising trial planning memo	Lcooper	8/17/2022	2.200
drafting outline of trial testimony	Lcooper	8/24/2022	3.333
reading CA8 PI decision	Lcooper	8/25/2022	0.500
Drafting outline of hutch and stambough points for testimony at trial	Lcooper	8/30/2022	2.500
drafting outline of points for karasic testimony	Lcooper	9/6/2022	3.333
Karasic trial prep	Lcooper	9/7/2022	2.000
Hutch trial prep	Lcooper	9/8/2022	2.000
Drafting Hutch direct	Lcooper	9/9/2022	5.400
Drafting Hutch direct	Lcooper	9/10/2022	4.500
Revising Hutch trial outline; revising proof plan re EP claim; reviewing docs re bias	Lcooper	9/11/2022	5.333
Hutch trial prep	Lcooper	9/11/2022	2.000
Drafting Karasic direct; reviewing Dennis direct	Lcooper	9/13/2022	5.500
Drafting Karasic direct;	Lcooper	9/14/2022	4.500
Revising Antommaria direct outline	Lcooper	9/15/2022	2.667
Reviewing SOC 8	Lcooper	9/16/2022	3.000
Hutch prep session; memo on SOC 8	Lcooper	9/18/2022	4.200
Reviewing witness outlines, reviewing depo exhibits for exhibit list	Lcooper	9/19/2022	5.000
Dennis trial prep	Lcooper	9/20/2022	1.000
reviewing and revising adkins direct	Lcooper	9/20/2022	2.667
Karasic trial prep	Lcooper	9/20/2022	2.000
Reviewing stambough direct outline c;all with team re same; revising Hutch direct	Lcooper	9/21/2022	5.800
karasic trial prep, Hutch trial prep	Lcooper	9/23/2022	4.000
revising objections to state exhibit list; revising saxton direct	Lcooper	9/24/2022	2.833
Hutch trial prep	Lcooper	9/25/2022	2.000
Reviewing Turban and Adkins directs, Stambough prep	Lcooper	9/27/2022	4.700
Karasic prep; working on Levine cross, regnerus cross strategy	Lcooper	9/28/2022	6.300
Reviewing objections to State's exhibits; Levine cross	Lcooper	9/29/2022	3.300
Karasic direct prep	Lcooper	9/30/2022	2.000
Karasic prep; working on Levine cross	Lcooper	10/3/2022	3.000

Karasic and Hutch preps	Lcooper	10/4/2022	4.600
Revising D. Brandt direct and Hruz cross	Lcooper	10/5/2022	4.333
Karasic prep; general trial prep	Lcooper	10/6/2022	3.500
Reviewing/revising J. Brandt and A. Jennen directs	Lcooper	10/7/2022	2.667
Hutch/stambough prep	Lcooper	10/9/2022	3.000
Karsic and Hutch preps	Lcooper	10/10/2022	4.300
Stambough prep	Lcooper	10/11/2022	2.000
Karasic and Hutch preps	Lcooper	10/12/2022	3.600
Stambough prep	Lcooper	10/13/2022	1.400
Reviewing cross outlines	Lcooper	10/14/2022	3.500
stambough trial prep	Lcooper	10/15/2022	2.000
Karasic prep	Lcooper	10/16/2022	2.000
Trial	Lcooper	10/17/2022	10.000
Stambough prep	Lcooper	10/18/2022	2.000
Trial	Lcooper	10/18/2022	8.000
Trial	Lcooper	10/19/2022	6.000
Prepping for Friday trial date	Lcooper	10/20/2022	5.700
Trial	Lcooper	10/21/2022	3.300
reviewing Hruz cross	Lcooper	10/31/2022	1.600
Call with Walas re Hiatt cross	Lcooper	11/1/2022	0.667
Revising Hiatt cross	Lcooper	11/3/2022	1.500
Reviewing Hiatt cross	Lcooper	11/7/2022	8.000
Reviewing international reports for cross prep	Lcooper	11/14/2022	1.500
Reviewing Hiatt and Perry crosses	Lcooper	11/16/2022	1.700
Revising perry cross	Lcooper	11/17/2022	0.667
Revising Burleigh cross	Lcooper	11/18/2022	0.500
Revising proposed FOF	Lcooper	11/21/2022	4.333
Reviewing Lappert cross	Lcooper	11/23/2022	2.200
Reviewing revised Lappert cross; revising Levine cross	Lcooper	11/26/2022	2.400
Trial prep	Lcooper	11/27/2022	5.667
Trial, trial prep for next day	Lcooper	11/28/2022	9.200
Trial, prepping for next day	Lcooper	11/29/2022	6.800
Trial, prepping for next day	Lcooper	11/30/2022	5.600
Trial	Lcooper	12/1/2022	5.300
Drafting proposed FOF	Lcooper	12/5/2022	4.100
Drafting proposed FOF	Lcooper	12/6/2022	3.800
Drafting proposed FOF	Lcooper	12/7/2022	5.500
Drafting proposed FOF	Lcooper	12/8/2022	4.000
Drafting proposed FOF	Lcooper	12/9/2022	3.600
Working on sections of proposed FOF	Lcooper	12/19/2022	3.833
Drafting proposed FOF	Lcooper	12/26/2022	2.700
Reviewing and editing draft EP section of trial brief	Lcooper	12/29/2022	3.800
Reviewing and editing EP section of brief and proposed FOF	Lcooper	12/30/2022	5.800
Total			595.233
Project/Time entry	User	Start date	Time (decimal)
Brandt v. Rutledge (GB026)			34.517
Reviewing revised version of EP section of trial brief	Lcooper	01/02/2023	4.200
Reviewing and revising sections of proposed FOF	Lcooper	01/03/2023	2.500

editing sections of proposed FOF	Lcooper	01/06/2023	1.667
Reviewing and revising CA8 brief	Lcooper	01/07/2023	4.500
Reviewing and revising full draft post trial brief	Lcooper	01/11/2023	2.200
Reviewing post-trial brief and proposed FOF	Lcooper	01/12/2023	3.700
revising proposed FOF	Lcooper	01/17/2023	1.333
Reviewing Ds' proposed FOF and writing notes about same	Lcooper	01/19/2023	1.667
Revising post trial brief	Lcooper	01/20/2023	3.667
Revising post-trial brief	Lcooper	01/27/2023	1.333
Reviewed and revised draft opposition to motion to stay injunction	Lcooper	06/14/2023	3.250
Reviewing plaintiff decs and Connelly dec	Lcooper	07/10/2023	1.833
research for fee petition	Lcooper	07/24/2023	2.667
Total			34.517
Total time: 891.367 hours			

Exhibit B

Project/Time entry	User	Start date	Time (decimal)
Brandt v. Rutledge (GB026)			114.250
complaint drafting	Cstrangio	05/11/2021	1.250
complaint drafting	Cstrangio	05/11/2021	1.500
PI preparation – pull expert declarations and reports from past cases	Cstrangio	05/12/2021	1.500
call with Dr. Adkins re declaration	Cstrangio	05/13/2021	1.000
team and client call	Cstrangio	05/18/2021	1.500
complaint drafting	Cstrangio	05/19/2021	4.500
PI drafting	Cstrangio	05/23/2021	3.500
discuss declaration with Adkins	Cstrangio	05/25/2021	1.500
work on PI brief	Cstrangio	05/31/2021	3.000
work on PI brief	Cstrangio	06/06/2021	2.500
work on PI brief	Cstrangio	06/07/2021	4.500
review draft declarations	Cstrangio	06/08/2021	1.000
PI brief finalizing	Cstrangio	06/13/2021	2.000
read Ds opp MPI brief	Cstrangio	07/09/2021	2.000
reply brief drafting	Cstrangio	07/10/2021	4.500
team call to discuss Ds’ opp MPI brief	Cstrangio	07/10/2021	1.000
reply brief drafting	Cstrangio	07/11/2021	5.000
reply brief drafting	Cstrangio	07/14/2021	7.500
argument prep for PI argument	Cstrangio	07/15/2021	6.750
argument prep for PI argument	Cstrangio	07/16/2021	4.500
argument prep for PI argument	Cstrangio	07/17/2021	4.500
moot	Cstrangio	07/17/2021	2.000
prep for PI argument	Cstrangio	07/17/2021	2.000
hearing	Cstrangio	07/21/2021	2.750
PI hearing prep	Cstrangio	07/21/2021	1.500
discuss case timeline with LC and JE	Cstrangio	07/26/2021	0.500
call to discuss case (w/LC)	Cstrangio	09/09/2021	1.000
call with Karasic to explore him being an expert	Cstrangio	10/08/2021	0.500
review outline of areas of expert testimony	Cstrangio	10/19/2021	1.500
review draft Adkins report	Cstrangio	10/21/2021	1.500
review draft Turban report	Cstrangio	10/22/2021	2.500
Adkins draft report review	Cstrangio	10/30/2021	1.000
review draft Karasic report	Cstrangio	10/31/2021	1.500
Turban draft report review	Cstrangio	11/01/2021	0.750
Turban draft report review	Cstrangio	11/04/2021	2.500
discuss amicus brief with LC	Cstrangio	11/05/2021	0.500
discuss report with Adkins	Cstrangio	11/08/2021	0.750
reviewing and commenting on draft Turban report	Cstrangio	11/10/2021	2.000
call with Adkins re report	Cstrangio	11/11/2021	1.000
outline of CA8 brief	Cstrangio	11/20/2021	0.500
call with Adkins re report	Cstrangio	11/22/2021	1.000
emails with LC re: expert reports	Cstrangio	11/23/2021	0.750
call re: Karasic report	Cstrangio	11/26/2021	1.250
drafting CA8 brief	Cstrangio	11/27/2021	9.000
discussion with LC re Adkins report	Cstrangio	11/28/2021	0.500
review Karasic draft report	Cstrangio	11/29/2021	1.500
drafting and reviewing CA8 brief	Cstrangio	12/04/2021	3.500
reviewing draft Turban report	Cstrangio	12/05/2021	2.000

review and discuss draft Adkins report	Cstrangio	12/06/2021	3.500
Total			114.250
Project/Time entry	User	Start date	Time (decimal)
Brandt v. Rutledge (GB026)			367.250
call with LC re deposition schedule	Cstrangio	03/07/2022	0.500
prep Hutch for deposition	Cstrangio	04/04/2022	1.000
Adkins deposition prep	Cstrangio	04/05/2022	1.500
Stambough depo prep	Cstrangio	04/10/2022	1.000
work on deposition outline for Hruz	Cstrangio	04/11/2022	2.500
Stambough depo prep	Cstrangio	04/15/2022	1.000
Adkins deposition prep	Cstrangio	04/18/2022	1.500
Adkins deposition prep	Cstrangio	04/20/2022	1.000
Adkins deposition prep	Cstrangio	04/21/2022	1.500
Attend Hiatt deposition	Cstrangio	04/26/2022	7.000
reach out to opposing counsel re: COVID protocols	Cstrangio	05/02/2022	0.500
prep Dr. Adkins for deposition	Cstrangio	05/02/2022	2.750
travel to NC to defend Adkins deposition	Cstrangio	05/02/2022	3.500
Defend adkins deposition	Cstrangio	05/03/2022	6.500
travel home from Adkins depostion	Cstrangio	05/03/2022	3.500
1 hour travel - Adkins deposition defense	Cstrangio	05/03/2022	1.000
1 hour break - Adkins deposition defesnse	Cstrangio	05/03/2022	1.000
Karasic deposition prep	Cstrangio	05/04/2022	1.500
Attend Renerus deposition	Cstrangio	05/05/2022	7.000
Attend Lappert deposition	Cstrangio	05/06/2022	7.000
Karasic deposition prep	Cstrangio	05/09/2022	1.500
Turban depo prep	Cstrangio	05/11/2022	1.500
Karasic deposition prep	Cstrangio	05/13/2022	1.500
Turban depo prep	Cstrangio	05/18/2022	2.500
Turban depo	Cstrangio	05/19/2022	7.000
Karasic depo	Cstrangio	05/20/2022	7.000
Hruz depo outline	Cstrangio	05/23/2022	3.500
prepare Hruz depo outline and prep of exhibits	Cstrangio	05/24/2022	5.500
Hruz depo	Cstrangio	05/25/2022	7.000
Levine depo	Cstrangio	05/26/2022	7.000
CA8 argument prep	Cstrangio	05/30/2022	3.500
CA8 argument prep	Cstrangio	05/31/2022	4.500
CA8 argument prep	Cstrangio	06/01/2022	6.500
CA8 argument moot	Cstrangio	06/02/2022	2.000
CA8 argument prep	Cstrangio	06/03/2022	5.500
CA8 argument prep	Cstrangio	06/04/2022	7.500
CA8 argument prep	Cstrangio	06/05/2022	3.500
CA8 argument prep	Cstrangio	06/06/2022	10.000
CA8 argument moot	Cstrangio	06/08/2022	2.000
CA8 argument prep	Cstrangio	06/08/2022	2.500
CA8 argument prep	Cstrangio	06/09/2022	5.000
CA8 argument prep	Cstrangio	06/10/2022	3.500
CA8 argument moot	Cstrangio	06/10/2022	2.000
CA8 argument prep	Cstrangio	06/11/2022	5.000
CA8 argument prep	Cstrangio	06/12/2022	5.000

prep for CA8 argument	Cstrangio	06/13/2022	6.500
travel to St. Louis for CA8 argument	Cstrangio	06/13/2022	4.000
prep for CA8 argument	Cstrangio	06/14/2022	14.500
travel home from CA8 argument	Cstrangio	06/15/2022	4.000
CA8 argument	Cstrangio	06/15/2022	1.500
trial brief drafting	Cstrangio	08/11/2022	3.500
review draft trial brief	Cstrangio	08/13/2022	2.500
prepare for Adkins testimony	Cstrangio	09/05/2022	1.000
Work of Adkins direct outline	Cstrangio	09/06/2022	1.000
Adkins trial prep	Cstrangio	09/06/2022	1.500
Outline for Turban direct	Cstrangio	09/08/2022	2.500
trial prep with Joanna	Cstrangio	09/12/2022	1.000
Call with LC re: trial witnesses	Cstrangio	09/12/2022	1.000
trial prep with Adkins	Cstrangio	09/12/2022	2.000
trial prep with Turban	Cstrangio	09/12/2022	1.500
work on Adkins direct	Cstrangio	09/14/2022	2.000
trial prep with Adkins	Cstrangio	09/14/2022	1.500
trial prep with Adkins	Cstrangio	09/16/2022	2.000
work on Turban direct	Cstrangio	09/20/2022	2.000
Jennen trial prep	Cstrangio	09/20/2022	1.000
Joanna trial prep	Cstrangio	09/22/2022	1.000
Turban trial prep	Cstrangio	09/23/2022	1.250
Turban trial prep	Cstrangio	09/26/2022	2.000
Adkins trial prep	Cstrangio	09/26/2022	1.500
expert direct outline discussion	Cstrangio	09/27/2022	1.000
work on Turban direct	Cstrangio	09/30/2022	3.500
Turban trial prep	Cstrangio	09/30/2022	2.000
Jennen trial prep	Cstrangio	10/04/2022	1.000
work on Turban direct	Cstrangio	10/05/2022	1.500
Turban trial prep	Cstrangio	10/05/2022	1.000
Adkins trial prep	Cstrangio	10/05/2022	2.000
Dylan tria prep	Cstrangio	10/06/2022	1.000
discuss en banc response with team	Cstrangio	10/07/2022	1.000
Turban trial prep	Cstrangio	10/10/2022	1.500
Jennen trial prep	Cstrangio	10/10/2022	1.000
Brandts trial prep	Cstrangio	10/10/2022	1.000
Hruz cross prep	Cstrangio	10/12/2022	1.000
Brandts trial prep	Cstrangio	10/13/2022	1.000
Turban trial prep	Cstrangio	10/13/2022	1.000
call with LC re Levine cross	Cstrangio	10/13/2022	0.500
work on directs	Cstrangio	10/14/2022	3.500
Adkins trial prep	Cstrangio	10/14/2022	2.000
Turban trial prep	Cstrangio	10/14/2022	2.000
direct outlines prep	Cstrangio	10/15/2022	3.500
witness prep (Dylan/Joanna)	Cstrangio	10/16/2022	2.500
review outlines for direct of Adkins and Turban	Cstrangio	10/16/2022	7.000
Turban trial prep	Cstrangio	10/17/2022	2.000
trial	Cstrangio	10/17/2022	12.000
prep with Dylan, Joanna	Cstrangio	10/18/2022	3.500
trial	Cstrangio	10/18/2022	6.500

trial	Cstrangio	10/19/2022	6.500
trial	Cstrangio	10/21/2022	5.500
teal call regarding trial/security	Cstrangio	10/24/2022	0.750
work on closing	Cstrangio	11/23/2022	5.000
work on Hruz cross (assemble exhibits)	Cstrangio	11/24/2022	5.500
review Lappert cross	Cstrangio	11/26/2022	1.500
closing prep	Cstrangio	11/27/2022	1.500
Hruz cross examination prep	Cstrangio	11/27/2022	3.500
trial	Cstrangio	11/28/2022	7.000
trial	Cstrangio	11/29/2022	7.000
trial	Cstrangio	11/30/2022	6.000
trial	Cstrangio	12/01/2022	5.500
drafting proposed findings of fact	Cstrangio	12/21/2022	3.500
drafting post-trial brief	Cstrangio	12/25/2022	4.500
read over LC's draft FOF	Cstrangio	12/26/2022	0.500
drafting post-trial brief	Cstrangio	12/27/2022	5.500
reviewing draft FOF	Cstrangio	12/28/2022	1.500
drafting post-trial brief	Cstrangio	12/30/2022	2.000
call with JE & LC re FOF	Cstrangio	12/30/2022	1.000
review FOF	Cstrangio	12/30/2022	1.000
Total			367.250
Project/Time entry	User	Start date	Time (decimal)
Brandt v. Rutledge (GB026)			16.500
drafting post-trial brief	Cstrangio	01/04/2023	1.500
drafting post-trial brief	Cstrangio	01/11/2023	1.000
reviewing FOF	Cstrangio	01/13/2023	2.000
reviewing FOF	Cstrangio	01/16/2023	1.500
reviewing draft post-trial brief	Cstrangio	01/20/2023	1.500
reviewing and revising post-trial brief	Cstrangio	01/21/2023	1.500
reviewing and revising post-trial brief	Cstrangio	01/27/2023	1.500
drafting edited sections of post-trial brief	Cstrangio	01/28/2023	2.500
reviewing and revising post-trial brief	Cstrangio	01/29/2023	2.500
finalizing post-trial brief	Cstrangio	01/30/2023	1.000
Total			16.500
Total time: 498.00 hours			

Exhibit C

Brandt Summary of Fees Sought by Li Nowlin-Sohl in Motion

Entry No.	Date	Time	Description
1	8/29/2022	7.5	Review Antommara deposition transcript, declarations, and reports
2	8/29/2022	1	Team call re trial preparation
3	8/30/2022	3.5	Review Karasic reports and declarations
4	8/30/2022	1	Call with Antommara re trial and preparation
5	9/6/2022	1	Team call re trial preparation
6	9/6/2022	0.7	Call with Antommara re trial and preparation
7	9/6/2022		Review Karasic direct outline
8	9/7/2022	1.1	Review antommara deposition prep materials
9	9/10/2022	2.5	Review Turban reports and declarations
10	9/10/2022	2.4	Prepare Antommara direct outline
11	9/11/2022	3.7	Prepare Antommara direct outline
12	9/12/2022	1.6	Revise Antommara outline
13	9/12/2022	1	Team call re trial preparation
14	9/14/2022	2	Review edits to Antommara direct outline and revise
15	9/15/2022	3.1	Prepare questions for Antommara direct
16	9/15/2022	2	Antommara trial prep session
17	9/18/2022	4.6	Revise Antommara direct outline and questions
18	9/19/2022	0.5	Prepare questions for Antommara prep session
19	9/19/2022	1	Team call re trial preparation
20	9/19/2022	2	Antommara trial prep session
21	9/21/2022	3	Prepare and revise Antommara direct questions
22	9/22/2022	1.3	Review and revise Antommara direct questions
23	9/22/2022	2	Antommara trial prep session
24	9/23/2022	2	Karasic trial prep session
25	9/26/2022	1.9	Antommara trial prep session
26	9/27/2022	2.4	Review and revise Karasic direct
27	9/28/2022	1.8	Review and revise Turban direct
28	9/29/2022	1	Team call re expert prep
29	9/29/2022	2	Antommara trial prep session
30	10/3/2022	0.3	Prepare correspondence to D. Richardson and J. Lester re Antommara trial prep
31	10/3/2022	0.6	Revise Antommara direct questions
32	10/3/2022	1	Team trial prep meeting
33	10/4/2022	1.5	Karasic trial prep session
34	10/4/2022	2	Antommara trial prep session
35	10/5/2022	1	Turban trial prep session
36	10/6/2022	2	Karasic trial prep session
37	10/9/2022	0.9	Review Hruz cross examination outline
38	10/10/2022	1.5	Turban trial cross prep session
39	10/11/2022	2	Antommara trial prep session
40	10/12/2022	2	Karasic trial prep session
41	10/13/2022	1	Revise Antommara outline
42	10/14/2022	1	Antommara Cross prep session
43	10/14/2022	0.8	Tech run through and courtroom review for trial
44	10/14/2022	1	Adkins prep session - partial
45	10/14/2022	0.4	Antommara outline revisions
46	10/14/2022	1.4	Amanda prep session
47	10/14/2022	0.7	Review and comment on Adkins outline
48	10/15/2022	1.7	Prepare Antommara documents for trial
49	10/16/2022	1.2	Revise Antommara direct questions
50	10/17/2022	11	Trial
51	10/17/2022	2	Antommara prep session
52	10/18/2022	7	Trial
53	10/18/2022	1	Hutchison prep

Brandt Summary of Fees Sought by Li Nowlin-Sohl in Motion

Entry No.	Date	Time	Description
54	10/19/2022	7.5	Trial
55	10/21/2022	5	Trial
56	10/24/2022	0.9	Team meeting to discuss trial and prep for next trial week
57	1/11/2023	2.4	Review and revise proposed findings of fact
58	1/23/2023	0.6	Team meeting to discuss post trial brief
Total		121	

Exhibit D

Project/Time entry	User	Start date	Time (decimal)
Brandt v. Rutledge (GB026)			132.700
review outline of testimony from plaintiffs' witnesses and correspondence with Leslie Cooper re same	James Esseks	08/29/2022	0.600
review court decision denying motion to exclude Lappert and Regnerus testimony	James Esseks	08/30/2022	0.300
Edit claims/proof chart	James Esseks	09/08/2022	0.700
emails with Leslie Cooper and Chase Strangio re expert witnesses, sequestration, closings	James Esseks	09/12/2022	0.400
review draft outline of Hutchison direct as part of prep for Stambough direct	James Esseks	09/12/2022	0.900
emails with Leslie Cooper and Dr. Stambough about trial prep	James Esseks	09/14/2022	0.200
review summary of legislative bias evidence and emails with Leslie Cooper about same	James Esseks	09/15/2022	0.500
emails with Richardson re Stambough exhibits	James Esseks	09/16/2022	0.200
emails with Cooper and Richardson about Regnerus cross prep	James Esseks	09/19/2022	0.300
emails with Cooper about Stambough direct outline	James Esseks	09/19/2022	0.400
Draft Stambough direct exam	James Esseks	09/19/2022	2.800
Call with Leslie Cooper about Stambough and Hutchison directs	James Esseks	09/19/2022	0.500
email with Richardson, Bodapati, Cooper, Matthew re Stambough direct outline and witness prep sessions	James Esseks	09/19/2022	0.200
emails with Cooper about Lundstrom materials	James Esseks	09/20/2022	0.400
review Richardson edits to Stambough direct and revise	James Esseks	09/20/2022	0.300
draft and revise Stambough direct outline; email to team re same	James Esseks	09/20/2022	2.700
review Cooper, Bodapati, Matthew edits to Stambough direct; revise same	James Esseks	09/21/2022	1.200
emails with Richardson re Regnerus cross prep	James Esseks	09/21/2022	0.200
emails with Cooper, Sullivan, Strangio, Walas about trial protocols before Judge Moody	James Esseks	09/21/2022	0.400
Stambough witness team discussion about direct examination outline with Cooper, Richardson, Bodapati, Matthew	James Esseks	09/21/2022	1.000
email Dr. Stambough re witness prep sessions	James Esseks	09/23/2022	0.200
revise Stambough direct	James Esseks	09/26/2022	2.100
Witness prep session with Dr. Stambough	James Esseks	09/27/2022	2.000
revise Stambough direct outline/prep outline and draft email to prep team	James Esseks	09/27/2022	1.200
Witness prep session with Dr. Stambough	James Esseks	10/03/2022	1.500
revise Stambough direct outline/prep outline	James Esseks	10/03/2022	1.100
revise Stambough direct outline/prep outline	James Esseks	10/04/2022	1.000
Review Regnerus deposition transcript re cross prep	James Esseks	10/04/2022	0.900
Call with Laura Kabler Oswell and Leslie Cooper re trial tech	James Esseks	10/04/2022	0.400
Witness prep session with Dr. Stambough	James Esseks	10/06/2022	2.000
Prep for prep session for Dr. Stambough	James Esseks	10/06/2022	0.500
Team discussion re response to en banc petition	James Esseks	10/07/2022	0.800
Review and digest Regnerus expert report and supplemental expert report in prep for cross	James Esseks	10/08/2022	3.100
Review and digest Regnerus deposition transcript to prepare for cross	James Esseks	10/09/2022	4.400
prep call with Stambough, Cooper, Bodapati, Mathew, Richardson re Stambough direct testimony	James Esseks	10/09/2022	2.500

Project/Time entry	User	Start date	Time (decimal)
Brandt v. Rutledge (GB026)			132.700
Revise Stambough direct exam	James Esseks	10/09/2022	0.600
Review Regnerus deposition transcript re cross prep	James Esseks	10/10/2022	1.600
review and revise Richardson's draft cross questions for Regnerus	James Esseks	10/10/2022	1.100
Witness prep session with Dr. Hutchison, Dr. Stambough, Cooper, Richardson, Bodapati, Mathew	James Esseks	10/11/2022	0.500
Revise cross of Regnerus	James Esseks	10/11/2022	2.100
Revise Stambough direct exam	James Esseks	10/11/2022	0.700
emails with Leslie Cooper re Hutchison direct and Stambough direct	James Esseks	10/11/2022	0.200
emails with Dan Richardson re Regnerus cross	James Esseks	10/12/2022	0.200
emails with Leslie Cooper and Laura Oswell about trial tech consultant	James Esseks	10/12/2022	0.200
emails about extension request to CA8 re response to petition for en banc review	James Esseks	10/12/2022	0.100
Edit draft of opposition to petition for rehearing en banc; email to ACLU team about same	James Esseks	10/12/2022	0.800
Revise Regnerus cross	James Esseks	10/12/2022	2.600
phone call Leslie Cooper re trial prep, Hutchison direct, Regnerus cross, Levine cross, Hruz cross	James Esseks	10/12/2022	0.800
prep session with Stambough, Cooper, Richardson, Mathew, Bodapati	James Esseks	10/13/2022	2.100
draft cross questions for Stambough; email to team re same	James Esseks	10/13/2022	1.500
email with Dan Richardson and Leslie Cooper re Regnerus cross edits	James Esseks	10/13/2022	0.400
review and revise (third time) draft of opp to state's petition for en banc review; email to ACLU team about same	James Esseks	10/13/2022	0.500
review and revise (second time) draft of opp to state's petition for en banc review; email to ACLU team about same	James Esseks	10/13/2022	0.900
review and revise opp to state's petition for en banc review (second time)	James Esseks	10/14/2022	0.600
review and revise opp to state's petition for en banc review before CA8	James Esseks	10/14/2022	0.800
review Cooper changes to Regnerus cross; revise Regnerus cross; emails with Cooper and Richardson re Regnerus cross	James Esseks	10/14/2022	0.500
review and annotate Hruz expert report	James Esseks	10/14/2022	1.200
revise Stambough direct and cross exams, summarize SOC8 changes for Stambough	James Esseks	10/14/2022	3.100
draft chart to map out timing of plaintiffs' witness testimony; phone call Leslie Cooper re same; emails with team re same	James Esseks	10/15/2022	0.800
review and annotate Hruz expert report	James Esseks	10/15/2022	3.400
prep session with Stambough, Cooper, Richardson, Mathew, Bodapati	James Esseks	10/15/2022	2.200
review and revise Stambough direct and cross	James Esseks	10/15/2022	0.600
conference Cooper re opp to petition for en banc review; emails with team re same	James Esseks	10/16/2022	0.200
prep team meeting agenda; conference Cooper re same	James Esseks	10/16/2022	0.500
review changes to opp to petition for en banc review; emails re same	James Esseks	10/16/2022	0.300
prep session with Dr. Karasic, Cooper, Strangio, Nowlin-Sohl	James Esseks	10/16/2022	4.400

Project/Time entry	User	Start date	Time (decimal)
Brandt v. Rutledge (GB026)			132.700
review and annotate Hruz expert report	James Esseks	10/16/2022	1.900
review revised witness timing chart; emails re same	James Esseks	10/16/2022	0.100
Prep Turban with Strangio	James Esseks	10/17/2022	1.300
attend trial	James Esseks	10/17/2022	12.000
attend trial	James Esseks	10/18/2022	6.500
attend trial	James Esseks	10/19/2022	6.500
attend trial	James Esseks	10/21/2022	5.500
attend trial	James Esseks	11/28/2022	7.000
attend trial	James Esseks	11/29/2022	7.000
attend trial	James Esseks	11/30/2022	6.000
attend trial	James Esseks	12/01/2022	5.500
Total			132.700
Total time: 132.7 hours			

Exhibit E

Expense Code	Description	Fiscal Year	Amount	Total
Case fees (filings, mailing/printing, transcriptions, non-travel expenses, etc.)	LC - mailing/printing	FY22	\$ 82.73	82.73
	CS - mailing/printing	FY22	\$ 263.30	263.3
	Total case fees:			346.03
Travel	LC - PI hearing	FY22	\$ 1,077.83	\$ 1,077.83
	JE - PI hearing	FY22	\$ 1,124.48	\$ 1,124.48
	CS - PI hearing	FY22	\$ 2,351.04	\$ 2,351.04
	Total travel:			\$ 4,553.35
Total PI hearing costs:		\$ 4,899.38		

Expense Code	Description	Fiscal Year	Amount	Total
<i>Case fees (filings, mailing/printing, transcriptions, non-travel expenses, etc.)</i>	Veritext - transcription services	FY23	\$ 5,546.90	\$ 5,546.90
	Veritext - transcription services	FY23	\$ 4,782.90	\$ 4,782.90
	Veritext - transcription services	FY23	\$ 708.00	\$ 708.00
	Veritext - transcription services	FY23	\$ 708.00	\$ 708.00
	Veritext - transcription services	FY23	\$ 708.00	\$ 708.00
	Veritext - transcription services	FY23	\$ 1,725.00	\$ 1,725.00
	Veritext - transcription services	FY23	\$ 5,962.10	\$ 5,962.10
	Veritext - transcription services	FY23	\$ 619.97	\$ 619.97
	Veritext - transcription services	FY23	\$ 601.22	\$ 601.22
	Veritext - transcription services	FY23	\$ 299.63	\$ 299.63
	Veritext - transcription services	FY23	\$ 578.29	\$ 578.29
	Veritext - transcription services	FY23	\$ 337.01	\$ 337.01
	Veritext - transcription services	FY23	\$ 2,118.00	\$ 2,118.00
	Veritext - transcription services	FY23	\$ 5,962.10	\$ 5,962.10
	Veritext - transcription services	FY23	\$ 2,366.20	\$ 2,366.20
	Veritext - transcription services	FY23	\$ 1,904.00	\$ 1,904.00
	Veritext - transcription services	FY23	\$ 4,132.25	\$ 4,132.25
	Veritext - transcription services	FY23	\$ 9,607.20	\$ 9,607.20
	Veritext - transcription services	FY23	\$ 2,374.10	\$ 2,374.10
	Veritext - transcription services	FY23	\$ 811.82	\$ 811.82
	Veritext - transcription services	FY23	\$ 891.94	\$ 891.94
	Veritext - transcription services	FY23	\$ 455.00	\$ 455.00
	Veritext - transcription services	FY23	\$ 195.00	\$ 195.00
	Veritext - transcription services	FY23	\$ 130.00	\$ 130.00
	Veritext - transcription services	FY23	\$ 455.00	\$ 455.00
	Veritext - transcription services	FY23	\$ 455.00	\$ 455.00
	Veritext - transcription services	FY23	\$ 105.00	\$ 105.00
	Veritext - transcription services	FY23	\$ 105.00	\$ 105.00
	Veritext - transcription services	FY23	\$ 105.00	\$ 105.00
	Veritext - transcription services	FY23	\$ 105.00	\$ 105.00
	Veritext - transcription services	FY23	\$ 80.00	\$ 80.00

Expense Code	Description	Fiscal Year	Amount	Total
	Veritext - transcription services	FY23	\$ 455.00	\$ 455.00
	Veritext - transcription services	FY23	\$ 105.00	\$ 105.00
	Veritext - transcription services	FY23	\$ 105.00	\$ 105.00
	Veritext - transcription services	FY23	\$ 45.00	\$ 45.00
	Veritext - transcription services	FY23	\$ 764.00	\$ 764.00
	CS - printing	FY23	\$ 63.47	\$ 63.47
	Total case fees:		\$	56,472.10
<i>Travel</i>	LC - deposition	FY 23	\$ 2,494.61	\$ 2,494.61
	LC - deposition	FY22	\$ 1,321.38	\$ 1,321.38
	LC - oral argument	FY 23	\$ 75.00	\$ 75.00
	CS - deposition	FY 23	\$ 1,857.92	\$ 1,857.92
	CS - oral argument	FY 23	\$ 1,255.39	\$ 1,255.39
	Total travel:		\$	7,004.30
Total discovery costs:		\$	63,476.40	

Expense Code	Description	Fiscal Year	Amount	Total
<i>Case fees (filings, mailing/printing, transcriptions, non-travel expenses, etc.)</i>	Flora - court reporter (wk. 1)	FY23	\$ 2,049.60	\$ 2,049.60
	Dellinger - court reporter (wk. 1)	FY23	\$ 1,153.50	\$ 1,153.50
	Hinson - court reporter (wk. 1)	FY23	\$ 1,078.80	\$ 1,078.80
	AR Real Time - transcription services	FY23	\$ 147.00	\$ 147.00
	AR Real Time - transcription services	FY23	\$ 110.25	\$ 110.25
	Dellinger - court reporter (wk. 2)	FY23	\$ 1,341.42	\$ 1,341.42
	Hinson - court reporter (wk. 2)	FY23	\$ 525.78	\$ 525.78
	Flora - court reporter (wk. 2)	FY23	\$ 839.76	\$ 839.76
Total case fees:				\$ 7,246.11
<i>Professional Services - Expert witness travel</i>	Turban - travel expenses	FY23	\$ 2,372.79	\$ 2,372.79
	Antommaria - travel expenses	FY23	\$ 4,364.23	\$ 4,364.23
	Hutchinson - travel expenses	FY23	\$ 384.20	\$ 384.20
	Adkins - travel expenses	FY23	\$ 1,205.00	\$ 1,205.00
	Karasic - travel expenses	FY23	\$ 743.83	\$ 743.83
Total professional services:				\$ 9,070.05
<i>Travel</i>	LC - trial (pt. 1)	FY23	\$ 5,078.03	\$ 5,078.03
	LC - trial (pt. 2)	FY23	\$ 956.78	\$ 956.78
	JE - trial (pt. 1)	FY23	\$ 6,829.25	\$ 6,829.25
	JE - trial (pt. 2)	FY23	\$ 6,810.46	\$ 6,810.46
	LNS - trial (pt. 1)	FY23	\$ 5,316.02	\$ 5,316.02
	CS - trial (pt. 1)	FY23	\$ 3,144.33	\$ 3,144.33
	CS - trial (pt. 2)	FY23	\$ 1,408.64	\$ 1,408.64
Total travel:				\$ 29,543.51
Total trial costs:			\$	45,859.67

Exhibit F

**THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

-----	x	
DYLAN BRANDT, et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Case No. 4:21-CV-00450-JM
	:	
TIM GRIFFIN, et al.,	:	
	:	
Defendants.	:	
	:	
-----	x	

**DECLARATION OF ANNE L. CLARK IN SUPPORT OF
PLAINTIFFS' MOTION FOR ATTORNEY FEES**

ANNE L. CLARK, under penalty of perjury, affirms and states as follows:

1. I am the Managing Partner of the firm Vladeck, Raskin & Clark, P.C. (the "Vladeck Firm").¹ I submit this declaration in support of the motion filed by the Plaintiffs for an award of attorney fees and costs arising from the work performed by attorneys at the American Civil Liberties Union ("ACLU") Foundation in preparing, filing, and litigating the above-captioned case. Specifically, I submit this declaration to provide evidence of what hourly rate ACLU lawyers James Esseks, Leslie Cooper, and Chase Strangio would command in the New York legal market for civil rights litigation if they were in private practice.

1. The Vladeck Firm concentrates in representing individuals in civil rights cases involving employment discrimination, and has successfully represented employees in numerous litigations and arbitrations. See, e.g., Merino v. Beverage Plus Am. Corp., No. 10 Civ. 0706, 2014

¹ Until June 2015, the name of the firm was Vladeck, Waldman, Elias & Engelhard, P.C.

WL 1744728 (S.D.N.Y. Mar. 6, 2014) (\$1.29 million judgment); Redd v. New York Div. of Parole, 678 F.3d 166 (2d Cir. 2012) (reinstating sexual harassment claims); DeCurtis v. Upward Bound Int'l, Inc., No. 09 Civ. 5378, 2012 WL 4561127 (S.D.N.Y. Sept. 27, 2012), aff'd sub nom. De Curtis v. Ferrandina, 529 F. App'x 85 (2d Cir. 2013) (affirming default judgment of \$845,309.11); Davis v. Abercrombie & Fitch Co., No. 08 Civ. 01859 (S.D.N.Y. October 2009); Sotak v. McGraw-Hill Companies, Inc., 07 Civ. 2698 (S.D.N.Y. trial January 2009); Zakre v. Norddeutsche Landesbank Girozentrale, 541 F. Supp. 2d 555 (S.D.N.Y. 2008), aff'd, 344 F. App'x 628 (2d Cir. 2009); Browne-Sanders v. Madison Square Garden, L.P., et al., No. 06 Civ. 0589 (S.D.N.Y. trial Sept.–Oct. 2007); Pappas v. Watson Wyatt & Co., No. 3:04-CV-304, 2008 WL 793597 (D. Conn. Mar. 20, 2008); Sandhaus v. McCann Erickson, Inc., No. 03 Civ. 6743 (S.D.N.Y. trial August 2005); Fitzgerald v. Ford Marrin Esposito Witmeyer & Gleser, L.L.P., No. 01-7256, 01-7322, 2002 WL 313225 (2d Cir. Feb. 27, 2002) (reinstating jury verdict in plaintiff's favor); Lawrence E. Lewis v. Communicar, Inc., No. 99 CV 609 (E.D.N.Y. trial December 2001); Ginsberg v. Valhalla Anesthesia Assocs., P.C., No. 96 Civ. 6462, 1997 WL 669870 (S.D.N.Y. Oct. 28, 1997); Mahoney v. Canada Dry Bottling Co. of New York, No. 94 Civ. 2924, 1998 WL 231082 (E.D.N.Y. May 7, 1998); DeGaetano v. Smith Barney, Inc., 983 F. Supp. 459 (S.D.N.Y. 1997); Dailey v. Societ  G n rale, 915 F. Supp. 1315 (S.D.N.Y. 1996), aff'd in part and vacated in part, 108 F.3d 451 (2d Cir. 1997); McIntosh v. Irving Trust Co., 873 F. Supp. 872 (S.D.N.Y. 1995); Malarkey v. Texaco, Inc., 794 F. Supp. 1237 (S.D.N.Y. 1992), aff'd, 983 F.2d 1204 (2d Cir. 1993); Pierce v. F.R. Tripler & Co., 770 F. Supp. 118 (S.D.N.Y. 1991), aff'd in relevant part and rev'd in part, 955 F.2d 820 (2d Cir. 1992); Wulach v. Bear Stearns & Co., No. 86 Civ. 5644, 1988 WL 123632 (S.D.N.Y. Nov. 8, 1988); Whittlescy v. Union Carbide Corp., 742 F.2d 724 (2d Cir. 1984); Plummer v. Chem. Bank, 579 F. Supp. 1364 (S.D.N.Y. 1984); Melani v. Bd. of Higher Educ. of

New York, 561 F. Supp. 769 (S.D.N.Y. 1983); Lo Re v. Chase Manhattan Corp., 431 F. Supp. 189 (S.D.N.Y. 1977). See also County of Suffolk v. Long Island Lighting Co. ("LILCO"), 710 F. Supp. 1407 (E.D.N.Y. 1989) (civil RICO, fraud case) aff'd, 907 F.2d 1295 (2d Cir. 1990); County of Suffolk v. Acorn, 710 F. Supp. 1428 (E.D.N.Y. 1989), aff'd in part and rev'd in part, 907 F.2d 1295 (2d Cir. 1990). In LILCO, Judge Weinstein described the firm as "of excellent quality." 710 F. Supp. at 1412.

2. I became associated with the Vladeck Firm in September 1993 and became a partner in January 1997. I became Managing Partner in January 2022. I graduated from New York University in 1985 and received my J.D. from New York University School of Law in 1990. Before my association with the Vladeck Firm, I was a law clerk for the Honorable Raymond J. Pettine in the United States District Court for the District of Rhode Island. After my clerkship, I worked for two years as a Skadden Fellow/staff attorney at the NOW Legal Defense and Education Fund ("NOW LDEF"). At NOW LDEF, I worked on the Eleventh Circuit appeal of Robinson v. Jacksonville Shipyards, Inc., 760 F. Supp. 1486 (M.D. Fla. 1991); served as lead counsel and argued the appeal of Townsend v. Indiana Univ., 995 F.2d 691 (7th Cir. 1993); and submitted an amicus curiae brief to the Supreme Court on Harris v. Forklift Sys., Inc., 510 U.S. 17 (1993).

3. Since becoming associated with the Vladeck Firm, I have served as lead counsel and co-counsel for plaintiffs in many civil rights employment cases in federal court, including serving as lead counsel in the trials of Carlson v. Northwell Health Inc., No. 20 CV 9852 (S.D.N.Y. trial May 2022); Delville v. Firmenich Inc., No. 08 Civ. 10891 (S.D.N.Y. trial November 2013); Zakre, No. 03 Civ. 257 (S.D.N.Y. trial April 2007); Pappas, 2008 WL 793597 (D. Ct. trial December 2006); Sandhaus, No. 03 Civ. 6743 (S.D.N.Y. trial August 2005); Kreinik v. Showbran Photo, Inc., No. 02 Civ. 1172 (S.D.N.Y. trial October 2004); Riisna v. Am. Broad. Cos., Inc., 219 F. Supp. 2d 568

(S.D.N.Y. trial February 2003); and Mahoney, 94 Civ. 2924; and as co-counsel in the trials of Fitzgerald, 2002 WL 313225; Ginsberg, 1997 WL 669870; and Antreassian v. Chem. Bank, 93 Civ. 6812 (SDNY trial June 1996). I have also been lead counsel in arbitrations concerning employment discrimination before the American Arbitration Association and JAMS and lead counsel and co-counsel in employment arbitrations before FINRA and its predecessors, the New York Stock Exchange and National Association of Securities Dealers.

4. In March 2021, the New York State Attorney General appointed me to co-lead the investigation of sexual harassment allegations against then-Governor Andrew Cuomo ("Cuomo"). The Attorney General also appointed another Vladeck Firm partner and two associates to work on the investigation.

5. For over a dozen years, I was an adjunct professor at Fordham University School of Law, where I co-taught "Women and the Law" and then "Employment Discrimination," and have guest-lectured at New York University School of Law, Cardozo Law School, New York Law School, Rutgers University School of Law, and John Jay College. I was on the Executive Board of the National Employment Lawyers Association/New York ("NELA/NY") and have spoken about employment law to numerous organizations, including the American Bar Association, the Institute of Judicial Administration/Center for Labor and Employment Law at New York University School of Law, the New York State Bar Association, the Practicing Law Institute, and the Pro Se Mediation Program at the U.S. District Court for the Southern District of New York.

6. I am familiar with the hourly rates awarded to civil rights attorneys in the New York area. As set forth below, courts have found that the rates charged by the Vladeck Firm are consistent with market rates.

7. The Vladeck Firm charges \$550-\$850 per hour for partners. The Vladeck Firm

currently charges \$800-850 per hour for my time. The firm bills many clients on an hourly basis and clients of the Vladeck Firm routinely pay my hourly rate.

8. I worked with James Esseks ("Esseks") at the Vladeck Firm from 1993 until 2001, including trying the Mahoney case with him. Even when I did not directly work with him on cases, I was familiar with his work. His legal work was always outstanding. Since Esseks left the Vladeck Firm to join the ACLU, I have followed a number of the cases he has worked on, and have continued to be impressed by his work and accomplishments. I have also reviewed his Declaration in support the motion for attorneys' fees, which details his experience. I have no doubt that were Esseks still employed at the Vladeck Firm, his billing rate would be \$800-850 per hour and clients would be willing to pay that rate.

9. Eight years ago, the Vladeck Firm was awarded \$700 per hour for the time of Vladeck partners, including me. See e.g., Kovach v. City Univ. of N.Y., 13 Civ. 7198 (LGS), 2015 WL 3540798, at *2, 5 (S.D.N.Y. Jun. 4, 2015) (approving \$700 per hour for my time); Merino v. Beverage Plus Am. Corp., No. 10 Civ. 0706 (ALC), 2012 WL 4468182, at *3 (S.D.N.Y. Sept. 25, 2012) (approving rate of \$700 for senior Vladeck partner who now bills at \$700-750 and \$450 for Vladeck partner less experienced than Esseks). In 2016, an arbitrator with the American Arbitration Association issued an award of attorneys' fees based on the rate of \$700 per hour for my time. See 2016 AAA Employment LEXIS 1 (Jan. 22, 2016). Over ten years ago, several courts awarded \$600 and \$550 for Vladeck partners who were less experienced than Esseks, see, e.g., Gualpa v. NY Pro Signs, Inc., No. 11 Civ. 3133 (LGS)(FM), 2014 WL 2200393, at *9 (S.D.N.Y. May 27, 2014) (approving rate of \$600 for Vladeck partner less-experienced than Esseks); DeCurtis v. Upward Bound Int'l. Inc., No. 09 Civ. 5378 (RJS), 2013 WL 3270357, at *6 (S.D.N.Y. June 3, 2013) (using rate of \$600 for Vladeck partner less-experienced than Esseks);

DeCurtis, 2011 WL 4549412, at *7-8 (S.D.N.Y. Sept. 27, 2011) (approving rate of \$550 for a Vladeck partner less-experienced than Esseks).

10. Leslie Cooper ("Cooper") is an ACLU lawyer who was part of the plaintiffs' team in this case. She graduated from law school in 1995. Given her years out of law school and legal experience, the Vladeck Firm would charge at least \$750 per hour for Cooper's time. As support for that rate, I note that one of the Vladeck Firm partners, Maia Goodell ("Goodell"), graduated from law school in 2001. The Vladeck Firm charges \$730 per hour for her time.

11. Chase Strangio ("Strangio") is an ACLU lawyer who was part of the plaintiffs' team in this case. He graduated from law school in 2010. Given his graduation year and legal experience, the Vladeck Firm would charge at least \$600 an hour for Strangio's time. As support for that rate, I note that Jeremiah Iadevaia ("Iadevaia") is a partner with the Vladeck Firm who graduated from law school in 2006. The Vladeck Firm currently bills \$675 an hour for Iadevaia's time. In 2013 and 2014, courts approved the hourly rate of \$350 for Iadevaia. See Gualpa v. NY Pro Signs Inc., No. 11 Civ. 3133, 2014 WL 2200393, at *9 (S.D.N.Y. May 27, 2014); DeCurtis, 2013 WL 3270357, at *6; see also Kovach, 2015 WL 3540798, at *2, 5 (awarding the Vladeck Firm \$350 per hour in 2015 for a former associate who graduated in 2006). In 2015, the Second Circuit Court of Appeals, the Southern District of New York, and the Bankruptcy Court in the Eastern District of New York awarded fees in the same case at \$450 per hour for Iadevaia. See De Curtis v. Upward Bound Int'l, Inc., No. 09-cv-5379 (RJS), 2015 WL 5254767, at * 3 (S.D.N.Y. Aug. 28, 2015). Vladeck Firm partner Yannick Grant graduated from law school in 2012 and the firm charges \$550 per hour for his time.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 18, 2023, in New York, New York.


ANNE L. CLARK

Exhibit 9

**THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

-----	X	
DYLAN BRANDT, et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Case No. 4:21-CV-00450-JM
	:	
TIM GRIFFIN, et al.,	:	
	:	
Defendants.	:	
	:	
-----	X	

**DECLARATION OF LAURA KABLER OSWELL IN SUPPORT OF
PLAINTIFFS’ MOTION FOR ATTORNEYS’ FEES AND COSTS**

I, LAURA K. OSWELL, declare as follows:

1. I have served as lead Sullivan & Cromwell LLP (“Sullivan & Cromwell,” “S&C,” or “the Firm”) counsel in the above-captioned matter (“Action”) from its inception to the present.

2. I am a partner at Sullivan & Cromwell, a member of the Bar of the State of California, and admitted *pro hac vice* to the Eastern District of Arkansas for this Action. I submit this declaration in support of Plaintiffs’ Motion for Attorneys’ Fees and Costs (the “Motion”) to provide information about Sullivan & Cromwell’s fees and costs in this Action. The information in this declaration is based upon my personal knowledge, and if called upon to testify, I could and would competently testify thereto.

3. Since April 2021, attorneys from Sullivan & Cromwell have represented Plaintiffs pro bono in this Action. I am the Sullivan & Cromwell partner responsible for overseeing

the legal services performed by those lawyers, as well as the expenses incurred by S&C, in connection with the Action.

4. This Action involved a first-in-the-nation outright ban on gender-affirming medical care for minors with gender dysphoria. Despite fierce opposition, and overriding the veto of Governor Asa Hutchinson, the Arkansas’s General Assembly passed Act 626 (the “Act”) on April 6, 2021. ARK. CODE ANN. §§ 20-9-1502. The Act prohibited healthcare professionals from providing “gender transition procedures” to any individual under eighteen years of age or from referring any individual under eighteen years of age to any healthcare professional for “gender transition procedures.” *Id.* On May 25, 2021, Plaintiffs sued, arguing that the Act violated the Equal Protection Clause, the Due Process Clause, and the First Amendment—and that declaratory and permanent injunctive relief barring enforcement of the Act was necessary.

5. Through this Motion, Plaintiffs are seeking an award of attorneys’ fees and costs, including those of Sullivan & Cromwell, for the results achieved in this vigorously litigated and successful matter. Although the Motion seeks fees for certain of the work Sullivan & Cromwell performed, the Firm agreed at the Action’s inception to donate all of the fees recovered to the American Civil Liberties Union Foundation, Inc. (“ACLU National”) and the American Civil Liberties Union of Arkansas after it recovers its costs.¹

¹ The fees and costs sought in the Motion for Sullivan & Cromwell are for the period from the inception of S&C’s work in connection with the case through February 1, 2023, the date of the filing of post-trial briefing. (*See* Plaintiffs’ Post-Trial Brief (ECF No. 266)). For our internal calculation of a donation to the ACLU from any fee award the Firm receives, Sullivan & Cromwell reserves the right to supplement the amount of costs identified in the Motion that it would deduct prior to the donation to include other costs that S&C has incurred in connection with the Action and to retain a tax offset (including any taxes on any portion of the fees retained to defray costs) for any portion of a fee award to S&C that the Firm thereafter donates.

6. Because Sullivan & Cromwell is representing Plaintiffs pro bono, it has not billed Plaintiffs for any legal services or any costs incurred by the Firm.

7. As described below, the rates sought in the Motion for each S&C timekeeper are substantially lower than those charged to the Firm's commercial clients. They are also substantially lower than the rates approved by courts in other proceedings for S&C attorneys with similar levels of experience. (*See infra* Section IV.) In this Action, instead of our traditional billing rates, we have applied rates consistent with those New York courts have awarded to Plaintiffs' counsel in similar civil rights matters, and they are all lower than what we charge for non-pro bono clients. *See* Ex. 8, Ex. F (Declaration of Anne Clark ("Clark Decl.")) ¶¶ 5-6; *infra* ¶¶ 50-57. While all of our lawyers practice in jurisdictions outside of Arkansas, Sullivan & Cromwell is seeking Arkansas rates for all junior lawyers and any more senior lawyers who left the Firm prior to trial. For those lawyers, the in-state rates we are seeking are consistent with the rates of local counsel. *See* Ex. 4 (Declaration of Beth Echols ("Echols Decl.")) ¶¶ 1-2; Ex. 5 (Declaration of Drake Mann ("Mann Decl.")) ¶¶ 1-2; Ex. 6 (Declaration of Christopher Travis ("Travis Decl.")) ¶¶ 1-2.

8. The Motion seeks fees for only some of the time Sullivan & Cromwell personnel recorded in connection with this case. The Motion requests fees for the efforts of only a subset of lawyers (including me) and paralegals. These lawyers conducted the lion's share of the Firm's work on the case during the period for which fees and costs are sought in the Motion. Further, these lawyers did not work on the matter simultaneously; instead, as some lawyers left the Firm for clerkships or other employment, other lawyers would join the matter.

9. Many other S&C lawyers, paralegals, and non-legal personnel made valuable contributions to the matter, but the motion does not seek fees for their time. For instance,

Sullivan & Cromwell is not seeking fees for the substantial contributions of associates who individually billed less than 300 hours to the matter. S&C has also excluded the work performed by summer associates and associates before they were admitted to the bar. We have also excluded time billed by support staff, except for the two most consistently involved paralegals who worked on the matter leading up to and through the trial.

10. S&C has also reviewed each time entry for the S&C timekeepers covered by the Motion, and in the exercise of billing judgment, has substantially reduced the time for which fees are sought. For example, S&C is not seeking fees for weekly team calls with co-counsel—other than for four S&C attorneys who worked on the matter at different stages of the litigation—or internal weekly S&C associate team calls. Additionally, S&C is not seeking fees for work that was related to media communications, S&C team turnover, assigning or reviewing work of summer associates, somewhat ministerial tasks performed by lawyers, and work driven by our lawyers’ being barred in jurisdictions outside Arkansas (*e.g.*, *pro hac vice* admissions).

11. Attached as Exhibit A is a summary of the rates and hours sought for each timekeeper included in the Motion, and attached as Exhibit B are modified timesheets for each timekeeper whose time is covered in the Motion. For clarity about the time for which the Motion seeks fees, each timesheet was modified by eliminating entries for tasks for which no fees are sought (*e.g.*, certain ministerial tasks and work we deemed to be primarily of a non-legal nature). We also have reduced or eliminated from Exhibits A and B the actual recorded hours for certain tasks to account for possible inefficiencies. The Motion seeks to recover fees only for the reduced number of hours included in the modified timesheets in those Exhibits. We also have amended certain of the narratives in those timesheets to protect legal privileges, *e.g.*, substituting generic descriptions for the specifics of research projects. In general, those modifications appear in square

brackets in the timesheets included in Exhibit B. Additional detail about the timesheets is provided below. (*Infra* Section III.b).

12. Similarly, the Motion seeks to recover for only certain costs, which are listed in Exhibit C. For example, the Motion does not seek costs for any transportation to or from S&C's offices or any meals (*i.e.*, weekend or evening transportation or meals) other than in connection with travel to Arkansas relating to the Action. Additional detail is provided below. (*Infra* Section III.c).

I. PROCEDURAL HISTORY AND SIGNIFICANCE OF THIS ACTION

13. Sullivan & Cromwell became involved in this case in part because of its dedication to pro bono work, which it considers it to be an important commitment of every lawyer.² Sullivan & Cromwell attorneys devote substantial time to a broad range of issues from domestic violence and family law to the protection of refugees to microfinance and LGBTQ+ rights. I, along with the team of Sullivan & Cromwell associates and staff, have dedicated at least 13,047 hours to litigating this case, making this the Firm's largest pro bono litigation by hours in 2022.

14. Sullivan & Cromwell has been involved in this litigation since before the filing of the Complaint in May 2021. Since the inception, this Action has required substantial time and resources to litigate, including extensive preliminary injunction, pre-trial, and post-trial briefing. The eight-day trial in this case included the testimony of 21 witnesses, which necessitated significant preparation, including relating to complex, scientific concepts. And, as described

² In 2022, Sullivan & Cromwell devoted more than 61,000 hours to a range of pro bono activities, and served untold individuals as well as legal, charitable, and government organizations. See Get Involved with Pro Bono, Sullivan & Cromwell LLP, <https://careers.sullcrom.com/get-involved-in-pro-bono>.

below at (*infra* ¶¶ 61-63), Defendants’ litigation conduct unnecessarily compounded the amount of work required for such a complex and precedent-setting civil rights case in multiple ways.

15. Due to these substantial efforts, on June 20, 2023, this Court held that the State’s ban on gender-affirming medical care for minors unconstitutionally infringed on Plaintiffs’ equal protection, due process, and free speech rights, permanently enjoined the Act, and issued judgment for Plaintiffs. Specifically, the Court held that “[s]ubstantial evidence at trial demonstrated that [the Act] violates Plaintiffs’ constitutional rights,” and that “[t]estimony from the Minor Plaintiffs, their parents, Dr. [Kathryn] Stambough and the experts proved that they would suffer immediate and irreparable harm from [the Act] if it were to go into effect.” *Brandt v. Rutledge*, No. 21CV00450, 2023 WL 4073727, at *38 (E.D. Ark. June 20, 2023).

16. Plaintiffs also achieved significant victories throughout the litigation of important precedential value. In June 2021, Plaintiffs successfully moved for a preliminary injunction that prevented the Act from taking effect the next month. The Eighth Circuit upheld the Court’s decision in August 2022, ruling that the Act “distinguishes between those who may receive certain types of medical care and those who may not” based on the patient’s sex assigned at birth and “is therefore subject to heightened scrutiny.” *Brandt by & through Brandt v. Rutledge*, 47 F.4th 661, 670 (8th Cir. 2022). Since then, both this Court’s preliminary injunction order and the Eighth Circuit’s decision affirming that order have been cited in multiple other cases about gender-affirming medical care.

II. SULLIVAN & CROMWELL QUALIFICATIONS

17. I have been involved in this case since before the filing of the Complaint. I am working on this case because of my dedication to pro bono work and expertise in litigating

complex cases, including class action lawsuits and trial work. When I took on this case, I recruited a team of Sullivan & Cromwell associates to assist me.

A. My Professional Background

18. I have been a lawyer since 2005, when I graduated with a J.D. from Stanford University. I have been employed by Sullivan & Cromwell since 2005 and became a partner in 2014. Throughout my career, I have represented companies and individuals in a wide variety of matters, including transaction-related, derivative, commercial and contract disputes, antitrust and employment litigation, and securities class actions. I also represent companies and individuals in matters before the U.S. Securities and Exchange Commission and the U.S. Department of Justice and am a practice group leader for Sullivan & Cromwell's Foreign Corrupt Practices team. Since 2015, I have also led the Firm's efforts in another significant pro bono matter, *Stiavetti v. Ahlin*, No. RG15-779731, 2019 WL 2176240 (Cal. Super. Ct. Apr. 19, 2019), which involves protecting the constitutional rights of people found incompetent to stand trial. Within the past ten years, I have tried four cases to verdict, including this Action, achieving victories for all clients.

19. Among the achievements and accolades it has been my good fortune to receive is being named one of the "Top Women Lawyers in California" by the *Daily Journal*. I have also been named a runner-up for "Litigator of the Week" by *AmLaw Litigation Daily*. I have further been recognized in *Benchmark Litigation's* "40 & Under Hot List," as one of the "Top 40 under 40" by the *Daily Journal*, and as a "Rising Star" for litigation at Euromoney's Americas Women in Business Law Awards. I have further been selected as one of *Global Investigations'* "40 under 40," as a "Rising Star" for trials by *Law 360*, and have been named in "Who's Who Legal Investigations," a guide that outlines the leading firms and lawyers worldwide in investigations work.

20. In this Action, I supervised the Sullivan & Cromwell team, oversaw case strategy, reviewed pleadings, briefs, and other filings, and cross-examined Defendants' expert witness, Dr. Patrick Lappert, at trial. Throughout the litigation, I have used my considerable trial experience and background to help win this case. Since becoming involved in the matter, I have dedicated a total of 237.25 hours to this case for which the Motion seeks fees. I am seeking an out-of-state rate of \$650, which, multiplied by the number of hours for which the Motion seeks recovery, amounts to \$154,212.50 in imputed fees. As in all of my cases, I have endeavored to dedicate my efforts to the demands of the Action and be available for this matter in addition to the many demands associated with a considerable caseload of other, non-pro bono, client matters.

B. Qualifications of Sullivan & Cromwell's Other Attorneys

21. The 11 other current and former S&C attorneys covered by the Motion have worked on the Action in addition to the other demands of their active caseloads. To avoid duplication and emphasize efficiency, S&C does not seek fees for time of associates who individually worked fewer than 300 hours on this case. In addition, three of the lawyers for whom fees are sought worked on the case only before August 2022, and four of the lawyers for whom fees are sought worked on the case only after August 2022. Because the Motion seeks fees for only a subset of the attorneys who worked on the case, we have reduced the hours for which fees are sought by thousands of hours. Further, while all of our lawyers practice in jurisdictions outside of Arkansas, we are seeking Arkansas rates for junior lawyers and more senior lawyers who left the Firm prior to trial. The lawyers described below for whom the Motion seeks national rates have extensive complex commercial litigation, trial, appellate, and/or pro bono experience. They each brought their individual backgrounds and expertise to the matter, as detailed below. Below

is a brief summary of each of their qualifications, hours, rates, and the total fees sought for S&C's work on the Action.

22. Garrard Beeney graduated from the University of Pennsylvania Law School in 1979 and was admitted to the Bar of the State of New York in 1980. Mr. Beeney joined Sullivan & Cromwell in 1979 and became a partner in 1987. Mr. Beeney is the co-head of Sullivan & Cromwell's Intellectual Property and Technology Group and is regularly recognized as a leading lawyer for his counsel to clients on intellectual property and licensing transactions and litigation matters around the world. Among other accolades, *IAM Patent 1000* lauded Mr. Beeney as "the person to connect with when you want to push the boundaries," commenting that he is "one of the best in the business" and "a fine litigator with sound judgment and strong pragmatic instincts." Mr. Beeney has an extensive and longstanding pro bono practice involving the constitutional rights of LGBTQ+ people, including in matters involving adoption by same-sex couples and in a First Amendment trial involving anti-LGBTQ+ viewpoint discrimination. *See, e.g., Buck v. Gordon*, 959 F.3d 219 (6th Cir. 2020); *Bostic v. Schaefer*, 760 F.3d 352 (4th Cir. 2014); *Ark. Dep't of Hum. Servs. v. Cole*, 2011 Ark. 145, 380 S.W.3d 429 (2011); *Gillman ex rel. Gillman v. Sch. Bd. for Holmes Cty.*, 567 F. Supp. 2d 1359 (N.D. Fla. 2008). Mr. Beeney leveraged his substantial experience and expertise to help oversee litigation and trial strategy, including editing pleadings, briefs, and other filings, especially during the initial phases of the case. Since becoming involved in the matter, Mr. Beeney has dedicated a total of 89.25 hours to this case for which the Motion seeks attorneys' fees. Sullivan & Cromwell is seeking a national rate of \$800, which, multiplied by the number of hours for which the Motion seeks recovery, amounts to \$71,400 in imputed fees.

23. Lauren Goldsmith received her J.D. from the University of California, Berkeley, School of Law in 2013, and her Ph.D. in Jurisprudence and Social Policy from the

University of California, Berkeley in 2016. Ms. Goldsmith has been a member of the New York bar since 2018 and the California bar since 2013. While pursuing her Ph.D., Ms. Goldsmith studied Constitutional and Family Law and co-taught two courses at the University of California, Berkeley. Prior to joining Sullivan & Cromwell in 2016, Ms. Goldsmith clerked for the Honorable John T. Noonan, Jr., of the U.S. Court of Appeals for the Ninth Circuit. Ms. Goldsmith later clerked for the Honorable Lorna G. Schofield, of the U.S. District Court for the Southern District of New York, after which she rejoined Sullivan & Cromwell. In addition to her pro bono work on this matter, Ms. Goldsmith works on a variety of complex litigation matters and has extensive previous pro bono experience, including involving the constitutional rights of LGBTQ+ people, specifically whether the non-biological child of a married LGBTQ+ parent could be recognized as an American citizen at birth. *Dvash-Banks v. Pompeo*, No. CV 18-523-JFW(JCx), 2019 WL 911799 (C.D. Cal. Feb. 21, 2019), *aff'd sub nom E. J. D.-B. v. U.S. Dep't of State*, 825 F. App'x 479 (9th Cir. 2020). Other previous pro bono work includes *Stiavetti*, 2019 WL 2176240. Ms. Goldsmith has been the senior associate on this matter from July 2022 to present and, since that time, has supervised all associates and worked directly on all major aspects of the case. For example, Ms. Goldsmith supervised and edited all submissions to the Court and the Eighth Circuit, corresponded with Defendants regarding the Action, prepared for and conducted the direct examination of Amanda Dennis at trial, prepared for and participated in the eight-day trial before the Court, and took a lead role in the formulation of Plaintiffs' litigation and trial strategy. During her time working on the matter, Ms. Goldsmith has dedicated a total of 488.75 hours to the Action for which the Motion seeks attorneys' fees. Sullivan & Cromwell is seeking a national rate of \$550, which, multiplied by the number of hours for which the Motion seeks recovery, amounts to \$268,812.50 in imputed fees.

24. Duncan Simpson LaGoy received his J.D. from Columbia Law School in 2014. Mr. Simpson LaGoy began his career with Sullivan & Cromwell in 2014. He is admitted to practice law in California. During his time at Sullivan & Cromwell, Mr. Simpson LaGoy worked on a variety of complex litigation matters, in addition to his pro bono work on this matter. His previous pro bono work also included *Stiavetti*, 2019 WL 2176240. Mr. Simpson LaGoy was the senior associate on this matter from its inception until July 2022. During that time, Mr. Simpson LaGoy supervised all associates and worked directly on all major aspects of the case, including, for example, supervising pre-trial discovery, corresponding with Defendants regarding the Action, working on the pre-Complaint investigation of Plaintiffs and potential claims, drafting and editing Plaintiffs' Motion for Preliminary Injunction and Opposition to Motion to Dismiss, and taking a lead role in the formulation of Plaintiffs' litigation strategy. During his time working on the matter, Mr. Simpson LaGoy dedicated a total of 473.5 hours to the Action for which the Motion seeks attorneys' fees. Sullivan & Cromwell is seeking a rate of \$225, which, multiplied by the number of hours for which the Motion seeks recovery, amounts to \$106,537.50 in imputed fees.

25. Jonathan Ossip received his J.D. from the New York University School of Law in 2015. Mr. Ossip clerked for the Honorable Eric L. Clay, of the U.S. Court of Appeals for the Sixth Circuit, and the Honorable Lawrence E. Kahn, of the U.S. District Court for the Northern District of New York. During his time at Sullivan & Cromwell, and in addition to his pro bono work on this matter, Mr. Ossip worked on a variety of complex litigation matters. Mr. Ossip was part of the pre-trial team from its inception until June 2022 and was involved in selecting Plaintiffs, drafting and editing the Complaint, working on expert declarations and reports, coordinating document discovery, and preparing Plaintiffs' witnesses for deposition. Mr. Ossip also defended

Plaintiffs' expert, Dr. Armand Antommaria, at deposition and deposed Defendants' witness, Dr. Lappert. During his time working on the matter, Mr. Ossip dedicated a total of 518.25 hours to the Action for which the Motion seeks attorneys' fees. Sullivan & Cromwell is seeking a rate of \$200, which, multiplied by the number of hours for which the Motion seeks recovery, amounts to \$103,650 in imputed fees.

26. Alexander Peacocke received his J.D. from the New York University School of Law in 2016. Mr. Peacocke clerked for the Honorable Barbara Moses, of the U.S. District Court for the Southern District of New York, and the Honorable Madeline Cox Arleo, of the U.S. District Court for the District of New Jersey, as well as the Honorable Julio Fuentes, of the U.S. Court of Appeals for the Third Circuit. During his time at Sullivan & Cromwell, and in addition to his pro bono work on this matter, Mr. Peacocke worked on a variety of complex litigation matters. Mr. Peacocke was part of the litigation team from August to December 2022. Mr. Peacocke drafted and edited pre- and post-trial submissions, including Plaintiffs' Response in Opposition to Defendants' Motion to Exclude Plaintiffs' Evidentiary Deposition Designations, and played a key role in preparing Plaintiffs' fact and expert witnesses for trial. He also had a key role in drafting and revising Plaintiffs' Opposition to the Petition for Rehearing En Banc that was submitted to the Eighth Circuit on the first day of trial. During his time working on the matter, Mr. Peacocke dedicated a total of 259.5 hours to the Action for which the Motion seeks attorneys' fees. Sullivan & Cromwell is seeking a rate of \$200, which, multiplied by the number of hours for which the Motion seeks recovery, amounts to \$51,900 in imputed fees.

27. Arun Bodapati received his J.D. from Harvard Law School in 2017. Mr. Bodapati clerked for the Honorable Victor Marrero, of the U.S. District Court for the Southern District of New York and the Honorable Michael Chagares, of the U.S. Court of Appeals for the

Third Circuit. During his time at Sullivan & Cromwell, and in addition to his pro bono work on this matter, Mr. Bodapati worked on a variety of complex litigation matters. Mr. Bodapati was an integral part of the trial and post-trial team from July 2022 to February 2023. Mr. Bodapati drafted and edited materials for trial and post-trial pleadings, including playing a major role in drafting and editing Plaintiffs' Proposed Findings of Fact and the Post-Trial Brief, and materials for trial, including deposition designations and proposed stipulations of fact, as well as preparing and defending Plaintiffs' witness, Dr. Michele Hutchison, and examining Defendants' witness, Clifton "Billy" Burleigh Jr. Mr. Bodapati also prepared and second-chaired during the examination of several witnesses, including Dr. Deanna Adkins, Dr. Janet Cathey, and Dr. Stephen Levine. He also managed Plaintiffs' trial exhibits, which involved extensive correspondence with Defendants about the exhibits. During his time working on the matter, Mr. Bodapati dedicated a total of 756.5 hours to the Action for which the Motion seeks attorneys' fees. Sullivan & Cromwell is seeking a national rate of \$450, which, multiplied by the number of hours for which the Motion seeks recovery, amounts to \$340,425 in imputed fees.

28. Daniel Richardson received his J.D. from the University of Virginia School of Law in 2018. Mr. Richardson clerked for the Honorable J. Harvie Wilkinson III, of the U.S. Court of Appeals for the Fourth Circuit, and the Honorable Stephen Breyer, of the Supreme Court of the United States. In addition to his pro bono work on this matter, Mr. Richardson works on a variety of complex litigation matters. Mr. Richardson has extensive appellate experience, which was especially valuable in this litigation, including for multiple issues before the Eighth Circuit. Mr. Richardson has been part of case team from January 2022 to present and, during that time, has drafted and edited pre-trial submissions, including motions to compel the production of documents and to exclude expert testimony, drafted and edited the Opposition to the Petition for Rehearing

En Banc before the Eighth Circuit, and argued the Motion to Compel Legislators' Documents. He prepared Plaintiffs' witnesses for depositions and deposed two of Defendants' witnesses, expert Professor Mark Regnerus and 30(b)(6) witness Dr. Rhys Branman. He also cross-examined Professor Regnerus at trial. During his time working on the matter, Mr. Richardson has dedicated a total of 453.75 hours to the Action for which the Motion seeks attorneys' fees. Sullivan & Cromwell is seeking a national rate of \$430, which, multiplied by the number of hours for which the Motion seeks recovery, amounts to \$195,112.50 in imputed fees.

29. Aviv Halpern received his J.D. from the University of Michigan Law School in 2019. In addition to his pro bono work on this matter, Mr. Halpern works on a variety of complex litigation matters. Mr. Halpern has been an integral part of the trial and post-trial team from July 2022 to present. He played a key role in drafting and editing materials for pre-trial, trial, and post-trial pleadings and materials, including *Daubert* motions, the Proposed Findings of Fact, and the Post-Trial Brief, as well as preparing both expert and fact witnesses for trial and assisting with managing Plaintiffs' trial exhibits; he cross-examined two of Defendants' third-party witnesses at trial, Cathy Campbell and Laura Smalts; and he second-chaired during the examination of multiple witnesses at trial, including Dr. Jack Turban, Aaron Jennen, and Dr. Paul Hruz. He also helped develop our trial strategy and coordinated trial logistics, which he was especially well-positioned to do given his extensive prior trial experience. Mr. Halpern also has substantial prior pro bono experience, including regarding constitutional rights for LGBTQ+ people. *Andrew Dvash-Banks*, 2019 WL 911799. During his time working on the matter, Mr. Halpern has dedicated a total of 871.75 hours to the Action for which the Motion seeks attorneys' fees. Sullivan & Cromwell is seeking a national rate of \$400, which, multiplied by the number of hours for which the Motion seeks recovery, amounts to \$348,700 in imputed fees.

30. Brandyn Rodgerson received his J.D. from the University of Alberta Faculty of Law in 2017 and his LL.M from Harvard Law School in 2023. Mr. Rodgerson clerked for the Honorable Sheila Greckol, of the Alberta Court of Appeal, and the Honorable Clément Gascon and the Honorable Nicholas Kasirer, of the Supreme Court of Canada. After leaving Sullivan & Cromwell to earn his LL.M., Mr. Rodgerson rejoined Sullivan & Cromwell in 2023. In addition to his pro bono work on this matter, Mr. Rodgerson works on a variety of complex litigation matters. Mr. Rodgerson was part of the pre-trial team from its inception until August 2022. During his time working on the matter, he drafted and edited pleadings as well as prepared Plaintiffs' witnesses for depositions. He also deposed Defendants' witness, Mr. Burleigh. Mr. Rodgerson also worked with experts regarding their expert declarations and reports and assisted with *Daubert* briefing. During his time working on the matter, Mr. Rodgerson dedicated a total of 537.25 hours to the Action for which the Motion seeks attorneys' fees. Sullivan & Cromwell is seeking a rate of \$175, which, multiplied by the number of hours for which the Motion seeks recovery, amounts to \$94,018.75 in imputed fees.

31. Jonathan Lester received his J.D. from Boston College Law School in 2021. In addition to his pro bono work on this matter, Mr. Lester worked on a variety of complex litigation matters. Mr. Lester was part of case team from October 2021 through post-trial briefing and, during that time, drafted and edited pleadings as well as prepared Plaintiffs' witnesses for depositions and second-chaired the deposition of the 30(b)(6) witness; he also second chaired during the examination of Dr. Antommaria at trial. In addition, he worked on drafting the Opposition to the Motion in Limine, the Motion to Compel Legislators' Documents as well as analyzing those documents. During his time working on the matter, Mr. Lester dedicated a total of 294.75 hours to the Action for which the Motion seeks attorneys' fees. Sullivan & Cromwell

is seeking a rate of \$175, which, multiplied by the number of hours for which the Motion seeks recovery, amounts to \$51,581.25 in imputed fees.

32. Maxime Matthew received their J.D. from the University of British Columbia, Peter A. Allard School of Law in 2021. In addition to their pro bono work on this matter, Mx. Matthew works on a variety of complex litigation matters. Mx. Matthew was part of the case team from September 2021 to present and, during that time, drafted and edited pleadings as well as cross-examination and direct outlines, prepared Plaintiffs' witnesses for depositions, and second-chaired the depositions of two of Defendants' witnesses. In addition, they second-chaired during the examination of Dr. Stambough, Dylan Brandt, and Ms. Campbell at trial. During their time working on the matter, Mx. Matthew has dedicated a total of 170.5 hours to the Action for which the Motion seeks attorneys' fees. Sullivan & Cromwell is seeking a rate of \$175, which, multiplied by the number of hours for which the Motion seeks recovery, amounts to \$29,837.50 in imputed fees.

33. In addition, during the course of the matter, two paralegals, Cate Llewellyn and Kenza Nadifi, recorded a total of 571.5 hours for which the Motion seeks to recover fees for an hourly rate of \$100, for a total of \$57,150. Ms. Llewellyn and Ms. Nadifi began to work on the case in July and August 2022, respectively. They provided incredibly valuable assistance, including through their participation in the eight-day trial. While additional paralegals made substantial contributions to the matter, the Motion does not seek to recover fees for their time.

34. Many other Sullivan & Cromwell personnel recorded time to the matter, but the Motion does not seek to recover fees for their time. These individuals include research librarians, summer associates, and members of Sullivan & Cromwell's e-discovery team who assisted with the processing of Defendants' document productions as well as collecting and

producing Plaintiffs' documents. In total, members of the Firm's non-legal staff who are not included in the Motion recorded in excess of 1,283 hours to the case.

III. SULLIVAN & CROMWELL'S BILLING IN THIS CASE

35. The rates that Sullivan & Cromwell seeks here are substantially lower than what Sullivan & Cromwell's clients regularly pay. They are also below the rates previously approved by courts as reasonable for Sullivan & Cromwell lawyers.

36. In this civil rights case, instead of our traditional billing rates, we have applied rates consistent with rates that New York courts have awarded to Plaintiffs' counsel in similar civil rights matters, and they are all lower than what we charge for non-pro bono clients. *See* Ex. 8, Ex. F (Clark Decl.) ¶¶ 5-6. While all Sullivan & Cromwell lawyers working on this Action practice outside of Arkansas, we are seeking Arkansas rates for junior lawyers and more senior lawyers who left the Firm before trial. For those lawyers, the in-state rates we are seeking are consistent with the rates of Arkansas counsel. *See* Ex. 2 (Declaration of John Burnett ("Burnett Decl.")); Ex. 4 (Echols Decl.) ¶¶ 1-2; Ex. 5 (Mann Decl.) ¶¶ 1-2; Ex. 6 (Travis Decl.) ¶¶ 1-2.

A. Sullivan & Cromwell's Billing on This Matter

37. The fees sought in the Motion were calculated by multiplying the hours for which fees are sought for each S&C lawyer by a reasonable hourly rate pursuant to a classic "lodestar" analysis under Eighth Circuit law, as described in more detail below.

38. Through this Motion, we are seeking national rates at the rates indicated in the chart below for our core litigation team, all of whom brought especially valuable and relevant trial, appellate, and/or pro bono experience to the case: Mr. Beeney, Ms. Oswell, Ms. Goldsmith, Mr. Bodapati, Mr. Richardson, and Mr. Halpern. We are seeking fees consistent with the rates sought by Arkansas counsel at the rates indicated in the chart below for the remaining attorneys in

this Motion: Mr. Simpson LaGoy, Mr. Ossip, Mr. Peacocke, Mr. Rodgerson, Mr. Lester, and Mx. Matthew. Similarly, we are seeking local rates for the two paralegals included in this Motion: Ms. Llewellyn and Ms. Nadifi.

Attorney and Graduation from Law School	Rate
Garrard Beeney (1979)	\$800
Laura Kabler Oswell (2005)	\$650
Lauren Goldsmith (2013, S&C 2015)	\$550
Arun Bodapati (2017)	\$450
Daniel Richardson (2018)	\$430
Aviv Halpern (2019)	\$400
Duncan Simpson LaGoy (2014)	\$225
Jonathan Ossip (2015)	\$200
Alexander Peacocke (2016)	\$200
Brandyn Rodgerson (2017, S&C 2019)	\$175
Jonathan Lester (2021)	\$175
Maxime Matthew (2021)	\$175
Cate Llewellyn (paralegal)	\$100
Kenza Nadifi (paralegal)	\$100

39. Applying the rates sought in the Motion and limiting the hours recorded to the subset of hours sought and costs included in the Motion, S&C seeks to recover in this Motion fees of \$1,873,337.50 (and payable to the ACLU Foundation Inc. and the ACLU of Arkansas) and costs of \$192,585.64, which are described in detail below.

B. Daily Time Entries and Time Charged

40. Attached as Exhibit B is a detailed and itemized accounting of the time for which Sullivan & Cromwell is seeking fees. The time entries in Exhibit B are modified timesheets for each timekeeper covered in the Motion based on records maintained by Sullivan & Cromwell from the inception of the matter on April 4, 2021 to February 1, 2023. These time entries, organized by day and task, are generated from data on each individual attorney's timesheet maintained by the attorney contemporaneously, or nearly contemporaneously, with the performance of the activity indicated.

41. I have reviewed the time records of the timekeepers involved (including my own) in assessing the Sullivan & Cromwell lodestar. Sullivan & Cromwell has substantially reduced the hours spent by its timekeepers on this litigation. As an example, although Sullivan & Cromwell attorneys spent many hours traveling to Little Rock for court hearings, we are not seeking compensation for any nonproductive travel time.

42. Sullivan & Cromwell also is not seeking any fees for the many hours its attorneys spent on internal weekly S&C associate team calls, which were critical for developing litigation strategy, coordinating the team's various workstreams, and delivering high-caliber work product. Additionally, although multiple Sullivan & Cromwell attorneys typically joined a weekly call with our co-counsel and other calls with the full team working on the matter, we are only seeking fees for a small subset of attorneys who generally did not work on the matter at the same time. As previously described, the modified timesheets reflected in Exhibits A and B include only the entries or portions of entries for tasks for which fees are sought in the Motion.

43. In total, Sullivan & Cromwell dedicated 7,324.5 hours to this matter for which we are not seeking compensation.

C. Related Costs

44. In addition to attorneys' fees, Sullivan & Cromwell ordinarily charges its clients for disbursements incurred in connection with other engagements, such as disbursements to third parties, travel costs, and significant reproduction or printing jobs.

45. Sullivan & Cromwell incurred costly disbursements in the litigation, including, but not limited to, expenses for filing fees, courier fees, transcript fees, and fees for stenographers and videographers for the depositions. Similarly, although we incurred \$27,250 in costs for the services of our experts, S&C is not seeking to recover any of those costs.

46. I have reviewed the records of the costs involved. Sullivan & Cromwell has substantially reduced the costs incurred for which the Motion seeks to recover. As an example, Sullivan & Cromwell is not seeking compensation for transportation or taxis, or any meals (*i.e.*, weekend and dinner meals) other than for those directly related to travel to Arkansas for this case. Although Sullivan & Cromwell would typically seek compensation for costs such as travel and meals, we have written off all of these costs.

47. In total, Sullivan & Cromwell incurred \$52,908.61 in costs related to this matter for which we are not seeking compensation.

IV. SULLIVAN & CROMWELL'S HISTORY OF RATES ACHIEVED

48. Courts have approved the submitted rates of attorneys working for Sullivan & Cromwell on numerous occasions in the past. Sullivan & Cromwell does not have different "prices" or rates for different locations in the United States. In the markets in which we participate, the work is judged among a national market of lawyers familiar with highly complex litigation.

49. Though Sullivan & Cromwell's rates are rarely litigated, I have attached several comprehensive analyses of Sullivan & Cromwell's billing and rate structures for partners

and associates of which I am aware. Several of these analyses³ are from complex matters in bankruptcy court where a variety of Sullivan & Cromwell lawyers, including litigation partners and associates, represented the debtor in connection with complex commercial disputes. Further, Sullivan & Cromwell has also sought rates above those in the local market in pro bono matters.⁴

50. Attached hereto as Exhibit D is a copy of the court's decision in *In re Kumtor Gold Co. CSJC*, No. 21-11051 (LGB) (Bankr. S.D.N.Y. July 29, 2022) (ECF 403) (order granting interim and final application for compensation and reimbursement of expenses) and the Summary of Final Fee Application of Sullivan & Cromwell as Counsel (*In re Kumtor Gold Co. CSJC*, No. 21-11051 (LGB) (Bankr. S.D.N.Y. July 6, 2022) (ECF 386, at 9-11)). In this decision, the bankruptcy court in the Southern District of New York approved hourly rates for Sullivan & Cromwell of \$1,630 to \$1,825 per hour for partners and special counsel, \$685 to \$1,225 per hour for associates, and \$375 to \$400 per hour for legal assistants.

51. Attached hereto as Exhibit E is a copy of the court's decision in *In re Garrett Motion Inc.*, No 20-12212 (MEW) (Bankr. S.D.N.Y. July 2, 2021) (ECF 1327) (order granting interim and final applications for allowance of compensation and reimbursement of expenses) and the Summary of Final Fee Application of Sullivan & Cromwell as Counsel (*In re Garrett Motion Inc.*, No 20-12212 (MEW) (Bankr. S.D.N.Y. June 1, 2021) (ECF 1256, at 8-11)). In this decision, the bankruptcy court in the Southern District of New York approved hourly rates for Sullivan & Cromwell of \$1,350 to \$1,750 per hour for partners, of counsel, and special counsel, \$635 to \$1,185 per hour for associates, and \$350 to \$495 per hour for legal assistants.

³ (See *infra* ¶¶ 50-53, 55-56.)

⁴ See *Stiavetti v. Ahlin*, No. RG15-779731, 2020 WL 2779005, at *6 (Cal. Super. Ct. May 1, 2020) (order granting in part motion for attorney's fees); *Franco-Gonzalez v. Holder*, No. CV-10-2211 (DMG), slip op. at 2-3 (C.D. Cal. Oct. 8, 2015) (ECF 866).

52. Attached hereto as Exhibit F is a copy of the court's decision in *In re LSC Communications, Inc.*, No. 20-10950 (SHL) (Bankr. S.D.N.Y. Apr. 30, 2021) (ECF 1384) (omnibus order granting applications for final approval and allowance of compensation for services) and the Summary of Final Fee Application of Sullivan & Cromwell as Counsel (*In re LSC Communications, Inc.*, No. 20-10950 (SHL) (Bankr. S.D.N.Y. Apr. 5, 2021) (ECF 1327, at 5-8)). In this decision, the bankruptcy court in the Southern District of New York approved hourly rates for Sullivan & Cromwell of \$1,350 to \$1,750 per hour for partners, of counsel, and special counsel, \$635 to \$1,185 per hour for associates, and \$350 to \$495 per hour for legal assistants.

53. Attached hereto as Exhibit G is a copy of the court's decision in *In re White Star Petroleum Holdings, LLC*, No. 19-12521 (JDL) (Bankr. W.D. Okla. July 8, 2019) (ECF 243) (order authorizing the retention and employment of Sullivan & Cromwell as counsel) and an excerpt of the accompanying Application for an Order Authorizing the Retention and Employment of Sullivan & Cromwell as Counsel (*In re White Star Petroleum Holdings, LLC*, No. 19-12521 (JDL) (Bankr. W.D. Okla. June 21, 2019) (ECF 90, at 5-6)). In this decision, the bankruptcy court in the Western District of Oklahoma approved hourly rates for Sullivan & Cromwell of \$1,275 to \$1,560 per hour for partners and special counsel, \$595 to \$1,040 per hour for associates, and \$335 to \$480 per hour for legal assistants.

54. Attached hereto as Exhibit H is a copy of the court's order granting attorneys' fees in *Stiavetti v. Ahlin*, No. RG15-779731, 2020 WL 2779005, at *6 (Cal. Super. Ct. May 1, 2020) (order granting in part motion for attorneys' fees). In this application, the court approved a blended billing rate of \$455 per hour, reflecting that 20% of time was spent was by attorneys with substantial general experience or specific expertise in the specific field at a rate of \$700 per hour, 50% of the time was spent by attorneys with two to five years of experience and

some case-specific expertise at a rate of \$450 per hour, and 30% of the time was spent by attorneys of zero to one years of experience at a rate of \$300 per hour, finding plaintiffs' action conferred substantial benefit on the public.

55. Attached hereto as Exhibit I is a copy of the court's decision in *In re Ascent Resources Marcellus Holdings, LLC.*, No. 18-10265 (LSS) (Bankr. D. Del. May 8, 2018) (ECF 160) (order approving first and final fee applications), and an excerpt of the accompanying Summary of First and Final Fee Application of Sullivan & Cromwell LLP as Counsel to the Debtors and Debtors-in-Possession (*In re Ascent Resources Marcellus Holdings, LLC.*, No. 18-10265 (LSS) (Bankr. D. Del. Apr. 10, 2018) (ECF 144, at 5)). The court approved hourly rates for Sullivan & Cromwell partners between \$718 and \$1,435, special counsel between \$550 and \$1,225, associates between \$425 and \$990, and legal assistants between \$350 to \$410.

56. Attached hereto as Exhibit J is a copy of the court's decision in *In re Energy Future Holdings Corp.*, No. 14-10979 (CSS) (Bankr. D. Del. Nov. 6, 2018) (ECF 13610), and an excerpt of the accompanying Summary of Final Fee Application of Sullivan & Cromwell LLP as Counsel to the EFH Committee (*In re Energy Future Holdings Corp.*, No. 14-10979 (CSS) (Bankr. D. Del. Jan. Apr. 23, 2018) (ECF 13002, at 7-10)). The court approved hourly rates for Sullivan & Cromwell partners and of counsel between \$570 and \$1,295, special counsel between \$865 and \$1,140, associates between \$460 and \$865, and legal assistants between \$138 and \$355.

57. Attached hereto as Exhibit K is a true and correct copy of the court's decision in *Franco-Gonzalez v. Holder*, No. CV-10-2211 (DMG), slip op. at 2-3 (C.D. Cal. Oct. 8, 2015) (ECF 866) (order approving settlement agreement for fees and costs), along with a

copy of the attorneys' fees settlement agreement⁵ in that case, and a copy of the Declaration of Michael H. Steinberg, (*Franco-Gonzalez v. Holder*, No. 10-CV-02211 (DMG) (C.D. Cal. July 31, 2015) (ECF 829, at 17), setting out the rates sought by counsel in that case. In *Franco*, a team of Sullivan & Cromwell attorneys, working in conjunction with the ACLU on a multi-year class-action litigation on behalf of immigration detainees with significant mental health issues, requested an award of \$11,632,425.73 in attorneys' fees. For Sullivan & Cromwell attorneys, this amount represented rates of \$1,040 per hour for the partner on the case and \$370 to \$865 for associates. These rates represented a significant discount from rates used by Sullivan & Cromwell when preparing estimates of fees under its normal billing procedures. The parties settled the fee motion for \$9,500,000, or just under 82% of what was requested. Pursuant to Federal Rule of Civil Procedure 23(e), the court reviewed the terms of the settlement to ensure that they were fair and reasonable to class members.

V. DEFENDANTS' CONDUCT INCREASED FEES AND COSTS

58. At least some of the fees and costs being sought here were increased as a result of Defendants' dilatory and unreasonable conduct throughout the case. For instance, Defendants needlessly compounded discovery by providing a 30(b)(6) witness, Amy Embry, who was unprepared to answer questions on certain noticed topics, necessitating motion practice, and ultimately the deposition of an additional 30(b)(6) witness, Dr. Branman. (*See* Response in Opposition to Defendants' Motion for a Protective Order (ECF 135)). Similarly, Defendants filed motions to prohibit Plaintiffs from questioning certain witnesses regarding their personal beliefs

⁵ Plaintiffs in *Franco* were settling their demand for attorneys' fees. In that case, a team of lawyers from Sullivan & Cromwell and the ACLU were able to secure partial summary judgment and a permanent injunction granting the full relief plaintiffs sought.

about transgender people, even though this Action included an equal protection claim alleging unjustified unequal treatment of transgender people, and Plaintiffs argued, among other things, that the law was motivated by animus. Defendants' motions required Plaintiffs' counsel to expend time drafting responses and were ultimately denied by the Court. (Order on *Daubert* Motions and Motion in Limine (ECF 195)).

59. Prior to trial, Defendants also unreasonably refused to agree to *any* of Plaintiffs proposed stipulations, including stipulations as uncontroversial as the ages of Minor Plaintiffs. As the Court observed after giving the Defendants two and a half days during trial to look at the stipulations: “[T]hey should have been looked at before. And I’ve asked you to look at them since the beginning of this trial. And the notion that you are going to let the plaintiffs rest, then decide what you are going to stipulate to after the fact, isn’t satisfactory.” (Tr. 3 at 509:18-22 (ECF 275)).

60. Two of Defendants’ expert witnesses—Dr. Lappert and Professor Regnerus—had no experience relevant to the issues before the Court. Their testimony had no bearing on the case and was not relied on by the Court. *Brandt*, 2023 WL 4073727, at *28; (see also Order on *Daubert* Motions and Motion in Limine (ECF 195)). Nevertheless, Plaintiffs’ counsel were required to spend significant time reviewing Dr. Lappert and Professor Regnerus’s expert declarations and reports, preparing for and taking their depositions, and preparing for and conducting their cross-examinations.

61. On the eve of the trial on the merits of Plaintiffs’ claims, Defendants sought en banc review of the Eighth Circuit’s decision upholding this Court’s preliminary injunction, requiring Plaintiffs to submit a 23-page opposition brief on the first day of the trial. As the Eighth Circuit ruled in denying the petition, “this case is not appropriate for rehearing en banc in its current

procedural posture,” *Brandt by & through Brandt v. Rutledge*, No. 21-2875, 2022 WL 16957734, at *1 (8th Cir. Nov. 16, 2022), because it “is now in the midst of a trial,” which would render any decision moot, *id.*

62. Finally, after Plaintiffs rested on the afternoon of the third day of trial, Defendants were unprepared to proceed with their case, refusing to put on even three local witnesses who were available, which the Court ultimately required them to do. If Defendants had not wasted nearly two full trial days, Plaintiffs believe that the trial could have concluded in fewer trial days, as the Court intended. (*See* Tr. 1 at 10:20-24 (ECF 219)).

VI. CONCLUSION

63. Sullivan & Cromwell litigated this case vigorously on behalf of Plaintiffs, from the beginning of the case through post-trial filings, including litigation in the Eighth Circuit while the case was pending before this Court.

64. As addressed above, in keeping with the complex and historic nature of this case and its national significance, the Court may and should award the fees requested here, which are reasonable in light of the needs of the case and the significant results achieved. The fees sought in the Motion are considerably below and discounted from those we have been awarded previously.

65. Because of S&C’s efforts, Plaintiffs’ fundamental rights—including their right to access the medical care they need—are protected, and as lead Plaintiff, Dylan Brandt, emphasized, they are more able to “fully live” their lives. *See* Federal Judge Overturns Arkansas’ Ban on Gender-Affirming Care for Transgender Youth, <https://www.aclu.org/press-releases/federal-judge-overturns-arkansas-ban-on-gender-affirming-care-for-transgender-youth>.

66. The permanent injunction we achieved in this case not only protects Plaintiffs and other minors in Arkansas, but also the fundamental right of parents to obtain medically-necessary care for their children, and of medical providers to prescribe and administer appropriate care to their patients.

67. While we have made every effort to eliminate potential inefficiencies and duplication, the fees and costs sought in the Motion reflect the complex nature of this high stakes, precedent-setting civil rights case. We respectfully submit that the fees and costs we are seeking in the Motion are reasonable and substantially less than we would normally be paid for our services.

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

Executed this 20 day of September, 2023 in Palo Alto, California.

Laura Kabler Oswell

Laura Kabler Oswell

Exhibit A

<i>Brandt</i> Summary of S&C Fees Sought in Motion			
Timekeeper	Adjusted Hours	Rates Sought	Fees Sought
Garrard R. Beeney	89.25	800	\$ 71,400.00
Laura Kabler Oswell	237.25	650	\$ 154,212.50
Lauren M. Goldsmith	488.75	550	\$ 268,812.50
Arun Bodapati	756.5	450	\$ 340,425.00
Daniel J. Richardson	453.75	430	\$ 195,112.50
Aviv S. Halpern	871.75	400	\$ 348,700.00
Duncan C. Simpson LaGoy	473.5	225	\$ 106,537.50
Jonathan J. Ossip	518.25	200	\$ 103,650.00
Alexander F.R. Peacocke	259.5	200	\$ 51,900.00
Brandyn J. Rodgerson	537.25	175	\$ 94,018.75
Jonathan G. Lester	294.75	175	\$ 51,581.25
Maxime D. Matthew	170.5	175	\$ 29,837.50
Cate M. Llewellyn	268.25	100	\$ 26,825.00
Kenza Nadifi	303.25	100	\$ 30,325.00
Grand Total	5722.5		\$ 1,873,337.50

Exhibit B

Brandt Time Entries for S&C Fees Sought in Motion

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1	4/2/2021	Garrard R. Beeney	Emails Cooper and Ms. Klein.	0.50	\$ 800.00	\$ 400.00
2	4/2/2021	Jonathan J. Ossip	Reviewed case background materials; scheduled call re: same; email correspondence re: same.	0.75	\$ 200.00	\$ 150.00
3	4/4/2021	Duncan C. Simpson LaGoy	Review background materials and conduct research re potential claims	1.50	\$ 225.00	\$ 337.50
4	4/5/2021	Garrard R. Beeney	Team conf. call, background materials.	1.25	\$ 800.00	\$ 1,000.00
5	4/5/2021	Laura Kabler Oswell	Call with ACLU team.	1.00	\$ 650.00	\$ 650.00
6	4/5/2021	Duncan C. Simpson LaGoy	Multiple emails with team re steps to get litigation started	0.75	\$ 225.00	\$ 168.75
7	4/5/2021	Duncan C. Simpson LaGoy	Meeting with Daniel A. Loevinsohn, LCOOPER@aclu.org , Holly@acluarkansas.org , Sarah@acluarkansas.org , breعان@walaslawfirm.com , Champton@aclu.org , Garrard R. Beeney, Laura Kabler Oswell, Duncan C. Simpson LaGoy, Jonathan J. Ossip regarding Arkansas Healthcare Case - Kick-Off Call	1.00	\$ 225.00	\$ 225.00
9	4/5/2021	Jonathan J. Ossip	Reviewed background materials; prepared for call; attended call with ACLU team; email correspondence re: same.	1.75	\$ 200.00	\$ 350.00
10	4/6/2021	Garrard R. Beeney	Telconf. team, emails team.	1.50	\$ 800.00	\$ 1,200.00
11	4/6/2021	Laura Kabler Oswell	Call with ACLU team; Review background materials.	2.00	\$ 650.00	\$ 1,300.00
12	4/6/2021	Duncan C. Simpson LaGoy	Team call re complaint	0.50	\$ 225.00	\$ 112.50
13	4/6/2021	Duncan C. Simpson LaGoy	Revise common interest agreement.	1.00	\$ 225.00	\$ 225.00
14	4/6/2021	Duncan C. Simpson LaGoy	Start working on outline re complaint	0.25	\$ 225.00	\$ 56.25
15	4/6/2021	Duncan C. Simpson LaGoy	Associates call re complaint	0.75	\$ 225.00	\$ 168.75
17	4/6/2021	Jonathan J. Ossip	Attended meetings and calls re: preparation of complaint and associated research; conducted legal research re: constitutional claims; email correspondence re: same.	2.25	\$ 200.00	\$ 450.00
18	4/7/2021	Garrard R. Beeney	Markup common interest, emails re plaintiffs.	0.50	\$ 800.00	\$ 400.00
19	4/7/2021	Duncan C. Simpson LaGoy	Research re potential claims	0.75	\$ 225.00	\$ 168.75
21	4/7/2021	Jonathan J. Ossip	Reviewed background materials; conducted research re: potential state constitutional claims; reviewed potential plaintiff biographies and interview notes.	2.75	\$ 200.00	\$ 550.00
22	4/8/2021	Garrard R. Beeney	Emails re joint defense, local counsel, hospital.	0.50	\$ 800.00	\$ 400.00
23	4/8/2021	Laura Kabler Oswell	Review draft Alabama complaint.	0.50	\$ 650.00	\$ 325.00
25	4/8/2021	Jonathan J. Ossip	Conducted research re: preparation of draft complaint; reviewed and edited research memorandum re: constitutional claims; email correspondence and call re: same.	5.50	\$ 200.00	\$ 1,100.00
26	4/9/2021	Garrard R. Beeney	Emails re meetings, agenda.	0.25	\$ 800.00	\$ 200.00
28	4/9/2021	Jonathan J. Ossip	Reviewed and edited research memorandum re: constitutional claims; email correspondence re: same.	1.50	\$ 200.00	\$ 300.00
29	4/10/2021	Duncan C. Simpson LaGoy	Review and comment on research outline re potential claims	1.50	\$ 225.00	\$ 337.50
30	4/11/2021	Jonathan J. Ossip	Reviewed edits to research memorandum re: constitutional claims; conducted research re: potential claims; email correspondence re: research and scheduling meeting.	1.25	\$ 200.00	\$ 250.00
31	4/12/2021	Garrard R. Beeney	Emails re claims, team call, emails Chris re plaintiffs, emails team re schedule.	0.75	\$ 800.00	\$ 600.00
32	4/12/2021	Laura Kabler Oswell	Call with S&C team.	0.75	\$ 650.00	\$ 487.50
33	4/12/2021	Duncan C. Simpson LaGoy	Draft summary of next steps	0.50	\$ 225.00	\$ 112.50
34	4/12/2021	Duncan C. Simpson LaGoy	Meeting with Alexander Holland, Brandyn Rodgeron, David H. Braff, Duncan C. Simpson LaGoy, Emily Armbruster, Garrard Beeney, Jonathan Ossip, Laura Kabler Oswell, Melike Tokatlioglu regarding Arkansas Gender Affirming Care: S&C Team Meeting	0.75	\$ 225.00	\$ 168.75
35	4/12/2021	Duncan C. Simpson LaGoy	Revise outline re potential claims	2.00	\$ 225.00	\$ 450.00
36	4/12/2021	Jonathan J. Ossip	Reviewed draft research memo; attended team call re: legal research and complaint drafting; scheduled call with local counsel and ACLU team; email correspondence re: the above.	1.50	\$ 200.00	\$ 300.00
37	4/13/2021	Garrard R. Beeney	Emails Cooper.	0.25	\$ 800.00	\$ 200.00
39	4/13/2021	Jonathan J. Ossip	Reviewed interview notes of potential plaintiffs; attended S&C team meeting to discuss complaint drafting; conducted research re: [issues for complaint]; email correspondence re: drafting complaint outline.	1.75	\$ 200.00	\$ 350.00
40	4/14/2021	Garrard R. Beeney	Emails Cooper re agenda, research.	0.25	\$ 800.00	\$ 200.00
41	4/14/2021	Duncan C. Simpson LaGoy	Review Plaintiff interview notes and email team re same	1.00	\$ 225.00	\$ 225.00
43	4/15/2021	Garrard R. Beeney	Emails re research, telconf. team.	1.00	\$ 800.00	\$ 800.00
44	4/15/2021	Laura Kabler Oswell	Prepare for and attend call with ACLU team re. Arkansas case	1.50	\$ 650.00	\$ 975.00
45	4/15/2021	Duncan C. Simpson LaGoy	Meeting with Alexander Holland re team call	0.25	\$ 225.00	\$ 56.25

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
46	4/15/2021	Duncan C. Simpson LaGoy	Meeting with Alexander Holland, Brandyn Rodgerson, Breean W, Chris Hampton, Daniel Loevinsohn, David H. Braff, Duncan C. Simpson LaGoy, ECHOLS, Emily Ambruster, Garrard R. Beeney, Holly Dickson, Jonathan Ossip, Laura Kabler Oswell, Leslie Cooper, Melike Tokatlioglu, Sarah Everett regarding Arkansas Gender Affirming Care: Team Call	1.75	\$ 225.00	\$ 393.75
47	4/15/2021	Jonathan J. Ossip	Reviewed interview summaries of potential plaintiffs; reviewed research note re: potential claims; email correspondence re: same; conducted research re: potential claims; reviewed and edited draft complaints sections; prepared drafting outline of potential claims; email correspondence re: same; attended call with ACLU team and local counsel re: potential claims and plaintiffs.	5.00	\$ 200.00	\$ 1,000.00
48	4/16/2021	Duncan C. Simpson LaGoy	Email team re research outline	0.25	\$ 225.00	\$ 56.25
50	4/16/2021	Jonathan J. Ossip	Conducted research re: legislation effective date; email correspondence re: same; reviewed correspondence from and draft response to local counsel.	1.25	\$ 200.00	\$ 250.00
51	4/18/2021	Jonathan J. Ossip	Reviewed notes and draft task list from ACLU team.	0.50	\$ 200.00	\$ 100.00
52	4/19/2021	Garrard R. Beeney	Team call, emails local counsel.	0.75	\$ 800.00	\$ 600.00
53	4/19/2021	Laura Kabler Oswell	Prepare for and attend call with ACLU team re. Arkansas case and emails re. same; Review background on potential plaintiffs	1.00	\$ 650.00	\$ 650.00
54	4/19/2021	Duncan C. Simpson LaGoy	Email associate team re complaint and interviews	0.75	\$ 225.00	\$ 168.75
55	4/19/2021	Duncan C. Simpson LaGoy	Meeting with Alexander Holland, Brandyn Rodgerson, Daniel Loevinsohn, Duncan C. Simpson LaGoy, Emily Ambruster, Garrard Beeney, Jonathan Ossip, Laura Kabler Oswell, Melike Tokatlioglu regarding AR Gender Affirming Care - S&C Catch up	0.50	\$ 225.00	\$ 112.50
57	4/19/2021	Jonathan J. Ossip	Reviewed call notes, task list, and draft complaint outline; attended S&C case team meeting re: draft complaint.	1.75	\$ 200.00	\$ 350.00
58	4/20/2021	Garrard R. Beeney	Emails local counsel.	0.25	\$ 800.00	\$ 200.00
59	4/20/2021	Laura Kabler Oswell	Review background on claims and potential plaintiffs and emails to team re. potential plaintiffs.	0.50	\$ 650.00	\$ 325.00
60	4/20/2021	Duncan C. Simpson LaGoy	Emails with team re complaint and experts	0.75	\$ 225.00	\$ 168.75
61	4/20/2021	Duncan C. Simpson LaGoy	Review plaintiff notes and email team re same	1.00	\$ 225.00	\$ 225.00
63	4/20/2021	Jonathan J. Ossip	Reviewed and edited draft sections of complaint; call with associates team re: complaint drafting; email correspondence re: selection of potential plaintiffs.	3.50	\$ 200.00	\$ 700.00
64	4/21/2021	Garrard R. Beeney	Emails re common interest.	0.25	\$ 800.00	\$ 200.00
65	4/21/2021	Duncan C. Simpson LaGoy	Revise complaint	1.50	\$ 225.00	\$ 337.50
67	4/21/2021	Jonathan J. Ossip	Reviewed and edited draft complaint sections; requested background checks of potential plaintiffs; email correspondence re: same.	4.50	\$ 200.00	\$ 900.00
68	4/22/2021	Laura Kabler Oswell	Emails re. plaintiffs.	0.25	\$ 650.00	\$ 162.50
69	4/22/2021	Duncan C. Simpson LaGoy	Start drafting interview outline	0.50	\$ 225.00	\$ 112.50
70	4/22/2021	Duncan C. Simpson LaGoy	Review Plaintiff interview memos	0.75	\$ 225.00	\$ 168.75
71	4/22/2021	Duncan C. Simpson LaGoy	Revise complaint and email team re same	2.50	\$ 225.00	\$ 562.50
72	4/22/2021	Duncan C. Simpson LaGoy	Meeting with Daniel Loevinsohn, Duncan C. Simpson LaGoy, Garrard Beeney, Jonathan Ossip, Travis regarding AR Gender-Affirming Medical Care - GRO/S&C Call	0.50	\$ 225.00	\$ 112.50
74	4/22/2021	Jonathan J. Ossip	Reviewed interview notes of potential plaintiffs; reviewed comments and edits to and revised draft complaint; conducted legal research re: same; attended call with local counsel re: potential claims; email correspondence re: the above.	6.00	\$ 200.00	\$ 1,200.00
75	4/23/2021	Garrard R. Beeney	Emails re theories of claims, telconf. ACLU re plaintiffs.	1.00	\$ 800.00	\$ 800.00
76	4/23/2021	Laura Kabler Oswell	Call re. potential plaintiffs; Review research re. potential additional claims and emails re. same.	1.00	\$ 650.00	\$ 650.00
77	4/23/2021	Duncan C. Simpson LaGoy	Emails and call with Loevinsohn re research	0.75	\$ 225.00	\$ 168.75
78	4/23/2021	Duncan C. Simpson LaGoy	Emails with team re interviews	1.00	\$ 225.00	\$ 225.00
80	4/23/2021	Jonathan J. Ossip	Reviewed plaintiff interview notes; email correspondence re: same; reviewed background checks of potential plaintiffs.	1.25	\$ 200.00	\$ 250.00
81	4/26/2021	Garrard R. Beeney	Emails re weekly call, email Cooper, attention to plaintiff interview.	0.50	\$ 800.00	\$ 400.00
82	4/26/2021	Laura Kabler Oswell	Revise draft outline for Plaintiff interviews.	0.50	\$ 650.00	\$ 325.00
83	4/26/2021	Duncan C. Simpson LaGoy	Revise interview outline	1.00	\$ 225.00	\$ 225.00
84	4/26/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER, *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	1.50	\$ 225.00	\$ 337.50
85	4/26/2021	Duncan C. Simpson LaGoy	Emails with team re plaintiff interviews	0.50	\$ 225.00	\$ 112.50
86	4/26/2021	Duncan C. Simpson LaGoy	Draft summary of team call	0.50	\$ 225.00	\$ 112.50
88	4/26/2021	Jonathan J. Ossip	Email correspondence re: plaintiff interviews.	0.50	\$ 200.00	\$ 100.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
89	4/27/2021	Garrard R. Beene	Emails re experts, plaintiffs, complaint.	0.25	\$ 800.00	\$ 200.00
90	4/27/2021	Laura Kabler Oswell	Revise draft complaint; Email re. potential plaintiffs.	2.00	\$ 650.00	\$ 1,300.00
91	4/27/2021	Duncan C. Simpson LaGoy	Emails with team re interviews	0.50	\$ 225.00	\$ 112.50
92	4/27/2021	Duncan C. Simpson LaGoy	Draft section of complaint re HB1570	2.50	\$ 225.00	\$ 562.50
93	4/27/2021	Duncan C. Simpson LaGoy	Meeting with 13476471605, Alexander Holland, Brandyn Rodgerson, Daniel Loevinsohn, Duncan C. Simpson LaGoy, Jonathan Ossip regarding Plaintiff Interviews	0.50	\$ 225.00	\$ 112.50
95	4/27/2021	Jonathan J. Ossip	Reviewed and edited draft plaintiff interview questions; scheduled and prepared for plaintiff interview; attention to emails re: plaintiff interviews, potential experts, and draft complaint; attended meeting with S&C associate team to discuss plaintiff interviews.	3.00	\$ 200.00	\$ 600.00
96	4/28/2021	Garrard R. Beene	Emails re plaintiffs, complaint.	0.50	\$ 800.00	\$ 400.00
97	4/28/2021	Laura Kabler Oswell	Emails re. plaintiff interviews.	0.25	\$ 650.00	\$ 162.50
98	4/28/2021	Duncan C. Simpson LaGoy	Emails with team re interviews	0.50	\$ 225.00	\$ 112.50
99	4/28/2021	Duncan C. Simpson LaGoy	Call with Armbruster re complaint	0.50	\$ 225.00	\$ 112.50
100	4/28/2021	Duncan C. Simpson LaGoy	Revise complaint per Oswell comments	3.25	\$ 225.00	\$ 731.25
102	4/28/2021	Jonathan J. Ossip	Prepared for plaintiff interview; reviewed and revised interview outline for same; attended plaintiff interview; calls with M. Tokatlioglu re: same; attention to emails re: plaintiff interviews, edits to complaint, and plaintiff selection; reviewed edits to complaint; reviewed complaint from precedent case for same.	6.00	\$ 200.00	\$ 1,200.00
103	4/29/2021	Garrard R. Beene	Emails re plaintiffs.	0.25	\$ 800.00	\$ 200.00
105	4/29/2021	Jonathan J. Ossip	Reviewed draft expert report; conducted research re: potential issues with prospective plaintiffs; prepared for potential plaintiff interview; reviewed and edited draft outline for same; attended call with ACLU team re: same; requested background checks for prospective plaintiffs; attention to emails re: the above.	4.25	\$ 200.00	\$ 850.00
106	4/30/2021	Garrard R. Beene	Emails re plaintiffs.	0.25	\$ 800.00	\$ 200.00
107	4/30/2021	Duncan C. Simpson LaGoy	Emails with associate team re interviews	0.25	\$ 225.00	\$ 56.25
109	4/30/2021	Jonathan J. Ossip	Prepared for plaintiff interview; scheduled call re: expert selection; reviewed background investigation results; attended plaintiff interview; reviewed and edited interview summaries; attention to emails re: the above.	3.75	\$ 200.00	\$ 750.00
110	5/1/2021	Jonathan J. Ossip	Reviewed plaintiff interview summary; email correspondence re: experts and plaintiff interviews.	0.75	\$ 200.00	\$ 150.00
111	5/2/2021	Duncan C. Simpson LaGoy	Emails with team re complaint and interviews	0.50	\$ 225.00	\$ 112.50
113	5/2/2021	Jonathan J. Ossip	Prepared interview summaries; email correspondence re: plaintiff and expert interviews.	1.00	\$ 200.00	\$ 200.00
114	5/3/2021	Garrard R. Beene	Emails re complaint, plaintiffs.	0.50	\$ 800.00	\$ 400.00
115	5/3/2021	Laura Kabler Oswell	Team call; Review draft Lemley interview memo.	1.25	\$ 650.00	\$ 812.50
116	5/3/2021	Laura Kabler Oswell	Team meeting.	1.00	\$ 650.00	\$ 650.00
117	5/3/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	1.25	\$ 225.00	\$ 281.25
118	5/3/2021	Duncan C. Simpson LaGoy	Email associate team re next steps	0.50	\$ 225.00	\$ 112.50
120	5/3/2021	Jonathan J. Ossip	Reviewed and edited draft plaintiff interview outline; reviewed and edited interview summary; attended case team meeting with ACLU and local counsel; prepared for and attended potential plaintiff interview; attention to emails re: the above.	5.00	\$ 200.00	\$ 1,000.00
121	5/4/2021	Duncan C. Simpson LaGoy	Emails with team re interviews	0.50	\$ 225.00	\$ 112.50
123	5/4/2021	Jonathan J. Ossip	Call with ACLU and local counsel re: potential expert; reviewed draft expert report; reviewed and edited draft plaintiff interview summary; attention to emails re: the above.	3.50	\$ 200.00	\$ 700.00
124	5/5/2021	Duncan C. Simpson LaGoy	Emails with associate team re interviews	0.75	\$ 225.00	\$ 168.75
125	5/5/2021	Duncan C. Simpson LaGoy	Call with Dickson re testimony	0.25	\$ 225.00	\$ 56.25
127	5/5/2021	Jonathan J. Ossip	Scheduled case team meetings; reviewed research notes re: potential plaintiffs and experts; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
128	5/6/2021	Duncan C. Simpson LaGoy	Review Plaintiff interview memos	0.75	\$ 225.00	\$ 168.75
129	5/6/2021	Duncan C. Simpson LaGoy	Email associate team re next steps	0.50	\$ 225.00	\$ 112.50
131	5/6/2021	Jonathan J. Ossip	Reviewed research note re potential plaintiffs; attention to emails re plaintiff and expert selection; reviewed plaintiff interview summaries.	1.50	\$ 200.00	\$ 300.00
132	5/7/2021	Laura Kabler Oswell	Review interview summaries.	0.50	\$ 650.00	\$ 325.00
133	5/7/2021	Duncan C. Simpson LaGoy	Email S&C team re potential plaintiffs	0.50	\$ 225.00	\$ 112.50
134	5/7/2021	Duncan C. Simpson LaGoy	Prepare for [potential plaintiff] interview	0.75	\$ 225.00	\$ 168.75
135	5/7/2021	Duncan C. Simpson LaGoy	Interview [potential plaintiff]	1.25	\$ 225.00	\$ 281.25
136	5/7/2021	Duncan C. Simpson LaGoy	Call with Loevinsohn re doctor interviews	0.25	\$ 225.00	\$ 56.25

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
138	5/7/2021	Jonathan J. Ossip	Reviewed plaintiff interview summary compilation; attention to emails re plaintiff interviews and draft complaint.	0.50	\$ 200.00	\$ 100.00
139	5/8/2021	Garrard R. Beeney	Emails re plaintiffs, emails re complaint.	0.50	\$ 800.00	\$ 400.00
140	5/10/2021	Garrard R. Beeney	Emails re plaintiffs.	0.25	\$ 800.00	\$ 200.00
141	5/10/2021	Laura Kabler Oswell	ACLU and S&C team call; Review draft chart of potential doctor plaintiffs; Emails re. draft complaint.	1.50	\$ 650.00	\$ 975.00
142	5/10/2021	Duncan C. Simpson LaGoy	Emails with team re plaintiffs	0.50	\$ 225.00	\$ 112.50
143	5/10/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	1.75	\$ 225.00	\$ 393.75
144	5/10/2021	Duncan C. Simpson LaGoy	Emails with Klein and Oswell re engaging plaintiffs	0.50	\$ 225.00	\$ 112.50
146	5/10/2021	Jonathan J. Ossip	Meeting with ACLU and local counsel re: plaintiff selection and draft complaint; calls with potential plaintiffs; attention to email re: the above.	2.00	\$ 200.00	\$ 400.00
147	5/11/2021	Duncan C. Simpson LaGoy	Emails with team re plaintiffs	1.00	\$ 225.00	\$ 225.00
148	5/11/2021	Duncan C. Simpson LaGoy	Draft engagement letter	1.00	\$ 225.00	\$ 225.00
149	5/11/2021	Duncan C. Simpson LaGoy	Revise plaintiff allegations	2.75	\$ 225.00	\$ 618.75
150	5/11/2021	Duncan C. Simpson LaGoy	Revise complaint per ACLU comments	2.50	\$ 225.00	\$ 562.50
152	5/11/2021	Jonathan J. Ossip	Reviewed edits to draft complaint; reviewed and edited same; conducted research re: same; reviewed and commented on draft expert report; attention to emails re: draft complaint and potential plaintiffs.	2.00	\$ 200.00	\$ 400.00
153	5/12/2021	Garrard R. Beeney	Emails re plaintiffs complaint.	0.50	\$ 800.00	\$ 400.00
154	5/12/2021	Laura Kabler Oswell	Revise draft complaint; Revise draft co-counsel agreement.	2.00	\$ 650.00	\$ 1,300.00
155	5/12/2021	Duncan C. Simpson LaGoy	Revise complaint	1.50	\$ 225.00	\$ 337.50
156	5/12/2021	Duncan C. Simpson LaGoy	Calls with ACLU re research	0.25	\$ 225.00	\$ 56.25
157	5/12/2021	Jonathan J. Ossip	Call with potential expert witness; call with potential plaintiffs; attention to emails re: expert issues, potential plaintiffs, draft complaint, and possible claims.	2.25	\$ 200.00	\$ 450.00
158	5/13/2021	Garrard R. Beeney	Emails re complaint, plaintiffs, co-counsel agreement, engagement letters.	0.75	\$ 800.00	\$ 600.00
159	5/13/2021	Laura Kabler Oswell	Revise draft complaint; Revise engagement letter; Emails re. same.	1.50	\$ 650.00	\$ 975.00
160	5/13/2021	Duncan C. Simpson LaGoy	Emails with team re case strategy	0.25	\$ 225.00	\$ 56.25
161	5/13/2021	Duncan C. Simpson LaGoy	Revise engagement letter	0.25	\$ 225.00	\$ 56.25
162	5/13/2021	Duncan C. Simpson LaGoy	Revise complaint	1.50	\$ 225.00	\$ 337.50
164	5/13/2021	Jonathan J. Ossip	Attention to emails re: draft complaint, potential plaintiffs.	1.25	\$ 200.00	\$ 250.00
165	5/14/2021	Laura Kabler Oswell	Review revised draft complaint; Emails re. client videos.	1.00	\$ 650.00	\$ 650.00
166	5/14/2021	Duncan C. Simpson LaGoy	Revise complaint	0.75	\$ 225.00	\$ 168.75
167	5/14/2021	Jonathan J. Ossip	Attention to emails re: draft complaint.	0.25	\$ 200.00	\$ 50.00
168	5/15/2021	Garrard R. Beeney	Email re video, Saxtons, plaintiffs.	0.50	\$ 800.00	\$ 400.00
169	5/16/2021	Garrard R. Beeney	Emails re plaintiffs.	0.25	\$ 800.00	\$ 200.00
170	5/16/2021	Laura Kabler Oswell	Emails re. co-counsel agreement and revise draft complaint.	1.00	\$ 650.00	\$ 650.00
171	5/16/2021	Jonathan J. Ossip	Attention to emails re: potential plaintiff selection, draft complaint, and meeting agenda for team call.	0.75	\$ 200.00	\$ 150.00
172	5/17/2021	Laura Kabler Oswell	Call with ACLU and S&C teams re. complaint preparation.	1.00	\$ 650.00	\$ 650.00
173	5/17/2021	Duncan C. Simpson LaGoy	Revise complaint	3.00	\$ 225.00	\$ 675.00
174	5/17/2021	Duncan C. Simpson LaGoy	Draft engagement letters	1.00	\$ 225.00	\$ 225.00
175	5/17/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	1.50	\$ 225.00	\$ 337.50
177	5/17/2021	Jonathan J. Ossip	Reviewed edits to complaint, email re complaint and plaintiffs. Research re potential [issues for complaint], email re same.	1.25	\$ 200.00	\$ 250.00
178	5/18/2021	Laura Kabler Oswell	Call with clients; Revise draft complaint; Revise draft co-counsel agreement.	2.00	\$ 650.00	\$ 1,300.00
179	5/18/2021	Duncan C. Simpson LaGoy	Emails re engagement letters	1.00	\$ 225.00	\$ 225.00
180	5/18/2021	Duncan C. Simpson LaGoy	Emails re doctor profiles	0.25	\$ 225.00	\$ 56.25
181	5/18/2021	Duncan C. Simpson LaGoy	Meeting with Holly Dickson , LCOOPER , Cstrangio , CHampton@aclu.org , Tyler Richard , Travis , Echols , Mann , Breen , Channing Ansley Grate , Sarah , *ARGenderAffirmingMedCare regarding HB1570 client & legal team meeting	1.00	\$ 225.00	\$ 225.00
183	5/18/2021	Jonathan J. Ossip	Research re [issues for complaint], email re same. Call with B. Rodgerson re [issues for complaint], research re same, email re same.	2.25	\$ 200.00	\$ 450.00
184	5/19/2021	Garrard R. Beeney	Emails re complaint, engagement letter.	0.75	\$ 800.00	\$ 600.00
185	5/19/2021	Duncan C. Simpson LaGoy	Review research re [issues for complaint] and email Rodgerson re same.	0.50	\$ 225.00	\$ 112.50

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
186	5/19/2021	Duncan C. Simpson LaGoy	Revise complaint, emails with team re same	1.00	\$ 225.00	\$ 225.00
187	5/19/2021	Duncan C. Simpson LaGoy	Emails with team re engagement letters	1.00	\$ 225.00	\$ 225.00
188	5/19/2021	Duncan C. Simpson LaGoy	Emails and calls re retainer agreement and complaint	1.00	\$ 225.00	\$ 225.00
190	5/19/2021	Jonathan J. Ossip	Reviewed and edited research note re [issues for complaint]; attention to email re draft complaint, client meeting, and engagement letters.	1.25	\$ 200.00	\$ 250.00
191	5/20/2021	Garrard R. Beeney	Email re complaint and claims.	0.75	\$ 800.00	\$ 600.00
192	5/20/2021	Laura Kabler Oswell	Review research and draft ACA cause of action; Emails re. plaintiffs.	1.00	\$ 650.00	\$ 650.00
193	5/20/2021	Duncan C. Simpson LaGoy	Review precedent PI motions	0.50	\$ 225.00	\$ 112.50
194	5/20/2021	Duncan C. Simpson LaGoy	Emails with team re privilege question	0.50	\$ 225.00	\$ 112.50
196	5/20/2021	Jonathan J. Ossip	Reviewed and edit memo re [issues for complaint]; meeting with client re draft complaint and engagement; reviewed and edited memo re [issues for complaint]; calls with B. Rodgerson re same; call with associate team re case status, complaint, preliminary injunction motion, and plaintiff selection/engagement; attention to email re the above.	4.00	\$ 200.00	\$ 800.00
197	5/21/2021	Garrard R. Beeney	Emails re complaint, plaintiffs, [privilege issues].	0.75	\$ 800.00	\$ 600.00
198	5/21/2021	Laura Kabler Oswell	Emails re. steps to finalize complaint and filing.	0.25	\$ 650.00	\$ 162.50
199	5/21/2021	Duncan C. Simpson LaGoy	Emails with team re engagement letters, GRO, amended complaint	0.50	\$ 225.00	\$ 112.50
201	5/21/2021	Jonathan J. Ossip	Call with potential plaintiff; attention to email re plaintiff selection, draft complaint, retention letter, document system.	0.50	\$ 200.00	\$ 100.00
202	5/22/2021	Garrard R. Beeney	Complaint strategy emails.	0.50	\$ 800.00	\$ 400.00
203	5/22/2021	Laura Kabler Oswell	Emails re. potential claims; Revise draft co-counsel agreement.	0.50	\$ 650.00	\$ 325.00
205	5/22/2021	Jonathan J. Ossip	Research re potential claims and draft complaint; attention to email re same.	2.25	\$ 200.00	\$ 450.00
206	5/23/2021	Garrard R. Beeney	Complaint strategy, telcon Esseks, emails team.	1.25	\$ 800.00	\$ 1,000.00
207	5/23/2021	Laura Kabler Oswell	Revise draft co-counsel agreement and email to Beeney re. same.	0.25	\$ 650.00	\$ 162.50
208	5/23/2021	Duncan C. Simpson LaGoy	Revise complaint	1.50	\$ 225.00	\$ 337.50
210	5/23/2021	Jonathan J. Ossip	Reviewed draft complaint; attention to email re same.	0.75	\$ 200.00	\$ 150.00
211	5/24/2021	Garrard R. Beeney	Emails re complaint, S&C call, team call, finalize.	2.50	\$ 800.00	\$ 2,000.00
212	5/24/2021	Laura Kabler Oswell	Calls with S&C and ACLU teams re. draft complaint and filings.	2.50	\$ 650.00	\$ 1,625.00
213	5/24/2021	Duncan C. Simpson LaGoy	Emails with team re finalizing complaint	1.00	\$ 225.00	\$ 225.00
214	5/24/2021	Duncan C. Simpson LaGoy	Review complaint	1.00	\$ 225.00	\$ 225.00
215	5/24/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	1.00	\$ 225.00	\$ 225.00
217	5/24/2021	Jonathan J. Ossip	Research re potential claims; call with B. Rodgerson re claims; attention to emails re: the above.	2.50	\$ 200.00	\$ 500.00
218	5/25/2021	Garrard R. Beeney	Edits to complaint.	0.50	\$ 800.00	\$ 400.00
219	5/25/2021	Duncan C. Simpson LaGoy	Emails with associate team re PI motion	0.50	\$ 225.00	\$ 112.50
220	5/25/2021	Duncan C. Simpson LaGoy	Call with Cooper re preliminary injunction schedule	0.50	\$ 225.00	\$ 112.50
221	5/25/2021	Duncan C. Simpson LaGoy	Revise complaint	0.50	\$ 225.00	\$ 112.50
223	5/26/2021	Garrard R. Beeney	Various court filings, PI prep., press.	0.25	\$ 800.00	\$ 200.00
224	5/26/2021	Duncan C. Simpson LaGoy	Emails with team re PI motion	0.50	\$ 225.00	\$ 112.50
225	5/27/2021	Garrard R. Beeney	Service issue, plan for PI.	0.50	\$ 800.00	\$ 400.00
226	5/27/2021	Duncan C. Simpson LaGoy	Review Alabama PI motion precedent	1.00	\$ 225.00	\$ 225.00
227	5/27/2021	Duncan C. Simpson LaGoy	Emails with Oswell and Loevinsohn re ACLU	0.25	\$ 225.00	\$ 56.25
228	5/27/2021	Duncan C. Simpson LaGoy	Meeting with Daniel Loevinsohn, Duncan C. Simpson LaGoy regarding strategy	0.25	\$ 225.00	\$ 56.25
229	5/27/2021	Duncan C. Simpson LaGoy	Meeting with Brandyn Rodgerson, Colin Mark, Daniel Loevinsohn, Duncan C. Simpson LaGoy, Emily Armbruster, Jonathan Ossip, Melike Tokatlioglu regarding PI motion	0.50	\$ 225.00	\$ 112.50
230	5/27/2021	Duncan C. Simpson LaGoy	Meeting with Leslie Cooper , Duncan C. Simpson LaGoy, Alexander S. Holland, Daniel A. Loevinsohn, Brandyn J. Rodgerson, Emily T.L. Armbruster, Melike Tokatlioglu, Jonathan J. Ossip, Cstrangio , Echols , Sarah , Breean regarding PI drafting meeting	1.00	\$ 225.00	\$ 225.00
232	5/27/2021	Jonathan J. Ossip	Call with M. Tokatlioglu re PI brief.	0.50	\$ 200.00	\$ 100.00
233	5/28/2021	Garrard R. Beeney	Email re service, telcon Esseks, emails team.	0.75	\$ 800.00	\$ 600.00
235	5/28/2021	Jonathan J. Ossip	Attention to email re expert reports; reviewed notes re same; call with potential declarant re preliminary injunction declaration; attention to email re the above.	1.00	\$ 200.00	\$ 200.00
236	5/29/2021	Jonathan J. Ossip	Reviewed edits to expert declaration; attention to email re same.	0.75	\$ 200.00	\$ 150.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
237	5/30/2021	Jonathan J. Ossip	Attention to email re expert declaration; scheduled call re same; reviewed and edited draft expert declaration.	2.75	\$ 200.00	\$ 550.00
238	5/31/2021	Jonathan J. Ossip	Reviewed local rules and general orders for same.	0.25	\$ 200.00	\$ 50.00
239	6/1/2021	Laura Kabler Oswell	Calls with S&C and ACLU teams.	1.50	\$ 650.00	\$ 975.00
240	6/1/2021	Duncan C. Simpson LaGoy	Revise declaration	0.25	\$ 225.00	\$ 56.25
241	6/1/2021	Duncan C. Simpson LaGoy	Work on document hold notice	0.25	\$ 225.00	\$ 56.25
242	6/1/2021	Duncan C. Simpson LaGoy	Meeting with Laura Kabler Oswell, *ARGenderAffirmingMedCare regarding S&C Arkansas Team Check-In	0.25	\$ 225.00	\$ 56.25
243	6/1/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER, *ARGenderAffirmingMedCare, Cstrangio regarding Ark. healthcare- team meeting	1.00	\$ 225.00	\$ 225.00
245	6/1/2021	Jonathan J. Ossip	Reviewed and edited draft preliminary injunction motion sections; call with expert; edited draft expert declaration; attention to emails re the above.	3.25	\$ 200.00	\$ 650.00
246	6/2/2021	Garrard R. Beeney	Emails re experts.	0.25	\$ 800.00	\$ 200.00
247	6/2/2021	Duncan C. Simpson LaGoy	Revise PI motion	6.00	\$ 225.00	\$ 1,350.00
248	6/2/2021	Duncan C. Simpson LaGoy	Call with Armbruster re PI motion	0.50	\$ 225.00	\$ 112.50
250	6/2/2021	Jonathan J. Ossip	Reviewed and edited preliminary injunction brief sections and expert declaration; correspondence with expert re declaration; calls with M. Tokatlioglu re preliminary injunction brief; attention to email re the above.	4.25	\$ 200.00	\$ 850.00
251	6/3/2021	Garrard R. Beeney	Emails re experts, joint declarations emails re Moody, preserve notice.	0.50	\$ 800.00	\$ 400.00
252	6/3/2021	Duncan C. Simpson LaGoy	Revise document hold notice	0.50	\$ 225.00	\$ 112.50
253	6/3/2021	Duncan C. Simpson LaGoy	Call with Holland re document hold notice	0.25	\$ 225.00	\$ 56.25
254	6/3/2021	Duncan C. Simpson LaGoy	Emails re expert engagement letter	0.25	\$ 225.00	\$ 56.25
256	6/3/2021	Jonathan J. Ossip	Reviewed expert engagement letter; attention to email re same; email re declarations for PI motion; reviewed draft declarations.	0.75	\$ 200.00	\$ 150.00
257	6/4/2021	Laura Kabler Oswell	Revise draft Motion for Preliminary Injunction.	0.50	\$ 650.00	\$ 325.00
258	6/4/2021	Duncan C. Simpson LaGoy	Revise declarations	2.00	\$ 225.00	\$ 450.00
259	6/4/2021	Duncan C. Simpson LaGoy	Revise PI motion	4.50	\$ 225.00	\$ 1,012.50
261	6/4/2021	Jonathan J. Ossip	Reviewed and edited draft declarations; reviewed and edited PI brief sections; edited expert engagement letter; reviewed and edited expert report; attention to email re the above.	1.75	\$ 200.00	\$ 350.00
262	6/5/2021	Jonathan J. Ossip	Attention to email re expert report, expert engagement letter, and draft PI motion.	0.50	\$ 200.00	\$ 100.00
263	6/6/2021	Garrard R. Beeney	Emails re PI motion, emails re experts.	0.25	\$ 800.00	\$ 200.00
264	6/6/2021	Duncan C. Simpson LaGoy	Revise PI motion	2.00	\$ 225.00	\$ 450.00
265	6/6/2021	Jonathan J. Ossip	Reviewed and edited expert declaration and engagement letter; correspondence with expert re same; reviewed and edited PI brief; attention to email re the above; call with A. Holland re PI brief.	7.00	\$ 200.00	\$ 1,400.00
266	6/7/2021	Garrard R. Beeney	Report on team call.	0.25	\$ 800.00	\$ 200.00
267	6/7/2021	Laura Kabler Oswell	Revise draft motion for preliminary injunction.	1.50	\$ 650.00	\$ 975.00
268	6/7/2021	Duncan C. Simpson LaGoy	Revise PI motion	1.75	\$ 225.00	\$ 393.75
269	6/7/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER, *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	0.50	\$ 225.00	\$ 112.50
270	6/7/2021	Jonathan J. Ossip	Edited preliminary injunction brief; reviewed document hold notice; call with ACLU and local counsel re case status and PI motion; reviewed and edited draft expert declaration; reviewed edits to expert engagement letter; attention to emails re the above.	2.75	\$ 200.00	\$ 550.00
271	6/8/2021	Garrard R. Beeney	Emails re PI and plaintiff declarations.	0.25	\$ 800.00	\$ 200.00
272	6/8/2021	Laura Kabler Oswell	Review draft declarations in support of Motion for Preliminary Injunction.	1.00	\$ 650.00	\$ 650.00
273	6/8/2021	Duncan C. Simpson LaGoy	Emails re deadlines	0.50	\$ 225.00	\$ 112.50
274	6/8/2021	Duncan C. Simpson LaGoy	Emails re efilng	0.25	\$ 225.00	\$ 56.25
275	6/8/2021	Duncan C. Simpson LaGoy	Revise declarations	2.75	\$ 225.00	\$ 618.75
276	6/8/2021	Duncan C. Simpson LaGoy	Revise PI motion	2.00	\$ 225.00	\$ 450.00
278	6/8/2021	Jonathan J. Ossip	Reviewed and edited declarations for PI brief; reviewed edits to expert declaration; analyzed case strategy re timing of response to complaint; correspondence with expert re draft declaration; attention to email re the above.	1.50	\$ 200.00	\$ 300.00
279	6/9/2021	Garrard R. Beeney	Emails re PI, declaration.	0.25	\$ 800.00	\$ 200.00
280	6/9/2021	Duncan C. Simpson LaGoy	Emails with team re PI motion and declarations	0.75	\$ 225.00	\$ 168.75
281	6/9/2021	Duncan C. Simpson LaGoy	Call with Cooper re PI motion	0.25	\$ 225.00	\$ 56.25
283	6/9/2021	Jonathan J. Ossip	Reviewed edits to declarations; reviewed schedule for PI motion; correspondence with expert re draft declaration; call with expert re same.	1.75	\$ 200.00	\$ 350.00
284	6/10/2021	Garrard R. Beeney	Emails re declaration, PI motion.	0.25	\$ 800.00	\$ 200.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
285	6/10/2021	Laura Kabler Oswell	Review revised draft Motion for Preliminary Injunction and revised draft declarations in support of same.	1.50	\$ 650.00	\$ 975.00
286	6/10/2021	Duncan C. Simpson LaGoy	Emails with team re declarations	0.50	\$ 225.00	\$ 112.50
287	6/10/2021	Duncan C. Simpson LaGoy	Revise PI motion	0.50	\$ 225.00	\$ 112.50
288	6/10/2021	Jonathan J. Ossip	Reviewed and edited expert declaration; correspondence with expert re same; call with potential declarant re PI motion declaration; call with S&C associate team re PI motion; attention to emails re the above.	2.50	\$ 200.00	\$ 500.00
289	6/11/2021	Duncan C. Simpson LaGoy	Revise PI memorandum	5.00	\$ 225.00	\$ 1,125.00
290	6/11/2021	Duncan C. Simpson LaGoy	Call with Holland re PI motion	0.25	\$ 225.00	\$ 56.25
291	6/11/2021	Duncan C. Simpson LaGoy	Team meeting re PI motion	0.75	\$ 225.00	\$ 168.75
292	6/11/2021	Duncan C. Simpson LaGoy	Call with Cooper re PI motion	0.75	\$ 225.00	\$ 168.75
294	6/11/2021	Jonathan J. Ossip	Reviewed edits to PI brief; edited expert declaration; correspondence with expert re same; attended S&C associate meeting re PI brief; call with M. Tokatlioglu re same; attention to emails re the above.	3.75	\$ 200.00	\$ 750.00
296	6/12/2021	Jonathan J. Ossip	Reviewed edits to PI brief; email re PI motion and associated documents.	0.75	\$ 200.00	\$ 150.00
297	6/13/2021	Duncan C. Simpson LaGoy	Revise PI memorandum	2.50	\$ 225.00	\$ 562.50
299	6/13/2021	Jonathan J. Ossip	Reviewed edits to PI brief; attention to email re same.	1.25	\$ 200.00	\$ 250.00
300	6/14/2021	Garrard R. Beeney	Emails and telconf. re PI.	0.75	\$ 800.00	\$ 600.00
301	6/14/2021	Laura Kabler Oswell	Call with ACLU and outside counsel teams.	1.00	\$ 650.00	\$ 650.00
302	6/14/2021	Duncan C. Simpson LaGoy	Emails with team re PI motion	0.75	\$ 225.00	\$ 168.75
303	6/14/2021	Duncan C. Simpson LaGoy	Call with Cooper re PI motion	0.25	\$ 225.00	\$ 56.25
304	6/14/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	0.75	\$ 225.00	\$ 168.75
305	6/14/2021	Duncan C. Simpson LaGoy	Cite check PI motion	6.75	\$ 225.00	\$ 1,518.75
306	6/14/2021	Duncan C. Simpson LaGoy	Meeting with Alexander S. Holland, Duncan C. Simpson LaGoy, Melike Tokatlioglu, Austin A. Feuer, Colin A. Mark regarding ACLU Arkansas Cite Check	0.25	\$ 225.00	\$ 56.25
308	6/14/2021	Jonathan J. Ossip	Attention to email re PI motion and related documents; call with ACLU and local counsel re PI motion.	1.00	\$ 200.00	\$ 200.00
309	6/15/2021	Laura Kabler Oswell	Review revised draft Motion for Preliminary Injunction and emails re. same.	1.00	\$ 650.00	\$ 650.00
310	6/15/2021	Duncan C. Simpson LaGoy	Revise PI motion	1.50	\$ 225.00	\$ 337.50
311	6/15/2021	Duncan C. Simpson LaGoy	Emails with team re PI motion	1.00	\$ 225.00	\$ 225.00
313	6/16/2021	Garrard R. Beeney	Emails re Bronni, MTD, hearing strategy.	0.50	\$ 800.00	\$ 400.00
314	6/16/2021	Laura Kabler Oswell	Emails re. Motion for Preliminary Injunction and Motion to Dismiss.	0.50	\$ 650.00	\$ 325.00
315	6/16/2021	Duncan C. Simpson LaGoy	Meeting with Austin A. Feuer, Duncan C. Simpson LaGoy, Colin A. Mark regarding discovery prep	0.50	\$ 225.00	\$ 112.50
316	6/16/2021	Duncan C. Simpson LaGoy	Call with AG re case schedule	0.25	\$ 225.00	\$ 56.25
317	6/16/2021	Duncan C. Simpson LaGoy	Emails with team re motion to dismiss	1.00	\$ 225.00	\$ 225.00
318	6/16/2021	Duncan C. Simpson LaGoy	Review motion to dismiss	1.00	\$ 225.00	\$ 225.00
319	6/17/2021	Garrard R. Beeney	Emails re MTD, team teleconf.	1.00	\$ 800.00	\$ 800.00
320	6/17/2021	Laura Kabler Oswell	Call with ACLU team and emails re. motion to dismiss briefing; Review Motion to Dismiss; Review and revise draft outline for opposition to motion to dismiss.	1.50	\$ 650.00	\$ 975.00
321	6/17/2021	Duncan C. Simpson LaGoy	Meeting with Austin Feuer, Brandyn Rodgerson, Breean W. Colin Mark, Duncan C. Simpson LaGoy, ECHOLS, Garrard R. Beeney, Alexander S. Holland, Holly Dickson she/her, Jonathan Ossip, Laura Kabler Oswell, Leslie Cooper, Melike Tokatlioglu, Sarah Everett regarding Motion to Dismiss - Arkansas	1.00	\$ 225.00	\$ 225.00
322	6/17/2021	Duncan C. Simpson LaGoy	Research and draft outline of opposition to MTD.	4.50	\$ 225.00	\$ 1,012.50
323	6/17/2021	Jonathan J. Ossip	Reviewed motion to dismiss; calls with ACLU, local counsel, and S&C team re response to motion to dismiss; reviewed statement of interest of the United States; attention to emails re the above.	2.00	\$ 200.00	\$ 400.00
324	6/18/2021	Garrard R. Beeney	Outline response to MTD.	0.25	\$ 800.00	\$ 200.00
325	6/18/2021	Jonathan J. Ossip	Attention to email re opposition brief outline for motion to dismiss.	0.50	\$ 200.00	\$ 100.00
326	6/19/2021	Jonathan J. Ossip	Revised outline of MTD opposition brief; attention to emails re the same.	0.75	\$ 200.00	\$ 150.00
327	6/20/2021	Jonathan J. Ossip	Attention to email re opposition to MTD.	0.25	\$ 200.00	\$ 50.00
328	6/21/2021	Garrard R. Beeney	Telconf. re deadlines, oppositions, emails court.	0.75	\$ 800.00	\$ 600.00
329	6/21/2021	Laura Kabler Oswell	Call with ACLU team and emails re. motion to dismiss briefing.	1.00	\$ 650.00	\$ 650.00
330	6/21/2021	Duncan C. Simpson LaGoy	Emails with the team, opposing counsel, and the court re MTD scheduling	1.00	\$ 225.00	\$ 225.00
331	6/21/2021	Duncan C. Simpson LaGoy	Draft opposition to motion to dismiss	3.75	\$ 225.00	\$ 843.75
332	6/21/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	0.25	\$ 225.00	\$ 56.25

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
334	6/21/2021	Jonathan J. Ossip	Revised draft amicus brief; correspondence with court and opposing counsel re briefing schedule; calls with ACLU and local counsel re opposition to MTD, PI briefing schedule, and correspondence with court; attention to emails re the above.	3.75	\$ 200.00	\$ 750.00
335	6/22/2021	Garrard R. Beeney	Amicus brief, motion extension, emails court.	0.50	\$ 800.00	\$ 400.00
336	6/22/2021	Laura Kabler Oswell	Emails to Simpson LaGoy re. schedule and request for extension; Reviewed emails from team re. same.	0.50	\$ 650.00	\$ 325.00
337	6/22/2021	Duncan C. Simpson LaGoy	Emails with team re Motion to Dismiss	0.50	\$ 225.00	\$ 112.50
338	6/22/2021	Duncan C. Simpson LaGoy	Draft opposition to motion to dismiss	7.00	\$ 225.00	\$ 1,575.00
340	6/22/2021	Jonathan J. Ossip	Reviewed filings and correspondence with court and opposing counsel re briefing schedule; reviewed and edited section of MTD opposition; reviewed edits to draft protective order; attention to emails re the above.	2.25	\$ 200.00	\$ 450.00
341	6/23/2021	Garrard R. Beeney	Emails re MTD, amicus motion.	0.25	\$ 800.00	\$ 200.00
342	6/23/2021	Duncan C. Simpson LaGoy	Draft opposition to motion to dismiss	8.50	\$ 225.00	\$ 1,912.50
343	6/23/2021	Duncan C. Simpson LaGoy	Call with Holland re MTD	0.00	\$ 225.00	\$ -
345	6/23/2021	Jonathan J. Ossip	Reviewed and edited sections of opposition to MTD; reviewed amicus filings; call with D. Simpson LaGoy re MTD opposition; attention to email re the above.	7.50	\$ 200.00	\$ 1,500.00
346	6/24/2021	Garrard R. Beeney	Emails James, amicus order, opp to MTD.	0.50	\$ 800.00	\$ 400.00
347	6/24/2021	Laura Kabler Oswell	Call with ACLU team and Skadden re. potential amicus brief.	0.50	\$ 650.00	\$ 325.00
348	6/24/2021	Duncan C. Simpson LaGoy	Draft opposition to motion to dismiss	2.50	\$ 225.00	\$ 562.50
349	6/24/2021	Duncan C. Simpson LaGoy	Email correspondence with Holly@acluarkansas.org, LCOOPER@aclu.org, Laura Kabler Oswell regarding Brandt v. Rutledge Draft Amicus Outline	0.75	\$ 225.00	\$ 168.75
351	6/24/2021	Jonathan J. Ossip	Reviewed draft opposition to MTD; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
352	6/25/2021	Garrard R. Beeney	Telcon James, emails re MTD, argument.	1.00	\$ 800.00	\$ 800.00
353	6/25/2021	Laura Kabler Oswell	Review draft amicus outline and draft opposition to motion to dismiss; Emails re. argument for preliminary injunction motion.	0.50	\$ 650.00	\$ 325.00
354	6/25/2021	Duncan C. Simpson LaGoy	Emails with team re amicus brief	0.25	\$ 225.00	\$ 56.25
355	6/25/2021	Duncan C. Simpson LaGoy	Emails with team re PI hearing	0.25	\$ 225.00	\$ 56.25
356	6/25/2021	Duncan C. Simpson LaGoy	Revise opposition to MTD per Oswell comments	3.00	\$ 225.00	\$ 675.00
357	6/25/2021	Jonathan J. Ossip	Correspondence with expert re potential reply declaration; attention to email re opposition to MTD and expert declarations for PI reply brief; reviewed sections of opposition to MTD.	1.00	\$ 200.00	\$ 200.00
358	6/27/2021	Duncan C. Simpson LaGoy	Revise opposition to motion to dismiss	1.00	\$ 225.00	\$ 225.00
359	6/28/2021	Garrard R. Beeney	MTD, team call.	0.75	\$ 800.00	\$ 600.00
360	6/28/2021	Laura Kabler Oswell	Team meeting.	0.50	\$ 650.00	\$ 325.00
361	6/28/2021	Laura Kabler Oswell	Revise draft opposition to motion to dismiss.	1.00	\$ 650.00	\$ 650.00
362	6/28/2021	Duncan C. Simpson LaGoy	Revise opposition to motion to dismiss	8.00	\$ 225.00	\$ 1,800.00
363	6/28/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	0.50	\$ 225.00	\$ 112.50
365	6/28/2021	Jonathan J. Ossip	Reviewed sections of opposition to MTD; reviewed edits to opposition to MTD; reviewed recent case for same; reviewed research note re potential appeal of PI decision; call with ACLU & local counsel re opposition to MTD and PI reply brief; researched potential expert witness; attention to emails re the above.	3.00	\$ 200.00	\$ 600.00
366	6/29/2021	Garrard R. Beeney	Work on MTD.	0.25	\$ 800.00	\$ 200.00
367	6/29/2021	Laura Kabler Oswell	Revise draft opposition to Motion to Dismiss and emails re. same; Emails re. business amicus brief and draft outline.	2.50	\$ 650.00	\$ 1,625.00
368	6/29/2021	Duncan C. Simpson LaGoy	Revise opposition to MTD	5.50	\$ 225.00	\$ 1,237.50
369	6/29/2021	Duncan C. Simpson LaGoy	Call with Cooper re opp to MTD.	0.25	\$ 225.00	\$ 56.25
371	6/29/2021	Jonathan J. Ossip	Reviewed updated draft of motion to dismiss opposition; reviewed business amicus brief; reviewed expert engagement letter; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
372	6/30/2021	Garrard R. Beeney	Emails re Walton, filing.	0.50	\$ 800.00	\$ 400.00
373	6/30/2021	Duncan C. Simpson LaGoy	Cite check and revise opposition to MTD.	6.50	\$ 225.00	\$ 1,462.50
375	6/30/2021	Jonathan J. Ossip	Attention to email re opposition to motion to dismiss.	0.50	\$ 200.00	\$ 100.00
376	7/1/2021	Garrard R. Beeney	Emails Chase.	0.25	\$ 800.00	\$ 200.00
377	7/1/2021	Jonathan J. Ossip	Attention to email re opposition to motion to dismiss and scheduling call for case team.	0.25	\$ 200.00	\$ 50.00
378	7/2/2021	Jonathan J. Ossip	Reviewed motion for leave to file amicus brief; reviewed other court filings.	0.50	\$ 200.00	\$ 100.00
379	7/6/2021	Garrard R. Beeney	Letter re amicus.	0.25	\$ 800.00	\$ 200.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
380	7/7/2021	Garrard R. Beeney	Emails re hearing prep.	0.25	\$ 800.00	\$ 200.00
381	7/7/2021	Laura Kabler Oswell	Review letter re. pharmacies; Emails re. hearing prep and reply brief.	0.50	\$ 650.00	\$ 325.00
382	7/7/2021	Duncan C. Simpson LaGoy	Email correspondence with cstrangio@aclu.org, LCOOPER@aclu.org regarding Argument	0.50	\$ 225.00	\$ 112.50
383	7/7/2021	Duncan C. Simpson LaGoy	Prep for hearing	3.75	\$ 225.00	\$ 843.75
384	7/8/2021	Garrard R. Beeney	Clients at hearing, amicus briefs, emails re moot.	0.50	\$ 800.00	\$ 400.00
385	7/8/2021	Duncan C. Simpson LaGoy	Emails with team re hearing prep	0.50	\$ 225.00	\$ 112.50
386	7/8/2021	Duncan C. Simpson LaGoy	Prep for hearing	3.50	\$ 225.00	\$ 787.50
387	7/8/2021	Jonathan J. Ossip	Correspond with ACLU re motion hearing and briefing; call with S&C associate team re same; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
388	7/9/2021	Garrard R. Beeney	Emails re state answer to PI.	0.50	\$ 800.00	\$ 400.00
389	7/9/2021	Laura Kabler Oswell	Review briefs; Emails re. same.	0.50	\$ 650.00	\$ 325.00
390	7/9/2021	Duncan C. Simpson LaGoy	Prep for hearing	2.00	\$ 225.00	\$ 450.00
391	7/9/2021	Duncan C. Simpson LaGoy	Emails with team and Alabama re amicus brief	0.50	\$ 225.00	\$ 112.50
392	7/9/2021	Duncan C. Simpson LaGoy	Review PI opposition and supporting materials	3.00	\$ 225.00	\$ 675.00
393	7/9/2021	Jonathan J. Ossip	Correspondence re potential amicus brief; reviewed defendants' opposition to motion for PI and associated exhibits; prepared request for reply expert declaration; attention to emails re the above.	2.75	\$ 200.00	\$ 550.00
394	7/10/2021	Garrard R. Beeney	Emails re response to PI.	0.25	\$ 800.00	\$ 200.00
395	7/10/2021	Laura Kabler Oswell	Review oral argument outline and email to Simpson re. same.	0.50	\$ 650.00	\$ 325.00
396	7/10/2021	Duncan C. Simpson LaGoy	Meeting with Leslie Cooper , *ARGenderAffirmingMedCare regarding Reply brief planning	1.00	\$ 225.00	\$ 225.00
398	7/10/2021	Jonathan J. Ossip	Reviewed defendants' opposition to PI and associated exhibits; correspond with expert re same; prepared potential arguments for reply brief; call with ACLU and local counsel re reply brief; attention to emails re the above.	4.50	\$ 200.00	\$ 900.00
399	7/11/2021	Duncan C. Simpson LaGoy	Draft PI reply	0.75	\$ 225.00	\$ 168.75
401	7/11/2021	Jonathan J. Ossip	Reviewed defendants' expert materials and prepared potential response to same; correspondence and call with expert witness re same; prepared draft declaration outline; attention to emails re the above.	7.75	\$ 200.00	\$ 1,550.00
402	7/12/2021	Garrard R. Beeney	Emails court, attendance at PI hearing.	0.50	\$ 800.00	\$ 400.00
403	7/12/2021	Laura Kabler Oswell	Call with ACLU re. preliminary injunction motion.	1.00	\$ 650.00	\$ 650.00
404	7/12/2021	Duncan C. Simpson LaGoy	Draft reply re PI motion	8.50	\$ 225.00	\$ 1,912.50
405	7/12/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	0.50	\$ 225.00	\$ 112.50
407	7/12/2021	Jonathan J. Ossip	Prepared research assignment re expert materials and standards of care; reviewed materials for reply brief; call with ACLU and local counsel re reply brief and hearing; reviewed correspondence with court re hearing; attention to emails re the above.	2.25	\$ 200.00	\$ 450.00
408	7/13/2021	Laura Kabler Oswell	Revised Reply re Plaintiffs Motion for Preliminary Injunction.	0.50	\$ 650.00	\$ 325.00
409	7/13/2021	Duncan C. Simpson LaGoy	Continue drafting reply brief	6.50	\$ 225.00	\$ 1,462.50
410	7/13/2021	Duncan C. Simpson LaGoy	Meeting with Chase Strangio , *ARGenderAffirmingMedCare regarding Discussion of Reply Brief	0.50	\$ 225.00	\$ 112.50
412	7/13/2021	Jonathan J. Ossip	Reviewed and edited draft section of PI reply brief; reviewed and edited draft supplemental expert declaration; reviewed summary of correspondence with defendants; call with ACLU and local counsel re reply brief and hearing; reviewed research notes re expert materials; attention to emails re the above.	3.50	\$ 200.00	\$ 700.00
413	7/14/2021	Laura Kabler Oswell	Revise draft reply in support of Preliminary Injunction.	1.50	\$ 650.00	\$ 975.00
414	7/14/2021	Duncan C. Simpson LaGoy	Revise reply brief	4.50	\$ 225.00	\$ 1,012.50
415	7/14/2021	Jonathan J. Ossip	Reviewed draft expert declaration; correspond with expert re same; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
416	7/15/2021	Garrard R. Beeney	Emails re reply/argument.	0.25	\$ 800.00	\$ 200.00
417	7/15/2021	Laura Kabler Oswell	Revise draft reply in support of Preliminary Injunction; Emails to Simpson re. same.	2.00	\$ 650.00	\$ 1,300.00
418	7/15/2021	Duncan C. Simpson LaGoy	Revise reply brief	4.50	\$ 225.00	\$ 1,012.50
419	7/15/2021	Duncan C. Simpson LaGoy	Emails with team re strategy for oral argument	0.50	\$ 225.00	\$ 112.50
420	7/15/2021	Jonathan J. Ossip	Reviewed edits to PI reply brief; reviewed draft expert declaration; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
421	7/16/2021	Garrard R. Beeney	Emails re clients, prep for hearing.	0.50	\$ 800.00	\$ 400.00
422	7/16/2021	Laura Kabler Oswell	Revised draft reply brief and emails to Simpson re. same.	1.50	\$ 650.00	\$ 975.00
423	7/16/2021	Duncan C. Simpson LaGoy	Cite check and finalize reply brief and declarations for filing.	7.50	\$ 225.00	\$ 1,687.50
425	7/16/2021	Jonathan J. Ossip	Reviewed draft expert declarations; reviewed draft PI reply brief; drafted questions for moot oral argument; attention to emails re the above	2.25	\$ 200.00	\$ 450.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
426	7/17/2021	Garrard R. Beeney	Oral prep questions.	0.25	\$ 800.00	\$ 200.00
427	7/17/2021	Laura Kabler Oswell	Attend prep for ACLU PI hearing.	2.00	\$ 650.00	\$ 1,300.00
428	7/17/2021	Duncan C. Simpson LaGoy	Oral argument moot	2.75	\$ 225.00	\$ 618.75
430	7/17/2021	Jonathan J. Ossip	Reviewed questions for moot argument; attention to email re hearing.	0.50	\$ 200.00	\$ 100.00
431	7/18/2021	Duncan C. Simpson LaGoy	Prep for hearing	0.50	\$ 225.00	\$ 112.50
432	7/19/2021	Garrard R. Beeney	Emails court, order of argument.	0.25	\$ 800.00	\$ 200.00
433	7/19/2021	Laura Kabler Oswell	Emails re. argument prep.	0.50	\$ 650.00	\$ 325.00
434	7/19/2021	Duncan C. Simpson LaGoy	Prep for hearing	1.50	\$ 225.00	\$ 337.50
435	7/19/2021	Jonathan J. Ossip	Reviewed correspondence with court re argument and re hearing preparations; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
436	7/20/2021	Duncan C. Simpson LaGoy	Prep for hearing	7.00	\$ 225.00	\$ 1,575.00
437	7/20/2021	Jonathan J. Ossip	Reviewed court filings and expert reports from plaintiffs; attention to email re same and re hearing preparation.	0.50	\$ 200.00	\$ 100.00
438	7/21/2021	Garrard R. Beeney	Emails re hearing and aftermath.	0.50	\$ 800.00	\$ 400.00
439	7/21/2021	Laura Kabler Oswell	Emails re. preliminary injunction hearing.	0.50	\$ 650.00	\$ 325.00
440	7/21/2021	Duncan C. Simpson LaGoy	Prep for and attend hearing	4.00	\$ 225.00	\$ 900.00
441	7/21/2021	Jonathan J. Ossip	Reviewed updates from and news articles re hearing; correspond with potential declarant re motion papers; attention to email re hearing and court ruling.	1.75	\$ 200.00	\$ 350.00
442	7/22/2021	Duncan C. Simpson LaGoy	Research re [legal issue in litigation].	3.00	\$ 225.00	\$ 675.00
443	7/22/2021	Duncan C. Simpson LaGoy	Call with Cooper re next steps	0.50	\$ 225.00	\$ 112.50
445	7/22/2021	Jonathan J. Ossip	Reviewed research note re [research for legal issue in litigation]; conducted research re same; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
446	7/23/2021	Garrard R. Beeney	Research on PI order.	0.25	\$ 800.00	\$ 200.00
447	7/23/2021	Duncan C. Simpson LaGoy	Research re [legal issue in litigation].	1.25	\$ 225.00	\$ 281.25
448	7/23/2021	Duncan C. Simpson LaGoy	Email team re [litigation strategy].	0.50	\$ 225.00	\$ 112.50
449	7/23/2021	Jonathan J. Ossip	Reviewed notes re outline for [litigation strategy]; reviewed draft summary of PI decision; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
450	7/26/2021	Laura Kabler Oswell	Arkansas team call.	1.00	\$ 650.00	\$ 650.00
451	7/26/2021	Duncan C. Simpson LaGoy	Research re potential appeal	1.00	\$ 225.00	\$ 225.00
452	7/26/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	1.00	\$ 225.00	\$ 225.00
453	7/27/2021	Duncan C. Simpson LaGoy	Revise motion re extension and email team re same	0.50	\$ 225.00	\$ 112.50
454	7/28/2021	Duncan C. Simpson LaGoy	Review research re [potential legal issue in litigation].	0.50	\$ 225.00	\$ 112.50
455	7/28/2021	Duncan C. Simpson LaGoy	Revise [research re issue in litigation].	0.25	\$ 225.00	\$ 56.25
456	7/28/2021	Duncan C. Simpson LaGoy	Revise proposed order re PI	0.25	\$ 225.00	\$ 56.25
457	7/29/2021	Laura Kabler Oswell	Review analysis and proposed order granting preliminary injunction.	0.50	\$ 650.00	\$ 325.00
458	7/29/2021	Duncan C. Simpson LaGoy	Revise [research re issue in litigation].	0.50	\$ 225.00	\$ 112.50
459	7/29/2021	Jonathan J. Ossip	Reviewed research note re [legal issue in litigation]; reviewed draft proposed order re same.	0.75	\$ 200.00	\$ 150.00
460	7/30/2021	Laura Kabler Oswell	Review proposed order and emails to Simpson re. same.	0.25	\$ 650.00	\$ 162.50
461	7/30/2021	Duncan C. Simpson LaGoy	Call with Ossip re strategy	0.50	\$ 225.00	\$ 112.50
462	7/30/2021	Duncan C. Simpson LaGoy	Emails with Oswell and Armbruster re proposed order	0.50	\$ 225.00	\$ 112.50
463	7/30/2021	Jonathan J. Ossip	Reviewed draft proposed order re preliminary injunction; call with D. Simpson LaGoy re case status and upcoming projects; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
464	8/2/2021	Garrard R. Beeney	PI order.	0.25	\$ 800.00	\$ 200.00
465	8/2/2021	Laura Kabler Oswell	Review revised draft proposed order granting preliminary injunction.	0.25	\$ 650.00	\$ 162.50
466	8/2/2021	Laura Kabler Oswell	Team call to discuss case schedule and possible appeal of Preliminary Injunction.	0.75	\$ 650.00	\$ 487.50
468	8/2/2021	Jonathan J. Ossip	Prepared research assignments; assigned drafting of proposed discovery schedule; call with D. Loevinsohn re legal research issues; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
469	8/4/2021	Jonathan J. Ossip	Reviewed draft proposed scheduling order and dates; call with E. Armbruster re same; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
470	8/5/2021	Jonathan J. Ossip	Reviewed and edited correspondence re draft scheduling order; scheduled call with ACLU re experts and amicus briefs; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
471	8/6/2021	Jonathan J. Ossip	Call with ACLU re expert and amicus issues; reviewed and edited note re discovery schedule; attention to emails re same.	1.00	\$ 200.00	\$ 200.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
472	8/9/2021	Garrard R. Beene	Review schedule, team meeting.	0.25	\$ 800.00	\$ 200.00
473	8/9/2021	Jonathan J. Ossip	Reviewed correspondence from potential amicus; call with A. Holland re same; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
475	8/10/2021	Jonathan J. Ossip	Reviewed notes from case strategy call.	0.25	\$ 200.00	\$ 50.00
476	8/11/2021	Garrard R. Beene	Emails re amicus.	0.25	\$ 800.00	\$ 200.00
477	8/11/2021	Jonathan J. Ossip	Attention to email re potential amicus, case team working groups.	0.50	\$ 200.00	\$ 100.00
478	8/12/2021	Garrard R. Beene	Working groups.	0.25	\$ 800.00	\$ 200.00
480	8/12/2021	Jonathan J. Ossip	Reviewed correspondence re case team working groups; reviewed proposed edits to draft scheduling order; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
481	8/13/2021	Garrard R. Beene	Emails re scheduling order.	0.25	\$ 800.00	\$ 200.00
482	8/13/2021	Jonathan J. Ossip	Attention to email re legal research for anticipated briefing and discovery issues.	0.25	\$ 200.00	\$ 50.00
483	8/16/2021	Garrard R. Beene	Emails re discovery, schedule, staffing.	0.50	\$ 800.00	\$ 400.00
484	8/16/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	1.00	\$ 225.00	\$ 225.00
485	8/16/2021	Jonathan J. Ossip	Attention to emails re [case strategy, amicus briefs, expert work].	0.25	\$ 200.00	\$ 50.00
486	8/17/2021	Duncan C. Simpson LaGoy	Revise scheduling order	1.00	\$ 225.00	\$ 225.00
487	8/18/2021	Garrard R. Beene	Emails re scheduling order.	0.25	\$ 800.00	\$ 200.00
489	8/18/2021	Jonathan J. Ossip	Reviewed research note re standards of scrutiny/equal protection claim; attention to email re expert preparation and proposed scheduling order.	0.50	\$ 200.00	\$ 100.00
490	8/19/2021	Garrard R. Beene	Emails re schedule.	0.25	\$ 800.00	\$ 200.00
491	8/19/2021	Duncan C. Simpson LaGoy	Emails re scheduling order	0.25	\$ 225.00	\$ 56.25
493	8/20/2021	Garrard R. Beene	Email re appeal and research.	0.50	\$ 800.00	\$ 400.00
494	8/20/2021	Duncan C. Simpson LaGoy	Research re notice of appeal	1.00	\$ 225.00	\$ 225.00
495	8/20/2021	Duncan C. Simpson LaGoy	Emails re invoices	0.25	\$ 225.00	\$ 56.25
496	8/20/2021	Jonathan J. Ossip	Reviewed notice of appeal; conducted research re same; attention to emails re defendants' appeal, expert speaking engagement.	1.25	\$ 200.00	\$ 250.00
497	8/23/2021	Garrard R. Beene	Team call, schedule email, docket.	0.75	\$ 800.00	\$ 600.00
498	8/23/2021	Laura Kabler Oswell	Team call.	0.50	\$ 650.00	\$ 325.00
499	8/23/2021	Jonathan J. Ossip	Call with ACLU and local counsel re appeal and proposed case schedule; conducted research re [legal strategy]; reviewed research note re equal protection arguments; attention to emails re the above.	2.00	\$ 200.00	\$ 400.00
500	8/24/2021	Garrard R. Beene	Emails re appeal strategy.	0.50	\$ 800.00	\$ 400.00
501	8/24/2021	Laura Kabler Oswell	Review research re. Motion to Dismiss appeal and emails re. same.	0.50	\$ 650.00	\$ 325.00
502	8/24/2021	Duncan C. Simpson LaGoy	Research re notice of appeal re MTD	1.50	\$ 225.00	\$ 337.50
503	8/24/2021	Duncan C. Simpson LaGoy	Emails with team re notice of appeal	0.50	\$ 225.00	\$ 112.50
504	8/24/2021	Jonathan J. Ossip	Reviewed appellate court filings; researched appellate procedure issues; call with T. Garvey re same; draft research note re same; call with D. Simpson LaGoy re same; attention to emails re the above.	2.25	\$ 200.00	\$ 450.00
505	8/25/2021	Garrard R. Beene	Emails re appeal.	0.25	\$ 800.00	\$ 200.00
506	8/25/2021	Duncan C. Simpson LaGoy	Emails with team re invoices and notice of appeal	0.25	\$ 225.00	\$ 56.25
507	8/25/2021	Jonathan J. Ossip	Drafted research note re [legal strategy]; attention to emails re the same.	0.50	\$ 200.00	\$ 100.00
508	8/26/2021	Garrard R. Beene	Emails re schedule.	0.25	\$ 800.00	\$ 200.00
509	8/26/2021	Jonathan J. Ossip	Call with ACLU and local counsel re preparation of expert reports; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
510	8/27/2021	Duncan C. Simpson LaGoy	Emails re motion for extension	0.25	\$ 225.00	\$ 56.25
511	8/27/2021	Jonathan J. Ossip	Reviewed correspondence with defendants re extension of briefing schedule; attention to emails re the same.	0.50	\$ 200.00	\$ 100.00
512	8/30/2021	Laura Kabler Oswell	Call with ACLU and outside counsel teams re. appeal and district court schedule.	0.50	\$ 650.00	\$ 325.00
513	8/30/2021	Duncan C. Simpson LaGoy	Research re 8th Circuit rules	1.00	\$ 225.00	\$ 225.00
514	8/30/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	1.00	\$ 225.00	\$ 225.00
515	8/30/2021	Duncan C. Simpson LaGoy	Emails with team re [legal issue in litigation].	0.50	\$ 225.00	\$ 112.50
516	8/30/2021	Jonathan J. Ossip	Reviewed court filings re attorney appearances; reviewed list of potential amicus briefs; reviewed correspondence with defendants re scheduling order; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
517	8/31/2021	Garrard R. Beene	Briefing schedule.	0.25	\$ 800.00	\$ 200.00
518	8/31/2021	Jonathan J. Ossip	Reviewed correspondence with defendants re proposed scheduling order; reviewed notes re potential attorney appearances in court of appeals; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
519	9/1/2021	Duncan C. Simpson LaGoy	Research re motions to stay	1.75	\$ 225.00	\$ 393.75
520	9/1/2021	Jonathan J. Ossip	Reviewed court filings re counsel appearances; reviewed research note re [legal issue in litigation]; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
521	9/2/2021	Garrard R. Beeney	Emails re 8th Circuit notice.	0.25	\$ 800.00	\$ 200.00
522	9/2/2021	Jonathan J. Ossip	Reviewed correspondence with defendants re joint appendix; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
523	9/3/2021	Garrard R. Beeney	Emails re joint appendix.	0.25	\$ 800.00	\$ 200.00
524	9/3/2021	Duncan C. Simpson LaGoy	Draft motion for scheduling order	1.00	\$ 225.00	\$ 225.00
525	9/3/2021	Jonathan J. Ossip	Reviewed correspondence from defendants re joint appendix; reviewed draft motion for scheduling order; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
526	9/4/2021	Laura Kabler Oswell	Revised Motion for Initial Scheduling Order.	0.25	\$ 650.00	\$ 162.50
527	9/4/2021	Jonathan J. Ossip	Reviewed edits to draft motion for scheduling order.	0.25	\$ 200.00	\$ 50.00
528	9/7/2021	Garrard R. Beeney	Scheduling motion, admin filings.	0.25	\$ 800.00	\$ 200.00
529	9/7/2021	Laura Kabler Oswell	Revise draft motion for scheduling order and email to Simpson re. same.	0.50	\$ 650.00	\$ 325.00
530	9/7/2021	Duncan C. Simpson LaGoy	Emails with Oswell re motion re scheduling order	0.50	\$ 225.00	\$ 112.50
531	9/7/2021	Jonathan J. Ossip	Reviewed edits to draft motion for scheduling order; reviewed appellate court filings; conducted research re same; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
532	9/8/2021	Garrard R. Beeney	Scheduling order, emails re default.	0.25	\$ 800.00	\$ 200.00
533	9/8/2021	Duncan C. Simpson LaGoy	Emails with team re answer	0.25	\$ 225.00	\$ 56.25
534	9/8/2021	Duncan C. Simpson LaGoy	Research re defaults	1.00	\$ 225.00	\$ 225.00
535	9/8/2021	Jonathan J. Ossip	Revised case status report; reviewed draft motion and notes re scheduling order and default by defendants; conducted research re same; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
536	9/9/2021	Garrard R. Beeney	Scheduling motion.	0.25	\$ 800.00	\$ 200.00
537	9/9/2021	Duncan C. Simpson LaGoy	Revise motion for scheduling order	0.75	\$ 225.00	\$ 168.75
538	9/9/2021	Jonathan J. Ossip	Reviewed proposed edits to motion for scheduling order; reviewed notes re [legal strategy]; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
539	9/10/2021	Duncan C. Simpson LaGoy	Email AG re answer	0.25	\$ 225.00	\$ 56.25
540	9/11/2021	Jonathan J. Ossip	Reviewed precedents re [potential legal issue in litigation].	0.25	\$ 200.00	\$ 50.00
541	9/13/2021	Laura Kabler Oswell	Weekly team call with ACLU and other outside counsel.	1.00	\$ 650.00	\$ 650.00
542	9/14/2021	Garrard R. Beeney	Emails re answer.	0.25	\$ 800.00	\$ 200.00
543	9/14/2021	Duncan C. Simpson LaGoy	Review Answer	0.50	\$ 225.00	\$ 112.50
544	9/14/2021	Jonathan J. Ossip	Reviewed answer to complaint; attention to emails re the same.	0.50	\$ 200.00	\$ 100.00
545	9/16/2021	Garrard R. Beeney	Emails re schedule, Bell case.	0.25	\$ 800.00	\$ 200.00
546	9/16/2021	Jonathan J. Ossip	Reviewed update re Tavistock appeal; reviewed case schedule for appeal; attention to emails re the above.	0.00	\$ 200.00	\$ -
547	9/17/2021	Garrard R. Beeney	Emails re Bell.	0.50	\$ 800.00	\$ 400.00
548	9/17/2021	Jonathan J. Ossip	Reviewed decision in Tavistock appeal; conducted research re same.	1.25	\$ 200.00	\$ 250.00
549	9/20/2021	Garrard R. Beeney	Emails re schedule.	0.25	\$ 800.00	\$ 200.00
550	9/20/2021	Laura Kabler Oswell	Weekly team call.	0.50	\$ 650.00	\$ 325.00
551	9/23/2021	Garrard R. Beeney	Emails re stay.	0.25	\$ 800.00	\$ 200.00
552	9/23/2021	Laura Kabler Oswell	Review Arkansas opposition to request for scheduling order and emails re. same.	0.50	\$ 650.00	\$ 325.00
553	9/23/2021	Duncan C. Simpson LaGoy	Drafted reply re motion for scheduling order	1.75	\$ 225.00	\$ 393.75
554	9/23/2021	Jonathan J. Ossip	Reviewed Tavistock appeal decision and case summary re same; reviewed opposition to motion for scheduling order and draft reply to same; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
555	9/24/2021	Garrard R. Beeney	Emails re stay.	0.25	\$ 800.00	\$ 200.00
556	9/24/2021	Laura Kabler Oswell	Revise response to request for scheduling order and emails to S&C team re. same.	0.50	\$ 650.00	\$ 325.00
557	9/24/2021	Jonathan J. Ossip	Attention to emails re response to opposition re scheduling order.	0.25	\$ 200.00	\$ 50.00
558	9/25/2021	Laura Kabler Oswell	Revise draft Reply re Motion for Initial Scheduling Order.	0.25	\$ 650.00	\$ 162.50
559	9/26/2021	Garrard R. Beeney	Reply re schedule.	0.25	\$ 800.00	\$ 200.00
560	9/26/2021	Laura Kabler Oswell	Review revised draft Reply re Motion for Initial Scheduling Order.	0.25	\$ 650.00	\$ 162.50
561	9/26/2021	Duncan C. Simpson LaGoy	Revise reply brief per Oswell comments	1.00	\$ 225.00	\$ 225.00
562	9/26/2021	Jonathan J. Ossip	Attention to emails re draft reply to motion for scheduling order.	0.25	\$ 200.00	\$ 50.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
563	9/27/2021	Garrard R. Beeney	Emails re scheduling reply.	0.25	\$ 800.00	\$ 200.00
564	9/27/2021	Laura Kabler Oswell	Revised draft Reply re Motion for Initial Scheduling Order.	0.50	\$ 650.00	\$ 325.00
565	9/27/2021	Duncan C. Simpson LaGoy	revise complaint and answer	0.50	\$ 225.00	\$ 112.50
566	9/27/2021	Duncan C. Simpson LaGoy	Revise reply re scheduling order	1.00	\$ 225.00	\$ 225.00
567	9/27/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	0.50	\$ 225.00	\$ 112.50
568	9/27/2021	Jonathan J. Ossip	Reviewed and edited draft reply re motion for scheduling order; reviewed court filings re attorney appearances; reviewed draft notices of appearance; reviewed merged complaint and answer; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
569	9/28/2021	Jonathan J. Ossip	Reviewed filed copy of scheduling order reply brief; reviewed draft notices of appearance; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
570	9/30/2021	Garrard R. Beeney	Scheduling order.	0.25	\$ 800.00	\$ 200.00
571	9/30/2021	Laura Kabler Oswell	Review Scheduling Order entered by court and emails to S&C team re. same.	0.25	\$ 650.00	\$ 162.50
572	9/30/2021	Duncan C. Simpson LaGoy	Email clerk re scheduling order	0.25	\$ 225.00	\$ 56.25
573	9/30/2021	Duncan C. Simpson LaGoy	Research re potential discovery	1.50	\$ 225.00	\$ 337.50
574	9/30/2021	Duncan C. Simpson LaGoy	Emails with team re scheduling order	1.00	\$ 225.00	\$ 225.00
575	9/30/2021	Jonathan J. Ossip	Reviewed notes re potential discovery requests, discovery report and next steps; schedule meeting re expert witnesses; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
576	10/1/2021	Garrard R. Beeney	26(f) report.	0.25	\$ 800.00	\$ 200.00
577	10/1/2021	Laura Kabler Oswell	Revised draft 26(f) report.	0.25	\$ 650.00	\$ 162.50
578	10/1/2021	Duncan C. Simpson LaGoy	Emails with team re discovery	0.50	\$ 225.00	\$ 112.50
579	10/1/2021	Duncan C. Simpson LaGoy	Research re expert reports	1.00	\$ 225.00	\$ 225.00
580	10/1/2021	Duncan C. Simpson LaGoy	Draft 26(f) report	1.00	\$ 225.00	\$ 225.00
582	10/1/2021	Jonathan J. Ossip	Scheduled and attended call with ACLU and local counsel re expert witnesses; reviewed and commented on draft Rule 26(f) report; assembled expert materials; attention to emails re the above.	1.75	\$ 200.00	\$ 350.00
583	10/4/2021	Garrard R. Beeney	Team call, 26(f) report.	0.50	\$ 800.00	\$ 400.00
584	10/4/2021	Duncan C. Simpson LaGoy	Revised document 26(f) Report	0.25	\$ 225.00	\$ 56.25
586	10/4/2021	Jonathan J. Ossip	Reviewed expert materials binder; correspond with expert re case status; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
587	10/5/2021	Garrard R. Beeney	Emails re treatment article.	0.25	\$ 800.00	\$ 200.00
589	10/6/2021	Garrard R. Beeney	Discovery plan.	0.25	\$ 800.00	\$ 200.00
590	10/6/2021	Duncan C. Simpson LaGoy	Email Oswell re discovery	0.25	\$ 225.00	\$ 56.25
591	10/6/2021	Duncan C. Simpson LaGoy	Email Echols re discovery	0.25	\$ 225.00	\$ 56.25
592	10/6/2021	Duncan C. Simpson LaGoy	Revised document 26(f) Report	0.25	\$ 225.00	\$ 56.25
593	10/6/2021	Duncan C. Simpson LaGoy	Meeting with Brandyn Rodgeron, Brecan Walas, Chris Travis, Daniel Loevinsohn, Duncan C. Simpson LaGoy, ECHOLS, Gregory L. Smith, Leslie Cooper, Sarah regarding Discovery Team Meeting	1.00	\$ 225.00	\$ 225.00
595	10/6/2021	Jonathan J. Ossip	Reviewed news article re expert issues; reviewed expert materials.	1.00	\$ 200.00	\$ 200.00
596	10/7/2021	Duncan C. Simpson LaGoy	Email Echols re discovery	0.25	\$ 225.00	\$ 56.25
598	10/7/2021	Jonathan J. Ossip	Reviewed expert materials; call with ACLU and local counsel re expert reports; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
599	10/8/2021	Garrard R. Beeney	Minutes, update plan, def 26(f) response.	0.25	\$ 800.00	\$ 200.00
600	10/8/2021	Duncan C. Simpson LaGoy	Review revisions to 26(f) report and email team re same	0.50	\$ 225.00	\$ 112.50
601	10/8/2021	Duncan C. Simpson LaGoy	Emails re discovery	0.25	\$ 225.00	\$ 56.25
602	10/8/2021	Jonathan J. Ossip	Coordinated exchange of expert materials with co-counsel; reviewed note re potential expert issues; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
603	10/11/2021	Garrard R. Beeney	Emails re agenda, discovery.	0.25	\$ 800.00	\$ 200.00
604	10/11/2021	Duncan C. Simpson LaGoy	Email correspondence with echols@gill-law.com regarding authorization letter	0.25	\$ 225.00	\$ 56.25
605	10/11/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	0.50	\$ 225.00	\$ 112.50
606	10/11/2021	Duncan C. Simpson LaGoy	Revise initial disclosures	0.75	\$ 225.00	\$ 168.75
607	10/11/2021	Duncan C. Simpson LaGoy	Revised document 26(f) Report.docx 4828-4012-7997 v.2.docx	0.75	\$ 225.00	\$ 168.75
608	10/11/2021	Duncan C. Simpson LaGoy	Meeting with Alexander Holland, Duncan C. Simpson LaGoy, Joseph F. Gilday, Gregory L. Smith, Eric M. Newman regarding Matter kickoff - 900001/03506	0.25	\$ 225.00	\$ 56.25
610	10/11/2021	Jonathan J. Ossip	Reviewed edits to discovery report; reviewed draft initial disclosures; coordinated document platform setup for case team; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
611	10/12/2021	Laura Kabler Oswell	Revise draft initial disclosures and emails re. same.	0.50	\$ 650.00	\$ 325.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
612	10/12/2021	Duncan C. Simpson LaGoy	Revise initial disclosures per Oswell comments	0.50	\$ 225.00	\$ 112.50
613	10/12/2021	Duncan C. Simpson LaGoy	Review draft 26(f) report from AG	0.25	\$ 225.00	\$ 56.25
614	10/12/2021	Duncan C. Simpson LaGoy	Revised document Plaintiffs First RFPs.docx 4827-8888-3198 v.1.docx	1.75	\$ 225.00	\$ 393.75
616	10/12/2021	Jonathan J. Ossip	Reviewed draft expert issues outline.	0.50	\$ 200.00	\$ 100.00
617	10/13/2021	Garrard R. Beeney	26(f) report.	0.25	\$ 800.00	\$ 200.00
618	10/13/2021	Duncan C. Simpson LaGoy	Review Brandt records	0.50	\$ 225.00	\$ 112.50
619	10/13/2021	Duncan C. Simpson LaGoy	Revise 26(f) report, draft proposed amended scheduling order and email AG re same	2.25	\$ 225.00	\$ 506.25
620	10/13/2021	Duncan C. Simpson LaGoy	Finish first draft of RFPs	2.25	\$ 225.00	\$ 506.25
622	10/13/2021	Jonathan J. Ossip	Reviewed report from potential additional expert; reviewed and commented on expert issues outline; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
623	10/14/2021	Garrard R. Beeney	26(f) edits.	0.25	\$ 800.00	\$ 200.00
624	10/14/2021	Duncan C. Simpson LaGoy	Email correspondence with Joseph F. Gilday, GenderAffirmingMedCareAssociates@sullcrom.com, disc_genderaffirmingmedcare@sullcrom.com regarding discovery	0.25	\$ 225.00	\$ 56.25
625	10/14/2021	Duncan C. Simpson LaGoy	Revised document Plaintiffs First RFPs.docx 4827-8888-3198 v.2.docx	1.00	\$ 225.00	\$ 225.00
626	10/14/2021	Duncan C. Simpson LaGoy	Research re document requests from legislators	2.25	\$ 225.00	\$ 506.25
627	10/14/2021	Duncan C. Simpson LaGoy	Email correspondence with Gregory L. Smith regarding ACLU Arkansas Gender Affirming Care - Plaintiffs' Initial Disclosures Draft	0.25	\$ 225.00	\$ 56.25
629	10/14/2021	Jonathan J. Ossip	Call with ACLU and local counsel re expert witnesses; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
630	10/15/2021	Garrard R. Beeney	Emails re discovery, RFPs.	0.25	\$ 800.00	\$ 200.00
631	10/15/2021	Duncan C. Simpson LaGoy	Email team re 26(f) report	0.25	\$ 225.00	\$ 56.25
632	10/15/2021	Jonathan J. Ossip	Reviewed draft requests for production; reviewed and edited note re potential expert witness; reviewed notes re discovery strategy and case status; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
633	10/16/2021	Jonathan J. Ossip	Attention to emails re preparation of expert report, discovery schedule, initial disclosures and document requests.	0.50	\$ 200.00	\$ 100.00
634	10/18/2021	Garrard R. Beeney	Telcon Ms. Cooper re deposition, 26(f) report.	0.75	\$ 800.00	\$ 600.00
635	10/18/2021	Laura Kabler Oswell	Revised draft Initial Disclosures.	0.25	\$ 650.00	\$ 162.50
636	10/18/2021	Laura Kabler Oswell	Revised draft 26(f) Report.	0.25	\$ 650.00	\$ 162.50
637	10/18/2021	Duncan C. Simpson LaGoy	Revise initial disclosures, RFPs and 26(f) report and serve them on Defendants	2.50	\$ 225.00	\$ 562.50
638	10/18/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	1.00	\$ 225.00	\$ 225.00
639	10/18/2021	Jonathan J. Ossip	Reviewed correspondence from potential amicus; reviewed draft discovery documents, reviewed note re potential expert witness; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
640	10/19/2021	Garrard R. Beeney	26(f) negotiations.	0.25	\$ 800.00	\$ 200.00
641	10/19/2021	Duncan C. Simpson LaGoy	Email team re 26(f) report	0.50	\$ 225.00	\$ 112.50
642	10/19/2021	Duncan C. Simpson LaGoy	Review Brooke's medical records	0.50	\$ 225.00	\$ 112.50
643	10/20/2021	Duncan C. Simpson LaGoy	Calls and emails with Vector re records	0.50	\$ 225.00	\$ 112.50
644	10/20/2021	Duncan C. Simpson LaGoy	Review Dylan's records	1.00	\$ 225.00	\$ 225.00
645	10/20/2021	Jonathan J. Ossip	Call with ACLU and local counsel re expert report; schedule call with expert; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
646	10/21/2021	Garrard R. Beeney	Emails re depo limits.	0.25	\$ 800.00	\$ 200.00
647	10/21/2021	Duncan C. Simpson LaGoy	Emails with team and AG re 26(f) report	0.25	\$ 225.00	\$ 56.25
648	10/21/2021	Duncan C. Simpson LaGoy	Review Sabrina's records	0.50	\$ 225.00	\$ 112.50
650	10/21/2021	Brandyn J. Rodgeron	Reviewing timeline prepared by the ACLU for expert reports.	0.50	\$ 175.00	\$ 87.50
651	10/21/2021	Brandyn J. Rodgeron	Call to discuss expert reports and Dr. Karasic's potential addition (0.75).	0.75	\$ 175.00	\$ 131.25
652	10/21/2021	Jonathan J. Ossip	Reviewed draft outline of expert issues; coordinated preparation of draft expert report; planned call with expert re same; reviewed correspondence with defendants re Rule 26(f) report; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
653	10/22/2021	Garrard R. Beeney	26(f) consent.	0.25	\$ 800.00	\$ 200.00
654	10/22/2021	Duncan C. Simpson LaGoy	Emails re 26(f) report	0.25	\$ 225.00	\$ 56.25
656	10/22/2021	Brandyn J. Rodgeron	Call with ACLU and Dr. Karasic to discuss potential expert report.	1.25	\$ 175.00	\$ 218.75
657	10/22/2021	Jonathan J. Ossip	Reviewed correspondence from defendants re Rule 26(f) report and potential amicus brief; schedule call with expert; reviewed team call summary; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
658	10/25/2021	Garrard R. Beeney	26(f) issues, initial disclosures.	0.25	\$ 800.00	\$ 200.00
659	10/25/2021	Laura Kabler Oswell	Call re. case status; Emails to Simpson re. staffing; Review initial disclosures.	1.25	\$ 650.00	\$ 812.50

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
660	10/25/2021	Duncan C. Simpson LaGoy	Review initial disclosures and email team re same	0.25	\$ 225.00	\$ 56.25
661	10/25/2021	Duncan C. Simpson LaGoy	Emails re expert declarations	0.25	\$ 225.00	\$ 56.25
662	10/25/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	1.00	\$ 225.00	\$ 225.00
665	10/25/2021	Jonathan J. Ossip	Reviewed filed Rule 26(f) report; reviewed expert declarations; preparation for call with expert; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
666	10/26/2021	Garrard R. Beeney	State 26(f) - medical board issues.	0.25	\$ 800.00	\$ 200.00
668	10/26/2021	Brandyn J. Rodgeron	Reviewing Defendants' initial disclosures.	0.50	\$ 175.00	\$ 87.50
669	10/26/2021	Jonathan J. Ossip	Call with expert re preparation of report; reviewed draft expert reports and outlines; attention to emails re the above.	1.75	\$ 200.00	\$ 350.00
670	10/27/2021	Garrard R. Beeney	Emails re research, depositions.	0.25	\$ 800.00	\$ 200.00
671	10/27/2021	Duncan C. Simpson LaGoy	Prep for discovery team meeting	0.50	\$ 225.00	\$ 112.50
672	10/27/2021	Duncan C. Simpson LaGoy	Research re [legal issue in litigation].	0.50	\$ 225.00	\$ 112.50
673	10/27/2021	Duncan C. Simpson LaGoy	Emails with Walas re document requests	0.25	\$ 225.00	\$ 56.25
674	10/27/2021	Duncan C. Simpson LaGoy	Discovery team meeting	1.00	\$ 225.00	\$ 225.00
675	10/27/2021	Brandyn J. Rodgeron	Reviewing draft expert report for Dr. Adkins.	2.75	\$ 175.00	\$ 481.25
676	10/27/2021	Brandyn J. Rodgeron	Amicus working group meeting to discuss status.	0.50	\$ 175.00	\$ 87.50
677	10/27/2021	Jonathan J. Ossip	Correspond with expert re potential report; reviewed markup of draft report re same; reviewed note re [legal issue in litigation]; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
678	10/28/2021	Duncan C. Simpson LaGoy	Review background materials re Burleigh	1.50	\$ 225.00	\$ 337.50
679	10/28/2021	Duncan C. Simpson LaGoy	Discuss strategy with Oswell	0.25	\$ 225.00	\$ 56.25
680	10/28/2021	Duncan C. Simpson LaGoy	Discuss subpoena with Smith	0.25	\$ 225.00	\$ 56.25
682	10/28/2021	Brandyn J. Rodgeron	Reviewing draft expert reports of Dr. Adkins and Dr. Karasic and providing comments regarding the same.	5.25	\$ 175.00	\$ 918.75
683	10/28/2021	Brandyn J. Rodgeron	Attending discovery group meeting to discuss next steps (0.75) and weekly associate meeting (0.50).	0.00	\$ 175.00	\$ -
684	10/28/2021	Jonathan J. Ossip	Correspond with expert re draft report and scheduling call; attention to emails re the same.	0.25	\$ 200.00	\$ 50.00
685	10/29/2021	Garrard R. Beeney	Discovery issues.	0.25	\$ 800.00	\$ 200.00
686	10/29/2021	Duncan C. Simpson LaGoy	Revise legislators subpoena	0.75	\$ 225.00	\$ 168.75
687	10/29/2021	Jonathan J. Ossip	Reviewed draft subpoena to legislators; attention to emails re the same.	0.50	\$ 200.00	\$ 100.00
688	10/30/2021	Garrard R. Beeney	Emails re amicus, depositions.	0.25	\$ 800.00	\$ 200.00
689	10/31/2021	Garrard R. Beeney	Emails Ms. Oswell re depositions, emails Ms. Cooper.	0.25	\$ 800.00	\$ 200.00
690	11/1/2021	Garrard R. Beeney	Emails re depositions.	0.25	\$ 800.00	\$ 200.00
691	11/1/2021	Laura Kabler Oswell	Emails re. deposition scheduling	0.25	\$ 650.00	\$ 162.50
692	11/1/2021	Laura Kabler Oswell	Call with ACLU team re. case status.	0.50	\$ 650.00	\$ 325.00
693	11/1/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	0.50	\$ 225.00	\$ 112.50
694	11/1/2021	Duncan C. Simpson LaGoy	Revise legislator subpoenas	0.75	\$ 225.00	\$ 168.75
695	11/1/2021	Brandyn J. Rodgeron	Corresponding with M. Pinado to create list of depositions and deposition calendar. Corresponding with M. Matthew and J. Lester to research public statements by Defendants' witnesses.	0.75	\$ 175.00	\$ 131.25
696	11/1/2021	Jonathan J. Ossip	Addressed expert request for materials; reviewed draft markup of expert report; attention to emails re the above.	0.00	\$ 200.00	\$ -
697	11/2/2021	Garrard R. Beeney	Emails re depositions.	0.25	\$ 800.00	\$ 200.00
698	11/2/2021	Duncan C. Simpson LaGoy	Emails with Smith re subpoenas	0.25	\$ 225.00	\$ 56.25
699	11/2/2021	Jonathan J. Ossip	Reviewed draft edits to expert report.	0.25	\$ 200.00	\$ 50.00
700	11/3/2021	Garrard R. Beeney	Subpoena service.	0.25	\$ 800.00	\$ 200.00
701	11/3/2021	Duncan C. Simpson LaGoy	Email associates re depositions	0.25	\$ 225.00	\$ 56.25
702	11/3/2021	Duncan C. Simpson LaGoy	Email Echols re medical records	0.25	\$ 225.00	\$ 56.25
703	11/3/2021	Duncan C. Simpson LaGoy	Email Holland re amici	0.25	\$ 225.00	\$ 56.25
704	11/3/2021	Duncan C. Simpson LaGoy	Review subpoenas	0.50	\$ 225.00	\$ 112.50
705	11/3/2021	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Brandyn J. Rodgeron, Sarah , Breean , LCOOPER , Echols , Daniel A. Loevinsohn, Cstrangio , Travis , Gregory L. Smith, Mann regarding Discovery Team Meeting	1.00	\$ 225.00	\$ 225.00
707	11/3/2021	Brandyn J. Rodgeron	Amicus planning group and discovery team meetings.	0.50	\$ 175.00	\$ 87.50
708	11/3/2021	Jonathan J. Ossip	Call with expert re draft report; reviewed and edited draft expert report; attention to emails re subpoenas; attention to emails re depositions.	1.00	\$ 200.00	\$ 200.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
709	11/4/2021	Garrard R. Beeney	Emails re service.	0.25	\$ 800.00	\$ 200.00
710	11/4/2021	Brandyn J. Rodgeron	Reviewing correspondence to ACLU regarding potential amicus briefs (0.25); Reviewing indices outlining research findings into public statements by Defendants' witnesses (2.0).	2.25	\$ 175.00	\$ 393.75
711	11/4/2021	Brandyn J. Rodgeron	Expert working group (0.5).	0.50	\$ 175.00	\$ 87.50
712	11/4/2021	Jonathan J. Ossip	Reviewed correspondence from defendants re service of subpoenas; reviewed and edited draft expert report; correspond with expert re same; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
713	11/5/2021	Laura Kabler Oswell	Call with Cooper re. deposition planning.	0.50	\$ 650.00	\$ 325.00
714	11/5/2021	Brandyn J. Rodgeron	Call to discuss planning for upcoming depositions.	0.50	\$ 175.00	\$ 87.50
715	11/5/2021	Jonathan J. Ossip	Reviewed correspondence from defendants re joint appendix; attention to emails re the same.	0.25	\$ 200.00	\$ 50.00
716	11/7/2021	Brandyn J. Rodgeron	Reviewing binder indices regarding background materials for L. Perry, B. Burleigh and Dr. Hiatt.	1.50	\$ 175.00	\$ 262.50
717	11/8/2021	Garrard R. Beeney	Emails re joint appendix.	0.25	\$ 800.00	\$ 200.00
718	11/8/2021	Duncan C. Simpson LaGoy	Emails with team re depo prep	0.25	\$ 225.00	\$ 56.25
719	11/8/2021	Duncan C. Simpson LaGoy	Emails with team and research re joint appendix	0.50	\$ 225.00	\$ 112.50
720	11/8/2021	Duncan C. Simpson LaGoy	Revise and serve legislators' subpoenas.	0.75	\$ 225.00	\$ 168.75
721	11/8/2021	Brandyn J. Rodgeron	Call to discuss preparation for upcoming depositions of L. Perry and B. Burleigh.	0.50	\$ 175.00	\$ 87.50
722	11/8/2021	Jonathan J. Ossip	Reviewed correspondence from attorney general's office re service of subpoenas; coordinated review of expert report; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
723	11/9/2021	Garrard R. Beeney	Emails re appendix, emails re depositions.	0.50	\$ 800.00	\$ 400.00
724	11/9/2021	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Leslie Cooper regarding Drafting 8th circuit brief	0.25	\$ 225.00	\$ 56.25
726	11/9/2021	Brandyn J. Rodgeron	Reviewing Dr. Turban's initial expert report.	2.25	\$ 175.00	\$ 393.75
727	11/9/2021	Brandyn J. Rodgeron	Reviewing documents State proposed to include in the joint appendix for the Eighth Circuit.	0.50	\$ 175.00	\$ 87.50
728	11/9/2021	Jonathan J. Ossip	Reviewed note re joint appendix; attention to emails re same.	0.25	\$ 200.00	\$ 50.00
729	11/10/2021	Garrard R. Beeney	Emails re amicus.	0.25	\$ 800.00	\$ 200.00
730	11/10/2021	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Brandyn J. Rodgeron, Sarah , Breean , LCOOPER , Echols , Daniel A. Loevinsohn, Cstrangio , Travis , Gregory L. Smith, Mann regarding Discovery Team Meeting	0.50	\$ 225.00	\$ 112.50
731	11/10/2021	Duncan C. Simpson LaGoy	Draft list of topics for depositions	0.50	\$ 225.00	\$ 112.50
732	11/10/2021	Duncan C. Simpson LaGoy	Meeting with Alexander Holland, Brandyn Rodgeron, Duncan C. Simpson LaGoy regarding Brandt Depositions	0.00	\$ 225.00	\$ -
734	11/10/2021	Brandyn J. Rodgeron	Coordinating with ACLU and J. Loffler regarding 'Voices' amicus brief.	0.75	\$ 175.00	\$ 131.25
735	11/10/2021	Brandyn J. Rodgeron	Calls to discuss amicus planning (0.50); discovery next steps (0.50); and depositions (0.50).	1.50	\$ 175.00	\$ 262.50
736	11/10/2021	Jonathan J. Ossip	Reviewed and edited draft expert reports; correspond with expert re same; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
737	11/11/2021	Garrard R. Beeney	Discovery requests.	0.25	\$ 800.00	\$ 200.00
739	11/11/2021	Jonathan J. Ossip	Reviewed edits to draft expert report; attention to emails re the same.	0.25	\$ 200.00	\$ 50.00
740	11/12/2021	Garrard R. Beeney	Expert reports, amicus brief.	0.25	\$ 800.00	\$ 200.00
741	11/12/2021	Duncan C. Simpson LaGoy	Review district court PI briefing	1.00	\$ 225.00	\$ 225.00
742	11/12/2021	Duncan C. Simpson LaGoy	Call with Oswell re depo planning	0.00	\$ 225.00	\$ -
743	11/12/2021	Duncan C. Simpson LaGoy	Review AR 8th cir brief	2.00	\$ 225.00	\$ 450.00
745	11/12/2021	Jonathan J. Ossip	Reviewed draft expert reports; call with expert re preparation of report; attention to emails re the above.	1.50	\$ 200.00	\$ 300.00
746	11/13/2021	Garrard R. Beeney	Defendants' brief.	0.25	\$ 800.00	\$ 200.00
747	11/13/2021	Jonathan J. Ossip	Reviewed edits to draft expert report; attention to emails re the same.	0.50	\$ 200.00	\$ 100.00
748	11/14/2021	Jonathan J. Ossip	Reviewed draft expert report and edits to same; attention to emails re the same.	0.50	\$ 200.00	\$ 100.00
749	11/15/2021	Garrard R. Beeney	Emails re scheduling order.	0.25	\$ 800.00	\$ 200.00
750	11/15/2021	Laura Kabler Oswell	Call re. Arkansas case status.	0.50	\$ 650.00	\$ 325.00
751	11/15/2021	Duncan C. Simpson LaGoy	Research re 8th cir brief	2.75	\$ 225.00	\$ 618.75
752	11/15/2021	Duncan C. Simpson LaGoy	Email associates team re 8th circuit brief	0.25	\$ 225.00	\$ 56.25
753	11/15/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	0.50	\$ 225.00	\$ 112.50
754	11/15/2021	Duncan C. Simpson LaGoy	Email Oswell re depositions	0.25	\$ 225.00	\$ 56.25
756	11/15/2021	Brandyn J. Rodgeron	Reviewing Dr. Adkins and Dr. Turban's expert reports.	2.75	\$ 175.00	\$ 481.25
757	11/15/2021	Brandyn J. Rodgeron	Reviewing proposed topics for depositions of L. Perry and B. Burleigh.	0.50	\$ 175.00	\$ 87.50
758	11/15/2021	Brandyn J. Rodgeron	Reviewing Defendants' appeal brief.	1.00	\$ 175.00	\$ 175.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
759	11/15/2021	Jonathan J. Ossip	Reviewed expert reports and accompanying materials; reviewed defendants' appeal brief; assessed arguments in response to same; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
760	11/16/2021	Garrard R. Beeney	Emails re schedule.	0.25	\$ 800.00	\$ 200.00
761	11/16/2021	Duncan C. Simpson LaGoy	Research re subpoenas	1.25	\$ 225.00	\$ 281.25
762	11/16/2021	Duncan C. Simpson LaGoy	Revise motion re extension	0.50	\$ 225.00	\$ 112.50
763	11/16/2021	Duncan C. Simpson LaGoy	Research re 8th Circuit brief	2.25	\$ 225.00	\$ 506.25
765	11/16/2021	Brandyn J. Rodgerson	Compiling appropriate materials to send to J. Loffler for 'Voices' amicus brief.	0.50	\$ 175.00	\$ 87.50
766	11/16/2021	Brandyn J. Rodgerson	Meeting with ACLU to discuss 'Voices' amicus brief.	1.25	\$ 175.00	\$ 218.75
767	11/16/2021	Jonathan J. Ossip	Reviewed and edited draft expert reports; reviewed motion for extension of time; reviewed and prepared arguments in response to defendants' appeal brief; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
768	11/17/2021	Garrard R. Beeney	Emails Ms. Cooper re expert, discovery order, initial disclosures, 8th circuit extension.	0.50	\$ 800.00	\$ 400.00
769	11/17/2021	Duncan C. Simpson LaGoy	Research re subpoenas	1.75	\$ 225.00	\$ 393.75
770	11/17/2021	Duncan C. Simpson LaGoy	Review Defendants' R&Os and email team re same.	1.50	\$ 225.00	\$ 337.50
771	11/17/2021	Duncan C. Simpson LaGoy	Email Matthew re research	0.50	\$ 225.00	\$ 112.50
772	11/17/2021	Duncan C. Simpson LaGoy	Revise motion to extend reply and emails with team re same	1.00	\$ 225.00	\$ 225.00
774	11/17/2021	Brandyn J. Rodgerson	Drafting update to amicus working group re status of amicus briefs.	0.25	\$ 175.00	\$ 43.75
775	11/17/2021	Brandyn J. Rodgerson	Compiling associate comments re Dr. Adkins and Dr. Turban's expert reports and circulating to the ACLU.	0.75	\$ 175.00	\$ 131.25
776	11/17/2021	Brandyn J. Rodgerson	Reviewing draft of motion to extend the deadline for Plaintiffs' response appeal brief.	0.50	\$ 175.00	\$ 87.50
777	11/17/2021	Brandyn J. Rodgerson	Reviewing Defendants' response to Plaintiffs' first set of requests for production, as well as Defendants' amended initial disclosures.	0.50	\$ 175.00	\$ 87.50
778	11/17/2021	Jonathan J. Ossip	Reviewed and edited draft expert reports; reviewed discovery responses from defendants; reviewed court order re discovery schedule; call with B. Rodgerson re amicus brief; reviewed defendants' appeal brief and prepared arguments in response to same; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
779	11/18/2021	Garrard R. Beeney	Amicus briefs.	0.25	\$ 800.00	\$ 200.00
780	11/18/2021	Duncan C. Simpson LaGoy	Review Bell amicus brief	0.25	\$ 225.00	\$ 56.25
781	11/18/2021	Duncan C. Simpson LaGoy	Prepare responses to Defendants' R&Os	1.00	\$ 225.00	\$ 225.00
782	11/18/2021	Duncan C. Simpson LaGoy	Meeting with Alexander S. Holland, Duncan C. Simpson LaGoy, Brandyn J. Rodgerson, LCOOPER, Cstrangio regarding Burleigh and Perry Depositions	0.75	\$ 225.00	\$ 168.75
784	11/18/2021	Brandyn J. Rodgerson	Reviewing parental autonomy section for proof chart, outlining key elements of claims that Plaintiffs must prove on appeal.	1.75	\$ 175.00	\$ 306.25
785	11/18/2021	Brandyn J. Rodgerson	Call with ACLU to discuss depositions of L. Perry and B. Burleigh.	0.50	\$ 175.00	\$ 87.50
786	11/18/2021	Brandyn J. Rodgerson	Expert working group meeting (0.50).	0.50	\$ 175.00	\$ 87.50
787	11/18/2021	Jonathan J. Ossip	Reviewed and edited expert reports; reviewed amicus brief; call with ACLU and local counsel re expert reports; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
788	11/19/2021	Garrard R. Beeney	Expert reports, amicus briefs.	0.25	\$ 800.00	\$ 200.00
789	11/19/2021	Duncan C. Simpson LaGoy	Research re legislators' subpoenas	0.50	\$ 225.00	\$ 112.50
790	11/19/2021	Duncan C. Simpson LaGoy	Review amicus briefs	1.25	\$ 225.00	\$ 281.25
792	11/19/2021	Brandyn J. Rodgerson	Reviewing amicus brief from Kiera Bell et al.	1.75	\$ 175.00	\$ 306.25
793	11/19/2021	Brandyn J. Rodgerson	Reviewing Defendants' appeal brief.	2.50	\$ 175.00	\$ 437.50
794	11/19/2021	Jonathan J. Ossip	Reviewed amicus briefs; reviewed draft motion for extension of time; correspondence with expert re report; reviewed defendants' appeal brief; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
795	11/20/2021	Jonathan J. Ossip	Reviewed defendants' appeal brief.	0.75	\$ 200.00	\$ 150.00
796	11/21/2021	Jonathan J. Ossip	Reviewed defendants' and amicus appeal briefs and identified arguments in response to same; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
797	11/22/2021	Garrard R. Beeney	Emails re extension order.	0.25	\$ 800.00	\$ 200.00
798	11/22/2021	Duncan C. Simpson LaGoy	Emails with team re meet and confer	0.50	\$ 225.00	\$ 112.50
799	11/22/2021	Duncan C. Simpson LaGoy	Review subpoena responses and email team re same	0.50	\$ 225.00	\$ 112.50
800	11/22/2021	Duncan C. Simpson LaGoy	Research to prep for meet and confer	1.00	\$ 225.00	\$ 225.00
802	11/22/2021	Brandyn J. Rodgerson	Updating J. Loffler (re amicus briefs) with recent updates in Eighth Circuit filings.	0.50	\$ 175.00	\$ 87.50
803	11/22/2021	Brandyn J. Rodgerson	Call to discuss Dr. Adkins' expert report (1.0) and call to discuss Dr. Turban's expert report (1.0).	2.00	\$ 175.00	\$ 350.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
804	11/22/2021	Jonathan J. Ossip	Reviewed edits to expert report; correspond with expert re same; call with expert re report; reviewed defendants' amicus appeal briefs and identified arguments in response to same; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
805	11/23/2021	Garrard R. Beeney	Emails re amicus, meet and confer.	0.50	\$ 800.00	\$ 400.00
806	11/23/2021	Duncan C. Simpson LaGoy	Emails with team re discovery plan	0.50	\$ 225.00	\$ 112.50
807	11/23/2021	Duncan C. Simpson LaGoy	Meet and confer re AG R&Os	0.75	\$ 225.00	\$ 168.75
808	11/23/2021	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Gregory L. Smith regarding meet and confer	0.50	\$ 225.00	\$ 112.50
809	11/23/2021	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Maxime D. Matthew regarding research	0.25	\$ 225.00	\$ 56.25
810	11/23/2021	Duncan C. Simpson LaGoy	Research re meet and confer letter	0.50	\$ 225.00	\$ 112.50
811	11/23/2021	Duncan C. Simpson LaGoy	Draft search terms for AG	0.75	\$ 225.00	\$ 168.75
813	11/23/2021	Brandyn J. Rodgeron	Reviewing amicus briefs in support of Arkansas.	2.75	\$ 175.00	\$ 481.25
814	11/24/2021	Garrard R. Beeney	Meet and confer, experts.	0.50	\$ 800.00	\$ 400.00
815	11/24/2021	Duncan C. Simpson LaGoy	Email Matthew re research	0.50	\$ 225.00	\$ 112.50
816	11/24/2021	Duncan C. Simpson LaGoy	Emails with discovery team	0.50	\$ 225.00	\$ 112.50
817	11/24/2021	Brandyn J. Rodgeron	Reviewing Defendants' Eighth Circuit brief and reading cases relied upon regarding parental autonomy.	2.75	\$ 175.00	\$ 481.25
818	11/24/2021	Brandyn J. Rodgeron	Reviewing amicus briefs in support of Arkansas.	3.25	\$ 175.00	\$ 568.75
819	11/24/2021	Jonathan J. Ossip	Reviewed draft expert report; reviewed correspondence with plaintiffs re meet and confer; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
820	11/26/2021	Garrard R. Beeney	Meet and confer scheduling.	0.25	\$ 800.00	\$ 200.00
821	11/26/2021	Jonathan J. Ossip	Reviewed correspondence from defendants re meet and confer.	0.25	\$ 200.00	\$ 50.00
822	11/28/2021	Jonathan J. Ossip	Attention to emails re expert reports.	0.25	\$ 200.00	\$ 50.00
823	11/29/2021	Garrard R. Beeney	Emails re experts, 8th Circuit notice.	0.25	\$ 800.00	\$ 200.00
824	11/29/2021	Duncan C. Simpson LaGoy	Research re 8th Circuit brief	1.25	\$ 225.00	\$ 281.25
825	11/29/2021	Duncan C. Simpson LaGoy	Meeting with *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	0.25	\$ 225.00	\$ 56.25
826	11/29/2021	Duncan C. Simpson LaGoy	Research re subpoenas	1.50	\$ 225.00	\$ 337.50
828	11/29/2021	Brandyn J. Rodgeron	Reviewing Dr. Adkins' expert report and providing comments.	2.25	\$ 175.00	\$ 393.75
829	11/29/2021	Jonathan J. Ossip	Reviewed correspondence with defendants re meet and confer; reviewed edits to expert report; reviewed court filings; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
830	11/30/2021	Garrard R. Beeney	Standard of review.	0.25	\$ 800.00	\$ 200.00
831	11/30/2021	Laura Kabler Oswell	Review and revise draft expert reports.	2.00	\$ 650.00	\$ 1,300.00
832	11/30/2021	Duncan C. Simpson LaGoy	Research re standard of review	0.50	\$ 225.00	\$ 112.50
833	11/30/2021	Duncan C. Simpson LaGoy	Call with Matthew re research	0.25	\$ 225.00	\$ 56.25
834	11/30/2021	Duncan C. Simpson LaGoy	Revise 8th Circuit brief	1.75	\$ 225.00	\$ 393.75
835	11/30/2021	Duncan C. Simpson LaGoy	Prep for meet and confer re subpoenas	0.50	\$ 225.00	\$ 112.50
836	11/30/2021	Duncan C. Simpson LaGoy	Meet and confer re subpoenas	0.50	\$ 225.00	\$ 112.50
837	11/30/2021	Duncan C. Simpson LaGoy	Review expert reports	0.50	\$ 225.00	\$ 112.50
839	11/30/2021	Brandyn J. Rodgeron	Reviewing draft of parental autonomy section for Eighth Circuit, and reviewing previous briefs and cases in support.	4.25	\$ 175.00	\$ 743.75
840	11/30/2021	Brandyn J. Rodgeron	Reviewing Dr. Karasic's expert report and providing comments and edits.	2.75	\$ 175.00	\$ 481.25
841	11/30/2021	Jonathan J. Ossip	Reviewed research note re appellate standard of review; attention to emails re experts reports; reviewed edits to expert report.	0.50	\$ 200.00	\$ 100.00
842	12/1/2021	Garrard R. Beeney	8th Circuit notice.	0.25	\$ 800.00	\$ 200.00
843	12/1/2021	Duncan C. Simpson LaGoy	Draft 8th Circuit brief	1.25	\$ 225.00	\$ 281.25
844	12/1/2021	Duncan C. Simpson LaGoy	Continue drafting meet and confer letter	0.75	\$ 225.00	\$ 168.75
845	12/1/2021	Duncan C. Simpson LaGoy	Discuss brief with Smith	0.25	\$ 225.00	\$ 56.25
846	12/1/2021	Duncan C. Simpson LaGoy	Discovery team meeting	0.50	\$ 225.00	\$ 112.50
847	12/1/2021	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Jonathan G. Lester regarding Team Arkansas - First Draft Comments Discussion	0.50	\$ 225.00	\$ 112.50
849	12/1/2021	Brandyn J. Rodgeron	Reviewing and revising section for appeal brief regarding parental autonomy.	3.25	\$ 175.00	\$ 568.75
850	12/2/2021	Garrard R. Beeney	Discovery emails and RFPs.	0.25	\$ 800.00	\$ 200.00
851	12/2/2021	Duncan C. Simpson LaGoy	Revise 8th Circuit brief	1.00	\$ 225.00	\$ 225.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
852	12/2/2021	Duncan C. Simpson LaGoy	Emails re search terms	0.25	\$ 225.00	\$ 56.25
853	12/2/2021	Duncan C. Simpson LaGoy	Review Def's RFPs and email team re same	1.25	\$ 225.00	\$ 281.25
854	12/2/2021	Duncan C. Simpson LaGoy	Continue drafting RFP meet and confer letter	0.75	\$ 225.00	\$ 168.75
856	12/2/2021	Brandyn J. Rodgeron	Revising parental autonomy draft section.	1.50	\$ 175.00	\$ 262.50
857	12/2/2021	Brandyn J. Rodgeron	Reviewing Dr. Turban's expert report.	1.50	\$ 175.00	\$ 262.50
858	12/2/2021	Brandyn J. Rodgeron	Reviewing Defendants' First Discovery Requests to Plaintiffs.	0.75	\$ 175.00	\$ 131.25
859	12/2/2021	Brandyn J. Rodgeron	Reviewing discovery search terms.	0.50	\$ 175.00	\$ 87.50
860	12/2/2021	Brandyn J. Rodgeron	Expert working group meeting (0.50).	0.50	\$ 175.00	\$ 87.50
861	12/2/2021	Jonathan J. Ossip	Updated case status tracker; reviewed expert report draft; reviewed document requests and interrogatories from defendants; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
862	12/3/2021	Duncan C. Simpson LaGoy	Team call re R&Os to def's RFPs	0.25	\$ 225.00	\$ 56.25
863	12/3/2021	Duncan C. Simpson LaGoy	Email team re R&Os to def's RFPs	0.25	\$ 225.00	\$ 56.25
864	12/3/2021	Duncan C. Simpson LaGoy	Continue drafting RFP meet and confer letter and draft subpoena meet and confer letter	1.50	\$ 225.00	\$ 337.50
865	12/3/2021	Duncan C. Simpson LaGoy	Revise 8th circuit brief	2.50	\$ 225.00	\$ 562.50
867	12/3/2021	Brandyn J. Rodgeron	Reviewing parental autonomy draft and [related case law].	1.00	\$ 175.00	\$ 175.00
868	12/3/2021	Brandyn J. Rodgeron	Reviewing team comments and interpretations of Defendants' First Discovery Requests to Plaintiffs, and draft protective order.	0.75	\$ 175.00	\$ 131.25
869	12/3/2021	Brandyn J. Rodgeron	Reviewing meet and confer letter.	0.75	\$ 175.00	\$ 131.25
870	12/3/2021	Brandyn J. Rodgeron	Reviewing WPATH Standards of Care 8 drafts.	2.25	\$ 175.00	\$ 393.75
871	12/3/2021	Brandyn J. Rodgeron	Meeting regarding Defendants' request for information.	0.50	\$ 175.00	\$ 87.50
872	12/5/2021	Duncan C. Simpson LaGoy	Revise 8th circuit brief	1.50	\$ 225.00	\$ 337.50
873	12/5/2021	Jonathan J. Ossip	Reviewed draft expert report; correspond with expert re same; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
874	12/6/2021	Garrard R. Beeney	Letter re meet and confer.	0.25	\$ 800.00	\$ 200.00
875	12/6/2021	Laura Kabler Oswell	Weekly team meeting.	0.25	\$ 650.00	\$ 162.50
876	12/6/2021	Duncan C. Simpson LaGoy	Finalize and send letters to AG	0.50	\$ 225.00	\$ 112.50
877	12/6/2021	Duncan C. Simpson LaGoy	Email parents re document collection	0.50	\$ 225.00	\$ 112.50
878	12/6/2021	Duncan C. Simpson LaGoy	Review list of medical providers	1.00	\$ 225.00	\$ 225.00
879	12/6/2021	Duncan C. Simpson LaGoy	Work on 8th Circuit brief	2.75	\$ 225.00	\$ 618.75
880	12/6/2021	Duncan C. Simpson LaGoy	Prep for call with parent plaintiffs	1.00	\$ 225.00	\$ 225.00
881	12/6/2021	Duncan C. Simpson LaGoy	Call with parent plaintiffs re document requests	0.75	\$ 225.00	\$ 168.75
882	12/6/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare regarding Ark. healthcare weekly team meeting	0.50	\$ 225.00	\$ 112.50
884	12/6/2021	Brandyn J. Rodgeron	Reviewing and summarizing WPATH SOC 8.	3.75	\$ 175.00	\$ 656.25
885	12/6/2021	Brandyn J. Rodgeron	Reviewing Dr. Turban's expert report.	1.25	\$ 175.00	\$ 218.75
886	12/6/2021	Jonathan J. Ossip	Reviewed and edited draft expert report; reviewed draft brief section; reviewed discovery correspondence to defendants and subpoena targets; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
887	12/7/2021	Duncan C. Simpson LaGoy	Discuss discovery issues with Smith	0.50	\$ 225.00	\$ 112.50
888	12/7/2021	Duncan C. Simpson LaGoy	Work on 8th Circuit brief	1.75	\$ 225.00	\$ 393.75
889	12/7/2021	Duncan C. Simpson LaGoy	Emails and call with EDLS re review	0.25	\$ 225.00	\$ 56.25
891	12/7/2021	Brandyn J. Rodgeron	Reviewing and summarizing WPATH SOC 8.	0.50	\$ 175.00	\$ 87.50
892	12/7/2021	Brandyn J. Rodgeron	Reviewing Dr. Karasic's expert report.	1.75	\$ 175.00	\$ 306.25
893	12/7/2021	Jonathan J. Ossip	Reviewed and edited draft brief sections; reviewed edits to expert reports; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
894	12/8/2021	Duncan C. Simpson LaGoy	Revise 8th Circuit brief	3.25	\$ 225.00	\$ 731.25
896	12/8/2021	Brandyn J. Rodgeron	Reviewing cite check for Dr. Adkins' expert report and creating bibliography.	2.75	\$ 175.00	\$ 481.25
897	12/8/2021	Brandyn J. Rodgeron	Reviewing summary of Dr. Karasic's expert report.	0.75	\$ 175.00	\$ 131.25
898	12/8/2021	Brandyn J. Rodgeron	Reviewing and summarizing WPATH SOC 8.	1.50	\$ 175.00	\$ 262.50
899	12/8/2021	Jonathan J. Ossip	Reviewed and edited draft section of appellee brief; reviewed and edited expert reports; call with expert re same; attention to emails re the above.	2.00	\$ 200.00	\$ 400.00
900	12/9/2021	Laura Kabler Oswell	Reviewed email from Brandyn J. Rodgeron regarding WPATH SOC 8	0.25	\$ 650.00	\$ 162.50
901	12/9/2021	Duncan C. Simpson LaGoy	Revise 8th circuit brief	2.50	\$ 225.00	\$ 562.50
902	12/9/2021	Duncan C. Simpson LaGoy	Follow up with medical care providers re medical records	2.25	\$ 225.00	\$ 506.25

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
903	12/9/2021	Duncan C. Simpson LaGoy	Review medical records	0.50	\$ 225.00	\$ 112.50
905	12/9/2021	Brandyn J. Rodgerson	Reviewing cite check for Dr. Turban's expert report and creating bibliography.	2.25	\$ 175.00	\$ 393.75
906	12/9/2021	Brandyn J. Rodgerson	Reviewing and finishing summary of WPATH SOC 8.	1.75	\$ 175.00	\$ 306.25
907	12/9/2021	Brandyn J. Rodgerson	Reviewing Dr. Turban's expert report.	1.25	\$ 175.00	\$ 218.75
908	12/9/2021	Brandyn J. Rodgerson	Implementing final edits to Dr. Adkins' expert report.	2.25	\$ 175.00	\$ 393.75
909	12/9/2021	Brandyn J. Rodgerson	Expert working group meeting.	1.25	\$ 175.00	\$ 218.75
910	12/9/2021	Jonathan J. Ossip	Reviewed and edited section of appellee brief; reviewed and edited expert report; call with ACLU and local counsel re same; attention to emails re the above.	2.75	\$ 200.00	\$ 550.00
911	12/10/2021	Laura Kabler Oswell	Emails re. recent Supreme Court decision and impact on AR litigation.	0.25	\$ 650.00	\$ 162.50
912	12/10/2021	Duncan C. Simpson LaGoy	Revise 8th Circuit brief	4.25	\$ 225.00	\$ 956.25
913	12/10/2021	Duncan C. Simpson LaGoy	Review [case law re potential legal issue in litigation].	0.50	\$ 225.00	\$ 112.50
914	12/10/2021	Duncan C. Simpson LaGoy	Review and serve expert reports	0.25	\$ 225.00	\$ 56.25
916	12/10/2021	Brandyn J. Rodgerson	Following up with J. Loffler re amicus brief.	0.25	\$ 175.00	\$ 43.75
917	12/10/2021	Brandyn J. Rodgerson	Coordinating finalization of Dr. Adkins and Dr. Turban's signed expert reports.	0.50	\$ 175.00	\$ 87.50
918	12/10/2021	Brandyn J. Rodgerson	Reviewing final version of Dr. Karasic's report.	0.75	\$ 175.00	\$ 131.25
919	12/13/2021	Duncan C. Simpson LaGoy	Revise proof chart	0.25	\$ 225.00	\$ 56.25
920	12/13/2021	Duncan C. Simpson LaGoy	Revise 8th Circuit brief and email team re same	2.50	\$ 225.00	\$ 562.50
921	12/13/2021	Duncan C. Simpson LaGoy	Draft memo re call with parents	0.50	\$ 225.00	\$ 112.50
922	12/13/2021	Duncan C. Simpson LaGoy	Team call	0.25	\$ 225.00	\$ 56.25
923	12/13/2021	Duncan C. Simpson LaGoy	Email doctor plaintiffs re document collection	0.50	\$ 225.00	\$ 112.50
924	12/13/2021	Duncan C. Simpson LaGoy	Emails and calls with parents re document collection	1.75	\$ 225.00	\$ 393.75
926	12/13/2021	Brandyn J. Rodgerson	Reviewing Dr. Lappert's expert report.	2.50	\$ 175.00	\$ 437.50
927	12/13/2021	Brandyn J. Rodgerson	Update re amicus briefs.	0.50	\$ 175.00	\$ 87.50
928	12/14/2021	Duncan C. Simpson LaGoy	Revise 8th circuit brief	0.75	\$ 225.00	\$ 168.75
930	12/14/2021	Brandyn J. Rodgerson	Reviewing edits to parental autonomy sections of appeal brief.	1.75	\$ 175.00	\$ 306.25
931	12/15/2021	Duncan C. Simpson LaGoy	Revise protective order	0.50	\$ 225.00	\$ 112.50
932	12/15/2021	Duncan C. Simpson LaGoy	Revise 8th circuit brief	1.00	\$ 225.00	\$ 225.00
933	12/15/2021	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Gregory L. Smith regarding Duncan C. Simpson LaGoy's Zoom Meeting	0.00	\$ 225.00	\$ -
934	12/15/2021	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Leslie Cooper regarding depo staffing	0.50	\$ 225.00	\$ 112.50
935	12/15/2021	Duncan C. Simpson LaGoy	Call with Smith re discovery responses	0.50	\$ 225.00	\$ 112.50
937	12/15/2021	Brandyn J. Rodgerson	Reviewing Dr. Hruz's expert report (2.75) and Dr. Levine's expert report (1.50).	4.25	\$ 175.00	\$ 743.75
938	12/16/2021	Garrard R. Beene	Emails re clinic.	0.25	\$ 800.00	\$ 200.00
939	12/16/2021	Duncan C. Simpson LaGoy	Meeting with LCOOPER , *ARGenderAffirmingMedCare , Holly regarding Gender Spectrum Clinic	1.00	\$ 225.00	\$ 225.00
940	12/16/2021	Duncan C. Simpson LaGoy	Meeting with Brandyn Rodgerson, Daniel Loevinsohn, Duncan C. Simpson LaGoy, Gregory L. Smith, Jonathan G. Lester, Jonathan Ossip, Maxime D. Matthew regarding Arkansas Weekly Meeting	0.25	\$ 225.00	\$ 56.25
941	12/16/2021	Duncan C. Simpson LaGoy	Revise 8th circuit brief	1.50	\$ 225.00	\$ 337.50
942	12/16/2021	Duncan C. Simpson LaGoy	Revise PO	1.00	\$ 225.00	\$ 225.00
943	12/16/2021	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Jonathan Ossip regarding Duncan C. Simpson LaGoy's Zoom Meeting	0.00	\$ 225.00	\$ -
945	12/16/2021	Brandyn J. Rodgerson	Reviewing Dr. Hruz's expert report (1.75) and Dr. Levine's expert report (3.0).	4.75	\$ 175.00	\$ 831.25
946	12/16/2021	Brandyn J. Rodgerson	Reviewing outline for amicus brief of bioethics and public health scholars.	1.75	\$ 175.00	\$ 306.25
947	12/16/2021	Brandyn J. Rodgerson	Expert working group meeting to discuss rebuttal reports (1.0).	1.00	\$ 175.00	\$ 175.00
948	12/16/2021	Jonathan J. Ossip	Reviewed defendants' expert reports; calls with ACLU & local counsel re expert reports and potential [legal issue in litigation]; reviewed draft of appellee brief; attention to emails re the above.	2.75	\$ 200.00	\$ 550.00
949	12/17/2021	Garrard R. Beene	Emails re Hagmeier, emails re meetings with ACH.	0.50	\$ 800.00	\$ 400.00
950	12/17/2021	Duncan C. Simpson LaGoy	Email Dr. Stambough	0.50	\$ 225.00	\$ 112.50
951	12/17/2021	Duncan C. Simpson LaGoy	Call with Smith re discovery	0.50	\$ 225.00	\$ 112.50
952	12/17/2021	Duncan C. Simpson LaGoy	Call with Dr. Stambough and Smith	0.50	\$ 225.00	\$ 112.50
953	12/17/2021	Duncan C. Simpson LaGoy	Revise protective order	0.50	\$ 225.00	\$ 112.50
954	12/17/2021	Brandyn J. Rodgerson	Reviewing index for expert report binder.	0.25	\$ 175.00	\$ 43.75

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
955	12/17/2021	Jonathan J. Ossip	Reviewed defendants' expert reports; [reviewed call summaries re potential [legal issue in litigation]; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
956	12/18/2021	Jonathan J. Ossip	Reviewed defendants' expert reports; prepared strategy for rebuttal expert reports.	4.25	\$ 200.00	\$ 850.00
957	12/19/2021	Jonathan J. Ossip	Reviewed defendants' expert reports; prepared strategy for rebuttal expert reports.	2.50	\$ 200.00	\$ 500.00
958	12/20/2021	Garrard R. Beeney	Emails re hospital protocol.	0.50	\$ 800.00	\$ 400.00
959	12/20/2021	Laura Kabler Oswell	Review 8th Circuit opening and amicus briefs.	2.00	\$ 650.00	\$ 1,300.00
960	12/20/2021	Duncan C. Simpson LaGoy	Team call	0.50	\$ 225.00	\$ 112.50
961	12/20/2021	Duncan C. Simpson LaGoy	Email team re discovery	0.50	\$ 225.00	\$ 112.50
962	12/20/2021	Duncan C. Simpson LaGoy	Revise 8th circuit brief	1.50	\$ 225.00	\$ 337.50
964	12/20/2021	Brandyn J. Rodgerson	Reviewing appeal brief for repetition and excess verbiage.	2.50	\$ 175.00	\$ 437.50
965	12/20/2021	Brandyn J. Rodgerson	Reviewing clinic protocols to determine extent to which they comply with HB 1570.	1.75	\$ 175.00	\$ 306.25
966	12/20/2021	Brandyn J. Rodgerson	Weekly meeting to discuss expert rebuttals and appeal brief.	0.50	\$ 175.00	\$ 87.50
967	12/20/2021	Brandyn J. Rodgerson	Discussion with ACLU re new clinic protocols.	1.25	\$ 175.00	\$ 218.75
968	12/20/2021	Jonathan J. Ossip	Reviewed plaintiffs' expert reports; reviewed correspondence re clinic protocol issues; attention to emails re the above.	1.50	\$ 200.00	\$ 300.00
969	12/21/2021	Garrard R. Beeney	Draft brief, protective order.	0.25	\$ 800.00	\$ 200.00
970	12/21/2021	Duncan C. Simpson LaGoy	Email AG re PO	0.25	\$ 225.00	\$ 56.25
971	12/21/2021	Duncan C. Simpson LaGoy	Calls and emails re medical records	0.50	\$ 225.00	\$ 112.50
972	12/21/2021	Duncan C. Simpson LaGoy	Revise responses to RFPs and Rogs	0.75	\$ 225.00	\$ 168.75
974	12/21/2021	Brandyn J. Rodgerson	Reviewing Dr. Regnerus' expert report.	3.25	\$ 175.00	\$ 568.75
975	12/21/2021	Brandyn J. Rodgerson	Discussion re new clinic protocols.	1.25	\$ 175.00	\$ 218.75
976	12/21/2021	Jonathan J. Ossip	Reviewed defendants' expert reports; reviewed and edited combined expert rebuttal outline; reviewed summary of WPATH SOC 8; attention to emails re the above.	1.50	\$ 200.00	\$ 300.00
977	12/22/2021	Garrard R. Beeney	8th Circuit brief.	0.25	\$ 800.00	\$ 200.00
978	12/22/2021	Laura Kabler Oswell	Work on 8th Circuit brief.	2.00	\$ 650.00	\$ 1,300.00
979	12/22/2021	Duncan C. Simpson LaGoy	Emails re 8th circuit brief	0.25	\$ 225.00	\$ 56.25
980	12/22/2021	Duncan C. Simpson LaGoy	Revise responses to RFPs and ROGs	0.50	\$ 225.00	\$ 112.50
982	12/22/2021	Brandyn J. Rodgerson	Reviewing outline and notes of topics for rebuttal expert reports.	3.25	\$ 175.00	\$ 568.75
983	12/22/2021	Brandyn J. Rodgerson	Expert working group meeting.	0.50	\$ 175.00	\$ 87.50
984	12/22/2021	Jonathan J. Ossip	Call with ACLU and local counsel re expert rebuttal reports; coordinated collection of expert materials; reviewed edits to expert issues outline; reviewed comments re appellee brief; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
985	12/23/2021	Garrard R. Beeney	8th Circuit brief.	0.25	\$ 800.00	\$ 200.00
986	12/23/2021	Laura Kabler Oswell	Revise 8th Circuit brief.	1.50	\$ 650.00	\$ 975.00
988	12/23/2021	Brandyn J. Rodgerson	Reviewing deposition background information for L. Perry.	1.00	\$ 175.00	\$ 175.00
989	12/23/2021	Brandyn J. Rodgerson	Consolidating expert notes and providing comments on draft rebuttal report of Dr. Adkins.	3.25	\$ 175.00	\$ 568.75
990	12/23/2021	Brandyn J. Rodgerson	Update re Voices amicus brief.	0.25	\$ 175.00	\$ 43.75
991	12/23/2021	Jonathan J. Ossip	Reviewed edits to appellee brief; reviewed discovery correspondence from legislators; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
992	12/24/2021	Garrard R. Beeney	Letter from Jacobs re subpoena.	0.25	\$ 800.00	\$ 200.00
993	12/27/2021	Duncan C. Simpson LaGoy	Call with Smith re ROG and RFP responses	0.25	\$ 225.00	\$ 56.25
994	12/27/2021	Duncan C. Simpson LaGoy	Call with Dr. Hutch re documents	0.50	\$ 225.00	\$ 112.50
995	12/27/2021	Duncan C. Simpson LaGoy	Revise 8th circuit brief	1.50	\$ 225.00	\$ 337.50
996	12/27/2021	Duncan C. Simpson LaGoy	Revise ROG and RFP responses	1.00	\$ 225.00	\$ 225.00
998	12/27/2021	Brandyn J. Rodgerson	Reviewing Eighth Circuit appeal brief and Defendants' brief.	3.25	\$ 175.00	\$ 568.75
999	12/27/2021	Jonathan J. Ossip	Reviewed expert report outlines; reviewed discovery correspondence with opposing counsel; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
1000	12/28/2021	Garrard R. Beeney	Emails state re discovery.	0.25	\$ 800.00	\$ 200.00
1001	12/28/2021	Duncan C. Simpson LaGoy	Revise ROG and RFP responses	1.00	\$ 225.00	\$ 225.00
1003	12/28/2021	Brandyn J. Rodgerson	Reviewing rebuttal report outline for Dr. Karasic.	3.25	\$ 175.00	\$ 568.75
1004	12/28/2021	Brandyn J. Rodgerson	Reviewing and providing comments on outline for Dr. Adkin's rebuttal report.	1.25	\$ 175.00	\$ 218.75

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1005	12/28/2021	Jonathan J. Ossip	Reviewed and edited rebuttal expert report outlines; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
1006	12/29/2021	Laura Kabler Oswell	Call with Cooper and Simpson; Revise draft 8th Circuit brief and emails re. same.	3.50	\$ 650.00	\$ 2,275.00
1007	12/29/2021	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Leslie Cooper, Laura Kabler Oswell regarding RE: 8th Circuit Brief	0.50	\$ 225.00	\$ 112.50
1008	12/29/2021	Brandyn J. Rodgerson	Following up with J. Loffler on amicus brief.	0.25	\$ 175.00	\$ 43.75
1009	12/29/2021	Brandyn J. Rodgerson	Reviewing and providing comments on outline for Dr. Turban's rebuttal report.	3.25	\$ 175.00	\$ 568.75
1010	12/29/2021	Jonathan J. Ossip	Reviewed and edited expert report outlines; attention to emails re the above.	1.75	\$ 200.00	\$ 350.00
1011	12/30/2021	Laura Kabler Oswell	Work on revised appellate brief.	1.25	\$ 650.00	\$ 812.50
1012	12/30/2021	Jonathan J. Ossip	Reviewed edits to draft expert report outlines; correspond with expert re same; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
1013	12/31/2021	Jonathan J. Ossip	Correspond with expert re draft report; attention to emails re the same.	0.50	\$ 200.00	\$ 100.00
1014	1/1/2022	Jonathan J. Ossip	Reviewed expert report outline; correspond with expert re same; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
1015	1/3/2022	Garrard R. Beeney	Emails re scheduling order.	0.25	\$ 800.00	\$ 200.00
1016	1/3/2022	Laura Kabler Oswell	Call with S&C and ACLU teams re. case status.	0.50	\$ 650.00	\$ 325.00
1018	1/3/2022	Jonathan J. Ossip	Call with expert re rebuttal report; reviewed expert report outlines; call with D. Loevinsohn re expert report; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
1019	1/4/2022	Garrard R. Beeney	Emails re edits to brief.	0.25	\$ 800.00	\$ 200.00
1021	1/4/2022	Jonathan J. Ossip	Reviewed note re potential expert rebuttal topic; reviewed edits to expert report; correspond with expert re same; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
1022	1/5/2022	Garrard R. Beeney	Emails re brief.	0.25	\$ 800.00	\$ 200.00
1023	1/5/2022	Duncan C. Simpson LaGoy	Emails with Loevinsohn and Ossip re depositions	0.25	\$ 225.00	\$ 56.25
1024	1/5/2022	Duncan C. Simpson LaGoy	Email Smith re discovery	0.25	\$ 225.00	\$ 56.25
1026	1/5/2022	Jonathan J. Ossip	Reviewed background research into opposing experts; reviewed proposed deposition schedules; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
1027	1/6/2022	Duncan C. Simpson LaGoy	Email Smith re discovery projects	0.50	\$ 225.00	\$ 112.50
1028	1/6/2022	Jonathan J. Ossip	Attention to emails re expert report preparation status.	0.25	\$ 200.00	\$ 50.00
1029	1/7/2022	Garrard R. Beeney	Emails re brief.	0.25	\$ 800.00	\$ 200.00
1030	1/7/2022	Duncan C. Simpson LaGoy	Revised document Plaintiffs' 8th Cir Brief.docx 4856-6434-0997 v.12.docx	1.00	\$ 225.00	\$ 225.00
1032	1/7/2022	Brandyn J. Rodgerson	Update re amicus brief.	0.25	\$ 175.00	\$ 43.75
1033	1/7/2022	Brandyn J. Rodgerson	Reviewing Eighth Circuit brief for final edits.	1.50	\$ 175.00	\$ 262.50
1034	1/10/2022	Garrard R. Beeney	Appearances, discovery emails.	0.25	\$ 800.00	\$ 200.00
1036	1/10/2022	Brandyn J. Rodgerson	Implementing final comments into Eighth Circuit brief.	1.00	\$ 175.00	\$ 175.00
1037	1/10/2022	Brandyn J. Rodgerson	Reviewing Trevor Project amicus brief.	1.50	\$ 175.00	\$ 262.50
1038	1/10/2022	Brandyn J. Rodgerson	Reviewing comments on Dr. Adkin Rebuttal Report and call to discuss rebuttal report (1.75).	1.75	\$ 175.00	\$ 306.25
1039	1/10/2022	Jonathan J. Ossip	Call with expert re rebuttal report; attention to emails re the above.	1.75	\$ 200.00	\$ 350.00
1040	1/11/2022	Garrard R. Beeney	Search terms.	0.25	\$ 800.00	\$ 200.00
1041	1/11/2022	Duncan C. Simpson LaGoy	Revise 8th cir brief	1.00	\$ 225.00	\$ 225.00
1043	1/12/2022	Garrard R. Beeney	Emails re brief.	0.25	\$ 800.00	\$ 200.00
1044	1/12/2022	Laura Kabler Oswell	Review discovery letters and emails to Simpson re. follow up to AG on scope and timing of production.	0.50	\$ 650.00	\$ 325.00
1045	1/12/2022	Duncan C. Simpson LaGoy	Email AG re search terms	0.50	\$ 225.00	\$ 112.50
1046	1/12/2022	Duncan C. Simpson LaGoy	Finalize and file 8th Circuit brief	1.50	\$ 225.00	\$ 337.50
1047	1/12/2022	Brandyn J. Rodgerson	Reviewing Institute for Justice's amicus brief.	1.75	\$ 175.00	\$ 306.25
1048	1/12/2022	Brandyn J. Rodgerson	Reviewing revised search terms and providing suggestions.	0.75	\$ 175.00	\$ 131.25
1049	1/12/2022	Brandyn J. Rodgerson	Final review of Eighth Circuit brief.	1.00	\$ 175.00	\$ 175.00
1050	1/12/2022	Brandyn J. Rodgerson	Updates re amicus briefs (0.50) and discovery team meeting (0.25).	0.75	\$ 175.00	\$ 131.25
1051	1/12/2022	Jonathan J. Ossip	Reviewed as filed appellee brief.	0.25	\$ 200.00	\$ 50.00
1052	1/13/2022	Garrard R. Beeney	Search terms, brief filing.	0.25	\$ 800.00	\$ 200.00
1054	1/13/2022	Brandyn J. Rodgerson	Reviewing and consolidating comments on Institute for Justice's amicus brief, and discussing next steps.	1.75	\$ 175.00	\$ 306.25
1055	1/13/2022	Brandyn J. Rodgerson	Update status re Voices amicus brief.	0.50	\$ 175.00	\$ 87.50
1056	1/13/2022	Jonathan J. Ossip	Reviewed brief deficiency notice; reviewed discovery correspondence with defendants; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
1057	1/14/2022	Garrard R. Beeney	Emails amicus.	0.25	\$ 800.00	\$ 200.00

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1059	1/14/2022	Brandyn J. Rodgeron	Call to discuss Institute for Justice's amicus brief.	0.75	\$ 175.00	\$ 131.25
1060	1/14/2022	Brandyn J. Rodgeron	Reviewing background materials on L. Perry.	2.25	\$ 175.00	\$ 393.75
1061	1/14/2022	Brandyn J. Rodgeron	Reviewing Voices amicus brief.	1.25	\$ 175.00	\$ 218.75
1062	1/15/2022	Brandyn J. Rodgeron	Reviewing international amicus brief.	1.75	\$ 175.00	\$ 306.25
1063	1/18/2022	Garrard R. Beeney	Emails re Appellate brief.	0.25	\$ 800.00	\$ 200.00
1064	1/18/2022	Duncan C. Simpson LaGoy	Revised document S&C Comments - BIS Motion to Compel.docx 4891-7409-9210 v.1.docx	1.25	\$ 225.00	\$ 281.25
1066	1/18/2022	Brandyn J. Rodgeron	Reviewing revised Voices amicus brief.	1.75	\$ 175.00	\$ 306.25
1067	1/18/2022	Brandyn J. Rodgeron	Reviewing amicus brief by California et al.	1.25	\$ 175.00	\$ 218.75
1068	1/18/2022	Brandyn J. Rodgeron	Call to discuss Voices amicus brief.	1.00	\$ 175.00	\$ 175.00
1069	1/18/2022	Daniel J. Richardson	Met with partner to discuss case and reviewed initial docket filings. Met with attorneys on case to discuss discovery strategy and work assignments.	2.50	\$ 430.00	\$ 1,075.00
1070	1/19/2022	Garrard R. Beeney	Amicus filings.	0.25	\$ 800.00	\$ 200.00
1071	1/19/2022	Laura Kabler Oswell	Revise draft motion to compel and emails to Simpson re. same.	0.50	\$ 650.00	\$ 325.00
1072	1/19/2022	Duncan C. Simpson LaGoy	Discovery team meeting	0.25	\$ 225.00	\$ 56.25
1073	1/19/2022	Duncan C. Simpson LaGoy	Revise MTC	1.50	\$ 225.00	\$ 337.50
1074	1/19/2022	Duncan C. Simpson LaGoy	Meeting with Alexander Holland, Duncan C. Simpson LaGoy regarding Duncan C. Simpson LaGoy's Zoom Meeting	0.25	\$ 225.00	\$ 56.25
1076	1/19/2022	Brandyn J. Rodgeron	Reviewing rebuttal expert report draft by Dr. Turban.	3.75	\$ 175.00	\$ 656.25
1077	1/19/2022	Brandyn J. Rodgeron	Discovery group meeting.	0.50	\$ 175.00	\$ 87.50
1078	1/19/2022	Daniel J. Richardson	Discovery meeting with Breean to discuss motion to compel/show cause. Reviewed discovery materials in advance of meeting.	0.50	\$ 430.00	\$ 215.00
1079	1/20/2022	Garrard R. Beeney	Amicus, Dylan update.	0.25	\$ 800.00	\$ 200.00
1080	1/20/2022	Duncan C. Simpson LaGoy	Review amicus briefs	0.50	\$ 225.00	\$ 112.50
1081	1/20/2022	Duncan C. Simpson LaGoy	Finalize and file motion to compel	1.00	\$ 225.00	\$ 225.00
1082	1/20/2022	Duncan C. Simpson LaGoy	Call with Cooper re discovery	0.50	\$ 225.00	\$ 112.50
1084	1/20/2022	Daniel J. Richardson	Reviewed motion to show cause for Duncan Simpson LaGoy. Sent email with markup edits.	0.50	\$ 430.00	\$ 215.00
1085	1/20/2022	Jonathan J. Ossip	Reviewed amicus briefs and motion to compel subpoena compliance; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
1086	1/21/2022	Garrard R. Beeney	Emails re briefs, OTSC.	0.25	\$ 800.00	\$ 200.00
1087	1/21/2022	Duncan C. Simpson LaGoy	Emails re Defendants' production	0.50	\$ 225.00	\$ 112.50
1088	1/21/2022	Brandyn J. Rodgeron	Reviewing rebuttal report draft of Dr. Adkins.	2.25	\$ 175.00	\$ 393.75
1089	1/21/2022	Jonathan J. Ossip	Reviewed discovery correspondence from defendants; reviewed draft expert report; reviewed amicus briefs; attention to emails re the above.	2.25	\$ 200.00	\$ 450.00
1090	1/23/2022	Daniel J. Richardson	Reviewed discovery materials, including current responses to interrogatories and requests for production.	0.75	\$ 430.00	\$ 322.50
1091	1/23/2022	Jonathan J. Ossip	Reviewed draft expert rebuttal report; attention to emails re the same.	0.25	\$ 200.00	\$ 50.00
1092	1/24/2022	Garrard R. Beeney	Emails re trial schedule.	0.25	\$ 800.00	\$ 200.00
1093	1/24/2022	Laura Kabler Oswell	Meeting with S&C, ACLU and Arkansas counsel re. case status.	0.50	\$ 650.00	\$ 325.00
1094	1/24/2022	Duncan C. Simpson LaGoy	Calls and emails with team re case schedule	0.50	\$ 225.00	\$ 112.50
1096	1/24/2022	Daniel J. Richardson	Full team meeting to discuss discovery timeline and benefits of seeking an extension of the trial date past July.	0.75	\$ 430.00	\$ 322.50
1097	1/24/2022	Jonathan J. Ossip	Reviewed and edited draft expert rebuttal reports; correspondence re case schedule; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
1098	1/25/2022	Garrard R. Beeney	Emails re extension.	0.25	\$ 800.00	\$ 200.00
1099	1/25/2022	Duncan C. Simpson LaGoy	Draft letter re case schedule	0.50	\$ 225.00	\$ 112.50
1100	1/25/2022	Jonathan J. Ossip	Reviewed and edited draft expert rebuttal report; reviewed correspondence re third-party subpoenas; attention to emails re the above.	3.25	\$ 200.00	\$ 650.00
1101	1/26/2022	Garrard R. Beeney	Emails re amicus.	0.25	\$ 800.00	\$ 200.00
1102	1/26/2022	Daniel J. Richardson	Reviewed expert report of Deanna Adkins and attended weekly meeting of discovery team.	1.00	\$ 430.00	\$ 430.00
1103	1/26/2022	Jonathan J. Ossip	Reviewed amicus briefs; correspondence with expert re draft rebuttal report; attention to emails re the above.	1.75	\$ 200.00	\$ 350.00
1104	1/27/2022	Garrard R. Beeney	Emails re protective order.	0.25	\$ 800.00	\$ 200.00
1105	1/27/2022	Laura Kabler Oswell	Revised draft letter to Guest.	0.25	\$ 650.00	\$ 162.50

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1106	1/27/2022	Jonathan J. Ossip	Reviewed and commented on draft expert report; correspondence with experts re same; reviewed edits to draft protective order; reviewed correspondence re third-party subpoenas; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
1107	1/28/2022	Garrard R. Beeney	Amicus briefs, emails re care limitations.	0.25	\$ 800.00	\$ 200.00
1109	1/28/2022	Jonathan J. Ossip	Reviewed amicus briefs; reviewed edits to draft expert report; reviewed update re clinic status; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00
1110	1/29/2022	Jonathan J. Ossip	Attention to emails re expert reports.	0.25	\$ 200.00	\$ 50.00
1112	1/30/2022	Jonathan J. Ossip	Attention to emails re expert reports.	0.25	\$ 200.00	\$ 50.00
1113	1/31/2022	Garrard R. Beeney	Order re oral argument.	0.25	\$ 800.00	\$ 200.00
1114	1/31/2022	Laura Kabler Oswell	Review emails re. 8th circuit case scheduling and revised draft discovery letter.	0.50	\$ 650.00	\$ 325.00
1115	1/31/2022	Daniel J. Richardson	Reviewed district court statement of interest from United States. Met with paralegal to plan case and discuss assignments.	1.75	\$ 430.00	\$ 752.50
1116	1/31/2022	Jonathan J. Ossip	Reviewed draft letter from Duncan Simpson Lagoy. Reviewed district court filings on merits.	0.50	\$ 200.00	\$ 100.00
1117	2/1/2022	Garrard R. Beeney	Reviewed discovery correspondence and court filings; attention to emails re the above.	0.25	\$ 800.00	\$ 200.00
1119	2/1/2022	Brandyn J. Rodgerson	Emails re protective filing, 8th Circuit.	2.25	\$ 175.00	\$ 393.75
1120	2/1/2022	Brandyn J. Rodgerson	Reviewing Dr. Karasic's rebuttal report.	0.50	\$ 175.00	\$ 87.50
1121	2/1/2022	Brandyn J. Rodgerson	Reviewing motion to compel for discovery purposes.	0.50	\$ 175.00	\$ 87.50
1122	2/1/2022	Jonathan J. Ossip	Reviewing proposed protective order.	0.50	\$ 175.00	\$ 87.50
1123	2/1/2022	Jonathan J. Ossip	Reviewed court order re schedule; reviewed discovery correspondence with defendants; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
1124	2/2/2022	Garrard R. Beeney	Discovery schedule, appeal brief.	0.25	\$ 800.00	\$ 200.00
1125	2/2/2022	Brandyn J. Rodgerson	Reviewing Dr. Turban's rebuttal report.	2.50	\$ 175.00	\$ 437.50
1126	2/2/2022	Brandyn J. Rodgerson	Rebuttal report discussion with Dr. Adkins (1.0).	1.00	\$ 175.00	\$ 175.00
1127	2/2/2022	Daniel J. Richardson	Reviewed draft expert reports; reviewed appellate reply brief; attention to emails re the above.	0.50	\$ 430.00	\$ 215.00
1128	2/2/2022	Jonathan J. Ossip	Reviewed edits to expert report; reviewed discovery correspondence with plaintiffs; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
1129	2/3/2022	Garrard R. Beeney	Discovery emails.	0.25	\$ 800.00	\$ 200.00
1130	2/3/2022	Brandyn J. Rodgerson	Call with Dr. Turban to discuss rebuttal report (2.0).	2.00	\$ 175.00	\$ 350.00
1131	2/3/2022	Daniel J. Richardson	Attended discovery team meeting and reviewed draft letters to opposing counsel.	0.25	\$ 430.00	\$ 107.50
1132	2/3/2022	Jonathan J. Ossip	Attention to emails re draft expert reports.	0.25	\$ 200.00	\$ 50.00
1133	2/4/2022	Brandyn J. Rodgerson	Reviewing Dr. Adkins rebuttal report.	1.75	\$ 175.00	\$ 306.25
1134	2/4/2022	Jonathan J. Ossip	Reviewed draft expert reports; reviewed appellate reply brief; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
1135	2/5/2022	Daniel J. Richardson	Reviewed CA8 briefing.	0.75	\$ 430.00	\$ 322.50
1136	2/5/2022	Jonathan J. Ossip	Reviewed edits to expert report; attention to emails re the same.	0.50	\$ 200.00	\$ 100.00
1137	2/6/2022	Jonathan J. Ossip	Attention to emails re call with expert.	0.25	\$ 200.00	\$ 50.00
1138	2/7/2022	Garrard R. Beeney	Emails re P.O., oral argument.	0.25	\$ 800.00	\$ 200.00
1139	2/7/2022	Laura Kabler Oswell	Call with ACLU and outside counsel teams; Emails re. 8th Cir argument.	0.50	\$ 650.00	\$ 325.00
1140	2/7/2022	Brandyn J. Rodgerson	Reviewing Dr. Karasic's rebuttal expert report.	1.75	\$ 175.00	\$ 306.25
1141	2/7/2022	Brandyn J. Rodgerson	Call to discuss Dr. Karasic's rebuttal expert report (1.0).	1.00	\$ 175.00	\$ 175.00
1142	2/7/2022	Daniel J. Richardson	Reviewed CA8 briefing and provided research notes to S&C team.	2.00	\$ 430.00	\$ 860.00
1143	2/7/2022	Jonathan J. Ossip	Call with expert re draft report; reviewed further edits to draft expert report; attention to emails re the above.	2.50	\$ 200.00	\$ 500.00
1144	2/8/2022	Garrard R. Beeney	Discovery issues.	0.25	\$ 800.00	\$ 200.00
1145	2/8/2022	Brandyn J. Rodgerson	Reviewing Dr. Turban's rebuttal expert report.	0.75	\$ 175.00	\$ 131.25
1146	2/8/2022	Jonathan J. Ossip	Reviewed revised draft of expert report; correspond with former Eighth Circuit clerk re procedural issues; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
1147	2/9/2022	Garrard R. Beeney	Emails re discovery.	0.25	\$ 800.00	\$ 200.00
1148	2/9/2022	Brandyn J. Rodgerson	Discovery group meeting (0.50); Attending presentation on private rights of enforcement (1.25).	1.75	\$ 175.00	\$ 306.25
1149	2/9/2022	Brandyn J. Rodgerson	Reviewing cite check of Dr. Adkins rebuttal expert report.	1.75	\$ 175.00	\$ 306.25
1150	2/9/2022	Daniel J. Richardson	Reviewed draft email from Duncan Simpson LaGoy to opposing counsel and attended weekly discovery meeting.	0.50	\$ 430.00	\$ 215.00
1151	2/9/2022	Jonathan J. Ossip	Reviewed edits to draft expert reports; call with former clerk re Eighth Circuit procedure; answered inquiries re cite check of expert reports; reviewed draft discovery correspondence with defendants; attention to emails re the above.	1.50	\$ 200.00	\$ 300.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1157	2/10/2022	Garrard R. Beeney	Emails re discovery, briefs.	0.25	\$ 800.00	\$ 200.00
1159	2/10/2022	Brandyn J. Rodgerson	Final proof-read of rebuttal expert reports.	2.75	\$ 175.00	\$ 481.25
1160	2/10/2022	Brandyn J. Rodgerson	Reviewing cite check of Dr. Turban's rebuttal expert report.	1.75	\$ 175.00	\$ 306.25
1161	2/10/2022	Brandyn J. Rodgerson	Call to discuss expert reports (1.0); Call to discuss Dr. Turban's rebuttal expert report (1.0).	2.00	\$ 175.00	\$ 350.00
1162	2/10/2022	Jonathan J. Ossip	Reviewed edits to expert report; call with expert working group re finalizing reports; reviewed deposition notices from defendants; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
1163	2/11/2022	Garrard R. Beeney	Emails re discovery.	0.25	\$ 800.00	\$ 200.00
1164	2/11/2022	Laura Kabler Oswell	Emails re. expert reports and discovery issues.	0.50	\$ 650.00	\$ 325.00
1166	2/11/2022	Brandyn J. Rodgerson	Finalizing rebuttal expert reports for Dr. Adkins and Dr. Turban.	6.25	\$ 175.00	\$ 1,093.75
1167	2/11/2022	Jonathan J. Ossip	Call with expert re finalizing report; reviewed final draft of same; correspond with team re defendants; deposition notices; reviewed correspondence with defendants re same; attention to emails re the above.	1.75	\$ 200.00	\$ 350.00
1168	2/14/2022	Garrard R. Beeney	Motion to withdraw as attorney.	0.25	\$ 800.00	\$ 200.00
1169	2/14/2022	Laura Kabler Oswell	Attend weekly team meeting.	0.50	\$ 650.00	\$ 325.00
1170	2/14/2022	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Gregory L. Smith regarding Duncan C. Simpson LaGoy's Zoom Meeting	0.00	\$ 225.00	\$ -
1172	2/14/2022	Brandyn J. Rodgerson	Calls with Dr. Hutchison and Dr. Stambough to discuss deposition planning.	1.25	\$ 175.00	\$ 218.75
1173	2/14/2022	Daniel J. Richardson	Attended weekly discovery meeting and began review of expert rebuttal reports.	0.50	\$ 430.00	\$ 215.00
1174	2/15/2022	Garrard R. Beeney	Letter re oral argument.	0.25	\$ 800.00	\$ 200.00
1175	2/15/2022	Laura Kabler Oswell	Review draft interrogatory responses and send comments to Simpson.	0.50	\$ 650.00	\$ 325.00
1176	2/15/2022	Laura Kabler Oswell	Emails and discussion with Simpson re. discovery meet & confer.	0.25	\$ 650.00	\$ 162.50
1177	2/15/2022	Duncan C. Simpson LaGoy	Meeting with Daniel J. Richardson, Duncan C. Simpson LaGoy regarding Duncan C. Simpson LaGoy's Zoom Meeting	0.25	\$ 225.00	\$ 56.25
1178	2/15/2022	Duncan C. Simpson LaGoy	Revised document DCSL revisions - First Production - Production Letter 4889-3461-7103 v.1.docx	0.50	\$ 225.00	\$ 112.50
1180	2/15/2022	Daniel J. Richardson	Meet and confer with opposing counsel and follow up internal meeting re: same	1.25	\$ 430.00	\$ 537.50
1181	2/16/2022	Duncan C. Simpson LaGoy	Email correspondence with Gregory L. Smith, Daniel J. Richardson regarding Motion to Compel	0.25	\$ 225.00	\$ 56.25
1182	2/16/2022	Duncan C. Simpson LaGoy	Email correspondence with Laura Kabler Oswell, Daniel J. Richardson, Gregory L. Smith regarding Arkansas privilege issues	0.50	\$ 225.00	\$ 112.50
1183	2/16/2022	Duncan C. Simpson LaGoy	Revised document Proposed Final Scheduling Order (J. Moody) 4836-3214-2326 v.2.docx	0.25	\$ 225.00	\$ 56.25
1184	2/16/2022	Duncan C. Simpson LaGoy	Meeting with Dan Richardson, Duncan C. Simpson LaGoy, Gregory L. Smith regarding Duncan C. Simpson LaGoy's Zoom Meeting	0.50	\$ 225.00	\$ 112.50
1185	2/16/2022	Duncan C. Simpson LaGoy	Revised document 2-16 Motion to Compel_v1 - DCSL comments.docx	1.25	\$ 225.00	\$ 281.25
1186	2/16/2022	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Emily Armbruster regarding Emily Armbruster's Zoom Meeting	0.25	\$ 225.00	\$ 56.25
1187	2/16/2022	Brandyn J. Rodgerson	Discovery team meeting.	0.75	\$ 175.00	\$ 131.25
1188	2/16/2022	Daniel J. Richardson	Researched and drafted motion to compel. Attended meeting with Duncan Simpson LaGoy and Gregory Smith to strategize motion.	5.50	\$ 430.00	\$ 2,365.00
1189	2/17/2022	Garrard R. Beeney	Scheduling stipulation, notice to counsel.	0.25	\$ 800.00	\$ 200.00
1190	2/17/2022	Laura Kabler Oswell	Review and revise draft stipulation on scheduling order.	0.25	\$ 650.00	\$ 162.50
1191	2/17/2022	Duncan C. Simpson LaGoy	Revised document Stipulation for Revised Scheduling Order (4855-3449-1919.1).docx	0.25	\$ 225.00	\$ 56.25
1192	2/17/2022	Duncan C. Simpson LaGoy	Revised document 2-16 Motion to Compel_v1 - DCSL comments.docx	0.50	\$ 225.00	\$ 112.50
1194	2/17/2022	Daniel J. Richardson	Reviewed and revised motion to compel	3.75	\$ 430.00	\$ 1,612.50
1195	2/17/2022	Jonathan J. Ossip	Reviewed opposition to motion to show cause re subpoena; attention to emails re discovery disputes.	0.50	\$ 200.00	\$ 100.00
1196	2/18/2022	Garrard R. Beeney	Discovery emails, hospital letter.	0.25	\$ 800.00	\$ 200.00
1197	2/18/2022	Daniel J. Richardson	Edited latest draft of motion to compel	0.75	\$ 430.00	\$ 322.50
1198	2/21/2022	Jonathan J. Ossip	Correspond with expert re rebuttal reports; attention to emails re the same.	0.25	\$ 200.00	\$ 50.00
1199	2/22/2022	Garrard R. Beeney	Emails re schedule.	0.25	\$ 800.00	\$ 200.00
1200	2/22/2022	Duncan C. Simpson LaGoy	Revised document Brandt - Reply re Motion to Show Cause + To Compel Docs (DRAFT 2.22.22) [Read-Only].docx	0.75	\$ 225.00	\$ 168.75
1201	2/22/2022	Brandyn J. Rodgerson	Reviewing Defendants' Opposition to Plaintiffs' Motion to Compel.	0.50	\$ 175.00	\$ 87.50
1202	2/22/2022	Brandyn J. Rodgerson	Reviewing Defendants' reply brief at the Eighth Circuit as well as Defendants' experts' rebuttal reports.	4.75	\$ 175.00	\$ 831.25
1203	2/22/2022	Daniel J. Richardson	Reviewed reply in support of motion to show cause and circulated edits re: same to Duncan LaGoy	0.75	\$ 430.00	\$ 322.50
1204	2/22/2022	Jonathan J. Ossip	Reviewed discovery correspondence with defendants.	0.25	\$ 200.00	\$ 50.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1205	2/23/2022	Garrard R. Beeney	Emails re schedule.	0.25	\$ 800.00	\$ 200.00
1206	2/23/2022	Duncan C. Simpson LaGoy	Meeting with Mann , Travis , Gregory L. Smith, Echols , Brandyn J. Rodgerson, Cstrangio , Brecan , LCOOPER , Sarah , Daniel A. Loevinsohn, Daniel J. Richardson regarding Discovery Team Meeting	0.50	\$ 225.00	\$ 112.50
1207	2/23/2022	Brandyn J. Rodgerson	Reviewing defendants' experts' rebuttal reports.	3.75	\$ 175.00	\$ 656.25
1208	2/23/2022	Brandyn J. Rodgerson	Discovery team meeting.	0.50	\$ 175.00	\$ 87.50
1209	2/23/2022	Daniel J. Richardson	Revised motion to compel in response to decision to not move to compel records from Arkansas Medical Board	1.00	\$ 430.00	\$ 430.00
1210	2/23/2022	Daniel J. Richardson	Weekly meeting of the discovery team.	0.25	\$ 430.00	\$ 107.50
1211	2/23/2022	Jonathan J. Ossip	Reviewed correspondence with defendants re scheduling stipulation and discovery issues; correspond re trial schedule conflicts; reviewed expert materials list; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
1212	2/24/2022	Garrard R. Beeney	Motion to show cause.	0.25	\$ 800.00	\$ 200.00
1213	2/24/2022	Laura Kabler Oswell	Revise draft motion to compel production of medical board docs.	0.50	\$ 650.00	\$ 325.00
1214	2/24/2022	Duncan C. Simpson LaGoy	Revised document Motion to Compel Production of Documents of Medical Board and AG 4857-7273-9599 v.2.docx	0.50	\$ 225.00	\$ 112.50
1215	2/24/2022	Brandyn J. Rodgerson	Reviewing reply brief in support of motion to compel documents from legislators.	0.75	\$ 175.00	\$ 131.25
1216	2/24/2022	Daniel J. Richardson	Revised motion to compel documents from AG's office in response to comments from Laura Kabler Oswell	0.75	\$ 430.00	\$ 322.50
1217	2/24/2022	Daniel J. Richardson	Revised discovery filings in response to feedback from Laura Kabler Oswell and conducted research re same	1.00	\$ 430.00	\$ 430.00
1218	2/24/2022	Jonathan J. Ossip	Reviewed draft reply brief for motion to show cause; reviewed correspondence with defendants re stipulation; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
1219	2/25/2022	Brandyn J. Rodgerson	Reading newly published Seattle Children's study on gender-affirming care.	1.25	\$ 175.00	\$ 218.75
1220	2/25/2022	Daniel J. Richardson	Updated motion to compel for AG's Office documents in response to edits from Duncan LaGoy	1.50	\$ 430.00	\$ 645.00
1221	2/25/2022	Jonathan J. Ossip	Reviewed email from defendants to court.	0.25	\$ 200.00	\$ 50.00
1222	2/28/2022	Garrard R. Beeney	Discovery order.	0.25	\$ 800.00	\$ 200.00
1223	2/28/2022	Laura Kabler Oswell	Review order on motion to show cause and emails re. various discovery issues.	0.50	\$ 650.00	\$ 325.00
1224	2/28/2022	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Gregory L. Smith, Jonathan G. Lester regarding Jonathan G. Lester's Zoom Meeting	0.00	\$ 225.00	\$ -
1226	2/28/2022	Daniel J. Richardson	Weekly meeting with ACLU re: discovery	0.25	\$ 430.00	\$ 107.50
1227	2/28/2022	Jonathan J. Ossip	Reviewed correspondence with expert re depositions; coordinated deposition schedule; reviewed court order re motion to show cause; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
1228	3/1/2022	Jonathan J. Ossip	Reviewed correspondence with defendants re discovery issues and deposition schedule.	0.25	\$ 200.00	\$ 50.00
1229	3/2/2022	Garrard R. Beeney	Discovery emails.	0.25	\$ 800.00	\$ 200.00
1230	3/2/2022	Laura Kabler Oswell	Revised Motion to Compel Production of Documents of Medical Board and AG.	0.25	\$ 650.00	\$ 162.50
1231	3/2/2022	Brandyn J. Rodgerson	Reviewing Defendants' email regarding responses to interrogatories.	0.75	\$ 175.00	\$ 131.25
1232	3/2/2022	Daniel J. Richardson	Reviewed discovery emails from Defendants' counsel in preparation for discovery meeting on 3/3/22.	0.25	\$ 430.00	\$ 107.50
1233	3/2/2022	Jonathan J. Ossip	Reviewed correspondence with defendants re discovery issues; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
1234	3/3/2022	Garrard R. Beeney	Emails re discovery.	0.25	\$ 800.00	\$ 200.00
1235	3/3/2022	Duncan C. Simpson LaGoy	Meeting with Brandyn Rodgerson, Brecan Walas, Daniel J. Richardson, drake mann, Duncan C. Simpson LaGoy, ECHOLS, Gregory L. Smith, Leslie Cooper regarding Discovery team meeting	0.75	\$ 225.00	\$ 168.75
1236	3/3/2022	Duncan C. Simpson LaGoy	Email correspondence with ARGenderAffirmingMedCare@sullcrom.com regarding 21-2875 Dylan Brandt, et al v. Leslie Rutledge, et al "Rule 28(j) Citation Filed"	0.25	\$ 225.00	\$ 56.25
1237	3/3/2022	Duncan C. Simpson LaGoy	Email correspondence with ARGenderAffirmingMedCare@sullcrom.com regarding Brandt v. Rutledge - Legislator Subpoena Responses	0.50	\$ 225.00	\$ 112.50
1238	3/3/2022	Brandyn J. Rodgerson	Reviewing brief in support of a motion to compel the records from the Arkansas AG office.	0.50	\$ 175.00	\$ 87.50
1239	3/3/2022	Brandyn J. Rodgerson	Discovery team meeting.	0.50	\$ 175.00	\$ 87.50
1240	3/3/2022	Daniel J. Richardson	Edited motion to compel in response to feedback from Laura Kabler Oswell. Met with discovery team to plan response to Defendants medical record request. Met with Jonathan Ossip to discuss expert depositions.	2.00	\$ 430.00	\$ 860.00
1241	3/3/2022	Jonathan J. Ossip	Reviewed Rule 28(j) letter from amicus; call with D. Richardson re expert depositions; reviewed discovery correspondence with subpoena targets; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
1242	3/4/2022	Garrard R. Beeney	Emails re filing, motion to compel.	0.25	\$ 800.00	\$ 200.00
1243	3/4/2022	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Brecan , Gregory L. Smith regarding Duncan C. Simpson LaGoy's Zoom Meeting	0.00	\$ 225.00	\$ -
1244	3/4/2022	Jonathan J. Ossip	Reviewed correspondence with subpoena targets; reviewed and commented on search terms for same; addressed expert deposition staffing; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1245	3/5/2022	Daniel J. Richardson	Reviewed Regnerus expert report and began outlining issues for deposition prep	2.50	\$ 430.00	\$ 1,075.00
1246	3/7/2022	Garrard R. Beene	Emails re discovery.	0.25	\$ 800.00	\$ 200.00
1247	3/7/2022	Laura Kabler Oswell	Emails to Simpson re. discover disputes.	0.25	\$ 650.00	\$ 162.50
1248	3/7/2022	Duncan C. Simpson LaGoy	Email correspondence with ARGenderAffirmingMedCare@sullcrom.com regarding Brandt - Conferring on Pl.'s Resps. to Def.'s First INTs and RFPs	0.50	\$ 225.00	\$ 112.50
1250	3/7/2022	Brandyn J. Rodgers	Reviewing Arkansas DOC Gender Identity Policy.	0.50	\$ 175.00	\$ 87.50
1251	3/7/2022	Brandyn J. Rodgers	Reviewing L. Cooper's correspondence re 30b6 topics.	0.75	\$ 175.00	\$ 131.25
1252	3/7/2022	Brandyn J. Rodgers	Reviewing Defendants' correspondence re deposition dates.	0.25	\$ 175.00	\$ 43.75
1253	3/7/2022	Daniel J. Richardson	Reviewed final motion to compel for AG office documents	0.25	\$ 430.00	\$ 107.50
1254	3/7/2022	Daniel J. Richardson	Reviewed Antommara expert report.	0.50	\$ 430.00	\$ 215.00
1255	3/7/2022	Jonathan J. Ossip	Reviewed correspondence from defendants re deposition schedule; reviewed correspondence with expert re deposition prep; reviewed motion to compel; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
1256	3/8/2022	Garrard R. Beene	Emails re discovery.	0.25	\$ 800.00	\$ 200.00
1257	3/8/2022	Duncan C. Simpson LaGoy	Email correspondence with ARGenderAffirmingMedCare@sullcrom.com regarding Brandt - Depositions	0.25	\$ 225.00	\$ 56.25
1259	3/8/2022	Brandyn J. Rodgers	Coordinating with E. Armbruster regarding deposition preparations for doctor plaintiffs.	0.25	\$ 175.00	\$ 43.75
1260	3/8/2022	Daniel J. Richardson	Began preparing outline of Regnerus declaration for depo prep	1.25	\$ 430.00	\$ 537.50
1261	3/8/2022	Daniel J. Richardson	Reviewed expert reports of Dr. Turban and Dr. Karasic and rebuttal report of Dr. Antommara for deposition prep	2.25	\$ 430.00	\$ 967.50
1262	3/8/2022	Jonathan J. Ossip	Reviewed correspondence with defendants and third party subpoena targets re discovery issues; correspond with expert re deposition and prep for same; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
1263	3/9/2022	Garrard R. Beene	Emails re discovery.	0.25	\$ 800.00	\$ 200.00
1264	3/9/2022	Duncan C. Simpson LaGoy	Meeting with Mann , Travis , Gregory L. Smith, Echols , Brandyn J. Rodgers, Cstrangio , Brecan , LCOOPER , Sarah , Daniel A. Loevinsohn, Daniel J. Richardson regarding Discovery Team Meeting	1.00	\$ 225.00	\$ 225.00
1266	3/9/2022	Brandyn J. Rodgers	Discovery team call to discuss legislators discovery.	0.50	\$ 175.00	\$ 87.50
1267	3/9/2022	Daniel J. Richardson	Finished outline of Regnerus declaration	1.25	\$ 430.00	\$ 537.50
1268	3/9/2022	Daniel J. Richardson	Weekly team meeting re: discovery	1.25	\$ 430.00	\$ 537.50
1269	3/9/2022	Daniel J. Richardson	Call to discuss response to Legislators' motion	0.25	\$ 430.00	\$ 107.50
1270	3/9/2022	Jonathan J. Ossip	Reviewed court filings and correspondence with defendants and third party subpoena recipients; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
1272	3/10/2022	Brandyn J. Rodgers	Coordinating with E. Armbruster re doctor plaintiff deposition preparations.	0.50	\$ 175.00	\$ 87.50
1273	3/10/2022	Brandyn J. Rodgers	Expert group meeting to discuss preparing for depositions.	0.50	\$ 175.00	\$ 87.50
1274	3/10/2022	Daniel J. Richardson	Continued work on Regnerus deposition outline	2.00	\$ 430.00	\$ 860.00
1275	3/10/2022	Daniel J. Richardson	Meeting on expert deposition prep	1.00	\$ 430.00	\$ 430.00
1276	3/10/2022	Jonathan J. Ossip	Call with expert working group; coordinated expert deposition staffing; reviewed documents for expert deposition; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
1277	3/11/2022	Daniel J. Richardson	Responded to comments from Leslie Cooper on deposition planning	0.25	\$ 430.00	\$ 107.50
1278	3/11/2022	Jonathan J. Ossip	Reviewed expert deposition staffing plan; reviewed court filing by amicus; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
1279	3/12/2022	Jonathan J. Ossip	Correspond with expert re review of other expert reports; attention to emails re the same.	0.25	\$ 200.00	\$ 50.00
1280	3/13/2022	Daniel J. Richardson	Worked on Regnerus deposition outline	1.25	\$ 430.00	\$ 537.50
1281	3/13/2022	Jonathan J. Ossip	Correspond with expert re report review; attention to emails re the same.	0.25	\$ 200.00	\$ 50.00
1282	3/14/2022	Garrard R. Beene	Emails re discovery.	0.25	\$ 800.00	\$ 200.00
1284	3/14/2022	Brandyn J. Rodgers	Call to discuss depositions of L. Perry and B. Burleigh.	0.50	\$ 175.00	\$ 87.50
1285	3/14/2022	Jonathan J. Ossip	Reviewed discovery correspondence from defendants; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
1286	3/15/2022	Duncan C. Simpson LaGoy	Email correspondence with brecan@walaslawfirm.com, ARGenderAffirmingMedCare@sullcrom.com regarding Drs. Gaudette and Cathey as Witnesses	0.50	\$ 225.00	\$ 112.50
1287	3/15/2022	Duncan C. Simpson LaGoy	Meeting with Alexander Holland, Brandyn Rodgers, Duncan C. Simpson LaGoy, Maxime Matthew regarding Perry Depo	0.00	\$ 225.00	\$ -
1288	3/15/2022	Brandyn J. Rodgers	Reviewing deposition schedule.	0.50	\$ 175.00	\$ 87.50
1289	3/15/2022	Brandyn J. Rodgers	Call to discuss deposition preparation of fact witnesses.	0.50	\$ 175.00	\$ 87.50
1290	3/15/2022	Daniel J. Richardson	Reviewed deposition schedule and coordinated on coverage for expert depositions	0.25	\$ 430.00	\$ 107.50
1291	3/15/2022	Jonathan J. Ossip	Correspond with team re deposition planning; reviewed correspondence to defendants re same; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1292	3/16/2022	Garrard R. Beeney	Emails re deposition, discovery.	0.25	\$ 800.00	\$ 200.00
1293	3/16/2022	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Emily Armbruster, Gregory L. Smith, Jonathan G. Lester, Maxime D. Matthew regarding Third-party doctors' depositions	0.50	\$ 225.00	\$ 112.50
1294	3/16/2022	Duncan C. Simpson LaGoy	Meeting with Mann , Travis , Gregory L. Smith, Echols , Brandyn J. Rodgerson, Cstrangio , Breean , LCOOPER , Sarah , Daniel A. Loevinsohn, Daniel J. Richardson regarding Discovery Team Meeting	1.00	\$ 225.00	\$ 225.00
1295	3/16/2022	Brandyn J. Rodgerson	Discovery team meeting.	0.50	\$ 175.00	\$ 87.50
1296	3/16/2022	Jonathan J. Ossip	Prepared for depositions; reviewed documents for same; reviewed draft deposition notices; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
1297	3/17/2022	Garrard R. Beeney	Emails re deposition.	0.25	\$ 800.00	\$ 200.00
1299	3/17/2022	Brandyn J. Rodgerson	Expert working group.	1.00	\$ 175.00	\$ 175.00
1300	3/17/2022	Daniel J. Richardson	Expert discovery work.	1.25	\$ 430.00	\$ 537.50
1301	3/17/2022	Jonathan J. Ossip	Scheduled expert deposition preparation; correspond with team re subpoenas and depositions; call with expert working group; prepared precedents for depositions outlines; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
1303	3/18/2022	Daniel J. Richardson	Reviewed Regnerus document file for use in deposition	0.75	\$ 430.00	\$ 322.50
1304	3/18/2022	Jonathan J. Ossip	Correspond with expert re deposition prep; reviewed draft deposition outline precedent; coordinated preparation of deposition materials; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
1305	3/19/2022	Jonathan J. Ossip	Reviewed documents and prepared for expert deposition prep; correspond with expert re same; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
1306	3/21/2022	Daniel J. Richardson	Began prep for Turban deposition defense	2.00	\$ 430.00	\$ 860.00
1307	3/21/2022	Daniel J. Richardson	Reviewed sample documents provided by defendants' counsel for documents from the AGs office.	0.25	\$ 430.00	\$ 107.50
1308	3/21/2022	Jonathan J. Ossip	Prepared for expert deposition; reviewed materials for same; prepared outline for same; reviewed discovery brief from defendants; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
1309	3/22/2022	Duncan C. Simpson LaGoy	Meeting with Daniel J. Richardson, Duncan C. Simpson LaGoy, Gregory L. Smith regarding Call re: reply for motion to compel	0.25	\$ 225.00	\$ 56.25
1310	3/22/2022	Brandyn J. Rodgerson	Discussion re deposition schedule and planning.	0.50	\$ 175.00	\$ 87.50
1311	3/22/2022	Daniel J. Richardson	Researched EPC case law and citations from Judge Moody for reply to motion to compel	1.00	\$ 430.00	\$ 430.00
1312	3/22/2022	Daniel J. Richardson	Reviewed edits to reply to motion to compel and began to make requested changes.	0.25	\$ 430.00	\$ 107.50
1313	3/22/2022	Daniel J. Richardson	Drafted reply to motion to compel	2.25	\$ 430.00	\$ 967.50
1314	3/22/2022	Daniel J. Richardson	Continued Turban deposition defense prep	1.00	\$ 430.00	\$ 430.00
1315	3/22/2022	Daniel J. Richardson	Updated reply for motion to compel following feedback from Duncan Simpson LaGoy.	0.75	\$ 430.00	\$ 322.50
1316	3/22/2022	Daniel J. Richardson	Call with Duncan Simpson Lagoy and Gregory Smith on reply for motion to compel.	0.25	\$ 430.00	\$ 107.50
1317	3/22/2022	Jonathan J. Ossip	Reviewed documents for deposition prep; call with A. Holland re same; attention to emails re the above.	2.50	\$ 200.00	\$ 500.00
1318	3/23/2022	Garrard R. Beeney	Emails re depositions.	0.25	\$ 800.00	\$ 200.00
1319	3/23/2022	Brandyn J. Rodgerson	Discovery team meeting.	1.00	\$ 175.00	\$ 175.00
1320	3/23/2022	Daniel J. Richardson	Reviewed Turban defense outline and circulated to defense team	0.25	\$ 430.00	\$ 107.50
1321	3/23/2022	Daniel J. Richardson	Revised reply re motion to compel and circulated to Laura Oswell for review.	2.25	\$ 430.00	\$ 967.50
1322	3/23/2022	Jonathan J. Ossip	Prepared for upcoming depositions; reviewed documents for same; prepared outline for same; correspondence with team re amicus brief in related action; attention to emails re the above.	1.50	\$ 200.00	\$ 300.00
1323	3/24/2022	Brandyn J. Rodgerson	Expert working group.	1.00	\$ 175.00	\$ 175.00
1324	3/24/2022	Daniel J. Richardson	Continued work on Regnerus deposition outline	3.25	\$ 430.00	\$ 1,397.50
1325	3/24/2022	Daniel J. Richardson	Finished background section of Regnerus deposition outline	0.75	\$ 430.00	\$ 322.50
1326	3/24/2022	Jonathan J. Ossip	Reviewed documents for upcoming depositions; prepared outline for same; reviewed legislators' privilege log; reviewed correspondence with defendants re depositions; attention to emails re the above.	1.75	\$ 200.00	\$ 350.00
1327	3/25/2022	Garrard R. Beeney	Emails re discovery.	0.25	\$ 800.00	\$ 200.00
1328	3/25/2022	Brandyn J. Rodgerson	Compiling background information for doctor deposition preparations.	0.75	\$ 175.00	\$ 131.25
1329	3/25/2022	Brandyn J. Rodgerson	Reviewing legislators' privilege log.	0.50	\$ 175.00	\$ 87.50
1330	3/25/2022	Brandyn J. Rodgerson	Reviewing draft reply for Plaintiffs' motion to compel documents from the AG's office.	0.50	\$ 175.00	\$ 87.50
1331	3/25/2022	Brandyn J. Rodgerson	Discussion re Hruz deposition prep.	0.25	\$ 175.00	\$ 43.75
1332	3/25/2022	Daniel J. Richardson	Met with Chase Strangio to discuss Turban defense prep and researched background materials for Turban	0.50	\$ 430.00	\$ 215.00
1333	3/25/2022	Jonathan J. Ossip	Reviewed documents for deposition prep; call with L. Cooper (ACLU) re upcoming depositions; reviewed correspondence re document productions; reviewed subpoenas and discovery correspondence from defendants; reviewed background investigation of expert; attention to emails re the above.	2.50	\$ 200.00	\$ 500.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1334	3/26/2022	Garrard R. Beeney	Attention to deposition outline.	0.25	\$ 800.00	\$ 200.00
1335	3/26/2022	Daniel J. Richardson	Continued work on Regnerus outline	1.00	\$ 430.00	\$ 430.00
1336	3/26/2022	Jonathan J. Ossip	Reviewed draft deposition outlines; attention to emails re the same.	0.75	\$ 200.00	\$ 150.00
1337	3/27/2022	Laura Kabler Oswell	Revise draft reply in support of motion to compel.	0.50	\$ 650.00	\$ 325.00
1338	3/28/2022	Garrard R. Beeney	Emails re motion.	0.25	\$ 800.00	\$ 200.00
1339	3/28/2022	Laura Kabler Oswell	Review revised reply in support of Motion to Compel.	0.25	\$ 650.00	\$ 162.50
1340	3/28/2022	Brandyn J. Rodgerson	Compiling documents for doctor plaintiff deposition preparations.	0.75	\$ 175.00	\$ 131.25
1341	3/28/2022	Brandyn J. Rodgerson	Reviewing new clinic protocols.	0.75	\$ 175.00	\$ 131.25
1342	3/28/2022	Brandyn J. Rodgerson	Reviewing reply re motion to compel documents of Attorney General.	0.50	\$ 175.00	\$ 87.50
1343	3/28/2022	Brandyn J. Rodgerson	Call to discuss doctor plaintiff deposition prep.	0.75	\$ 175.00	\$ 131.25
1344	3/28/2022	Daniel J. Richardson	Finished reply for motion to compel and continued work on Regnerus deposition outline	4.25	\$ 430.00	\$ 1,827.50
1345	3/28/2022	Jonathan J. Ossip	Reviewed draft reply for motion to compel; correspondence with team re upcoming depositions; reviewed notes re expert deposition prep outline; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
1346	3/29/2022	Jonathan J. Ossip	Correspond with team re upcoming depositions; reviewed correspondence with defendants re same; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
1347	3/30/2022	Brandyn J. Rodgerson	Discovery team meeting.	0.50	\$ 175.00	\$ 87.50
1348	3/30/2022	Daniel J. Richardson	Weekly discovery meeting; continued work on Depo outline for Regnerus	1.50	\$ 430.00	\$ 645.00
1349	3/30/2022	Jonathan J. Ossip	Reviewed draft deposition outline; reviewed documents produced by subpoena target; reviewed correspondence from court re motion hearing; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
1350	3/31/2022	Garrard R. Beeney	Emails re discovery.	0.25	\$ 800.00	\$ 200.00
1351	3/31/2022	Brandyn J. Rodgerson	Expert group updates.	0.25	\$ 175.00	\$ 43.75
1352	3/31/2022	Daniel J. Richardson	Updated Q&A document in response to feedback from Duncan Simpson Lagoy.	0.50	\$ 430.00	\$ 215.00
1353	3/31/2022	Daniel J. Richardson	Drafted opening statement and outline for motion to compel hearing	0.50	\$ 430.00	\$ 215.00
1354	3/31/2022	Daniel J. Richardson	Worked on argument outline for motion to compel hearing	3.25	\$ 430.00	\$ 1,397.50
1355	3/31/2022	Jonathan J. Ossip	Reviewed correspondence from defendants re subpoenas; reviewed correspondence with court re motion hearing; correspondence with team re expert team meeting; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
1356	4/1/2022	Daniel J. Richardson	Oral argument preparation for motion to compel hearing	1.75	\$ 430.00	\$ 752.50
1357	4/1/2022	Daniel J. Richardson	Practiced opening for motion to compel hearing.	0.50	\$ 430.00	\$ 215.00
1358	4/1/2022	Daniel J. Richardson	Continued revisions to Q&A for hearing.	0.25	\$ 430.00	\$ 107.50
1359	4/1/2022	Daniel J. Richardson	Reviewed record in preparation for ED Ark hearing	0.50	\$ 430.00	\$ 215.00
1360	4/1/2022	Jonathan J. Ossip	Attention to emails re document productions and depositions.	0.25	\$ 200.00	\$ 50.00
1361	4/2/2022	Daniel J. Richardson	Continued work on preparation for motion to compel hearing.	2.25	\$ 430.00	\$ 967.50
1362	4/2/2022	Daniel J. Richardson	Reviewed record for motion to compel hearing.	3.00	\$ 430.00	\$ 1,290.00
1363	4/3/2022	Daniel J. Richardson	Continued work on preparation for hearing on motion to compel.	3.00	\$ 430.00	\$ 1,290.00
1364	4/3/2022	Daniel J. Richardson	Prep for motion to compel hearing	2.50	\$ 430.00	\$ 1,075.00
1365	4/4/2022	Laura Kabler Oswell	Attend status meeting; Review prep for motion to compel argument; Review email from Simpson re. open tasks.	0.50	\$ 650.00	\$ 325.00
1366	4/4/2022	Brandyn J. Rodgerson	Reviewing outline for Dr. Adkins' deposition preparation.	1.25	\$ 175.00	\$ 218.75
1367	4/4/2022	Brandyn J. Rodgerson	Reviewing background information on Dr. Adkins.	1.50	\$ 175.00	\$ 262.50
1368	4/4/2022	Brandyn J. Rodgerson	Reviewing outline for Dr. Hutchison's deposition preparations.	1.75	\$ 175.00	\$ 306.25
1369	4/4/2022	Brandyn J. Rodgerson	Dr. Hutchison deposition prep.	1.50	\$ 175.00	\$ 262.50
1370	4/4/2022	Daniel J. Richardson	Hearing prep	3.25	\$ 430.00	\$ 1,397.50
1371	4/4/2022	Jonathan J. Ossip	Attention to emails re depositions; call with A. Holland re same; reviewed documents for same.	0.50	\$ 200.00	\$ 100.00
1372	4/5/2022	Garrard R. Beeney	Emails re argument, deposition.	0.25	\$ 800.00	\$ 200.00
1373	4/5/2022	Laura Kabler Oswell	Emails re. hearing on motion to compel and Perry deposition.	0.50	\$ 650.00	\$ 325.00
1374	4/5/2022	Duncan C. Simpson LaGoy	Perry deposition	8.00	\$ 225.00	\$ 1,800.00
1375	4/5/2022	Brandyn J. Rodgerson	Attending deposition of L. Perry.	8.25	\$ 175.00	\$ 1,443.75
1376	4/5/2022	Daniel J. Richardson	Prepared for and participated in hearing on motion to compel	7.50	\$ 430.00	\$ 3,225.00
1377	4/5/2022	Jonathan J. Ossip	Prepared for upcoming depositions; drafted outline and reviewed documents for same; reviewed and edited draft deposition outline; reviewed summaries of deposition and court hearing; attention to emails re the above.	1.50	\$ 200.00	\$ 300.00
1378	4/6/2022	Laura Kabler Oswell	Review order on motion to compel and multiple emails re. same.	0.50	\$ 650.00	\$ 325.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1379	4/6/2022	Brandyn J. Rodgerson	Reviewing deposition subpoenas for Billy Burleigh.	0.50	\$ 175.00	\$ 87.50
1380	4/6/2022	Brandyn J. Rodgerson	Discovery team meeting.	0.50	\$ 175.00	\$ 87.50
1381	4/6/2022	Daniel J. Richardson	Reviewed discovery notices and sent edits re same	1.00	\$ 430.00	\$ 430.00
1382	4/6/2022	Daniel J. Richardson	Discovery meeting	0.50	\$ 430.00	\$ 215.00
1383	4/6/2022	Jonathan J. Ossip	Reviewed and edited draft deposition outline; reviewed summaries of court hearing and deposition; reviewed deposition transcript; coordinated deposition locations; reviewed court order re discovery issue; reviewed research re public statements by attorney general; correspond with expert re upcoming deposition; attention to emails re the above.	4.50	\$ 200.00	\$ 900.00
1384	4/7/2022	Daniel J. Richardson	Weekly discovery meeting	0.50	\$ 430.00	\$ 215.00
1385	4/7/2022	Daniel J. Richardson	Reviewed filings for Burleigh subpoena and 30(b)(6) for Ark. Med. Bd.	1.25	\$ 430.00	\$ 537.50
1386	4/7/2022	Jonathan J. Ossip	Correspond with expert re upcoming deposition; prepared for same; reviewed and edited preparation outline for same; correspond with expert working group re deposition preparation; reviewed deposition notices; attention to emails re the above.	4.50	\$ 200.00	\$ 900.00
1387	4/8/2022	Brandyn J. Rodgerson	Collecting materials and reviewing materials for deposition prep for Drs. Adkins, Hutchinson, and Stambough.	2.25	\$ 175.00	\$ 393.75
1388	4/8/2022	Jonathan J. Ossip	Coordinated preparation of materials for deposition preparation; reviewed and edited outline for same; reviewed Family Research Council release of FOIA documents; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
1389	4/9/2022	Daniel J. Richardson	Completed review of Turban background materials for expert prep.	1.25	\$ 430.00	\$ 537.50
1390	4/10/2022	Brandyn J. Rodgerson	Dr. Stambough deposition prep.	1.50	\$ 175.00	\$ 262.50
1391	4/10/2022	Daniel J. Richardson	Completed first draft of Regnerus deposition outline.	2.75	\$ 430.00	\$ 1,182.50
1392	4/11/2022	Brandyn J. Rodgerson	Summarizing notes and questions to assist with Dr. Hutchison's deposition preparations.	2.25	\$ 175.00	\$ 393.75
1393	4/11/2022	Brandyn J. Rodgerson	Deposition prep call with Dr. Hutchison.	1.50	\$ 175.00	\$ 262.50
1394	4/11/2022	Daniel J. Richardson	Reviewed edits to Regnerus depo outline and provided feedback re same	1.00	\$ 430.00	\$ 430.00
1395	4/11/2022	Jonathan J. Ossip	Reviewed correspondence with defendants re subpoenas; edited case status description; prepared deposition outlines; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
1396	4/12/2022	Brandyn J. Rodgerson	Reviewing background materials for Dr. Stambough in preparation for her deposition.	2.25	\$ 175.00	\$ 393.75
1397	4/12/2022	Daniel J. Richardson	Continued incorporating edits to Regnerus outline. Assisted junior associates with document productions.	2.25	\$ 430.00	\$ 967.50
1398	4/12/2022	Jonathan J. Ossip	Reviewed 28 (j) letter from amicus; reviewed notes re potential response to same; call with A. Holland re deposition outlines; drafted deposition outline; reviewed documents for same; reviewed and edited preparation outline for expert deposition; attention to emails re the above.	1.75	\$ 200.00	\$ 350.00
1399	4/13/2022	Brandyn J. Rodgerson	Discovery team meeting.	0.50	\$ 175.00	\$ 87.50
1400	4/13/2022	Daniel J. Richardson	Finalized Regnerus outline in response to feedback from Leslie Cooper and recirculated edited version.	1.50	\$ 430.00	\$ 645.00
1401	4/13/2022	Jonathan J. Ossip	Call with L. Cooper (ACLU) and A. Holland re expert preparation; reviewed and edited expert deposition prep outline; prepared for depositions and addressed logistical issues re same; reviewed note re 28(j) letter from amicus; attention to emails re the above.	6.75	\$ 200.00	\$ 1,350.00
1402	4/14/2022	Brandyn J. Rodgerson	Expert group meeting (1.0) and weekly associate call to discuss status updates (0.50).	1.50	\$ 175.00	\$ 262.50
1403	4/14/2022	Daniel J. Richardson	Expert working group meeting; finalized and circulated draft of Regnerus outline.	0.75	\$ 430.00	\$ 322.50
1404	4/14/2022	Jonathan J. Ossip	Attended call with expert witness re preparation for deposition; call with expert working group; reviewed and edited draft deposition outlines; reviewed correspondence with defendants re depositions; attention to emails re the above.	3.75	\$ 200.00	\$ 750.00
1405	4/15/2022	Brandyn J. Rodgerson	Reviewing background materials on Billy Burleigh.	2.25	\$ 175.00	\$ 393.75
1406	4/15/2022	Brandyn J. Rodgerson	Coordinating upload and stamping of materials provided by Billy Burleigh.	0.50	\$ 175.00	\$ 87.50
1407	4/15/2022	Brandyn J. Rodgerson	Attending deposition of Dr. Ho.	5.25	\$ 175.00	\$ 918.75
1408	4/15/2022	Daniel J. Richardson	Met with Jonathan Lester to discuss Regnerus outline.	0.50	\$ 430.00	\$ 215.00
1409	4/15/2022	Jonathan J. Ossip	Prepare for upcoming depositions; prepared outlines for same; reviewed correspondence with defendants re discovery issues; attention to emails re the above.	1.50	\$ 200.00	\$ 300.00
1410	4/16/2022	Brandyn J. Rodgerson	Reviewing background materials on Billy Burleigh.	3.25	\$ 175.00	\$ 568.75
1411	4/16/2022	Daniel J. Richardson	Reviewed Levine expert outline	0.25	\$ 430.00	\$ 107.50
1412	4/16/2022	Jonathan J. Ossip	Reviewed draft deposition outline; reviewed discovery correspondence from defendants; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
1413	4/17/2022	Daniel J. Richardson	Reviewed Levine and Regnerus outlines and drafted email to team re: same	1.25	\$ 430.00	\$ 537.50
1414	4/17/2022	Jonathan J. Ossip	Prepare for depositions; reviewed documents and prepared outline for same; reviewed correspondence re third party deposition; attention to emails re the above.	1.00	\$ 200.00	\$ 200.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1415	4/18/2022	Laura Kabler Oswell	Emails re. upcoming depositions and preparation for same.	0.50	\$ 650.00	\$ 325.00
1416	4/18/2022	Brandyn J. Rodgerson	Dr. Adkins deposition prep.	1.50	\$ 175.00	\$ 262.50
1417	4/18/2022	Brandyn J. Rodgerson	Preparing deposition outline for Billy Burleigh.	3.25	\$ 175.00	\$ 568.75
1418	4/18/2022	Daniel J. Richardson	Reviewed defendants' privilege log for AG records.	0.25	\$ 430.00	\$ 107.50
1419	4/18/2022	Jonathan J. Ossip	Revised and draft deposition outlines; attended prep session with expert witness; call with A. Holland re same; reviewed draft Rule 28(j) response; attention to emails re the above.	2.25	\$ 200.00	\$ 450.00
1420	4/19/2022	Jonathan J. Ossip	Drafted deposition outline; coordinated deposition logistics; reviewed documents for same; attention to emails re the above.	1.50	\$ 200.00	\$ 300.00
1421	4/20/2022	Brandyn J. Rodgerson	Preparing deposition outline for Billy Burleigh.	3.75	\$ 175.00	\$ 656.25
1422	4/20/2022	Brandyn J. Rodgerson	Discovery team meeting.	0.50	\$ 175.00	\$ 87.50
1423	4/20/2022	Brandyn J. Rodgerson	Dr. Stambough deposition prep.	1.00	\$ 175.00	\$ 175.00
1424	4/20/2022	Daniel J. Richardson	Depo prep meeting with Liz Rose.	0.50	\$ 430.00	\$ 215.00
1425	4/20/2022	Jonathan J. Ossip	Drafted deposition outline; reviewed documents and materials for same; calls with A. Holland re deposition preparation; attention to emails re the above.	3.00	\$ 200.00	\$ 600.00
1426	4/21/2022	Brandyn J. Rodgerson	Expert working group meeting.	0.75	\$ 175.00	\$ 131.25
1427	4/21/2022	Brandyn J. Rodgerson	Call to discuss Billy Burleigh's deposition re preparation and goals.	0.50	\$ 175.00	\$ 87.50
1428	4/21/2022	Brandyn J. Rodgerson	Dr. Adkins' deposition prep.	1.50	\$ 175.00	\$ 262.50
1429	4/21/2022	Daniel J. Richardson	Depo prep for Regnerus.	1.25	\$ 430.00	\$ 537.50
1430	4/21/2022	Jonathan J. Ossip	Drafted deposition outline; reviewed documents and materials for same; coordinated deposition logistics; calls with A. Holland re deposition prep; attention to emails re the above.	5.75	\$ 200.00	\$ 1,150.00
1431	4/22/2022	Brandyn J. Rodgerson	Reviewing [materials for deposition preparation].	1.25	\$ 175.00	\$ 218.75
1432	4/22/2022	Brandyn J. Rodgerson	Dr. Stambough (1.5) and Dr. Hutchison (2.0) deposition prep.	3.50	\$ 175.00	\$ 612.50
1433	4/22/2022	Brandyn J. Rodgerson	Coordinating service of Billy Burleigh documents in response to his subpoena.	0.50	\$ 175.00	\$ 87.50
1434	4/22/2022	Brandyn J. Rodgerson	Coordinating re organization of Billy Burleigh deposition exhibits.	0.75	\$ 175.00	\$ 131.25
1435	4/22/2022	Jonathan J. Ossip	Drafted deposition outline; reviewed documents and materials for same; addressed deposition logistics; calls with A. Holland re deposition outline; correspond with expert re deposition preparation; attention to emails re the above.	10.00	\$ 200.00	\$ 2,000.00
1436	4/23/2022	Daniel J. Richardson	Regnerus deposition prep	0.50	\$ 430.00	\$ 215.00
1437	4/23/2022	Jonathan J. Ossip	Drafted deposition outline; reviewed documents for same; reviewed draft correspondence to counsel for deponent; attention to emails re the above.	2.75	\$ 200.00	\$ 550.00
1438	4/24/2022	Brandyn J. Rodgerson	Reviewing materials in preparation for Dr. Adkin's deposition.	2.25	\$ 175.00	\$ 393.75
1439	4/24/2022	Brandyn J. Rodgerson	Deposition preparation with Dr. Hutchison (3.5) and Dr. Stambough (2.0).	5.50	\$ 175.00	\$ 962.50
1440	4/24/2022	Daniel J. Richardson	Created new draft of Regnerus outline and collected exhibit list.	5.25	\$ 430.00	\$ 2,257.50
1441	4/24/2022	Jonathan J. Ossip	Revised draft deposition outline; reviewed documents for same; reviewed comments to same; attention to emails re the above.	1.50	\$ 200.00	\$ 300.00
1442	4/25/2022	Brandyn J. Rodgerson	Preparation for Dr. Hutchison's deposition.	2.75	\$ 175.00	\$ 481.25
1443	4/25/2022	Brandyn J. Rodgerson	Kate Stambough deposition.	7.75	\$ 175.00	\$ 1,356.25
1444	4/25/2022	Daniel J. Richardson	Attended Stambaugh dep.; updated Regnerus outline; worked with paralegals and associates to prepare exhibits	1.50	\$ 430.00	\$ 645.00
1445	4/25/2022	Jonathan J. Ossip	Attended deposition preparation with expert; drafted expert deposition outline; prepared for deposition; calls with A. Holland re same; attention to emails re the above.	2.75	\$ 200.00	\$ 550.00
1446	4/26/2022	Brandyn J. Rodgerson	Michele Hutchison deposition.	8.75	\$ 175.00	\$ 1,531.25
1447	4/26/2022	Daniel J. Richardson	Revised Regnerus outline. Reviewed records of Arkansas Medical Board and circulated research re: same.	2.25	\$ 430.00	\$ 967.50
1448	4/26/2022	Jonathan J. Ossip	Drafted expert deposition outline; prepared for same; attention to emails re the above.	3.75	\$ 200.00	\$ 750.00
1449	4/27/2022	Brandyn J. Rodgerson	Preparing for Billy Burleigh deposition.	6.75	\$ 175.00	\$ 1,181.25
1450	4/27/2022	Brandyn J. Rodgerson	Prep meeting for Dr. Adkins deposition.	1.75	\$ 175.00	\$ 306.25
1451	4/27/2022	Daniel J. Richardson	Completed revision to Regnerus outline; attended meet and confer on Arkansas Medical Board 30b6; continued research into Medical Board members	4.00	\$ 430.00	\$ 1,720.00
1452	4/27/2022	Jonathan J. Ossip	Drafted expert deposition outline; reviewed and incorporated edits to same; attention to emails re the above.	5.75	\$ 200.00	\$ 1,150.00
1453	4/28/2022	Duncan C. Simpson LaGoy	Burleigh Deposition	8.00	\$ 225.00	\$ 1,800.00
1454	4/28/2022	Brandyn J. Rodgerson	Billy Burleigh deposition.	9.25	\$ 175.00	\$ 1,618.75
1455	4/28/2022	Daniel J. Richardson	Expert team meeting; depo defense meeting with Dr. Turban	3.00	\$ 430.00	\$ 1,290.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1456	4/28/2022	Jonathan J. Ossip	Attended deposition preparation session with expert; call with expert consulting group; revised draft expert deposition outline; attention to emails re the above.	10.00	\$ 200.00	\$ 2,000.00
1457	4/29/2022	Garrard R. Beene	Emails re deposition reports.	0.50	\$ 800.00	\$ 400.00
1458	4/29/2022	Laura Kabler Oswell	Emails re. depositions; Review text messages produced in discovery.	0.50	\$ 650.00	\$ 325.00
1459	4/29/2022	Brandyn J. Rodgerson	Flagging future strategic points for associate team re trial preparation.	0.50	\$ 175.00	\$ 87.50
1460	4/29/2022	Brandyn J. Rodgerson	Summarizing Billy Burleigh deposition takeaways.	0.75	\$ 175.00	\$ 131.25
1461	4/29/2022	Daniel J. Richardson	Completed new draft of Regnerus outline.	2.75	\$ 430.00	\$ 1,182.50
1462	4/29/2022	Jonathan J. Ossip	Revised expert deposition outline; prepared materials for same; attention to emails re the above.	7.00	\$ 200.00	\$ 1,400.00
1463	4/30/2022	Brandyn J. Rodgerson	Preparing for Billy Burleigh's deposition and reviewing exhibits.	3.75	\$ 175.00	\$ 656.25
1464	4/30/2022	Brandyn J. Rodgerson	Reviewing materials in preparation for Dr. Hutchison and Dr. Stambough depositions.	4.75	\$ 175.00	\$ 831.25
1465	4/30/2022	Daniel J. Richardson	Researched possible deponents for Ark Medical Board	0.25	\$ 430.00	\$ 107.50
1466	4/30/2022	Jonathan J. Ossip	Prepared for deposition; reviewed documents and materials for same; correspond with expert re same; revised deposition outline; attention to emails re the above.	4.50	\$ 200.00	\$ 900.00
1467	5/1/2022	Daniel J. Richardson	Regnerus deposition prep	3.00	\$ 430.00	\$ 1,290.00
1468	5/1/2022	Daniel J. Richardson	Reviewed background materials for AMB 30b6 deposition and emailed Leslie Cooper re same	0.50	\$ 430.00	\$ 215.00
1469	5/1/2022	Jonathan J. Ossip	Prepared for deposition; revised deposition outline for same; attention to emails re the above.	6.75	\$ 200.00	\$ 1,350.00
1470	5/2/2022	Brandyn J. Rodgerson	Deposition preparations for Dr. Adkins.	5.25	\$ 175.00	\$ 918.75
1471	5/2/2022	Daniel J. Richardson	Coordinated with Jonathan Lester on next steps for Arkansas Medical Board depositions	0.75	\$ 430.00	\$ 322.50
1472	5/2/2022	Daniel J. Richardson	Regnerus depo prep	3.75	\$ 430.00	\$ 1,612.50
1473	5/2/2022	Jonathan J. Ossip	Prepared for deposition; reviewed DOJ complaint in related case; reviewed discovery correspondence from defendants; conducted research re deposition procedure; addressed deposition logistics; revised deposition outline and materials; reviewed documents for same; attended preparation session for expert deposition; calls and attention to emails re the above.	9.75	\$ 200.00	\$ 1,950.00
1474	5/3/2022	Brandyn J. Rodgerson	Dr. Adkins' deposition.	9.75	\$ 175.00	\$ 1,706.25
1475	5/3/2022	Daniel J. Richardson	Regnerus depo prep, expert meeting, and review of documents for 30b6	3.75	\$ 430.00	\$ 1,612.50
1476	5/3/2022	Daniel J. Richardson	Regnerus deposition prep	2.00	\$ 430.00	\$ 860.00
1477	5/3/2022	Jonathan J. Ossip	Revised expert deposition outline; prepared materials for same; addressed logistics for same; reviewed final binder and exhibit set for same; attention to emails and calls re the above.	3.75	\$ 200.00	\$ 750.00
1478	5/4/2022	Brandyn J. Rodgerson	Reviewing Lappert's outline for his deposition.	1.75	\$ 175.00	\$ 306.25
1479	5/4/2022	Brandyn J. Rodgerson	Watching FRC panel (with AG Rutledge) about the SAFE Act.	0.75	\$ 175.00	\$ 131.25
1480	5/4/2022	Daniel J. Richardson	Regnerus depo prep	8.25	\$ 430.00	\$ 3,547.50
1481	5/4/2022	Jonathan J. Ossip	Prepared for deposition; revised outline for same; addressed logistics for same; incorporated edits to draft outline; reviewed recent academic article for same; attention to emails and calls re the above.	12.25	\$ 200.00	\$ 2,450.00
1482	5/5/2022	Brandyn J. Rodgerson	Attending deposition of Dr. Regnerus.	8.25	\$ 175.00	\$ 1,443.75
1483	5/5/2022	Daniel J. Richardson	Regnerus deposition	11.25	\$ 430.00	\$ 4,837.50
1484	5/5/2022	Jonathan J. Ossip	Prepared for deposition; reviewed outline and materials re same; meetings and calls with team members re same; attention to emails re the above.	7.75	\$ 200.00	\$ 1,550.00
1485	5/6/2022	Brandyn J. Rodgerson	Attending deposition of Dr. Lappert.	8.25	\$ 175.00	\$ 1,443.75
1486	5/6/2022	Jonathan J. Ossip	Prepared for and took expert deposition; meetings and calls re same; attention to emails re the above.	12.00	\$ 200.00	\$ 2,400.00
1487	5/7/2022	Jonathan J. Ossip	Correspond with court reporter re transcript; reviewed rough draft of same.	1.00	\$ 200.00	\$ 200.00
1488	5/8/2022	Daniel J. Richardson	Reviewed 30b6 outline and sent comments re same	0.50	\$ 430.00	\$ 215.00
1489	5/8/2022	Jonathan J. Ossip	Additional correspondence with court reporter re transcript; reviewed and edited draft summary of deposition; reviewed rough draft of transcript; prepared for expert deposition preparation; attention to emails re the above.	2.25	\$ 200.00	\$ 450.00
1490	5/9/2022	Duncan C. Simpson LaGoy	Revised document DCSL comments - Motion to Compel Legislators' Documents- Legislative Privilege (4881-5903-3886.1) _JGL.docx	0.75	\$ 225.00	\$ 168.75
1491	5/9/2022	Daniel J. Richardson	Veritext prep for Embry 30b6 deposition.	0.50	\$ 430.00	\$ 215.00
1492	5/9/2022	Daniel J. Richardson	Discussed Eighth Circuit Daubert ops with Brecan Walas.	0.25	\$ 430.00	\$ 107.50
1493	5/9/2022	Jonathan J. Ossip	Attended expert deposition prep session; prepared for upcoming deposition; reviewed and edited outline and documents set for same; reviewed correspondence from defendants re 30(b)(6) depositions; attention to emails re the above.	7.50	\$ 200.00	\$ 1,500.00
1494	5/10/2022	Garrard R. Beene	Updates, motion to quash.	0.25	\$ 800.00	\$ 200.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1495	5/10/2022	Duncan C. Simpson LaGoy	Meeting with Emily T.L. Armbruster, Duncan C. Simpson LaGoy, Gregory L. Smith regarding Emily Armbruster's Zoom Meeting	0.25	\$ 225.00	\$ 56.25
1496	5/10/2022	Brandyn J. Rodgeron	Reviewing Rep. Lundstrum's motion to quash as well as deposition transcript for Billy Burleigh.	3.25	\$ 175.00	\$ 568.75
1497	5/10/2022	Daniel J. Richardson	30b6 deposition of Amy Embry	3.75	\$ 430.00	\$ 1,612.50
1498	5/10/2022	Jonathan J. Ossip	Prepared for expert deposition; reviewed and edited outline for same; reviewed motion to quash subpoena; attention to emails re the above.	4.75	\$ 200.00	\$ 950.00
1499	5/11/2022	Duncan C. Simpson LaGoy	Meeting with Breean Walas, Duncan C. Simpson LaGoy, Emily Armbruster, Gregory L. Smith, Jonathan G. Lester, Leslie Cooper, Sarah Everett regarding Discovery Team Meeting	0.50	\$ 225.00	\$ 112.50
1500	5/11/2022	Brandyn J. Rodgeron	Reviewing background materials for Dr. Hruz's deposition.	3.75	\$ 175.00	\$ 656.25
1501	5/11/2022	Brandyn J. Rodgeron	Discovery team meeting.	0.75	\$ 175.00	\$ 131.25
1502	5/11/2022	Daniel J. Richardson	Began drafting outline for AMB member deposition	0.75	\$ 430.00	\$ 322.50
1503	5/11/2022	Daniel J. Richardson	Expert depo prep for Dr. Turban	1.75	\$ 430.00	\$ 752.50
1504	5/11/2022	Jonathan J. Ossip	Prepared for expert deposition; attended prep session with expert and co-counsel; reviewed documents and materials for same; meeting with co-counsel re same; conducted research re potential motion to exclude expert; reviewed draft motion to compel; attention to emails re the above.	9.00	\$ 200.00	\$ 1,800.00
1505	5/12/2022	Laura Kabler Oswell	Revised document Motion to Compel Legislators' Documents.	0.25	\$ 650.00	\$ 162.50
1506	5/12/2022	Brandyn J. Rodgeron	Attending Dr. Antommara's deposition.	7.25	\$ 175.00	\$ 1,268.75
1507	5/12/2022	Daniel J. Richardson	Drafted Branman depo outline and began research for Daubert brief on Regnerus.	1.75	\$ 430.00	\$ 752.50
1508	5/12/2022	Jonathan J. Ossip	Attended and defended expert deposition; meetings with witness and co-counsel re same; prepared for same; attention to emails re the above.	12.50	\$ 200.00	\$ 2,500.00
1509	5/13/2022	Duncan C. Simpson LaGoy	Revised document Motion to Compel Legislators' Documents.docx 4890-9880-1951 v.8.docx	0.50	\$ 225.00	\$ 112.50
1510	5/13/2022	Brandyn J. Rodgeron	Reviewing Plaintiffs' motion to compel legislature documents.	0.75	\$ 175.00	\$ 131.25
1511	5/13/2022	Daniel J. Richardson	Met with Leslie Cooper to discuss deposition of Arkansas Medical Board member	0.50	\$ 430.00	\$ 215.00
1512	5/13/2022	Jonathan J. Ossip	Discussed deposition with Alexander Holland; reviewed draft motion to compel; correspondence with expert working group re Daubert motions; attention to emails re the above.	2.75	\$ 200.00	\$ 550.00
1513	5/14/2022	Brandyn J. Rodgeron	Reviewing PI decision regarding Alabama's felony ban on gender affirming care for minors.	1.25	\$ 175.00	\$ 218.75
1514	5/14/2022	Daniel J. Richardson	Updated Branman depo outline in response to feedback from Leslie Cooper.	0.75	\$ 430.00	\$ 322.50
1515	5/14/2022	Jonathan J. Ossip	Reviewed court order from related case re preliminary injunction; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
1516	5/15/2022	Daniel J. Richardson	Circulated revised Branman outline	0.25	\$ 430.00	\$ 107.50
1517	5/15/2022	Jonathan J. Ossip	Correspondence with expert re deposition and follow up from same; reviewed document re same; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
1518	5/16/2022	Duncan C. Simpson LaGoy	Meeting with Duncan C. Simpson LaGoy, Jonathan G. Lester, Gregory L. Smith, Emily T.L. Armbruster regarding Opp to Leg motion	0.50	\$ 225.00	\$ 112.50
1519	5/16/2022	Daniel J. Richardson	Coordinated logistics for Branman deposition	0.25	\$ 430.00	\$ 107.50
1520	5/16/2022	Jonathan J. Ossip	Call with expert re deposition; reviewed court order re oral argument; conducted research re same; correspond with expert re deposition; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
1521	5/17/2022	Jonathan J. Ossip	Call re motions to exclude experts; reviewed article from expert; correspondence re potential 28(j) letter; attention to emails re the above.	1.25	\$ 200.00	\$ 250.00
1522	5/18/2022	Duncan C. Simpson LaGoy	Revised document Reply re Motion to Compel Legislators' Documents.docx 4880-2580-9952 v.1.docx	0.75	\$ 225.00	\$ 168.75
1523	5/18/2022	Brandyn J. Rodgeron	Exhibit Share training session.	1.50	\$ 175.00	\$ 262.50
1524	5/18/2022	Daniel J. Richardson	Deposition prep for Jack Turban	3.00	\$ 430.00	\$ 1,290.00
1525	5/18/2022	Jonathan J. Ossip	Reviewed discovery correspondence from defendants; reviewed opposition to motion to compel; correspondence re expert deposition; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
1526	5/19/2022	Laura Kabler Oswell	Review revised draft Reply in support of Motion to Compel and emails to Simpson re. same.	0.50	\$ 650.00	\$ 325.00
1527	5/19/2022	Duncan C. Simpson LaGoy	Revised document DCSL comments - 28(j) Letter of Supplemental Authority - Eknes-Tucker v. Marshall (4862-1877-2256.1).docx	0.25	\$ 225.00	\$ 56.25
1528	5/19/2022	Duncan C. Simpson LaGoy	Revised document Reply re Motion to Compel Legislators' Documents.docx 4880-2580-9952 v.1.docx	1.00	\$ 225.00	\$ 225.00
1529	5/19/2022	Brandyn J. Rodgeron	Attending Dr. Turban's deposition.	6.75	\$ 175.00	\$ 1,181.25
1530	5/19/2022	Daniel J. Richardson	Turban deposition	1.50	\$ 430.00	\$ 645.00
1531	5/19/2022	Daniel J. Richardson	Regnerus Daubert motion drafting	1.00	\$ 430.00	\$ 430.00
1532	5/19/2022	Jonathan J. Ossip	Reviewed and edited correspondence to defendants re expert deposition; reviewed reply to motion to compel; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1533	5/20/2022	Duncan C. Simpson LaGoy	Attend Karasic deposition (partial)	4.00	\$ 225.00	\$ 900.00
1534	5/20/2022	Brandyn J. Rodgerson	Attending Dr. Karasic's deposition.	5.25	\$ 175.00	\$ 918.75
1535	5/20/2022	Jonathan J. Ossip	Reviewed expert deposition transcript; reviewed motion to quash; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00
1536	5/21/2022	Brandyn J. Rodgerson	Reviewing Dr. Hruz's deposition outline and potential exhibits, and revising the same.	6.75	\$ 175.00	\$ 1,181.25
1537	5/21/2022	Jonathan J. Ossip	Attention to emails re motion to exclude expert.	0.25	\$ 200.00	\$ 50.00
1538	5/22/2022	Duncan C. Simpson LaGoy	Revised document Opposition to Motion to Quash and for Protective Order.docx 4887-9073-7952 v.5.docx	0.75	\$ 225.00	\$ 168.75
1539	5/22/2022	Brandyn J. Rodgerson	Reviewing Dr. Hruz's deposition outline and potential exhibits, and revising the same.	7.25	\$ 175.00	\$ 1,268.75
1540	5/23/2022	Garrard R. Beeneey	Attention to updates re MT Quash and 8th circuit.	0.50	\$ 800.00	\$ 400.00
1541	5/23/2022	Duncan C. Simpson LaGoy	Revised document Opposition to Motion to Quash and for Protective Order (4887-9073-7952.6) - bw [Read-Only].docx	1.00	\$ 225.00	\$ 225.00
1542	5/23/2022	Brandyn J. Rodgerson	Reviewing Plaintiffs' Opposition to Motion to Quash and for Protective Order.	1.75	\$ 175.00	\$ 306.25
1543	5/23/2022	Brandyn J. Rodgerson	Finalizing Hruz deposition outline and exhibits; coordinating printing of the same.	2.25	\$ 175.00	\$ 393.75
1544	5/23/2022	Brandyn J. Rodgerson	Reviewing Plaintiffs' 28(j) letter regarding Alabama's recent decision on gender affirming medical care.	0.50	\$ 175.00	\$ 87.50
1545	5/23/2022	Daniel J. Richardson	Attended Daubert meeting; began drafting brief in opposition to motion for protective order.	1.50	\$ 430.00	\$ 645.00
1546	5/23/2022	Jonathan J. Ossip	Reviewed draft 28(j) letter; attention to emails re the above.	0.00	\$ 200.00	\$ -
1547	5/24/2022	Duncan C. Simpson LaGoy	Revised document Opposition to Motion to Quash and for Protective Order (4887-9073-7952.7) (002) [Read-Only].docx	1.25	\$ 225.00	\$ 281.25
1548	5/24/2022	Brandyn J. Rodgerson	Uploading Hruz exhibits and reviewing Hruz outline and exhibits in preparation for his deposition.	5.75	\$ 175.00	\$ 1,006.25
1549	5/24/2022	Daniel J. Richardson	Revised brief in opposition to motion for protective order and circulated to full team for review.	2.00	\$ 430.00	\$ 860.00
1550	5/24/2022	Jonathan J. Ossip	Call with S&C team re motions to exclude experts.	0.50	\$ 200.00	\$ 100.00
1551	5/25/2022	Brandyn J. Rodgerson	Preparing for and attending Dr. Hruz's deposition.	9.75	\$ 175.00	\$ 1,706.25
1552	5/25/2022	Daniel J. Richardson	Meeting with Isaiah Beaton to discuss Regnerus Daubert brief.	0.50	\$ 430.00	\$ 215.00
1553	5/25/2022	Daniel J. Richardson	Finished brief in opposition to motion to quash and filed with court.	3.00	\$ 430.00	\$ 1,290.00
1554	5/25/2022	Jonathan J. Ossip	Reviewed opposition to motion to quash.	0.25	\$ 200.00	\$ 50.00
1555	5/26/2022	Brandyn J. Rodgerson	Attending Dr. Levine's deposition.	9.25	\$ 175.00	\$ 1,618.75
1556	5/26/2022	Daniel J. Richardson	Regnerus Daubert research	0.50	\$ 430.00	\$ 215.00
1557	5/26/2022	Jonathan J. Ossip	Correspondence with expert re deposition transcript.	0.25	\$ 200.00	\$ 50.00
1558	5/26/2022	Jonathan J. Ossip	Correspondence with expert re deposition.	0.00	\$ 200.00	\$ -
1559	5/27/2022	Garrard R. Beeneey	Updates and depos, motion response.	0.50	\$ 800.00	\$ 400.00
1560	5/27/2022	Daniel J. Richardson	Reviewed research on Daubert legal standards.	0.75	\$ 430.00	\$ 322.50
1561	5/27/2022	Jonathan J. Ossip	Call with Alexander Holland re motion to exclude expert and errata to deposition transcript; reviewed summary of expert deposition; reviewed expert deposition transcript; attention to emails re the above.	0.75	\$ 200.00	\$ 150.00
1562	5/28/2022	Daniel J. Richardson	Drafted Daubert brief for Regnerus.	2.25	\$ 430.00	\$ 967.50
1563	5/29/2022	Garrard R. Beeneey	Emails re moot.	0.25	\$ 800.00	\$ 200.00
1564	5/29/2022	Daniel J. Richardson	Continued work on Regnerus motion.	1.00	\$ 430.00	\$ 430.00
1565	5/29/2022	Daniel J. Richardson	Continued drafting Regnerus Daubert motion	1.25	\$ 430.00	\$ 537.50
1566	5/29/2022	Jonathan J. Ossip	Correspond with expert re deposition errata; attention to emails re oral argument prep and motion to exclude expert.	0.50	\$ 200.00	\$ 100.00
1567	5/30/2022	Daniel J. Richardson	Finished first draft of Regnerus motion to exclude and circulated to team for review.	3.25	\$ 430.00	\$ 1,397.50
1568	5/30/2022	Jonathan J. Ossip	Attention to emails re motion to exclude expert.	0.25	\$ 200.00	\$ 50.00
1569	5/31/2022	Jonathan J. Ossip	Attention to emails re oral argument prep.	0.50	\$ 200.00	\$ 100.00
1570	6/1/2022	Laura Kabler Oswell	Review briefs and record for 8th Cir moot.	3.50	\$ 650.00	\$ 2,275.00
1571	6/1/2022	Duncan C. Simpson LaGoy	Revised document DCSL comments - Reply In Support of Motion to Compel Production of Legislators Documents (4871-7341-2899.3).docx	0.50	\$ 225.00	\$ 112.50
1572	6/1/2022	Daniel J. Richardson	Reviewed updates to Daubert brief and recirculated new draft	0.75	\$ 430.00	\$ 322.50
1573	6/1/2022	Jonathan J. Ossip	Call with A. Holland re motion to exclude expert; attention to emails re the above.	0.25	\$ 200.00	\$ 50.00
1574	6/2/2022	Laura Kabler Oswell	Prepare for and attend moot for 8th Cir argument.	3.50	\$ 650.00	\$ 2,275.00
1575	6/2/2022	Brandyn J. Rodgerson	Moot for Eighth Circuit appeal.	1.75	\$ 175.00	\$ 306.25
1576	6/2/2022	Daniel J. Richardson	Moot for CA8 argument, finished draft of Regnerus motion and circulated to full team.	3.00	\$ 430.00	\$ 1,290.00
1577	6/2/2022	Jonathan J. Ossip	Reviewed errata from expert; conducted research re same; attention to emails re the above.	0.50	\$ 200.00	\$ 100.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1578	6/3/2022	Duncan C. Simpson LaGoy	Revised document Reply In Support of Motion to Compel Production of Legislators Documents (4871-7341-2899.6.1).docx	0.25	\$ 225.00	\$ 56.25
1579	6/3/2022	Daniel J. Richardson	Finalized Regnerus Daubert and circulated to full team for review.	0.25	\$ 430.00	\$ 107.50
1580	6/6/2022	Daniel J. Richardson	Reviewed argument prep notes and sent email re same.	0.00	\$ 430.00	\$ -
1581	6/6/2022	Jonathan J. Ossip	Reviewed correspondence with expert re deposition errata.	0.00	\$ 200.00	\$ -
1582	6/8/2022	Duncan C. Simpson LaGoy	Meeting with Chris Travis, Duncan C. Simpson LaGoy, ECHOLS, Emily Armbruster, Esha Bhandari, Isabel Canning, Isaiah Beaton, James Essek, Jon Davidson, Kathleen Hartnett, Omar Gonzalez-Pagan, S&C LLP, Maxime D. Matthew regarding Gender-Affirming Medical Care - Moot Court	1.75	\$ 225.00	\$ 393.75
1583	6/8/2022	Duncan C. Simpson LaGoy	Revised document DCSL comments - Motion to Exclude - Lappert (4874-9057-2065.2.1).docx	1.00	\$ 225.00	\$ 225.00
1584	6/8/2022	Brandyn J. Rodgeron	Moot court.	2.00	\$ 175.00	\$ 350.00
1585	6/8/2022	Daniel J. Richardson	Discussion of Daubert brief edits.	0.50	\$ 430.00	\$ 215.00
1586	6/9/2022	Daniel J. Richardson	Reviewed edits to Regnerus motion.	0.75	\$ 430.00	\$ 322.50
1587	6/9/2022	Daniel J. Richardson	Emailed proposed restructuring for Lappert Daubert brief.	0.50	\$ 430.00	\$ 215.00
1588	6/9/2022	Daniel J. Richardson	Call with Leslie Cooper to discuss Daubert brief.	1.00	\$ 430.00	\$ 430.00
1589	6/10/2022	Garrard R. Beeney	Order re discovery and schedule issues.	0.25	\$ 800.00	\$ 200.00
1590	6/10/2022	Duncan C. Simpson LaGoy	Meeting regarding Gender-Affirming Medical Care - Moot Court	1.75	\$ 225.00	\$ 393.75
1591	6/10/2022	Duncan C. Simpson LaGoy	Revised document DCSL comments - Motion to Exclude - Lappert (4874-9057-2065.2.3).docx	0.50	\$ 225.00	\$ 112.50
1592	6/10/2022	Brandyn J. Rodgeron	Researching [potential witness].	0.75	\$ 175.00	\$ 131.25
1593	6/10/2022	Brandyn J. Rodgeron	Moot court.	2.00	\$ 175.00	\$ 350.00
1594	6/10/2022	Daniel J. Richardson	Revised motion to exclude in response to feedback and circulated new draft re same	3.50	\$ 430.00	\$ 1,505.00
1595	6/12/2022	Daniel J. Richardson	Updated motion to exclude Regnerus and circulated to full team for review.	3.00	\$ 430.00	\$ 1,290.00
1596	6/13/2022	Duncan C. Simpson LaGoy	Revised document Motion to Exclude - Lappert (4874-9057-2065.3).docx	1.00	\$ 225.00	\$ 225.00
1597	6/13/2022	Brandyn J. Rodgeron	Reviewing motions to exclude Dr. Lappert and Prof. Regnerus.	3.25	\$ 175.00	\$ 568.75
1598	6/13/2022	Daniel J. Richardson	Edited Lappert brief; emailed opposing counsel about deposition scheduling.	2.25	\$ 430.00	\$ 967.50
1599	6/14/2022	Daniel J. Richardson	Updated Regnerus motion to exclude in response to feedback from co-counsel.	2.50	\$ 430.00	\$ 1,075.00
1600	6/14/2022	Daniel J. Richardson	Updated Regnerus Daubert motion in response to associate feedback.	0.50	\$ 430.00	\$ 215.00
1601	6/14/2022	Daniel J. Richardson	Continued work on Regnerus Daubert motion in response to team feedback.	1.50	\$ 430.00	\$ 645.00
1602	6/15/2022	Daniel J. Richardson	Updated motion to exclude and circulated to team for cite check	2.00	\$ 430.00	\$ 860.00
1603	6/16/2022	Daniel J. Richardson	Updates to Regnerus motion	2.25	\$ 430.00	\$ 967.50
1604	6/16/2022	Daniel J. Richardson	Reviewed brief in support of motion to exclude and sent new comments to co-counsel.	0.50	\$ 430.00	\$ 215.00
1605	6/17/2022	Daniel J. Richardson	Revised motion to dismiss in response to latest round of feedback from co-counsel and re-circulated to team	4.75	\$ 430.00	\$ 2,042.50
1606	6/18/2022	Daniel J. Richardson	Updated Branman deposition outline and circulated to the full team for review.	1.75	\$ 430.00	\$ 752.50
1607	6/18/2022	Daniel J. Richardson	Emailed group with thoughts on reliability argument in motion to exclude.	0.50	\$ 430.00	\$ 215.00
1608	6/19/2022	Daniel J. Richardson	Edited draft of Regnerus motion and emailed team re same	0.25	\$ 430.00	\$ 107.50
1609	6/20/2022	Daniel J. Richardson	Revised Regnerus motion to exclude; revised Branman deposition outline.	2.25	\$ 430.00	\$ 967.50
1610	6/21/2022	Laura Kabler Oswell	Review draft motion to exclude.	0.50	\$ 650.00	\$ 325.00
1611	6/21/2022	Daniel J. Richardson	Prepared exhibits for Regnerus motion. Finalized binder for Branman deposition.	1.00	\$ 430.00	\$ 430.00
1612	6/22/2022	Daniel J. Richardson	Finalized Regnerus motion and reviewed materials for Branman deposition.	3.25	\$ 430.00	\$ 1,397.50
1613	6/23/2022	Daniel J. Richardson	Branman deposition prep	0.50	\$ 430.00	\$ 215.00
1614	6/23/2022	Daniel J. Richardson	Emailed team re Branman deposition	0.50	\$ 430.00	\$ 215.00
1615	6/24/2022	Brandyn J. Rodgeron	Dr. Branman's deposition.	6.75	\$ 175.00	\$ 1,181.25
1616	6/24/2022	Daniel J. Richardson	Branman deposition.	5.75	\$ 430.00	\$ 2,472.50
1617	6/26/2022	Daniel J. Richardson	Reviewed Turban deposition for errata.	1.00	\$ 430.00	\$ 430.00
1618	6/27/2022	Brandyn J. Rodgeron	Reviewing Dr. Stambough's deposition transcript and completing errata sheet.	3.25	\$ 175.00	\$ 568.75
1619	6/27/2022	Daniel J. Richardson	Emailed team about [analysis of potential legal issue in litigation]	0.25	\$ 430.00	\$ 107.50
1620	6/28/2022	Brandyn J. Rodgeron	Reviewing information re [potential legal issue in litigation].	0.50	\$ 175.00	\$ 87.50
1621	6/28/2022	Brandyn J. Rodgeron	Reviewing Dr. Hutchison's deposition transcript and completing errata sheet.	4.25	\$ 175.00	\$ 743.75
1622	6/29/2022	Brandyn J. Rodgeron	Reviewing Dr. Adkin's deposition transcript and completing errata sheet.	4.50	\$ 175.00	\$ 787.50
1623	6/30/2022	Duncan C. Simpson LaGoy	Draft status report	0.50	\$ 225.00	\$ 112.50

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1624	6/30/2022	Brandyn J. Rodgerson	Attending Rep. Lundstrum's deposition.	3.75	\$ 175.00	\$ 656.25
1625	7/1/2022	Brandyn J. Rodgerson	Finalizing Dr. Adkins' errata sheet.	1.75	\$ 175.00	\$ 306.25
1626	7/5/2022	Brandyn J. Rodgerson	Reviewing work plan for fact charts.	1.25	\$ 175.00	\$ 218.75
1627	7/5/2022	Brandyn J. Rodgerson	Call with E. Armbruster to discuss fact charts.	0.75	\$ 175.00	\$ 131.25
1628	7/6/2022	Duncan C. Simpson LaGoy	Emails re mediation	0.25	\$ 225.00	\$ 56.25
1629	7/6/2022	Brandyn J. Rodgerson	Associate call to discuss fact charts.	0.50	\$ 175.00	\$ 87.50
1630	7/7/2022	Daniel J. Richardson	Coordinated with associate on trial schedules.	0.25	\$ 430.00	\$ 107.50
1631	7/7/2022	Lauren M. Goldsmith	Attending weekly team call.	0.25	\$ 550.00	\$ 137.50
1632	7/11/2022	Garrard R. Beene	Emails re trial prep.	0.25	\$ 800.00	\$ 200.00
1633	7/11/2022	Laura Kabler Oswell	Attend team call.	0.75	\$ 650.00	\$ 487.50
1634	7/11/2022	Brandyn J. Rodgerson	Reviewing Dr. Branman's deposition transcript.	3.75	\$ 175.00	\$ 656.25
1635	7/11/2022	Daniel J. Richardson	Reviewed Branman transcript and sent co-counsel summary re same.	1.50	\$ 430.00	\$ 645.00
1636	7/11/2022	Lauren M. Goldsmith	Call w/ ACLU and S&C team.	0.75	\$ 550.00	\$ 412.50
1637	7/12/2022	Garrard R. Beene	Emails re trial prep.	0.25	\$ 800.00	\$ 200.00
1638	7/12/2022	Daniel J. Richardson	Coordinated with associate on Regnerus reply; reviewed designation materials for Branman.	0.50	\$ 430.00	\$ 215.00
1639	7/13/2022	Laura Kabler Oswell	Call with Richardson re. Arkansas staffing.	0.00	\$ 650.00	\$ -
1640	7/13/2022	Daniel J. Richardson	Completed designations for Branman; began draft of Regnerus reply.	1.75	\$ 430.00	\$ 752.50
1641	7/13/2022	Lauren M. Goldsmith	Reviewing draft reply brief.	0.50	\$ 550.00	\$ 275.00
1642	7/14/2022	Garrard R. Beene	Court scheduling emails.	0.25	\$ 800.00	\$ 200.00
1643	7/14/2022	Laura Kabler Oswell	Review scheduling order and information re. next steps for trial.	0.50	\$ 650.00	\$ 325.00
1644	7/14/2022	Laura Kabler Oswell	Call re. trial planning for Arkansas case.	0.50	\$ 650.00	\$ 325.00
1645	7/14/2022	Aviv S. Halpern	Edited opposition to motion to exclude.	1.75	\$ 400.00	\$ 700.00
1646	7/14/2022	Aviv S. Halpern	Created and updated trial/case task list. Reviewed and edited Response in Opposition to Defendants' Objections to Plaintiffs Designations.	1.75	\$ 400.00	\$ 700.00
1647	7/14/2022	Daniel J. Richardson	Prepared notes on reply brief and circulated to team re same.	2.00	\$ 430.00	\$ 860.00
1648	7/14/2022	Daniel J. Richardson	Team call to prep for trial; meeting with senior associate to discuss trial role.	0.75	\$ 430.00	\$ 322.50
1649	7/14/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern re trial planning.	0.75	\$ 550.00	\$ 412.50
1650	7/14/2022	Lauren M. Goldsmith	Attention to emails re reply brief, reviewing same.	0.75	\$ 550.00	\$ 412.50
1651	7/15/2022	Garrard R. Beene	Telecon with Ms. Oswell; emails with Ms. Klein re trial plan.	0.50	\$ 800.00	\$ 400.00
1652	7/15/2022	Laura Kabler Oswell	Revised document Response in Opposition to Defendants' Objections to Plaintiffs' Deposition Designations.	0.50	\$ 650.00	\$ 325.00
1653	7/15/2022	Aviv S. Halpern	Cite checked reply brief in support of motion to exclude.	0.50	\$ 400.00	\$ 200.00
1654	7/15/2022	Aviv S. Halpern	Drafted team task list. Compiled trial preparation materials. Meetings with L. Goldsmith re same. Attn to pretrial disclosures. Other trial preparation.	4.25	\$ 400.00	\$ 1,700.00
1655	7/15/2022	Brandyn J. Rodgerson	Reviewing Response in Opposition to Defendants' Objections to Plaintiffs' Deposition Designations.	1.25	\$ 175.00	\$ 218.75
1656	7/15/2022	Jonathan G. Lester	Communicating with team about upcoming legal research.	0.25	\$ 175.00	\$ 43.75
1657	7/15/2022	Daniel J. Richardson	Responded to emails re Regnerus reply with thoughts on brief.	0.25	\$ 430.00	\$ 107.50
1658	7/15/2022	Daniel J. Richardson	Drafted Regnerus reply and sent to team re same with outline; reviewed response to designation objections for Embry and sent edits re same.	5.50	\$ 430.00	\$ 2,365.00
1659	7/15/2022	Lauren M. Goldsmith	Working on task list, emailing team re assignments.	0.50	\$ 550.00	\$ 275.00
1660	7/17/2022	Aviv S. Halpern	Attn to outline of reply brief in support of motion to exclude Regnerus.	0.50	\$ 400.00	\$ 200.00
1661	7/17/2022	Brandyn J. Rodgerson	Reviewing brief in opposition to exclude Prof. Regnerus's testimony, and preparing outline to respond.	4.75	\$ 175.00	\$ 831.25
1662	7/17/2022	Daniel J. Richardson	Reviewed questions from associate on Regnerus reply brief and sent email re same.	0.25	\$ 430.00	\$ 107.50
1663	7/17/2022	Lauren M. Goldsmith	Working on daubert replies.	1.50	\$ 550.00	\$ 825.00
1664	7/18/2022	Laura Kabler Oswell	Team call.	0.50	\$ 650.00	\$ 325.00
1665	7/18/2022	Aviv S. Halpern	Edited reply brief in support of motion to exclude Regnerus.	2.00	\$ 400.00	\$ 800.00
1666	7/18/2022	Aviv S. Halpern	Call with L. Goldsmith re case management, trial tasks, trial logistics, and team assignments.	1.00	\$ 400.00	\$ 400.00
1667	7/18/2022	Aviv S. Halpern	Call with R. Kadosh re trial prep tasks re witness digests and lists. Communicated with L. Goldsmith re same.	0.25	\$ 400.00	\$ 100.00
1668	7/18/2022	Aviv S. Halpern	Trial Prep (logistics, database, etc.)	1.50	\$ 400.00	\$ 600.00
1669	7/18/2022	Aviv S. Halpern	Call with L. Goldsmith, B. Rodgerson, A. Holland, and Leslie Cooper (ACLU) re reply briefs in support of motion to exclude.	1.25	\$ 400.00	\$ 500.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1670	7/18/2022	Brandyn J. Rodgerson	Drafting reply to motion to exclude Regnerus.	4.25	\$ 175.00	\$ 743.75
1671	7/18/2022	Brandyn J. Rodgerson	Call with Dr. Stambough re updates to role.	0.75	\$ 175.00	\$ 131.25
1672	7/18/2022	Brandyn J. Rodgerson	Call to discuss responses to motions to exclude Lappert and Regnerus.	1.00	\$ 175.00	\$ 175.00
1673	7/18/2022	Brandyn J. Rodgerson	Reviewing response to motion to exclude deposition designations.	1.75	\$ 175.00	\$ 306.25
1674	7/18/2022	Brandyn J. Rodgerson	Reviewing outline for reply brief to exclude Lappert.	0.75	\$ 175.00	\$ 131.25
1675	7/18/2022	Jonathan G. Lester	Pulling pretrial disclosure sheet precedents.	0.25	\$ 175.00	\$ 43.75
1676	7/18/2022	Daniel J. Richardson	Reviewed updated reply brief outlines.	0.25	\$ 430.00	\$ 107.50
1677	7/18/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern re pretrial disclosures and trial logistics.	1.00	\$ 550.00	\$ 550.00
1678	7/18/2022	Lauren M. Goldsmith	Weekly team call w/ co-counsel.	1.00	\$ 550.00	\$ 550.00
1679	7/18/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and L. Cooper re team meeting agenda.	0.25	\$ 550.00	\$ 137.50
1680	7/18/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, R. Kadosh, A. Halpern, A. Holland, B. Richardson, L. Cooper (ACLU) re daubert replies.	1.00	\$ 550.00	\$ 550.00
1681	7/18/2022	Lauren M. Goldsmith	Working on daubert replies.	2.50	\$ 550.00	\$ 1,375.00
1682	7/19/2022	Aviv S. Halpern	Call with L. Goldsmith re reply brief and trial prep. Attn to Regnerus reply brief.	4.25	\$ 400.00	\$ 1,700.00
1683	7/19/2022	Brandyn J. Rodgerson	Reviewing reply to motion to exclude Regnerus.	3.75	\$ 175.00	\$ 656.25
1684	7/19/2022	Brandyn J. Rodgerson	Reviewing research findings regarding standard for expert testimony in Eighth Circuit.	1.25	\$ 175.00	\$ 218.75
1685	7/19/2022	Brandyn J. Rodgerson	Reviewing Rep. Lundstrum's deposition transcript.	2.25	\$ 175.00	\$ 393.75
1686	7/19/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern re trial planning.	0.75	\$ 550.00	\$ 412.50
1687	7/19/2022	Lauren M. Goldsmith	Continuing to review discovery material.	1.75	\$ 550.00	\$ 962.50
1688	7/19/2022	Lauren M. Goldsmith	Reviewing and revising daubert brief.	3.25	\$ 550.00	\$ 1,787.50
1689	7/20/2022	Garrard R. Beene	Motion to compel; religion issue.	0.25	\$ 800.00	\$ 200.00
1690	7/20/2022	Aviv S. Halpern	Trial preparation and associated duties. Call with L. Goldsmith, R. Kadosh, E. Armbruster re fact stipulations. Communicated with M. Pinado and I. Canning re depositions, transcripts, and videos. Attn to Regnerus motion. Edited Regnerus motion.	6.50	\$ 400.00	\$ 2,600.00
1691	7/20/2022	Brandyn J. Rodgerson	Reviewing and revising reply to motion to exclude Regnerus.	4.25	\$ 175.00	\$ 743.75
1692	7/20/2022	Brandyn J. Rodgerson	Reviewing reply to motion to exclude Lappert.	1.75	\$ 175.00	\$ 306.25
1693	7/20/2022	Brandyn J. Rodgerson	Reviewing fact charts for Dennis family and Dr. Hutchison.	1.50	\$ 175.00	\$ 262.50
1694	7/20/2022	Jonathan G. Lester	Reviewing Defendants' Motion in Limine.	0.50	\$ 175.00	\$ 87.50
1695	7/20/2022	Daniel J. Richardson	Responded to questions on draft of motion to exclude reply brief	0.25	\$ 430.00	\$ 107.50
1696	7/20/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, R. Kadosh, E. Armbruster, and A. Halpern re stipulation.	1.00	\$ 550.00	\$ 550.00
1697	7/20/2022	Lauren M. Goldsmith	Reviewing defendants' MIL.	0.50	\$ 550.00	\$ 275.00
1698	7/20/2022	Lauren M. Goldsmith	Reviewing and revising daubert brief.	5.50	\$ 550.00	\$ 3,025.00
1699	7/21/2022	Garrard R. Beene	Emails re motions.	0.25	\$ 800.00	\$ 200.00
1700	7/21/2022	Aviv S. Halpern	Attn to MiL. Call with ACLU and S&C team re pretrial brief. Conducted research re MiL response. Outlined MiL response. Edited draft stipulation of facts. Call with G. Smith re MiL outline. Drafted MiL response.	8.75	\$ 400.00	\$ 3,500.00
1701	7/21/2022	Brandyn J. Rodgerson	Reviewing Defendants' motion in limine to exclude evidence.	2.25	\$ 175.00	\$ 393.75
1702	7/21/2022	Brandyn J. Rodgerson	Revising reply to motion to exclude Regnerus.	1.25	\$ 175.00	\$ 218.75
1703	7/21/2022	Brandyn J. Rodgerson	Call to discuss pre trial brief.	1.00	\$ 175.00	\$ 175.00
1704	7/21/2022	Daniel J. Richardson	Meeting to discuss trial brief and response to motion in limine; emailed associates about final edits to reply brief on motion to exclude.	1.50	\$ 430.00	\$ 645.00
1705	7/21/2022	Lauren M. Goldsmith	Call w/ L. Cooper (ACLU), C. Strangio (ACLU), L. Goldsmith, D. Richardson, R. Kadosh, B. Rodgerson, E. Armbruster, and A. Halpern re pretrial brief and MIL opposition.	1.00	\$ 550.00	\$ 550.00
1706	7/21/2022	Lauren M. Goldsmith	Reviewing deposition transcripts.	3.00	\$ 550.00	\$ 1,650.00
1707	7/21/2022	Lauren M. Goldsmith	Reviewing and analyzing defendants' MIL.	1.25	\$ 550.00	\$ 687.50
1708	7/21/2022	Lauren M. Goldsmith	Reviewing revisions to daubert brief.	1.00	\$ 550.00	\$ 550.00
1709	7/22/2022	Garrard R. Beene	Motion to exclude.	0.25	\$ 800.00	\$ 200.00
1710	7/22/2022	Aviv S. Halpern	Compiled MiL outline. Communicated with team re same. Conducted associated research. Edited and finalized Regnerus brief. Finalized Lappert brief. Attn to motion for leave to file reply.	9.50	\$ 400.00	\$ 3,800.00
1711	7/22/2022	Lauren M. Goldsmith	Reviewing deposition transcripts.	1.75	\$ 550.00	\$ 962.50
1712	7/22/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Halpern, and paralegals about trial planning.	0.50	\$ 550.00	\$ 275.00
1713	7/22/2022	Lauren M. Goldsmith	Reviewing and revising motion for leave.	0.75	\$ 550.00	\$ 412.50

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1714	7/22/2022	Lauren M. Goldsmith	Reviewing and revising stipulation.	3.00	\$ 550.00	\$ 1,650.00
1715	7/22/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about MIL.	0.75	\$ 550.00	\$ 412.50
1716	7/22/2022	Kenza Nadifi	Met with Brandt team to discuss trial.	0.50	\$ 100.00	\$ 50.00
1717	7/23/2022	Jonathan G. Lester	Drafting opposition to Motion in Limine.	3.75	\$ 175.00	\$ 656.25
1718	7/24/2022	Laura Kabler Oswell	Revise draft task list and trial planning chart and emails to Cooper and S&C team re. same.	0.50	\$ 650.00	\$ 325.00
1719	7/24/2022	Aviv S. Halpern	Drafted MiL. Conducted associated research. Communicated with L. Goldsmith re same. Incorporated edits from L. Goldsmith. Revised MiL. Circulated draft to team. Incorporated comments.	20.50	\$ 400.00	\$ 8,200.00
1720	7/24/2022	Jonathan G. Lester	Drafting opposition to Motion in Limine.	0.75	\$ 175.00	\$ 131.25
1721	7/24/2022	Lauren M. Goldsmith	Reviewing and revising opposition to MIL.	1.50	\$ 550.00	\$ 825.00
1722	7/24/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about MIL opposition.	0.25	\$ 550.00	\$ 137.50
1723	7/25/2022	Garrard R. Beeney	Order re reply; motion practice.	0.25	\$ 800.00	\$ 200.00
1724	7/25/2022	Laura Kabler Oswell	Attend call with case team re. trial prep.	0.50	\$ 650.00	\$ 325.00
1725	7/25/2022	Aviv S. Halpern	Edited motion in limine. Communicated with team re same. Incorporated edits. Conducted associated research.	9.50	\$ 400.00	\$ 3,800.00
1726	7/25/2022	Jonathan G. Lester	Reviewing Embry deposition transcript for references to asking questions of Board members.	0.75	\$ 175.00	\$ 131.25
1727	7/25/2022	Daniel J. Richardson	Began research into CA8 case law for trial brief.	0.75	\$ 430.00	\$ 322.50
1728	7/25/2022	Lauren M. Goldsmith	Reviewing deposition transcripts.	0.25	\$ 550.00	\$ 137.50
1729	7/25/2022	Lauren M. Goldsmith	Call w/ co-counsel.	0.75	\$ 550.00	\$ 412.50
1730	7/25/2022	Lauren M. Goldsmith	Reviewing and revising opposition to MIL.	5.50	\$ 550.00	\$ 3,025.00
1731	7/25/2022	Lauren M. Goldsmith	Reviewing and revising draft stipulation.	1.00	\$ 550.00	\$ 550.00
1732	7/26/2022	Garrard R. Beeney	Emails re hearing prep, motions.	0.50	\$ 800.00	\$ 400.00
1733	7/26/2022	Laura Kabler Oswell	Revise draft MiL Response.	0.50	\$ 650.00	\$ 325.00
1734	7/26/2022	Laura Kabler Oswell	Prepare for and attend meeting re. trial staffing assignments.	1.00	\$ 650.00	\$ 650.00
1735	7/26/2022	Aviv S. Halpern	Call with Goldsmith re trial. Edited Motion in Limine. Conducted associated research. Communicated with paralegals re trial. Reviewed draft fact stipulation. Attn to Lunstrum designations. Attn to trial logistics documents and communicated with G. Smith re same.	8.50	\$ 400.00	\$ 3,400.00
1736	7/26/2022	Brandyn J. Rodgeron	Reviewing motion in limine.	1.75	\$ 175.00	\$ 306.25
1737	7/26/2022	Brandyn J. Rodgeron	Reviewing fact stipulations.	1.75	\$ 175.00	\$ 306.25
1738	7/26/2022	Jonathan G. Lester	Reviewing updated filing drafts circulated to team.	0.50	\$ 175.00	\$ 87.50
1739	7/26/2022	Jonathan G. Lester	Reviewing Branman transcript for references to personal views.	0.25	\$ 175.00	\$ 43.75
1740	7/26/2022	Daniel J. Richardson	Call with Leslie Cooper to discuss standing arguments for trial brief.	0.25	\$ 430.00	\$ 107.50
1741	7/26/2022	Daniel J. Richardson	Continued work on trial brief standing section.	1.25	\$ 430.00	\$ 537.50
1742	7/26/2022	Daniel J. Richardson	Researched third party standing issues for trial brief.	3.00	\$ 430.00	\$ 1,290.00
1743	7/26/2022	Lauren M. Goldsmith	Reviewing and revising opposition to MIL.	2.00	\$ 550.00	\$ 1,100.00
1744	7/26/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about task list and trial logistics.	1.00	\$ 550.00	\$ 550.00
1745	7/26/2022	Lauren M. Goldsmith	Reviewing draft Lundstrum designation.	2.00	\$ 550.00	\$ 1,100.00
1746	7/26/2022	Lauren M. Goldsmith	Call w/ L. Oswell, L. Goldsmith, and A. Halpern about task list.	1.00	\$ 550.00	\$ 550.00
1747	7/27/2022	Laura Kabler Oswell	Revised draft MiL Response.	0.50	\$ 650.00	\$ 325.00
1748	7/27/2022	Aviv S. Halpern	Meeting re trial prep. Communicated with team re motion in limine. Communicated with paralegals re deposition videos and transcripts. Finalized motion in limine for filing. Finalized exhibits. Incorporated edits from team.	8.00	\$ 400.00	\$ 3,200.00
1749	7/27/2022	Jonathan G. Lester	Researching FRE 403 cases for MiL opposition brief.	0.75	\$ 175.00	\$ 131.25
1750	7/27/2022	Jonathan G. Lester	Researching case law for FRE 610.	1.00	\$ 175.00	\$ 175.00
1751	7/27/2022	Jonathan G. Lester	Cite checking opposition brief to Defendants' MiL.	2.25	\$ 175.00	\$ 393.75
1752	7/27/2022	Daniel J. Richardson	Finalized trial brief sections and circulated to team for review.	1.50	\$ 430.00	\$ 645.00
1753	7/27/2022	Daniel J. Richardson	Continued work on trial brief section re standing	0.25	\$ 430.00	\$ 107.50
1754	7/27/2022	Lauren M. Goldsmith	Reviewing revisions to opposition to MIL.	3.00	\$ 550.00	\$ 1,650.00
1755	7/28/2022	Laura Kabler Oswell	Emails to Richardson re. trial strategy.	0.25	\$ 650.00	\$ 162.50
1756	7/28/2022	Aviv S. Halpern	Meeting with L. Goldsmith and R. Kadosh re trial logistics. Drafted initial witness team chart. Emailed with C. Behan and L. Mazzella and team re trial logistics. Communicated with G. Smith re same and initiated process for hotels, printers, supplies, etc.	4.25	\$ 400.00	\$ 1,700.00
1757	7/28/2022	Brandyn J. Rodgeron	Coordinating early planning for responding to objections re Lundstrum designations.	0.75	\$ 175.00	\$ 131.25

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1758	7/28/2022	Brandyn J. Rodgersen	Drafting due process section for pre-trial brief.	2.75	\$ 175.00	\$ 481.25
1759	7/28/2022	Daniel J. Richardson	Continued first draft of Branman Response in Opposition to Motion to Exclude.	1.50	\$ 430.00	\$ 645.00
1760	7/28/2022	Daniel J. Richardson	Drafted Response to Motion to Exclude Branman designations.	4.00	\$ 430.00	\$ 1,720.00
1761	7/28/2022	Daniel J. Richardson	Revised standing and remedy sections of trial brief and recirculated to team for review.	1.00	\$ 430.00	\$ 430.00
1762	7/28/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Halpern, G. Smith, L. Mazzella, and C. Behan about trial prep.	0.50	\$ 550.00	\$ 275.00
1763	7/28/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, R. Kadosh, and A. Halpern about trial prep.	0.50	\$ 550.00	\$ 275.00
1764	7/28/2022	Lauren M. Goldsmith	Reviewing draft section of pretrial brief.	0.25	\$ 550.00	\$ 137.50
1765	7/28/2022	Kenza Nadifi	Collected additional information for trial planning calendar, updated tracker accordingly.	1.50	\$ 100.00	\$ 150.00
1766	7/29/2022	Aviv S. Halpern	Trial preparation and logistics. Compiled draft of witness teams. Communicated with L. Goldsmith and E. Armbruster re same. Updated task list.	3.25	\$ 400.00	\$ 1,300.00
1767	7/29/2022	Brandyn J. Rodgersen	Reviewing and revising due process section for pre-trial brief.	1.25	\$ 175.00	\$ 218.75
1768	7/29/2022	Daniel J. Richardson	Drafted and revised Response in Opposition to Motion to Exclude and circulated to full team for review.	3.25	\$ 430.00	\$ 1,397.50
1769	7/29/2022	Lauren M. Goldsmith	Continuing to review case material.	0.75	\$ 550.00	\$ 412.50
1770	7/29/2022	Lauren M. Goldsmith	Reviewing revisions to stipulation.	0.25	\$ 550.00	\$ 137.50
1771	7/29/2022	Lauren M. Goldsmith	Reviewing and revising Branman brief.	1.75	\$ 550.00	\$ 962.50
1772	7/29/2022	Lauren M. Goldsmith	Emails about anticipated Lundstrum motion.	0.25	\$ 550.00	\$ 137.50
1773	7/29/2022	Lauren M. Goldsmith	Reviewing Branman motion.	0.25	\$ 550.00	\$ 137.50
1774	7/29/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.25	\$ 550.00	\$ 137.50
1775	7/29/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Halpern, and E. Armbruster about witness teams.	1.50	\$ 550.00	\$ 825.00
1776	7/29/2022	Kenza Nadifi	Meeting with Cate Llewellyn, Kenza Nadifi, Rebecca S. Kadosh regarding Brandt - Opus	0.25	\$ 100.00	\$ 25.00
1777	7/31/2022	Garrard R. Beene	Emails Chase re motions to exclude.	0.25	\$ 800.00	\$ 200.00
1778	7/31/2022	Daniel J. Richardson	Updated response in opposition to motion to exclude and circulated to team for review.	0.50	\$ 430.00	\$ 215.00
1779	8/1/2022	Garrard R. Beene	Pretrial filings.	0.25	\$ 800.00	\$ 200.00
1780	8/1/2022	Laura Kabler Oswell	Weekly team meeting.	0.50	\$ 650.00	\$ 325.00
1781	8/1/2022	Aviv S. Halpern	Communicated with team re trial logistics. Coordinated trial logistics and communicated with potential office space sites. Reviewed and analyzed pretrial disclosures. Edited pretrial disclosures and communicated with team re exhibit list.	4.75	\$ 400.00	\$ 1,900.00
1782	8/1/2022	Brandyn J. Rodgersen	Call to discuss exhibit list (0.5).	0.50	\$ 175.00	\$ 87.50
1783	8/1/2022	Brandyn J. Rodgersen	Reviewing portions of Lundstrum transcript where Defendants objected on basis of privilege.	1.25	\$ 175.00	\$ 218.75
1784	8/1/2022	Jonathan G. Lester	Meeting to discuss potential exhibits list for pre-trial disclosure.	0.75	\$ 175.00	\$ 131.25
1785	8/1/2022	Daniel J. Richardson	Updated latest version of Appendix to accompany Branman Response in Opposition and emailed team new drafts of Response and Appendix.	0.50	\$ 430.00	\$ 215.00
1786	8/1/2022	Daniel J. Richardson	Updated Appendix to accompany Response in Opp re Branman	0.50	\$ 430.00	\$ 215.00
1787	8/1/2022	Lauren M. Goldsmith	Reviewing revisions to stipulation.	0.75	\$ 550.00	\$ 412.50
1788	8/1/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and R. Kadosh about pretrial brief.	0.50	\$ 550.00	\$ 275.00
1789	8/1/2022	Lauren M. Goldsmith	Team meeting with co-counsel.	0.75	\$ 550.00	\$ 412.50
1790	8/1/2022	Lauren M. Goldsmith	Reviewing pretrial disclosures.	0.25	\$ 550.00	\$ 137.50
1791	8/1/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about pretrial disclosures.	0.50	\$ 550.00	\$ 275.00
1792	8/1/2022	Lauren M. Goldsmith	Reviewing pretrial brief.	2.00	\$ 550.00	\$ 1,100.00
1793	8/1/2022	Lauren M. Goldsmith	Reviewing and revising Branman brief and appendix.	1.00	\$ 550.00	\$ 550.00
1794	8/1/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about pretrial disclosures.	0.25	\$ 550.00	\$ 137.50
1795	8/1/2022	Arun Bodapati	Emailing S&C associates re: preparation of initial exhibit list for pretrial disclosures.	0.75	\$ 450.00	\$ 337.50
1796	8/1/2022	Arun Bodapati	Meeting with S&C associates to discuss preparation of initial exhibit list/description for inclusion with pretrial disclosures.	0.50	\$ 450.00	\$ 225.00
1797	8/1/2022	Arun Bodapati	Meeting with Aviv Halpern and Breean Walas to discuss exhibit list for inclusion with pretrial disclosures.	1.00	\$ 450.00	\$ 450.00
1798	8/1/2022	Kenza Nadifi	Collected available transcripts and attempted to upload to opus.	2.50	\$ 100.00	\$ 250.00
1799	8/2/2022	Garrard R. Beene	Emails re filings.	0.25	\$ 800.00	\$ 200.00
1800	8/2/2022	Laura Kabler Oswell	Revised document Fact Stipulations and emails to team re. same.	0.25	\$ 650.00	\$ 162.50

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1801	8/2/2022	Aviv S. Halpern	Communicated with team re exhibit list. Communicated with local counsel re trial logistics and exhibit list. Drafted exhibit list and edited pre-trial disclosures. Edited draft stipulation of facts. Coordinated trial logistics and communicated with L. Mazzella re same.	4.75	\$ 400.00	\$ 1,900.00
1802	8/2/2022	Jonathan G. Lester	Pre-trial exhibit designations.	0.25	\$ 175.00	\$ 43.75
1803	8/2/2022	Jonathan G. Lester	Updating citations in the pre-trial brief.	1.25	\$ 175.00	\$ 218.75
1804	8/2/2022	Lauren M. Goldsmith	Revising pretrial brief.	3.25	\$ 550.00	\$ 1,787.50
1805	8/2/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about witness teams.	0.50	\$ 550.00	\$ 275.00
1806	8/2/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.25	\$ 550.00	\$ 137.50
1807	8/2/2022	Lauren M. Goldsmith	Emails about stipulation.	0.50	\$ 550.00	\$ 275.00
1808	8/2/2022	Arun Bodapati	Call with Gregory Smith to discuss preparation of initial exhibit list for inclusion with pretrial disclosures.	0.25	\$ 450.00	\$ 112.50
1809	8/2/2022	Arun Bodapati	Revising draft exhibit list for inclusion in pretrial disclosures.	1.75	\$ 450.00	\$ 787.50
1810	8/2/2022	Kenza Nadifi	Updated team calendar, including color coding and formatting, then uploaded it to NetDocs.	1.00	\$ 100.00	\$ 100.00
1811	8/2/2022	Cate M. Llewellyn	Reviewed deposition transcripts re depositions of recent fact witnesses.	1.25	\$ 100.00	\$ 125.00
1812	8/3/2022	Garrard R. Beene	Pre-trial filings.	0.50	\$ 800.00	\$ 400.00
1813	8/3/2022	Aviv S. Halpern	Emailled with team re Branman opposition brief. Reviewed draft pretrial disclosures and exhibit list. Emailled with A. Bodapati re same. Emailled with L. Goldsmith re witness prep assignments. Read and reviewed Cathey deposition transcript. Compiled deposition digest. Met with G. Smith re trial logistics. Call with L. Goldsmith re trial logistics and witness prep.	5.75	\$ 400.00	\$ 2,300.00
1814	8/3/2022	Brandyn J. Rodgeron	Reviewing response to Branman objections.	1.75	\$ 175.00	\$ 306.25
1815	8/3/2022	Jonathan G. Lester	Cite checking Opposition to MIL to exclude Dr. Branman	1.25	\$ 175.00	\$ 218.75
1816	8/3/2022	Jonathan G. Lester	Updating citations in the pre-trial brief.	3.50	\$ 175.00	\$ 612.50
1817	8/3/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and R. Kadosh about pretrial brief.	0.50	\$ 550.00	\$ 275.00
1818	8/3/2022	Lauren M. Goldsmith	Reviewing pretrial brief.	1.00	\$ 550.00	\$ 550.00
1819	8/3/2022	Lauren M. Goldsmith	Emails about trial logistics.	1.00	\$ 550.00	\$ 550.00
1820	8/3/2022	Lauren M. Goldsmith	Emails about Branman brief.	0.50	\$ 550.00	\$ 275.00
1821	8/3/2022	Arun Bodapati	Revising exhibit list for pretrial disclosures.	1.50	\$ 450.00	\$ 675.00
1822	8/3/2022	Kenza Nadifi	Revised ACLU Brandt Depo Transcript Contacts list to add additional contacts I obtained.	1.00	\$ 100.00	\$ 100.00
1823	8/3/2022	Kenza Nadifi	Communicating over the phone and over email with court reporting companies to obtain deposition videos.	2.50	\$ 100.00	\$ 250.00
1824	8/3/2022	Cate M. Llewellyn	Reviewed recent deposition videos, transcripts, & exhibits, re trial prep.	3.00	\$ 100.00	\$ 300.00
1825	8/4/2022	Aviv S. Halpern	Coordinated trial logistics. Edited pre-trial disclosures. Reviewed deposition transcripts and compiled deposition digest.	2.25	\$ 400.00	\$ 900.00
1826	8/4/2022	Jonathan G. Lester	Creating exhibits for Branman opposition motion.	0.25	\$ 175.00	\$ 43.75
1827	8/4/2022	Daniel J. Richardson	Reviewed and circulated updated drafts of the Branman Response materials.	0.25	\$ 430.00	\$ 107.50
1828	8/4/2022	Daniel J. Richardson	Began review of Branman outline for witness prep	0.25	\$ 430.00	\$ 107.50
1829	8/4/2022	Lauren M. Goldsmith	Emails about pretrial disclosures.	0.50	\$ 550.00	\$ 275.00
1830	8/4/2022	Lauren M. Goldsmith	Emails about witness prep.	0.25	\$ 550.00	\$ 137.50
1831	8/4/2022	Lauren M. Goldsmith	Reviewing Branman brief.	0.50	\$ 550.00	\$ 275.00
1832	8/4/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about pretrial disclosures.	0.00	\$ 550.00	\$ -
1833	8/4/2022	Lauren M. Goldsmith	Reviewing Court's decision on motion to compel, emails about same.	0.25	\$ 550.00	\$ 137.50
1834	8/4/2022	Lauren M. Goldsmith	Reviewing comments on pretrial brief.	0.25	\$ 550.00	\$ 137.50
1835	8/4/2022	Arun Bodapati	Revising pretrial disclosures.	6.00	\$ 450.00	\$ 2,700.00
1836	8/4/2022	Kenza Nadifi	Further updated deponent chart to illustrate progress made on obtaining all materials and new court reporting contacts.	1.00	\$ 100.00	\$ 100.00
1837	8/4/2022	Kenza Nadifi	Further communications with Veritext about deposition videos.	1.25	\$ 100.00	\$ 125.00
1838	8/5/2022	Garrard R. Beene	Emails re PT brief.	0.25	\$ 800.00	\$ 200.00
1839	8/5/2022	Laura Kabler Oswell	Review revised draft stipulations of fact and pre-trial disclosures and emails re. same.	0.75	\$ 650.00	\$ 487.50
1840	8/5/2022	Aviv S. Halpern	Edited pretrial disclosures. Communicated with team re same. Edited exhibit list.	4.25	\$ 400.00	\$ 1,700.00
1841	8/5/2022	Brandyn J. Rodgeron	Reviewing pre-trial brief.	1.75	\$ 175.00	\$ 306.25
1842	8/5/2022	Jonathan G. Lester	Reviewing ruling on motion to compel documents.	0.25	\$ 175.00	\$ 43.75
1843	8/5/2022	Daniel J. Richardson	Completed citations and facts for Branman deposition digest	2.50	\$ 430.00	\$ 1,075.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1844	8/5/2022	Daniel J. Richardson	Reviewed recent updates to pretrial disclosures	0.25	\$ 430.00	\$ 107.50
1845	8/5/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about pretrial disclosures and trial prep.	0.50	\$ 550.00	\$ 275.00
1846	8/5/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.25	\$ 550.00	\$ 137.50
1847	8/5/2022	Lauren M. Goldsmith	Emails about document discovery.	0.50	\$ 550.00	\$ 275.00
1848	8/5/2022	Lauren M. Goldsmith	Emails about pretrial disclosures.	0.25	\$ 550.00	\$ 137.50
1849	8/5/2022	Lauren M. Goldsmith	Emails about stipulation.	0.50	\$ 550.00	\$ 275.00
1850	8/5/2022	Lauren M. Goldsmith	Emails about pretrial disclosures.	1.25	\$ 550.00	\$ 687.50
1851	8/5/2022	Arun Bodapati	Meeting with Rebecca Kadosh, Emily Armbruster, and Maxime Matthew to discuss deposition digests, particularly for Levine.	0.50	\$ 450.00	\$ 225.00
1852	8/5/2022	Arun Bodapati	Revising pretrial disclosures and exhibit list.	4.50	\$ 450.00	\$ 2,025.00
1853	8/6/2022	Aviv S. Halpern	Attn to emails re pretrial disclosures. Edited disclosures and exhibit list. Communicated with team re same.	1.50	\$ 400.00	\$ 600.00
1854	8/6/2022	Lauren M. Goldsmith	Emails about pretrial disclosures.	1.00	\$ 550.00	\$ 550.00
1855	8/7/2022	Aviv S. Halpern	Edited and finalized pretrial disclosures. Communicated with team re same.	6.25	\$ 400.00	\$ 2,500.00
1856	8/7/2022	Daniel J. Richardson	Completed depo digest section for Stambough deposition	1.50	\$ 430.00	\$ 645.00
1857	8/7/2022	Lauren M. Goldsmith	Emails about pretrial disclosures.	2.00	\$ 550.00	\$ 1,100.00
1858	8/7/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about pretrial disclosures.	0.75	\$ 550.00	\$ 412.50
1859	8/8/2022	Aviv S. Halpern	Edited and finalized pretrial disclosures. Communicated with team re same.	9.00	\$ 400.00	\$ 3,600.00
1860	8/8/2022	Daniel J. Richardson	Worked on deposition digests	1.50	\$ 430.00	\$ 645.00
1861	8/8/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about trial logistics.	1.00	\$ 550.00	\$ 550.00
1862	8/8/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and D. Richardson about trial preparation.	0.75	\$ 550.00	\$ 412.50
1863	8/8/2022	Lauren M. Goldsmith	Attending weekly co-counsel meeting, follow up call w/ L. Goldsmith, A. Halpern, E. Armbruster, and L. Cooper (ACLU) about trial preparation.	2.00	\$ 550.00	\$ 1,100.00
1864	8/8/2022	Lauren M. Goldsmith	Emails about stipulation.	0.50	\$ 550.00	\$ 275.00
1865	8/8/2022	Lauren M. Goldsmith	Reviewing revised draft of pretrial disclosures.	0.75	\$ 550.00	\$ 412.50
1866	8/8/2022	Lauren M. Goldsmith	Emails about pretrial disclosures.	1.25	\$ 550.00	\$ 687.50
1867	8/8/2022	Kenza Nadifi	Pulled amended scheduling order.	0.25	\$ 100.00	\$ 25.00
1868	8/9/2022	Laura Kabler Oswell	Review pre-trial brief and pre-trial disclosures	3.00	\$ 650.00	\$ 1,950.00
1869	8/9/2022	Aviv S. Halpern	Communicated with team re Court's discovery order. Communicated with team re same. Coordinated trial logistics. Attn to draft stipulation of facts. Communicated with team re deposition digests. Drafted Campbell deposition digest.	7.25	\$ 400.00	\$ 2,900.00
1870	8/9/2022	Daniel J. Richardson	Completed Part I of Lundstrum deposition digest and emailed associate on witness prep team re same; reviewed State's motion re Lundstrum testimony	2.00	\$ 430.00	\$ 860.00
1871	8/9/2022	Lauren M. Goldsmith	Reviewing Lundstrum motion.	0.50	\$ 550.00	\$ 275.00
1872	8/9/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about Lundstrum opposition.	0.50	\$ 550.00	\$ 275.00
1873	8/9/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Bodapati, and A. Halpern about exhibit list.	1.00	\$ 550.00	\$ 550.00
1874	8/9/2022	Lauren M. Goldsmith	Emails about exhibit list.	0.25	\$ 550.00	\$ 137.50
1875	8/9/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Holland about deposition digests.	0.75	\$ 550.00	\$ 412.50
1876	8/9/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about trial logistics.	0.25	\$ 550.00	\$ 137.50
1877	8/9/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.25	\$ 550.00	\$ 137.50
1878	8/9/2022	Lauren M. Goldsmith	Revising submission about stipulation.	1.00	\$ 550.00	\$ 550.00
1879	8/9/2022	Arun Bodapati	Meeting with Lauren Goldsmith and Aviv Halpern to discuss preparation of exhibit list, and follow up with paralegals to start preparation process.	1.00	\$ 450.00	\$ 450.00
1880	8/9/2022	Kenza Nadifi	Revised document ACLU Brandt Depo Transcript Contacts (003) [Read-Only].docx	1.00	\$ 100.00	\$ 100.00
1881	8/9/2022	Kenza Nadifi	Uploaded Karasic Deposition Transcript and Exhibits to ND.	0.50	\$ 100.00	\$ 50.00
1882	8/9/2022	Kenza Nadifi	Communicated with Veritext and Arkansas Realtime Reporting about missing deposition videos.	4.25	\$ 100.00	\$ 425.00
1883	8/9/2022	Kenza Nadifi	Uploaded documents to ND.	0.50	\$ 100.00	\$ 50.00
1884	8/10/2022	Garrard R. Beene	Emails with Ms. Oswell re logistics, court filings.	0.50	\$ 800.00	\$ 400.00
1885	8/10/2022	Laura Kabler Oswell	Emails re. trial preparation.	0.25	\$ 650.00	\$ 162.50
1886	8/10/2022	Aviv S. Halpern	Meeting with G. Smith re logistics. Communicated with L. Goldsmith and G. Smith re same. Attn to emails with L. Mazzella re hotels and supplies. Analyzed Defendants motion to exclude Lundstrum. Meeting with ACLU re Lundstrum draft. Communicated with team re court order and communications with legislators.	8.75	\$ 400.00	\$ 3,500.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1887	8/10/2022	Brandyn J. Rodgeron	Reviewing Defendants' proposed fact stipulations.	0.25	\$ 175.00	\$ 43.75
1888	8/10/2022	Jonathan G. Lester	Meeting with A. Halpern to discuss trial preparation.	0.50	\$ 175.00	\$ 87.50
1889	8/10/2022	Jonathan G. Lester	Adkins Deposition Digest.	1.50	\$ 175.00	\$ 262.50
1890	8/10/2022	Daniel J. Richardson	Began deposition digest for Antommara.	0.75	\$ 430.00	\$ 322.50
1891	8/10/2022	Daniel J. Richardson	Call with senior associate to discuss staffing for trial	0.00	\$ 430.00	\$ -
1892	8/10/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about trial logistics.	0.50	\$ 550.00	\$ 275.00
1893	8/10/2022	Lauren M. Goldsmith	Emails about document production.	0.50	\$ 550.00	\$ 275.00
1894	8/10/2022	Lauren M. Goldsmith	Emails about submission about stipulation.	0.25	\$ 550.00	\$ 137.50
1895	8/10/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and L. Cooper about pretrial brief and Lundstrum opposition brief.	1.00	\$ 550.00	\$ 550.00
1896	8/10/2022	Lauren M. Goldsmith	Reviewing comments on pretrial brief, revising draft of same.	1.25	\$ 550.00	\$ 687.50
1897	8/10/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about Lundstrum opposition.	0.25	\$ 550.00	\$ 137.50
1898	8/10/2022	Lauren M. Goldsmith	Emails about Lundstrum opposition.	0.25	\$ 550.00	\$ 137.50
1899	8/10/2022	Arun Bodapati	Preparing deposition digest for Stephen Levine.	5.25	\$ 450.00	\$ 2,362.50
1900	8/10/2022	Arun Bodapati	Supervising paralegals' efforts to compile exhibits for trial.	0.50	\$ 450.00	\$ 225.00
1901	8/10/2022	Alexander F.R. Peacocke	Meeting with Alexander Peacocke, Aviv S. Halpern, Emily Armbruster, Gregory L. Smith regarding Response to Rep. Lundstrum Objections	0.50	\$ 200.00	\$ 100.00
1902	8/10/2022	Kenza Nadifi	Further communications over the phone and over email with court reporting companies to obtain all deposition videos, including getting passwords working with help desk to get through fire wall.	4.75	\$ 100.00	\$ 475.00
1903	8/11/2022	Aviv S. Halpern	Drafted Lundstrum brief. Met with ACLU and L. Goldsmith re witness. Team meeting. Coordinated trial logistics. Drafted deposition digest.	10.50	\$ 400.00	\$ 4,200.00
1904	8/11/2022	Jonathan G. Lester	Antommara Deposition Digest.	1.75	\$ 175.00	\$ 306.25
1905	8/11/2022	Jonathan G. Lester	Circulating draft medical record summaries.	0.25	\$ 175.00	\$ 43.75
1906	8/11/2022	Jonathan G. Lester	Communicating in firm about witness prep for trial.	0.25	\$ 175.00	\$ 43.75
1907	8/11/2022	Jonathan G. Lester	Adkins Deposition Digest.	3.25	\$ 175.00	\$ 568.75
1908	8/11/2022	Daniel J. Richardson	Completed Antommara deposition digest section and emailed the team re same	1.50	\$ 430.00	\$ 645.00
1909	8/11/2022	Lauren M. Goldsmith	Reviewing document collection.	2.00	\$ 550.00	\$ 1,100.00
1910	8/11/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.25	\$ 550.00	\$ 137.50
1911	8/11/2022	Lauren M. Goldsmith	Working on witness teams.	0.50	\$ 550.00	\$ 275.00
1912	8/11/2022	Lauren M. Goldsmith	Reviewing and revising pretrial brief.	1.75	\$ 550.00	\$ 962.50
1913	8/11/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Halpern, and L. Cooper (ACLU) about witness scheduling.	1.00	\$ 550.00	\$ 550.00
1914	8/11/2022	Lauren M. Goldsmith	Emails about trial procedure.	0.25	\$ 550.00	\$ 137.50
1915	8/11/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about Lundstrum opposition.	0.25	\$ 550.00	\$ 137.50
1916	8/11/2022	Arun Bodapati	Preparing deposition digest for Stephen Levine.	3.00	\$ 450.00	\$ 1,350.00
1917	8/11/2022	Arun Bodapati	Working with paralegals to compile exhibits for trial exhibit list.	0.50	\$ 450.00	\$ 225.00
1918	8/11/2022	Arun Bodapati	Meeting with Rebecca Kadosh, Emily Armbruster, and Maxime Matthew to discuss status of Stephen Levine deposition digest.	0.25	\$ 450.00	\$ 112.50
1919	8/11/2022	Alexander F.R. Peacocke	Reviewing initial filings and supporting documents to prepare for opposition to motion to exclude deposition designations of Rep. Lundstrum.	1.50	\$ 200.00	\$ 300.00
1920	8/11/2022	Alexander F.R. Peacocke	Email correspondence with Aviv S. Halpern regarding Lundstrum Relevance Reviewed email from Aviv S. Halpern regarding Lundstrum Relevance Reviewed email from Aviv S. Halpern regarding Lundstrum Relevance Email correspondence with [no recipients] regarding Lundstrum Relevance	0.25	\$ 200.00	\$ 50.00
1921	8/11/2022	Alexander F.R. Peacocke	Preparing and integrating responses on opposition to motion to exclude Lundstrum deposition designations.	0.50	\$ 200.00	\$ 100.00
1922	8/11/2022	Alexander F.R. Peacocke	Working on opposition to motion to exclude Lundstrom deposition designations.	2.25	\$ 200.00	\$ 450.00
1923	8/12/2022	Laura Kabler Oswell	Review trial plan and call with Goldsmith and Halpern re. same.	1.00	\$ 650.00	\$ 650.00
1924	8/12/2022	Aviv S. Halpern	Communicated with team re witness prep and deposition digests. Drafted deposition digests. Communicated with team re issue tags for digests and claim chart. Followed up with legal assistants re deposition videos. Coordinated trial logistics and other trial prep.	4.25	\$ 400.00	\$ 1,700.00
1925	8/12/2022	Jonathan G. Lester	Hruz Deposition Digest.	2.50	\$ 175.00	\$ 437.50
1926	8/12/2022	Jonathan G. Lester	Adkins Deposition Digest.	1.75	\$ 175.00	\$ 306.25
1927	8/12/2022	Daniel J. Richardson	Reviewed records for trial prep and sent email re same related to Branman deposition	0.25	\$ 430.00	\$ 107.50
1928	8/12/2022	Daniel J. Richardson	Responded to email from associate regarding issue tags for exhibits during trial prep	0.25	\$ 430.00	\$ 107.50

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1929	8/12/2022	Lauren M. Goldsmith	Reviewing and revising Lundstrum opposition.	4.50	\$ 550.00	\$ 2,475.00
1930	8/12/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about Lundstrum opposition and trial logistics.	0.50	\$ 550.00	\$ 275.00
1931	8/12/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about trial prep.	0.50	\$ 550.00	\$ 275.00
1932	8/12/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.25	\$ 550.00	\$ 137.50
1933	8/12/2022	Lauren M. Goldsmith	Call w/ co-counsel about pretrial brief.	1.50	\$ 550.00	\$ 825.00
1934	8/12/2022	Lauren M. Goldsmith	Call w/ L. Oswell, L. Goldsmith, and A. Halpern about trial logistics.	0.50	\$ 550.00	\$ 275.00
1935	8/12/2022	Lauren M. Goldsmith	Reviewing Hruz deposition transcript.	0.50	\$ 550.00	\$ 275.00
1936	8/12/2022	Arun Bodapati	Preparing deposition digest for Amy Embry.	8.50	\$ 450.00	\$ 3,825.00
1937	8/12/2022	Alexander F.R. Peacocke	Opposition to motion to exclude Lundstrom deposition designations.	4.25	\$ 200.00	\$ 850.00
1938	8/12/2022	Kenza Nadifi	Updated deposition video progress chart.	0.50	\$ 100.00	\$ 50.00
1939	8/12/2022	Kenza Nadifi	Extensive and constant coordination with three primary court reporting companies and EDLS to obtain all deposition videos and upload to Opus.	6.75	\$ 100.00	\$ 675.00
1940	8/13/2022	Jonathan G. Lester	Hruz Deposition Digest.	4.00	\$ 175.00	\$ 700.00
1941	8/13/2022	Lauren M. Goldsmith	Reviewing revisions to pretrial brief.	0.25	\$ 550.00	\$ 137.50
1942	8/13/2022	Lauren M. Goldsmith	Reviewing and revising Lundstrum opposition.	0.50	\$ 550.00	\$ 275.00
1943	8/13/2022	Arun Bodapati	Preparing deposition digest for Michele Hutchison.	9.00	\$ 450.00	\$ 4,050.00
1944	8/13/2022	Arun Bodapati	Preparing deposition digest for Amy Embry.	2.25	\$ 450.00	\$ 1,012.50
1945	8/13/2022	Alexander F.R. Peacocke	Supporting materials review, preparing claim chart.	3.75	\$ 200.00	\$ 750.00
1946	8/13/2022	Alexander F.R. Peacocke	Incorporating comments from L. Cooper on Opposition to Motion to Exclude Lundstrum's Deposition Designation.	1.00	\$ 200.00	\$ 200.00
1947	8/14/2022	Jonathan G. Lester	Cite checking the pre-trial brief.	3.25	\$ 175.00	\$ 568.75
1948	8/14/2022	Jonathan G. Lester	Reviewing materials related to deposition digests.	0.25	\$ 175.00	\$ 43.75
1949	8/14/2022	Jonathan G. Lester	Dr. Ho deposition digest.	3.00	\$ 175.00	\$ 525.00
1950	8/14/2022	Daniel J. Richardson	Continued work on deposition digests for Antommara, Stambough, Branman, Lundstrum, and Hruz. Emailed full associate team about issue tags for trial prep.	4.75	\$ 430.00	\$ 2,042.50
1951	8/14/2022	Lauren M. Goldsmith	Emails about pretrial brief.	0.25	\$ 550.00	\$ 137.50
1952	8/14/2022	Lauren M. Goldsmith	Reviewing and revising Lundstrum opposition.	0.25	\$ 550.00	\$ 137.50
1953	8/14/2022	Arun Bodapati	Preparing deposition digest for Michele Hutchison.	9.00	\$ 450.00	\$ 4,050.00
1954	8/14/2022	Alexander F.R. Peacocke	Incorporating comments from L. Cooper on Opposition to Motion to Exclude Lunstrum's Deposition Designation.	6.00	\$ 200.00	\$ 1,200.00
1955	8/15/2022	Laura Kabler Oswell	Calls with Goldsmith and Cooper; Team call; Review revised draft pretrial brief; Work on trial planning and witness teams.	5.00	\$ 650.00	\$ 3,250.00
1956	8/15/2022	Aviv S. Halpern	Call with L. Goldsmith re upcoming tasks. Emailed with team re depo digests. Emailed with D. Richardson re issue tags. Drafted deposition digest for C. Campbell. Drafted Hruz digest.	7.50	\$ 400.00	\$ 3,000.00
1957	8/15/2022	Jonathan G. Lester	Editing Dr. Antommara deposition digest	0.75	\$ 175.00	\$ 131.25
1958	8/15/2022	Jonathan G. Lester	Dr. Ho deposition digest.	2.25	\$ 175.00	\$ 393.75
1959	8/15/2022	Daniel J. Richardson	Completed Lundstrum and Antommara deposition digests and sent emails re same	0.75	\$ 430.00	\$ 322.50
1960	8/15/2022	Daniel J. Richardson	Completed Branman and Stambough depo digests; revised Lundstrum depo digest and recirculated to associate	0.75	\$ 430.00	\$ 322.50
1961	8/15/2022	Lauren M. Goldsmith	Reviewing and analyzing Defendants' pretrial brief.	0.75	\$ 550.00	\$ 412.50
1962	8/15/2022	Lauren M. Goldsmith	Updating witness teams chart.	0.25	\$ 550.00	\$ 137.50
1963	8/15/2022	Lauren M. Goldsmith	Emails about Lundstrum opposition.	0.75	\$ 550.00	\$ 412.50
1964	8/15/2022	Lauren M. Goldsmith	Call w/ L. Oswell, L. Goldsmith, R. Kadosh, E. Armbruster, L. Cooper (ACLU), B. Walas (Walas) about pretrial brief.	1.50	\$ 550.00	\$ 825.00
1965	8/15/2022	Lauren M. Goldsmith	Attending weekly co-counsel call.	0.25	\$ 550.00	\$ 137.50
1966	8/15/2022	Lauren M. Goldsmith	Emails about document discovery.	0.25	\$ 550.00	\$ 137.50
1967	8/15/2022	Lauren M. Goldsmith	Emails about claim chart.	0.25	\$ 550.00	\$ 137.50
1968	8/15/2022	Lauren M. Goldsmith	Call w/ L. Oswell, L. Goldsmith, and L. Cooper (ACLU) about witness teams.	0.75	\$ 550.00	\$ 412.50
1969	8/15/2022	Lauren M. Goldsmith	Emails about witness prep.	0.25	\$ 550.00	\$ 137.50
1970	8/15/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about task list.	0.25	\$ 550.00	\$ 137.50
1971	8/15/2022	Lauren M. Goldsmith	Reviewing Hruz deposition transcript.	0.25	\$ 550.00	\$ 137.50

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
1972	8/15/2022	Lauren M. Goldsmith	Emails about exhibit list.	0.25	\$ 550.00	\$ 137.50
1973	8/15/2022	Lauren M. Goldsmith	Revising and finalizing pretrial brief.	2.00	\$ 550.00	\$ 1,100.00
1974	8/15/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and R. Kadosh about pretrial brief.	0.50	\$ 550.00	\$ 275.00
1975	8/15/2022	Arun Bodapati	Preparing deposition digest for Deanna Adkins.	3.50	\$ 450.00	\$ 1,575.00
1976	8/15/2022	Arun Bodapati	Completing/revising deposition digests for Levine, Embry, and Hutchison.	2.75	\$ 450.00	\$ 1,237.50
1977	8/15/2022	Alexander F.R. Peacocke	Turning comments from L. Cooper (ACLU), B. Walas (Walas firm) on Lundstrum deposition designations exclusion brief.	0.75	\$ 200.00	\$ 150.00
1978	8/15/2022	Alexander F.R. Peacocke	Turning comments from B. Walas (Walas Firm) on Lundstrum motion to exclude opposition; sending to team. Reviewing edits from A. Halpern, email correspondence with A. Halpern re: those edits.; reviewing pretrial brief, supporting cases.	0.50	\$ 200.00	\$ 100.00
1979	8/15/2022	Kenza Nadifi	Gathered information from EDLS about the file extension required to upload all required deposition materials to Opus, communicated this information to Veritext.	2.00	\$ 100.00	\$ 200.00
1980	8/15/2022	Kenza Nadifi	Followed up with Veritext about outstanding deposition materials and engaged in extensive back and forth to get to the bottom of the delay.	2.25	\$ 100.00	\$ 225.00
1981	8/15/2022	Kenza Nadifi	Updated deposition video upload tracker and coordinated B. Rodgeron's removal from alias,	1.75	\$ 100.00	\$ 175.00
1982	8/15/2022	Cate M. Llewellyn	Call re trial prep (Arkansas trial logistics & supplies).	1.25	\$ 100.00	\$ 125.00
1983	8/16/2022	Aviv S. Halpern	Drafted, edited and filed Lundstrum brief. Attn to deposition digests. Communicated with team re same. Drafted Campbell digest and Hruz digest. Communicated with M. Matthew re Perry digest.	14.25	\$ 400.00	\$ 5,700.00
1984	8/16/2022	Jonathan G. Lester	Cite checking Lundstrum opposition	1.25	\$ 175.00	\$ 218.75
1985	8/16/2022	Daniel J. Richardson	Drafted summary of deft's trial brief and circulated same to full litigation team	1.75	\$ 430.00	\$ 752.50
1986	8/16/2022	Lauren M. Goldsmith	Emails about Lundstrum opposition.	1.00	\$ 550.00	\$ 550.00
1987	8/16/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about Lundstrum opposition.	0.25	\$ 550.00	\$ 137.50
1988	8/16/2022	Lauren M. Goldsmith	Reviewing and analyzing Defendants' pretrial brief.	0.25	\$ 550.00	\$ 137.50
1989	8/16/2022	Arun Bodapati	Finalizing deposition digests for Levine, Embry, Hutchison, and Adkins.	12.50	\$ 450.00	\$ 5,625.00
1990	8/16/2022	Alexander F.R. Peacocke	Meeting with Alexander Peacocke, Aviv S. Halpern re: Case management.	0.25	\$ 200.00	\$ 50.00
1991	8/16/2022	Alexander F.R. Peacocke	Inputting edits from B. Walas (Walas Firm) on Lundstrum Opp. Brief.	1.00	\$ 200.00	\$ 200.00
1992	8/16/2022	Alexander F.R. Peacocke	Adding cold read edits to Lundstrum Opp. Brief.	0.50	\$ 200.00	\$ 100.00
1993	8/16/2022	Kenza Nadifi	Coordinated with various court reporting companies to obtain transcript and mdb file for Turban and Karasic and transcript and mdb file for Stambough and Adkins.	1.25	\$ 100.00	\$ 125.00
1994	8/16/2022	Cate M. Llewellyn	Reviewed Opposition to Defendants' Motion in Limine.	1.00	\$ 100.00	\$ 100.00
1995	8/16/2022	Cate M. Llewellyn	Reviewed list of supplies for trial.	2.25	\$ 100.00	\$ 225.00
1996	8/17/2022	Aviv S. Halpern	Communicated with team re communications from legislators. Drafted response. Conducted research re privilege. Call with L. Goldsmith re trial prep. Drafted and edited deposition digests for Perry, Hruz, Campbell, and Turban.	11.75	\$ 400.00	\$ 4,700.00
1997	8/17/2022	Aviv S. Halpern	Perry deposition digest.	2.00	\$ 400.00	\$ 800.00
1998	8/17/2022	Daniel J. Richardson	Finished Hruz deposition digest and sent email re same	1.75	\$ 430.00	\$ 752.50
1999	8/17/2022	Lauren M. Goldsmith	Calls w/ L. Goldsmith and A. Halpern about issue re document discovery.	1.25	\$ 550.00	\$ 687.50
2000	8/17/2022	Lauren M. Goldsmith	Emails about issue re document discovery.	1.00	\$ 550.00	\$ 550.00
2001	8/17/2022	Arun Bodapati	Meeting with Breean Walas and Aviv Halpern to discuss logistics and details of exhibit list for trial.	1.00	\$ 450.00	\$ 450.00

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2002	8/17/2022	Alexander F.R. Peacocke	Reviewed email from breean@walaslawfirm.com regarding Brandt v. Rutledge: Follow-up Court's Order Reviewed email from Aviv S. Halpern regarding Brandt v. Rutledge: Follow-up Court's Order Email correspondence with sarah@acluarkansas.org, breean@walaslawfirm.com, Aviv S. Halpern, Lauren M. Goldsmith, ARGenderAffirmingMedCare@sullcrom.com regarding Brandt v. Rutledge: Follow-up Court's Order Reviewed email from Lauren M. Goldsmith regarding Brandt v. Rutledge: Follow-up Court's Order Reviewed email from Aviv S. Halpern regarding Brandt v. Rutledge: Follow-up Court's Order Email correspondence with Sarah@acluarkansas.org, breean@walaslawfirm.com, Aviv S. Halpern, Lauren M. Goldsmith, ARGenderAffirmingMedCare@sullcrom.com regarding Brandt v. Rutledge: Follow-up Court's Order Reviewed email from Aviv S. Halpern regarding Brandt v. Rutledge: Follow-up Court's Order Reviewed email from Alexander F.R. Peacocke regarding Brandt v. Rutledge: Follow-up Court's Order Email correspondence with breean@walaslawfirm.com, Sarah@acluarkansas.org, Aviv S. Halpern, Lauren M. Goldsmith, ARGenderAffirmingMedCare@sullcrom.com regarding Brandt v. Rutledge: Follow-up Court's Order Reviewed email from breean@walaslawfirm.com regarding Brandt v. Rutledge: Follow-up Court's Order Reviewed email from Lauren M. Goldsmith regarding Brandt v. Rutledge: Follow-up Court's Order	0.75	\$ 200.00	\$ 150.00
2003	8/17/2022	Kenza Nadifi	Communicated further with court reporting companies about status of requested videos that still had not been sent.	1.00	\$ 100.00	\$ 100.00
2004	8/17/2022	Cate M. Llewellyn	Draft summary re review of deposition videos to be used for witness prep.	0.75	\$ 100.00	\$ 75.00
2005	8/18/2022	Aviv S. Halpern	Edited deposition digests and communicated with G. Smith re same.	2.00	\$ 400.00	\$ 800.00
2006	8/18/2022	Aviv S. Halpern	Completed deposition digests. Meeting with legislators re remaining documents. Meeting with team re same. Conducted research re privilege. Communicated with team re same. Coordinated trial logistics and coneducted other trial preparation.	6.75	\$ 400.00	\$ 2,700.00
2007	8/18/2022	Lauren M. Goldsmith	Emails about issue re document discovery.	1.00	\$ 550.00	\$ 550.00
2008	8/18/2022	Lauren M. Goldsmith	Call w/ S&C team to debrief about meet and confer re document discovery.	1.00	\$ 550.00	\$ 550.00
2009	8/18/2022	Arun Bodapati	Following up with paralegals regarding creation of exhibit list.	0.75	\$ 450.00	\$ 337.50
2010	8/18/2022	Alexander F.R. Peacocke	Reviewed document [in preparation] for meet & confer [on legislator document production].	1.25	\$ 200.00	\$ 250.00
2011	8/18/2022	Alexander F.R. Peacocke	Meeting with Graham C. Talley , *ARGenderAffirmingMedCare , Breean , Lauren M. Goldsmith, Aviv S. Halpern, LCOOPER , dylan.jacobs@arkansasag.gov , amanda.land@arkansasag.gov , michael.cantrell@arkansasag.gov regarding FW: Brandt v. Rutledge: Meet-and-Confer re Privilege Issues	0.50	\$ 200.00	\$ 100.00
2012	8/18/2022	Alexander F.R. Peacocke	Email correspondence on discovery issues re: court's ordered legislator production, case management.	1.50	\$ 200.00	\$ 300.00
2013	8/18/2022	Alexander F.R. Peacocke	Meeting with Alexander Peacocke, Aviv S. Halpern, Breean Walas, Lauren M. Goldsmith, Maxime D. Matthew regarding [EXTERNAL] RE: discovery issues with legislator productions.	0.75	\$ 200.00	\$ 150.00
2014	8/18/2022	Alexander F.R. Peacocke	Meeting with Alexander Peacocke, Aviv S. Halpern, Breean Walas, Li Nowlin-Sohl, Maxime D. Matthew regarding Brandt v. Rutledge: Follow-up re: Court's Order	0.50	\$ 200.00	\$ 100.00
2015	8/18/2022	Kenza Nadifi	Call with local Arkansas court reporter.	0.25	\$ 100.00	\$ 25.00
2016	8/18/2022	Kenza Nadifi	Extensive back and forth with Veritext and EDLS after Veritext claimed they had already sent the MDB extensions required for the Opus upload of trial materials.	2.75	\$ 100.00	\$ 275.00
2017	8/18/2022	Kenza Nadifi	Filled out trial material status chart and provided update to associates.	1.00	\$ 100.00	\$ 100.00
2018	8/18/2022	Kenza Nadifi	Compiled updated list of still outstanding deposition materials and the court reporting companies responsible for each.	1.00	\$ 100.00	\$ 100.00
2019	8/18/2022	Kenza Nadifi	Call with Veritext representative after they did not respond to multiple emails inquiring about the status of our orders.	0.25	\$ 100.00	\$ 25.00
2020	8/18/2022	Cate M. Llewellyn	Revised list of supplies to purchase for trial.	2.50	\$ 100.00	\$ 250.00
2021	8/19/2022	Aviv S. Halpern	Edited argument outline for potential emergency hearing re legislator documents. Conducted associated research. Communicated with team re trial prep and witness prep. Coordinated trial logistics. Other trial preparation tasks.	6.00	\$ 400.00	\$ 2,400.00
2022	8/19/2022	Jonathan G. Lester	Reviewing legislators' production for completeness.	3.50	\$ 175.00	\$ 612.50
2023	8/19/2022	Jonathan G. Lester	Updating notes for call with Judge Moody.	0.75	\$ 175.00	\$ 131.25
2024	8/19/2022	Lauren M. Goldsmith	Emails about issue re document discovery.	1.00	\$ 550.00	\$ 550.00
2025	8/19/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about document discovery.	0.25	\$ 550.00	\$ 137.50
2026	8/19/2022	Alexander F.R. Peacocke	Email correspondence with breean@walaslawfirm.com, Maxime D. Matthew, Lauren M. Goldsmith, Aviv S. Halpern regarding Follow-up Court's Order Preparation Meeting Reviewed email from Aviv S. Halpern regarding Follow-up Court's Order Preparation Meeting	0.25	\$ 200.00	\$ 50.00
2027	8/19/2022	Alexander F.R. Peacocke	Reviewing Karasic deposition transcript in preparation for Digest.	0.50	\$ 200.00	\$ 100.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2028	8/19/2022	Alexander F.R. Peacocke	Email correspondence with litigationssupport@sullcrom.com, Stephen P. Dooley, Aviv S. Halpern, Maxime D. Matthew regarding Production Standards Email correspondence with Aviv S. Halpern, Maxime D. Matthew regarding Email to Graham re meet and confer Email correspondence with Aviv S. Halpern, Lauren M. Goldsmith, Maxime D. Matthew regarding [S&C Only] Brandt v. Rutledge, No. 21-cv-00450 Email correspondence with gttalley@mwlaw.com, Kacie_Glenn@ared.uscourts.gov, brean@walaslawfirm.com, amanda.land@arkansasag.gov, Aviv S. Halpern regarding 4:21-cv-00450-JM Brandt et al v. Rutledge et al	0.50	\$ 200.00	\$ 100.00
2029	8/19/2022	Alexander F.R. Peacocke	Email correspondence on discovery issues with S&C Team, Breean Walas (Walas firm), G. Talley (legislator's counsel).	0.75	\$ 200.00	\$ 150.00
2030	8/19/2022	Kenza Nadifi	Revised document Copy of Offsite Supplies Revised (CML).xls	1.50	\$ 100.00	\$ 150.00
2031	8/19/2022	Kenza Nadifi	Compiled list of outstanding depo digests and associate teams assigned to them for A. Halpern.	0.75	\$ 100.00	\$ 75.00
2032	8/19/2022	Kenza Nadifi	Managed Arkansas Realtime Reporting depo videos on Box and coordinated with EDLS for additional uploads to Opus.	1.50	\$ 100.00	\$ 150.00
2033	8/19/2022	Cate M. Llewellyn	Revised trial material & supplies list.	1.25	\$ 100.00	\$ 125.00
2034	8/20/2022	Jonathan G. Lester	Reviewing legislator's production	4.50	\$ 175.00	\$ 787.50
2035	8/20/2022	Jonathan G. Lester	Verifying receipt of all documents.	1.00	\$ 175.00	\$ 175.00
2036	8/20/2022	Alexander F.R. Peacocke	Researching and taking notes on underlying supporting law.	1.25	\$ 200.00	\$ 250.00
2037	8/20/2022	Alexander F.R. Peacocke	Email correspondence with Eileen Y. L. Yim, Gregory L. Smith, Aviv S. Halpern, disc_genderaffirmingmedcare@sullcrom.com, Lauren M. Goldsmith regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production.	0.75	\$ 200.00	\$ 150.00
2038	8/21/2022	Aviv S. Halpern	Trial preparation.	2.00	\$ 400.00	\$ 800.00
2039	8/21/2022	Jonathan G. Lester	Call with G. Smith to discuss document production issues.	0.25	\$ 175.00	\$ 43.75
2040	8/21/2022	Lauren M. Goldsmith	Emails about privilege issue.	0.50	\$ 550.00	\$ 275.00
2041	8/21/2022	Alexander F.R. Peacocke	Email correspondence with Aviv S. Halpern, Lauren M. Goldsmith regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178 Reviewed email from Lauren M. Goldsmith regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178 Email correspondence with [no recipients] regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178 Email correspondence with Lauren M. Goldsmith, Aviv S. Halpern regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178 Reviewed email from Aviv S. Halpern regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178 Reviewed email from Alexander S. Holland regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178 Email correspondence with Alexander S. Holland, Aviv S. Halpern, Emily T.L. Armbruster, Lauren M. Goldsmith regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178 Email correspondence with Aviv S. Halpern, Lauren M. Goldsmith regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178	0.25	\$ 200.00	\$ 50.00
2042	8/21/2022	Alexander F.R. Peacocke	Researching supporting law for claim chart.	2.50	\$ 200.00	\$ 500.00
2043	8/22/2022	Laura Kabler Oswell	Call with S&C and ACLU teams re. trial preparations.	0.50	\$ 650.00	\$ 325.00
2044	8/22/2022	Aviv S. Halpern	Call with L. Goldsmith re trial prep, witness planning, pretrial orders, witness prep team, and trial strategy. Trial prep.	3.25	\$ 400.00	\$ 1,300.00
2045	8/22/2022	Jonathan G. Lester	Summarizing parent documents for attachments that should have been produced in camera by opposing counsel.	0.50	\$ 175.00	\$ 87.50
2046	8/22/2022	Lauren M. Goldsmith	Reviewing depo digests.	0.75	\$ 550.00	\$ 412.50
2047	8/22/2022	Lauren M. Goldsmith	Emails about depo digests.	0.25	\$ 550.00	\$ 137.50
2048	8/22/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.25	\$ 550.00	\$ 137.50
2049	8/22/2022	Lauren M. Goldsmith	Leading weekly co-counsel call.	0.75	\$ 550.00	\$ 412.50
2050	8/22/2022	Lauren M. Goldsmith	Reviewing hot documents.	1.50	\$ 550.00	\$ 825.00
2051	8/22/2022	Lauren M. Goldsmith	Reviewing and analyzing Defendants' pretrial brief.	0.25	\$ 550.00	\$ 137.50
2052	8/22/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about claim chart and trial prep.	1.00	\$ 550.00	\$ 550.00
2053	8/22/2022	Alexander F.R. Peacocke	Email correspondence with team regarding discovery issues, deposition digests.	1.00	\$ 200.00	\$ 200.00
2054	8/22/2022	Alexander F.R. Peacocke	Reviewed document Brandt v. Rutledge - Plaintiffs Trial Brief.pdf - Adobe Acrobat Standard DC (32-bit)	1.50	\$ 200.00	\$ 300.00
2055	8/22/2022	Alexander F.R. Peacocke	Working on Karasic deposition digest.	2.50	\$ 200.00	\$ 500.00
2056	8/22/2022	Kenza Nadifi	Coordinated further with EDLS based on updates from court reporting companies.	0.50	\$ 100.00	\$ 50.00
2057	8/22/2022	Kenza Nadifi	Compiled new list of outstanding deposition digests and sent to A. Halpern.	0.50	\$ 100.00	\$ 50.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2058	8/22/2022	Kenza Nadifi	Further coordination through email correspondence with videoadmin-nj@veritext.com, cs-ny@veritext.com, calendar-ar@veritext.com, BrandtParalegals@sullcrom.com regarding Brandt et al v. Rutledge et al Deposition Videos	2.00	\$ 100.00	\$ 200.00
2059	8/23/2022	Aviv S. Halpern	Trial prep. Attn to dispute re legislator documents. Emailed with team re same. Call with team re legislator documents. Revised hearing outline. Reviewed deposition transcripts and drafted witness outlines.	7.25	\$ 400.00	\$ 2,900.00
2060	8/23/2022	Lauren M. Goldsmith	Emails about discovery dispute.	0.25	\$ 550.00	\$ 137.50
2061	8/23/2022	Lauren M. Goldsmith	Reviewing witness team proposal.	0.25	\$ 550.00	\$ 137.50
2062	8/23/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Peacocke (partial), and A. Halpern about claim chart, prep. for discovery conference, and trial prep.	1.00	\$ 550.00	\$ 550.00
2063	8/23/2022	Lauren M. Goldsmith	Reviewing argument outline for discovery conference.	0.50	\$ 550.00	\$ 275.00
2064	8/23/2022	Lauren M. Goldsmith	Emails w/ L. Cooper about team meeting.	0.25	\$ 550.00	\$ 137.50
2065	8/23/2022	Arun Bodapati	Reviewing pretrial disclosures and briefs.	3.00	\$ 450.00	\$ 1,350.00
2066	8/23/2022	Alexander F.R. Peacocke	Reviewed email from Aviv S. Halpern regarding Brandt: Witness Prep Reviewed email from Aviv S. Halpern regarding Brandt: Witness Prep Reviewed email from Aviv S. Halpern regarding Brandt: Witness Prep Reviewed email from Breean@walaslawfirm.com regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178 Reviewed email from Breean@walaslawfirm.com regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178	0.25	\$ 200.00	\$ 50.00
2067	8/23/2022	Alexander F.R. Peacocke	Email correspondence with ARGenderAffirmingMedCare@sullcrom.com regarding Brandt v. Rutledge Reviewed email from Lauren M. Goldsmith regarding Brandt v. Rutledge Email correspondence with Lauren M. Goldsmith regarding Brandt v. Rutledge Reviewed email from Lauren M. Goldsmith regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178 Email correspondence with gtalley@mwlaw.com, Breean@walaslawfirm.com, amanda.land@arkansasag.gov, CReedy@mwlaw.com, AJanik@mwlaw.com regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178 Email correspondence with Breean@walaslawfirm.com, ARGenderAffirmingMedCare@sullcrom.com regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178 Reviewed email from Lauren M. Goldsmith regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178 Email correspondence with Breean@walaslawfirm.com, Lauren M. Goldsmith, Aviv S. Halpern, ARGenderAffirmingMedCare@sullcrom.com regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178	0.50	\$ 200.00	\$ 100.00
2068	8/23/2022	Alexander F.R. Peacocke	Reviewing Depositions of Hiatt, Karasic to prepare digests.	2.75	\$ 200.00	\$ 550.00
2069	8/23/2022	Alexander F.R. Peacocke	Karasic & Hiatt Deposition Digest Prep.	5.00	\$ 200.00	\$ 1,000.00
2070	8/23/2022	Alexander F.R. Peacocke	Strategy call with L. Goldsmith, A. Halpern.	0.50	\$ 200.00	\$ 100.00
2071	8/23/2022	Kenza Nadifi	Revised document Depo Tracker.docx	0.75	\$ 100.00	\$ 75.00
2072	8/23/2022	Kenza Nadifi	Revised document ACLU Brandt Depo Transcript Contacts (003).docx	0.25	\$ 100.00	\$ 25.00
2073	8/23/2022	Cate M. Llewellyn	Met with case team to discuss trial prep.	1.00	\$ 100.00	\$ 100.00
2074	8/24/2022	Aviv S. Halpern	Trial prep. Meeting with legislator team re hearing prep.	2.50	\$ 400.00	\$ 1,000.00
2075	8/24/2022	Daniel J. Richardson	Call with Goldsmith to discuss trial prep staffing	0.25	\$ 430.00	\$ 107.50
2076	8/24/2022	Lauren M. Goldsmith	Working on prep. for witness prep.	1.00	\$ 550.00	\$ 550.00
2077	8/24/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Peacocke, A. Halpern and co-counsel about oral argument prep.	0.50	\$ 550.00	\$ 275.00
2078	8/24/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and D. Richardson about trial prep.	0.25	\$ 550.00	\$ 137.50
2079	8/24/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.25	\$ 550.00	\$ 137.50
2080	8/24/2022	Lauren M. Goldsmith	Emails w/ L. Cooper about witness team assignments.	0.25	\$ 550.00	\$ 137.50
2081	8/24/2022	Lauren M. Goldsmith	Reviewing revised argument outline for discovery conference.	1.25	\$ 550.00	\$ 687.50
2082	8/24/2022	Lauren M. Goldsmith	Reviewing trial prep. outline.	1.00	\$ 550.00	\$ 550.00
2083	8/24/2022	Alexander F.R. Peacocke	Reviewing precedent trial preparation documents, preparing claim chart.	1.00	\$ 200.00	\$ 200.00
2084	8/24/2022	Alexander F.R. Peacocke	Reviewed document Brandt v. Rutledge - Plaintiffs Trial Brief.pdf - Adobe Acrobat Standard DC (32-bit)	0.50	\$ 200.00	\$ 100.00
2085	8/24/2022	Alexander F.R. Peacocke	Meeting with Alexander Peacocke, Lauren M. Goldsmith, Aviv S. Halpern, Breean, *ARGenderAffirmingMedCare, Jonathan G. Lester, Maxime D. Matthew, Gregory L. Smith, Drake Mann regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178 Email correspondence with Aviv S. Halpern, Lauren M. Goldsmith regarding Brandt et al. v. Rutledge et al., No. 21-cv-00450 (E.D. Ark.): Legislators' Production Pursuant ECF No. 178	0.50	\$ 200.00	\$ 100.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2086	8/25/2022	Garrard R. Beeney	Emails re trial, 8th circuit.	0.50	\$ 800.00	\$ 400.00
2087	8/25/2022	Laura Kabler Oswell	Call with Goldsmith re. trial planning.	0.50	\$ 650.00	\$ 325.00
2088	8/25/2022	Laura Kabler Oswell	Review 8th Circuit opinion and emails re. same.	0.50	\$ 650.00	\$ 325.00
2089	8/25/2022	Aviv S. Halpern	Attn to Eighth Circuit decision. Communicated with team re same. Trial prep.	4.00	\$ 400.00	\$ 1,600.00
2090	8/25/2022	Lauren M. Goldsmith	Emails about exchange of exhibit and witness lists.	0.25	\$ 550.00	\$ 137.50
2091	8/25/2022	Lauren M. Goldsmith	Calls w/ L. Goldsmith and A. Halpern about trial prep.	1.00	\$ 550.00	\$ 550.00
2092	8/25/2022	Lauren M. Goldsmith	Reviewing 8th Circuit decision, emails about same.	0.50	\$ 550.00	\$ 275.00
2093	8/25/2022	Lauren M. Goldsmith	Call w/ L. Oswell and L. Goldsmith about trial prep.	0.50	\$ 550.00	\$ 275.00
2094	8/25/2022	Arun Bodapati	Drafting and revising proposal re: exchange of exhibit and witness lists with Defendants.	1.75	\$ 450.00	\$ 787.50
2095	8/25/2022	Alexander F.R. Peacocke	Reviewed document Brandt v. Rutledge - Plaintiffs Trial Brief.pdf - Adobe Acrobat Standard DC (32-bit)	0.50	\$ 200.00	\$ 100.00
2096	8/25/2022	Alexander F.R. Peacocke	Preparing claim chart, reviewing supporting materials for claim chart.	4.00	\$ 200.00	\$ 800.00
2097	8/25/2022	Kenza Nadifi	Determined Veritext video team's contact information and coordinated with them directly.	0.75	\$ 100.00	\$ 75.00
2098	8/25/2022	Kenza Nadifi	Created and sent out calendar invites for case deadlines.	0.50	\$ 100.00	\$ 50.00
2099	8/25/2022	Kenza Nadifi	Communicated with court reporting companies to determine why the materials they had promised were delayed and to determine the new timeline for the project.	1.00	\$ 100.00	\$ 100.00
2100	8/25/2022	Kenza Nadifi	Coordinated with EDLS to track down remaining outstanding deposition materials from court reporters.	1.50	\$ 100.00	\$ 150.00
2101	8/26/2022	Garrard R. Beeney	Attention to witness chart.	0.25	\$ 800.00	\$ 200.00
2102	8/26/2022	Aviv S. Halpern	Trial Prep.	3.75	\$ 400.00	\$ 1,500.00
2103	8/26/2022	Lauren M. Goldsmith	Calls w/ L. Goldsmith and A. Halpern about trial prep.	0.50	\$ 550.00	\$ 275.00
2104	8/26/2022	Arun Bodapati	Corresponding with team re: proposing schedule for exchanging exhibit and witness lists with Defendants.	0.25	\$ 450.00	\$ 112.50
2105	8/27/2022	Alexander F.R. Peacocke	Hiatt deposition digest prep.	2.50	\$ 200.00	\$ 500.00
2106	8/28/2022	Alexander F.R. Peacocke	Hiatt deposition digest work.	7.50	\$ 200.00	\$ 1,500.00
2107	8/29/2022	Laura Kabler Oswell	Review materials for trial witness prep.	1.50	\$ 650.00	\$ 975.00
2108	8/29/2022	Laura Kabler Oswell	Team call; Review order on motions to exclude and motions in limine.	1.50	\$ 650.00	\$ 975.00
2109	8/29/2022	Aviv S. Halpern	Call with M. Matthew re Campbell prep. Witness prep. Emailed with witness teams re same. Trial prep. Trial logistics.	2.25	\$ 400.00	\$ 900.00
2110	8/29/2022	Daniel J. Richardson	Coordinated with witness prep teams on next steps for witness outlines related to Antommaria, Stambough, Regnerus, Branman, and Lundstrum	1.25	\$ 430.00	\$ 537.50
2111	8/29/2022	Lauren M. Goldsmith	Emails w/ A. Bodapati and A. Halpern about trial prep.	0.25	\$ 550.00	\$ 137.50
2112	8/29/2022	Lauren M. Goldsmith	Emails w/ L. Cooper about team meeting agenda.	0.25	\$ 550.00	\$ 137.50
2113	8/29/2022	Lauren M. Goldsmith	Leading co-counsel team meeting.	1.00	\$ 550.00	\$ 550.00
2114	8/29/2022	Lauren M. Goldsmith	Emails about witness prep.	0.25	\$ 550.00	\$ 137.50
2115	8/29/2022	Lauren M. Goldsmith	Call w/ L. Cooper about team meeting agenda.	0.25	\$ 550.00	\$ 137.50
2116	8/29/2022	Arun Bodapati	Various logistical tasks related to exhibit list, witness prep, and providing full team with access to witness prep materials.	1.50	\$ 450.00	\$ 675.00
2117	8/29/2022	Alexander F.R. Peacocke	Revised document Hiatt Deposition Digest.docx	2.25	\$ 200.00	\$ 450.00
2118	8/29/2022	Cate M. Llewellyn	Reviewed Stambough & Hutchinson deposition materials.	1.25	\$ 100.00	\$ 125.00
2119	8/30/2022	Aviv S. Halpern	Attn to Order re MiL and motions to exclude. Emailed with team re same. Emailed with L. Goldsmith re digests. Call with L. Goldsmith re trial prep. Meeting re Branman witness prep. Campbell witness prep. Meeting with L. Oswell re trial prep. Meeting with G. Smith re expert comparison chart and trial logistics.	4.75	\$ 400.00	\$ 1,900.00
2120	8/30/2022	Jonathan G. Lester	Reviewing deposition digests to summarize topic areas.	1.25	\$ 175.00	\$ 218.75
2121	8/30/2022	Jonathan G. Lester	Meeting regarding expert witness and fact witness preparations.	0.50	\$ 175.00	\$ 87.50
2122	8/30/2022	Daniel J. Richardson	Meeting with witness prep team to discuss Branman examination at trial	0.50	\$ 430.00	\$ 215.00
2123	8/30/2022	Lauren M. Goldsmith	Reviewing decision on MIL and motion to exclude.	0.25	\$ 550.00	\$ 137.50
2124	8/30/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about trial prep.	0.50	\$ 550.00	\$ 275.00
2125	8/30/2022	Arun Bodapati	Call with Gregory Smith to discuss preparation of witness outlines for Amanda Dennis.	0.25	\$ 450.00	\$ 112.50
2126	8/30/2022	Arun Bodapati	Meeting with Leslie Cooper, Rebecca Kadosh, and Alex Holland to discuss preparation for witness exams of Michele Hutchison, Stephen Levine, and Janet Cathey at trial.	0.00	\$ 450.00	\$ -
2127	8/30/2022	Arun Bodapati	Working with paralegals and EDLS to provide full team with access to witness prep materials.	1.00	\$ 450.00	\$ 450.00
2128	8/30/2022	Alexander F.R. Peacocke	Revised document Hiatt Deposition Digest.docx 4869-7453-4192 v.1.docx	1.75	\$ 200.00	\$ 350.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2129	8/30/2022	Alexander F.R. Peacocke	Revised document Regnerus Deposition Digest.docx	0.50	\$ 200.00	\$ 100.00
2130	8/30/2022	Kenza Nadifi	Created copies of all trial materials and uploaded into ND collabspace.	2.00	\$ 100.00	\$ 200.00
2131	8/30/2022	Cate M. Llewellyn	Reviewed Brandt family public statements & press coverage.	3.25	\$ 100.00	\$ 325.00
2132	8/31/2022	Aviv S. Halpern	Trial prep.	1.50	\$ 400.00	\$ 600.00
2133	8/31/2022	Lauren M. Goldsmith	Working on witness prep.	0.50	\$ 550.00	\$ 275.00
2134	8/31/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about trial prep.	0.00	\$ 550.00	\$ -
2135	8/31/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Halpern, J. Lester, and L. Cooper about trial prep.	1.25	\$ 550.00	\$ 687.50
2136	8/31/2022	Arun Bodapati	Reviewing materials for Michele Hutchison and determining areas of potential overlap between her testimony and Dr. Stambough's.	2.50	\$ 450.00	\$ 1,125.00
2137	8/31/2022	Arun Bodapati	Call with Gregory Smith to discuss preparation of witness outlines for Amanda Dennis.	0.25	\$ 450.00	\$ 112.50
2138	8/31/2022	Arun Bodapati	Reviewing medical records for patients to determine which are helpful and unhelpful (particularly with respect to Michele Hutchison's testimony).	2.00	\$ 450.00	\$ 900.00
2139	8/31/2022	Cate M. Llewellyn	Reviewed Brandt public statements & press coverage.	1.75	\$ 100.00	\$ 175.00
2140	9/1/2022	Aviv S. Halpern	Trial prep and trial logistics.	5.75	\$ 400.00	\$ 2,300.00
2141	9/1/2022	Jonathan G. Lester	Meeting with M. Matthew and G. Smith to discuss expert witness comparison chart.	0.25	\$ 175.00	\$ 43.75
2142	9/1/2022	Jonathan G. Lester	Reviewing deposition transcripts to pull relevant testimony.	2.25	\$ 175.00	\$ 393.75
2143	9/1/2022	Daniel J. Richardson	Sent follow up emails regarding witness prep assignments.	0.25	\$ 430.00	\$ 107.50
2144	9/1/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.25	\$ 550.00	\$ 137.50
2145	9/1/2022	Lauren M. Goldsmith	Prep for witness prep.	2.00	\$ 550.00	\$ 1,100.00
2146	9/1/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and R. Kadosh about trial prep.	0.25	\$ 550.00	\$ 137.50
2147	9/1/2022	Lauren M. Goldsmith	Reviewing research summary about calling children as witnesses.	0.25	\$ 550.00	\$ 137.50
2148	9/1/2022	Arun Bodapati	Reviewing client medical records to determine whether any are helpful or unhelpful for testimony (particularly Michele Hutchison's).	8.75	\$ 450.00	\$ 3,937.50
2149	9/1/2022	Alexander F.R. Peacocke	Reviewed email from LCOOPER@aclu.org regarding Fwd: Brandt v. Rutledge - En Banc Extension Reviewed email from Lauren M. Goldsmith regarding Fwd: Brandt v. Rutledge - En Banc Extension	0.25	\$ 200.00	\$ 50.00
2150	9/2/2022	Garrard R. Beene	Motion for extension.	0.25	\$ 800.00	\$ 200.00
2151	9/2/2022	Aviv S. Halpern	Trial prep.	4.00	\$ 400.00	\$ 1,600.00
2152	9/2/2022	Aviv S. Halpern	Meeting Lundstrum prep.	0.50	\$ 400.00	\$ 200.00
2153	9/2/2022	Jonathan G. Lester	Reviewing deposition transcripts to pull relevant testimony.	1.00	\$ 175.00	\$ 175.00
2154	9/2/2022	Jonathan G. Lester	Acquiring background [materials for witness prep.].	0.25	\$ 175.00	\$ 43.75
2155	9/2/2022	Jonathan G. Lester	Reviewing background search materials [for witness prep.].	0.50	\$ 175.00	\$ 87.50
2156	9/2/2022	Jonathan G. Lester	Joanna Brandt team meeting.	0.75	\$ 175.00	\$ 131.25
2157	9/2/2022	Jonathan G. Lester	Follow up call with R. Kadosh to discuss next steps for Joanna Brandt prep.	0.25	\$ 175.00	\$ 43.75
2158	9/2/2022	Daniel J. Richardson	Call with Lundstrum witness team to discuss approach to trial.	0.50	\$ 430.00	\$ 215.00
2159	9/2/2022	Lauren M. Goldsmith	Emails w/ L. Goldsmith and A. Halpern about findings of fact and conclusions of law and trial prep.	1.25	\$ 550.00	\$ 687.50
2160	9/2/2022	Lauren M. Goldsmith	Call w/ Lundstrum witness prep team.	0.50	\$ 550.00	\$ 275.00
2161	9/2/2022	Lauren M. Goldsmith	Call w/ Brandt witness prep team.	0.75	\$ 550.00	\$ 412.50
2162	9/2/2022	Lauren M. Goldsmith	Emails about Lundstrum witness prep.	0.25	\$ 550.00	\$ 137.50
2163	9/2/2022	Arun Bodapati	Reviewing/revising outline for direct examination of Amanda Dennis.	6.00	\$ 450.00	\$ 2,700.00
2164	9/2/2022	Arun Bodapati	Reviewing materials/considering potential exhibits for Michele Hutchison.	0.50	\$ 450.00	\$ 225.00
2165	9/2/2022	Kenza Nadifi	Re-uploaded all requested trial materials from internal ND space into ND collabspace including ACLU, including time spent resolving access issue in the ND space.	2.25	\$ 100.00	\$ 225.00
2166	9/2/2022	Cate M. Llewellyn	Reviewed doc re trial logistics preparations.	1.50	\$ 100.00	\$ 150.00
2167	9/3/2022	Jonathan G. Lester	Reviewing deposition transcripts to pull relevant testimony.	2.50	\$ 175.00	\$ 437.50
2168	9/3/2022	Arun Bodapati	Reviewing materials/considering potential exhibits for Michele Hutchison.	5.25	\$ 450.00	\$ 2,362.50
2169	9/4/2022	Daniel J. Richardson	Began cross-examination outline for Regnerus.	2.00	\$ 430.00	\$ 860.00
2170	9/4/2022	Arun Bodapati	Reviewing materials/considering potential exhibits for Deanna Adkins.	3.75	\$ 450.00	\$ 1,687.50
2171	9/4/2022	Arun Bodapati	Reviewing materials/considering potential witness exhibits for Michele Hutchison.	1.00	\$ 450.00	\$ 450.00
2172	9/5/2022	Aviv S. Halpern	Trial prep.	1.75	\$ 400.00	\$ 700.00
2173	9/5/2022	Jonathan G. Lester	Reviewing [transcripts in preparation for trial].	1.25	\$ 175.00	\$ 218.75

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2174	9/5/2022	Alexander F.R. Peacocke	Researching cases, taking notes on those governing our claims.	1.75	\$ 200.00	\$ 350.00
2175	9/5/2022	Alexander F.R. Peacocke	Preparing claim chart.	1.50	\$ 200.00	\$ 300.00
2176	9/6/2022	Garrard R. Beeney	Claim chart; education issues.	0.25	\$ 800.00	\$ 200.00
2177	9/6/2022	Laura Kabler Oswell	Call with S&C and ACLU team.	0.50	\$ 650.00	\$ 325.00
2178	9/6/2022	Aviv S. Halpern	Call with L. Goldsmith re trial logistics. Drafted proposed pretrial order. Emailed with paralegal team re witness assignments, and with ACLU re trial logistics. Conducted research related to [legal issues for trial].	9.00	\$ 400.00	\$ 3,600.00
2179	9/6/2022	Jonathan G. Lester	Meeting with A. Halpern to discuss [legal issues for trial].	0.50	\$ 175.00	\$ 87.50
2180	9/6/2022	Jonathan G. Lester	Reviewing and updating expert testimony comparison chart.	0.50	\$ 175.00	\$ 87.50
2181	9/6/2022	Jonathan G. Lester	Meeting with M. Matthew and G. Smith to discuss expert witness comparison chart.	0.50	\$ 175.00	\$ 87.50
2182	9/6/2022	Jonathan G. Lester	Meeting with G. Smith to discuss medical records and legislator bias.	0.50	\$ 175.00	\$ 87.50
2183	9/6/2022	Jonathan G. Lester	Team prep session for Dr. Antommara.	0.50	\$ 175.00	\$ 87.50
2184	9/6/2022	Jonathan G. Lester	Dr. Adkins deposition preparation.	0.25	\$ 175.00	\$ 43.75
2185	9/6/2022	Daniel J. Richardson	Regnerus cross-examination prep; research on [evidentiary rules re potential trial issue]; meeting to discuss Antommara witness preparation process.	1.50	\$ 430.00	\$ 645.00
2186	9/6/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, R. Kadosh (partial), and A. Halpern about pretrial order and order of witnesses.	1.50	\$ 550.00	\$ 825.00
2187	9/6/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and L. Cooper about team meeting agenda.	0.25	\$ 550.00	\$ 137.50
2188	9/6/2022	Lauren M. Goldsmith	Working on Dennis witness prep.	3.25	\$ 550.00	\$ 1,787.50
2189	9/6/2022	Lauren M. Goldsmith	Leading co-counsel/S&C team meeting.	1.50	\$ 550.00	\$ 825.00
2190	9/6/2022	Lauren M. Goldsmith	Emails w/ L. Goldsmith and A. Halpern about trial prep.	0.50	\$ 550.00	\$ 275.00
2191	9/6/2022	Arun Bodapati	Revising cross outline for prep of Amanda Dennis.	3.50	\$ 450.00	\$ 1,575.00
2192	9/6/2022	Arun Bodapati	Compiling notes of potentially relevant documents for prep of Dr. Hutchison - e.g. helpful and harmful medical records, public statements etc.	4.75	\$ 450.00	\$ 2,137.50
2193	9/6/2022	Alexander F.R. Peacocke	Reviewed document Major Filings EBinder (4842-2713-3181.1.3).pdf - Adobe Acrobat Standard DC (32-bit) Reviewed document Act 626 HB 1070 as enacted.pdf - Adobe Acrobat Standard DC (32-bit) Reviewed document Major Filings EBinder (4842-2713-3181.1.3).pdf - Adobe Acrobat Standard DC (32-bit)	0.50	\$ 200.00	\$ 100.00
2194	9/6/2022	Alexander F.R. Peacocke	Preparing claim chart.	2.50	\$ 200.00	\$ 500.00
2195	9/6/2022	Kenza Nadifi	Revised Background Materials Index - Dr Antommara (4891-3381-5569.1).docx	0.75	\$ 100.00	\$ 75.00
2196	9/6/2022	Kenza Nadifi	Compared Antommara index found in records email to outline used at Antommara deposition.	0.50	\$ 100.00	\$ 50.00
2197	9/6/2022	Kenza Nadifi	Located zip folder of files used in final Antommara binder and used them to recreate most recent version of binder, at the associates request.	1.75	\$ 100.00	\$ 175.00
2198	9/6/2022	Kenza Nadifi	Updated list of outstanding depo digests and sent to A. Halpern.	0.25	\$ 100.00	\$ 25.00
2199	9/6/2022	Kenza Nadifi	Searched on ND and SCFind for confirmed final version of binder used for the prep session with Dr. Antommara.	1.75	\$ 100.00	\$ 175.00
2200	9/6/2022	Kenza Nadifi	Ran redline to compare multiple versions of Antommara binder.	0.50	\$ 100.00	\$ 50.00
2201	9/6/2022	Kenza Nadifi	Saved Antommara declaration to ND.	0.25	\$ 100.00	\$ 25.00
2202	9/6/2022	Kenza Nadifi	Moved the documents uploaded by EDLS from recent production to the Produced ViewPoints Document folder in ND collabspc.	1.25	\$ 100.00	\$ 125.00
2203	9/6/2022	Cate M. Llewellyn	Reviewed docs re witness prep teams & witness schedule.	2.25	\$ 100.00	\$ 225.00
2204	9/6/2022	Cate M. Llewellyn	Reviewed Antommara deposition digest.	1.00	\$ 100.00	\$ 100.00
2205	9/7/2022	Laura Kabler Oswell	Call with S&C team re. witness prep.	1.00	\$ 650.00	\$ 650.00
2206	9/7/2022	Aviv S. Halpern	Trial prep and witness prep.	7.50	\$ 400.00	\$ 3,000.00
2207	9/7/2022	Jonathan G. Lester	Updating expert [materials for trial].	1.25	\$ 175.00	\$ 218.75
2208	9/7/2022	Jonathan G. Lester	Reviewing Attorney General productions for Brandt-related communications.	1.25	\$ 175.00	\$ 218.75
2209	9/7/2022	Jonathan G. Lester	Reviewing document productions for [preparation for trial].	1.00	\$ 175.00	\$ 175.00
2210	9/7/2022	Jonathan G. Lester	Prep Session #1 with Dr. Adkins.	0.75	\$ 175.00	\$ 131.25
2211	9/7/2022	Daniel J. Richardson	Continued work on Regnerus cross-examination outline.	0.75	\$ 430.00	\$ 322.50
2212	9/7/2022	Daniel J. Richardson	Meeting to discuss witness preparation for cross-examination.	1.00	\$ 430.00	\$ 430.00
2213	9/7/2022	Daniel J. Richardson	Reviewed Plaintiff expert summary and comparison documents and sent response re same.	0.50	\$ 430.00	\$ 215.00
2214	9/7/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about trial logistics and witness prep.	0.50	\$ 550.00	\$ 275.00
2215	9/7/2022	Lauren M. Goldsmith	Emails about Lundstrum witness prep., research about same.	0.75	\$ 550.00	\$ 412.50
2216	9/7/2022	Lauren M. Goldsmith	Working on Dennis witness prep.	3.50	\$ 550.00	\$ 1,925.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2217	9/7/2022	Arun Bodapati	Witness prep session for Dr. Deanna Adkins.	0.75	\$ 450.00	\$ 337.50
2218	9/7/2022	Arun Bodapati	Call with Leslie Cooper to discuss prep for Michele Hutchison.	1.00	\$ 450.00	\$ 450.00
2219	9/7/2022	Arun Bodapati	Reviewing materials for Deanna Adkins prep sessions.	3.50	\$ 450.00	\$ 1,575.00
2220	9/7/2022	Arun Bodapati	Reviewing materials for witness prep of Dr. Michele Hutchison.	2.25	\$ 450.00	\$ 1,012.50
2221	9/7/2022	Alexander F.R. Peacocke	Email correspondence with LCOOPER@aclu.org, Maxime D. Matthew regarding Team Karasic Check-In Email correspondence with LCOOPER@aclu.org, Knowlin-sohl@aclu.org, Maxime D. Matthew regarding karasic Email correspondence with knowlin-sohl@aclu.org, LCOOPER@aclu.org, Maxime D. Matthew regarding deposition and Statement	0.25	\$ 200.00	\$ 50.00
2222	9/7/2022	Alexander F.R. Peacocke	Meeting with Alexander Peacocke, Leslie Cooper, Knowlin, Maxime D. Matthew regarding Karasic Prep Call	0.50	\$ 200.00	\$ 100.00
2223	9/7/2022	Kenza Nadifi	Inquired with EDLS about a sharepoint for the case.	0.25	\$ 100.00	\$ 25.00
2224	9/7/2022	Kenza Nadifi	Uploaded pre-trial briefing to internal ND and ND collabspace including ACLU.	0.25	\$ 100.00	\$ 25.00
2225	9/7/2022	Cate M. Llewellyn	Reviewed Lundstrum deposition designations.	0.75	\$ 100.00	\$ 75.00
2226	9/7/2022	Cate M. Llewellyn	Revised witness flow timeline & prep teams document.	2.00	\$ 100.00	\$ 200.00
2227	9/8/2022	Aviv S. Halpern	Call with team re trial prep. Call with G. Smith re Turban and Bias Modules. Trial prep.	3.25	\$ 400.00	\$ 1,300.00
2228	9/8/2022	Jonathan G. Lester	Sending reports, declarations, and deposition transcript to Dr. Adkins.	0.50	\$ 175.00	\$ 87.50
2229	9/8/2022	Jonathan G. Lester	Reviewing document productions for [preparation for trial].	2.00	\$ 175.00	\$ 350.00
2230	9/8/2022	Daniel J. Richardson	Began drafting conclusions of law.	1.00	\$ 430.00	\$ 430.00
2231	9/8/2022	Daniel J. Richardson	Drafted outline for Regnerus cross and emailed team re same; drafted motion related to judicial notice of legislator document and emailed team re same.	3.25	\$ 430.00	\$ 1,397.50
2232	9/8/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about findings of fact/conclusions of law and witness prep.	0.50	\$ 550.00	\$ 275.00
2233	9/8/2022	Lauren M. Goldsmith	Working on trial themes.	0.25	\$ 550.00	\$ 137.50
2234	9/8/2022	Lauren M. Goldsmith	Working on Dennis witness prep.	1.25	\$ 550.00	\$ 687.50
2235	9/8/2022	Arun Bodapati	Meeting with Aviv Halpern and Daniel Richardson to discuss preparing proposed findings of fact and conclusions of law.	0.75	\$ 450.00	\$ 337.50
2236	9/8/2022	Arun Bodapati	Witness prep session for Dr. Michele Hutchison.	0.75	\$ 450.00	\$ 337.50
2237	9/8/2022	Arun Bodapati	Coordinating with paralegal Matt Palmer re preparation of exhibit list.	0.50	\$ 450.00	\$ 225.00
2238	9/8/2022	Arun Bodapati	Noting points of potential overlap between Hutchison and Stambough testimony.	1.75	\$ 450.00	\$ 787.50
2239	9/8/2022	Alexander F.R. Peacocke	Reviewed email from Daniel J. Richardson regarding Regnerus cross-examination plan	0.25	\$ 200.00	\$ 50.00
2240	9/8/2022	Cate M. Llewellyn	Meet with case team re witness preparations & upcoming deadlines for trial prep.	2.00	\$ 100.00	\$ 200.00
2241	9/8/2022	Cate M. Llewellyn	Reviewed Lindstrom deposition transcript designations.	2.25	\$ 100.00	\$ 225.00
2242	9/8/2022	Cate M. Llewellyn	Reviewed trial brief.	0.75	\$ 100.00	\$ 75.00
2243	9/8/2022	Cate M. Llewellyn	Reviewed list of daily trial procedures.	0.50	\$ 100.00	\$ 50.00
2244	9/9/2022	Aviv S. Halpern	Trial prep.	6.75	\$ 400.00	\$ 2,700.00
2245	9/9/2022	Jonathan G. Lester	Circulating updated expert witness testimony charts.	0.25	\$ 175.00	\$ 43.75
2246	9/9/2022	Jonathan G. Lester	Updating Jennen Medical Records Summary	0.75	\$ 175.00	\$ 131.25
2247	9/9/2022	Jonathan G. Lester	Joanna Brandt prep team meeting.	0.25	\$ 175.00	\$ 43.75
2248	9/9/2022	Daniel J. Richardson	Continued work on conclusions of law; drafted joint motion regarding legislator documents.	1.50	\$ 430.00	\$ 645.00
2249	9/9/2022	Lauren M. Goldsmith	Calls w/ L. Goldsmith and A. Halpern about legislator documents and pretrial order.	1.00	\$ 550.00	\$ 550.00
2250	9/9/2022	Lauren M. Goldsmith	Call w/ Brandt witness prep. team.	0.25	\$ 550.00	\$ 137.50
2251	9/9/2022	Lauren M. Goldsmith	Reviewing comments on claim chart.	0.50	\$ 550.00	\$ 275.00
2252	9/9/2022	Arun Bodapati	Revising direct and cross outlines for Amanda Dennis.	4.50	\$ 450.00	\$ 2,025.00
2253	9/9/2022	Arun Bodapati	Proposing edits to direct outline for Deanna Adkins, and considering points for cross.	2.50	\$ 450.00	\$ 1,125.00
2254	9/9/2022	Kenza Nadifi	Coordinated with help desk to gain access to document needed for trial preparation that was only available on Google Drive.	0.50	\$ 100.00	\$ 50.00
2255	9/9/2022	Kenza Nadifi	Conducted social media sweep on Dr. Turban.	1.00	\$ 100.00	\$ 100.00
2256	9/9/2022	Cate M. Llewellyn	Reviewed docs & met with team re trial logistics planning.	2.25	\$ 100.00	\$ 225.00
2257	9/10/2022	Jonathan G. Lester	Reviewing Adkins direct prep outline.	0.75	\$ 175.00	\$ 131.25
2258	9/10/2022	Jonathan G. Lester	Updating [materials for trial].	1.50	\$ 175.00	\$ 262.50
2259	9/10/2022	Jonathan G. Lester	Updating Jennen Medical Records Summary	0.50	\$ 175.00	\$ 87.50
2260	9/10/2022	Jonathan G. Lester	First prep session with Dylan Brandt.	1.00	\$ 175.00	\$ 175.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2261	9/10/2022	Arun Bodapati	Reviewing and proposing revisions to draft direct outline for Dr. Michele Hutchison.	1.75	\$ 450.00	\$ 787.50
2262	9/10/2022	Arun Bodapati	Reviewing and proposing revisions to draft direct outline for Dr. Deanna Adkins.	3.25	\$ 450.00	\$ 1,462.50
2263	9/11/2022	Aviv S. Halpern	Reviewed comments on pretrial order. Call with G. Smith re trial prep. Call with G. Smith re Turban prep. Trial and witness preparation.	6.25	\$ 400.00	\$ 2,500.00
2264	9/11/2022	Jonathan G. Lester	Reviewing expert reports for Adkins direct.	2.75	\$ 175.00	\$ 481.25
2265	9/11/2022	Jonathan G. Lester	Updating and sending [materials for trial].	0.25	\$ 175.00	\$ 43.75
2266	9/11/2022	Lauren M. Goldsmith	Reviewing joint proposed pretrial order.	0.50	\$ 550.00	\$ 275.00
2267	9/11/2022	Arun Bodapati	Preparing for prep session for Dr. Michele Hutchison.	1.00	\$ 450.00	\$ 450.00
2268	9/11/2022	Arun Bodapati	Drafting portion of direct outline for Dr. Hutchison regarding the patient plaintiffs.	3.00	\$ 450.00	\$ 1,350.00
2269	9/11/2022	Arun Bodapati	Witness prep session for Dr. Michele Hutchison.	2.00	\$ 450.00	\$ 900.00
2270	9/12/2022	Garrard R. Beeney	Emails with Ms. Klein re research.	0.25	\$ 800.00	\$ 200.00
2271	9/12/2022	Laura Kabler Oswell	Meeting with S&C, ACLU and local counsel teams.	1.00	\$ 650.00	\$ 650.00
2272	9/12/2022	Aviv S. Halpern	Trial preparation.	9.25	\$ 400.00	\$ 3,700.00
2273	9/12/2022	Jonathan G. Lester	Revising and sending notes on Dr. Adkins prep call.	1.00	\$ 175.00	\$ 175.00
2274	9/12/2022	Jonathan G. Lester	Providing feedback to paralegal team on creation of patient-plaintiff medical records binder.	1.00	\$ 175.00	\$ 175.00
2275	9/12/2022	Jonathan G. Lester	Witness prep call with expert witness Dr. Adkins.	1.50	\$ 175.00	\$ 262.50
2276	9/12/2022	Jonathan G. Lester	Revising and sending notes from call with Joanna Brandt.	0.75	\$ 175.00	\$ 131.25
2277	9/12/2022	Jonathan G. Lester	Joanna Brandt witness prep call.	1.00	\$ 175.00	\$ 175.00
2278	9/12/2022	Jonathan G. Lester	Additional Dr. Adkins preparation on direct testimony outline.	0.25	\$ 175.00	\$ 43.75
2279	9/12/2022	Daniel J. Richardson	Continued work on draft of conclusions of law.	0.75	\$ 430.00	\$ 322.50
2280	9/12/2022	Lauren M. Goldsmith	Brandt witness prep.	1.00	\$ 550.00	\$ 550.00
2281	9/12/2022	Lauren M. Goldsmith	Call about trial logistics.	0.75	\$ 550.00	\$ 412.50
2282	9/12/2022	Lauren M. Goldsmith	Co-counsel team meeting.	1.00	\$ 550.00	\$ 550.00
2283	9/12/2022	Lauren M. Goldsmith	Reviewing summary of [materials for trial].	0.50	\$ 550.00	\$ 275.00
2284	9/12/2022	Lauren M. Goldsmith	Dennis witness prep.	1.75	\$ 550.00	\$ 962.50
2285	9/12/2022	Arun Bodapati	Correspondence and prep for various witness teams - Adkins, Dennis, Embry.	2.50	\$ 450.00	\$ 1,125.00
2286	9/12/2022	Arun Bodapati	Proposing revisions to direct exam outline for Dr. Michele Hutchison.	0.50	\$ 450.00	\$ 225.00
2287	9/12/2022	Arun Bodapati	Witness prep session for Dr. Deanna Adkins.	2.00	\$ 450.00	\$ 900.00
2288	9/12/2022	Arun Bodapati	Preparing witness and exhibit lists for exchange with defendants.	1.25	\$ 450.00	\$ 562.50
2289	9/12/2022	Cate M. Llewellyn	Reviewed Turban Declaration & Reports.	0.75	\$ 100.00	\$ 75.00
2290	9/12/2022	Cate M. Llewellyn	Reviewed S. Jennen medical records binder, re witness prep.	2.50	\$ 100.00	\$ 250.00
2291	9/13/2022	Garrard R. Beeney	Emails re time limits.	0.25	\$ 800.00	\$ 200.00
2292	9/13/2022	Aviv S. Halpern	Coordinated trial logistics.	0.75	\$ 400.00	\$ 300.00
2293	9/13/2022	Aviv S. Halpern	Revised Perry cross examination outline. Conducted research on Hruz and Campbell. Reviewed Jennen medical records in prep for Campbell cross. Attn to documents sent to Turban. Revised Turban direct. Communicated with team re [materials for trial and strategy re same].	7.50	\$ 400.00	\$ 3,000.00
2294	9/13/2022	Jonathan G. Lester	Updating [materials for trial].	0.50	\$ 175.00	\$ 87.50
2295	9/13/2022	Jonathan G. Lester	Reviewing updated Adkins direct testimony binder.	0.25	\$ 175.00	\$ 43.75
2296	9/13/2022	Jonathan G. Lester	Additional changes to Jennen medical record e-binder.	0.25	\$ 175.00	\$ 43.75
2297	9/13/2022	Daniel J. Richardson	Reviewed Antommara direct examination outline and sent edits re same.	0.75	\$ 430.00	\$ 322.50
2298	9/13/2022	Lauren M. Goldsmith	Calls w/ L. Goldsmith and A. Halpern about trial prep.	0.00	\$ 550.00	\$ -
2299	9/13/2022	Lauren M. Goldsmith	Emails about pretrial order.	0.25	\$ 550.00	\$ 137.50
2300	9/13/2022	Lauren M. Goldsmith	Working on witness prep.	1.50	\$ 550.00	\$ 825.00
2301	9/13/2022	Arun Bodapati	Preparing exhibit and witness lists for exchange with defendants, and reviewing documents to determine initial exhibit set.	7.50	\$ 450.00	\$ 3,375.00
2302	9/13/2022	Arun Bodapati	Revising direct outline for Deanna Adkins.	0.50	\$ 450.00	\$ 225.00
2303	9/13/2022	Alexander F.R. Peacocke	Reviewed email from breacan@walaslawfirm.com regarding Brandt // Pretrial Order Reviewed email from Gary@acuarkansas.org regarding Brandt // Pretrial Order Reviewed email from Lauren M. Goldsmith regarding Brandt // Pretrial Order	0.25	\$ 200.00	\$ 50.00
2304	9/13/2022	Cate M. Llewellyn	Reviewed list of trial supplies.	1.00	\$ 100.00	\$ 100.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2305	9/13/2022	Cate M. Llewellyn	Reviewed Jennen medical records re witness prep.	2.25	\$ 100.00	\$ 225.00
2306	9/14/2022	Garrard R. Beene	Emails re PTO.	0.50	\$ 800.00	\$ 400.00
2307	9/14/2022	Laura Kabler Oswell	Call re. pretrial order and emails re. same.	1.00	\$ 650.00	\$ 650.00
2308	9/14/2022	Aviv S. Halpern	Call with local counsel re draft pretrial order. Call with A. Bodapati re exhibit list. Call with L. Goldsmith re pretrial order. Campbell witness prep and other trial prep. Revised Perry cross outline. Revised Turban direct outline. Started chart on Jennen medical records.	6.25	\$ 400.00	\$ 2,500.00
2309	9/14/2022	Jonathan G. Lester	Drafting and sending notes from prep meeting with Dr. Adkins.	0.50	\$ 175.00	\$ 87.50
2310	9/14/2022	Jonathan G. Lester	Dr. Adkins cross-examination prep.	0.50	\$ 175.00	\$ 87.50
2311	9/14/2022	Jonathan G. Lester	Updating Dylan Brandt direct testimony outline.	0.50	\$ 175.00	\$ 87.50
2312	9/14/2022	Jonathan G. Lester	Preparing for Dr. Adkins' witness preparation session.	0.25	\$ 175.00	\$ 43.75
2313	9/14/2022	Jonathan G. Lester	Third witness prep call with expert witness Dr. Adkins.	1.75	\$ 175.00	\$ 306.25
2314	9/14/2022	Daniel J. Richardson	Call to discuss edits to proposed pre-trial order.	0.50	\$ 430.00	\$ 215.00
2315	9/14/2022	Daniel J. Richardson	Finished drafting conclusions of law and circulated to associates.	4.00	\$ 430.00	\$ 1,720.00
2316	9/14/2022	Lauren M. Goldsmith	Call w/ L. Oswell and L. Goldsmith about trial prep.	0.50	\$ 550.00	\$ 275.00
2317	9/14/2022	Lauren M. Goldsmith	Calls w/ L. Goldsmith and A. Halpern about trial prep.	0.25	\$ 550.00	\$ 137.50
2318	9/14/2022	Lauren M. Goldsmith	Call w/ co-counsel about pretrial order.	0.75	\$ 550.00	\$ 412.50
2319	9/14/2022	Lauren M. Goldsmith	Dennis witness prep.	0.50	\$ 550.00	\$ 275.00
2320	9/14/2022	Lauren M. Goldsmith	Revising direct outline.	2.25	\$ 550.00	\$ 1,237.50
2321	9/14/2022	Arun Bodapati	Updating witness and exhibit list.	0.75	\$ 450.00	\$ 337.50
2322	9/14/2022	Arun Bodapati	Meeting with Aviv Halpern to discuss [exhibit list for trial].	0.25	\$ 450.00	\$ 112.50
2323	9/14/2022	Arun Bodapati	Witness prep session for Dr. Deanna Adkins.	1.50	\$ 450.00	\$ 675.00
2324	9/14/2022	Arun Bodapati	Witness prep session for Dr. Michele Hutchison.	2.25	\$ 450.00	\$ 1,012.50
2325	9/14/2022	Arun Bodapati	Initial call with prep team for Amanda Dennis.	0.50	\$ 450.00	\$ 225.00
2326	9/14/2022	Alexander F.R. Peacocke	Reviewed email from Lauren M. Goldsmith regarding Subpoena for Janet Cathey re. Brandt v. Rutledge; Case No. 4:21-cv-450 Reviewed email from Lauren M. Goldsmith regarding Subpoena for Janet Cathey re. Brandt v. Rutledge; Case No. 4:21-cv-450	0.25	\$ 200.00	\$ 50.00
2327	9/14/2022	Alexander F.R. Peacocke	Reviewed document Expert Reports Binder (4855-4073-5494.1.2).pdf - Adobe Acrobat Standard DC (32-bit)	1.00	\$ 200.00	\$ 200.00
2328	9/14/2022	Kenza Nadifi	Saved new documents to ND and reorganized ND space accordingly.	1.00	\$ 100.00	\$ 100.00
2329	9/14/2022	Cate M. Llewellyn	Reviewed S. Ho confidential deposition exhibits.	1.50	\$ 100.00	\$ 150.00
2330	9/15/2022	Aviv S. Halpern	Call re trial logistics. Drafted Turban prep materials. Edited draft exhibit list. Drafted proposed findings of fact. Conducted reserach re Hruz for cross prep. Trial logistics.	7.00	\$ 400.00	\$ 2,800.00
2331	9/15/2022	Jonathan G. Lester	Revising notes from prep session with Dr. Antommara.	0.50	\$ 175.00	\$ 87.50
2332	9/15/2022	Jonathan G. Lester	First prep session with Dr. Antommara.	1.75	\$ 175.00	\$ 306.25
2333	9/15/2022	Jonathan G. Lester	Continuing Dr. Adkins cross-examination prep.	1.00	\$ 175.00	\$ 175.00
2334	9/15/2022	Jonathan G. Lester	Call with Leslie Cooper of the ACLU and Alex Peacocke of S&C to discuss Dr. Ho testimony.	0.50	\$ 175.00	\$ 87.50
2335	9/15/2022	Jonathan G. Lester	Pulling materials for Dr. Hruz cross-examination prep.	0.25	\$ 175.00	\$ 43.75
2336	9/15/2022	Jonathan G. Lester	Final review of Jennen medical records binder.	0.50	\$ 175.00	\$ 87.50
2337	9/15/2022	Daniel J. Richardson	Drafted notes on Lundstrum depo comments and circulated to team for review.	1.00	\$ 430.00	\$ 430.00
2338	9/15/2022	Daniel J. Richardson	Antommara prep meeting; communicated with trial witness prep teams about exhibits; prepared Antommara cross-examination materials.	3.00	\$ 430.00	\$ 1,290.00
2339	9/15/2022	Lauren M. Goldsmith	Calls w/ L. Goldsmith and A. Halpern about trial prep.	0.75	\$ 550.00	\$ 412.50
2340	9/15/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and L. Cooper (ACLU) about trial prep.	0.75	\$ 550.00	\$ 412.50
2341	9/15/2022	Lauren M. Goldsmith	Continuing to revise direct outline.	2.50	\$ 550.00	\$ 1,375.00
2342	9/15/2022	Lauren M. Goldsmith	Reviewing Lundstrum prep. material.	1.25	\$ 550.00	\$ 687.50
2343	9/15/2022	Lauren M. Goldsmith	Emails w/ Lundstrum prep. team.	0.25	\$ 550.00	\$ 137.50
2344	9/15/2022	Arun Bodapati	Tasks related to exhibit list - reviewing exhibits, revising list, and following up with team re: outstanding requests.	4.00	\$ 450.00	\$ 1,800.00
2345	9/15/2022	Alexander F.R. Peacocke	Meeting with Jonathan G. Lester, Leslie Cooper, Alexander Peacocke regarding Dr. Ho Witness Prep (Team Meeting)	0.50	\$ 200.00	\$ 100.00
2346	9/15/2022	Cate M. Llewellyn	Reviewed Jennen medical records re witness prep.	2.00	\$ 100.00	\$ 200.00
2347	9/16/2022	Garrard R. Beene	Telecon Ms. Oswell re trial prep.	0.25	\$ 800.00	\$ 200.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2348	9/16/2022	Laura Kabler Oswell	Emails re. pretrial order.	0.25	\$ 650.00	\$ 162.50
2349	9/16/2022	Laura Kabler Oswell	Call with Beeney re. trial planning.	0.25	\$ 650.00	\$ 162.50
2350	9/16/2022	Aviv S. Halpern	Drafted and edited proposed pretrial order. Communicated with local counsel re same. Trial logistics. Hruz cross prep. Lundstrum cross prep. Attn to legislator documents. Compiled [potential trial exhibits for consideration].	6.50	\$ 400.00	\$ 2,600.00
2351	9/16/2022	Jonathan G. Lester	Compiling exhibits from Dr. Antommara's deposition to send to ACLU.	0.25	\$ 175.00	\$ 43.75
2352	9/16/2022	Jonathan G. Lester	Communicating with Dr. Antommara about updated CV.	0.25	\$ 175.00	\$ 43.75
2353	9/16/2022	Jonathan G. Lester	Call to discuss [materials for trial].	0.75	\$ 175.00	\$ 131.25
2354	9/16/2022	Daniel J. Richardson	Meeting to discuss Lundstrum witness exhibits.	0.75	\$ 430.00	\$ 322.50
2355	9/16/2022	Daniel J. Richardson	Continued work on Regnerus cross outline.	0.75	\$ 430.00	\$ 322.50
2356	9/16/2022	Lauren M. Goldsmith	Witness prep.	0.75	\$ 550.00	\$ 412.50
2357	9/16/2022	Lauren M. Goldsmith	Emails about pretrial order, discussing same w/ A. Halpern.	0.25	\$ 550.00	\$ 137.50
2358	9/16/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about pretrial order.	0.50	\$ 550.00	\$ 275.00
2359	9/16/2022	Lauren M. Goldsmith	Call w/ Lundstrum prep. team.	0.75	\$ 550.00	\$ 412.50
2360	9/16/2022	Lauren M. Goldsmith	Emails w/ Lundstrum prep. team.	0.50	\$ 550.00	\$ 275.00
2361	9/16/2022	Lauren M. Goldsmith	Prep. for call w/ Lundstrum prep. team.	0.25	\$ 550.00	\$ 137.50
2362	9/16/2022	Arun Bodapati	Tasks related to exhibit list - reviewing exhibits, revising list, following up with team members re: outstanding requests.	4.00	\$ 450.00	\$ 1,800.00
2363	9/16/2022	Alexander F.R. Peacocke	Reviewed document Expert Reports Binder (4855-4073-5494.1.2).pdf - Adobe Acrobat Standard DC (32-bit) Reviewed document Expert Reports Binder (4855-4073-5494.1.2).pdf - Adobe Acrobat Standard DC (32-bit)	0.25	\$ 200.00	\$ 50.00
2364	9/16/2022	Alexander F.R. Peacocke	Reviewed document Stephanie Ho 4-15 Exhibit 1.pdf 4892-1095-2222 v.1 - Adobe Acrobat Standard DC (32-bit)	0.50	\$ 200.00	\$ 100.00
2365	9/16/2022	Alexander F.R. Peacocke	Revised document Karasic direct3 [Read-Only].docx Revised document Karasic direct Examination outline (LC).docx 4894-0185-3491 v.1.1.docx	0.50	\$ 200.00	\$ 100.00
2366	9/16/2022	Cate M. Llewellyn	Reviewed Stambough exhibit - letter to clinic families.	0.75	\$ 100.00	\$ 75.00
2367	9/17/2022	Arun Bodapati	Updating exhibit list and exhibits and circulating to full team.	2.50	\$ 450.00	\$ 1,125.00
2368	9/18/2022	Garrard R. Beeney	Emails re SOC 8	0.25	\$ 800.00	\$ 200.00
2369	9/18/2022	Aviv S. Halpern	Coordinated trial logistics and other trial prep. Edited pretrial order. Edited trial exhibit list. Compiled chart of Jennen's medical records. Campbell prep. Hruz prep. Turban Prep.	6.25	\$ 400.00	\$ 2,500.00
2370	9/18/2022	Jonathan G. Lester	Dr. Antommara cross-examination topic areas.	0.75	\$ 175.00	\$ 131.25
2371	9/18/2022	Jonathan G. Lester	Updating Dr. Adkins cross-examination materials.	2.50	\$ 175.00	\$ 437.50
2372	9/18/2022	Daniel J. Richardson	Reviewed emails regarding new legislator documents and sent responses re same; reviewed defendant expert reports to prepare for Antommara cross-examination prep.	1.25	\$ 430.00	\$ 537.50
2373	9/18/2022	Lauren M. Goldsmith	Emails w/ A. Halpern and G. Smith about trial logistics.	0.25	\$ 550.00	\$ 137.50
2374	9/18/2022	Arun Bodapati	Compiling cross prep materials for Adkins.	1.50	\$ 450.00	\$ 675.00
2375	9/18/2022	Arun Bodapati	Witness prep session for Dr. Michele Hutchison.	1.50	\$ 450.00	\$ 675.00
2376	9/18/2022	Alexander F.R. Peacocke	Revised document Branman Depo Notes.docx Reviewed document RhysBranmanMD_PDFTran.pdf 4871-6441-9112 v.1 - Adobe Acrobat Standard DC (32-bit) Reviewed document RhysBranmanMD_PDFTran.pdf 4871-6441-9112 v.1 - Adobe Acrobat Standard DC (32-bit) Revised document Branman Depo Notes.docx Reviewed document RhysBranmanMD_PDFTran.pdf 4871-6441-9112 v.1 - Adobe Acrobat Standard DC (32-bit) Revised document Branman Depo Notes.docx Reviewed document RhysBranmanMD_PDFTran.pdf 4871-6441-9112 v.1 - Adobe Acrobat Standard DC (32-bit) Reviewed document RhysBranmanMD_PDFTran.pdf 4871-6441-9112 v.1 - Adobe Acrobat Standard DC (32-bit)	1.75	\$ 200.00	\$ 350.00
2377	9/19/2022	Aviv S. Halpern	Coordinated trial logistics. Edited pretrial order. Drafted proposed findings of fact. Edited Perry outline. Call with M. Matthew re Perry.	8.25	\$ 400.00	\$ 3,300.00
2378	9/19/2022	Jonathan G. Lester	Editing notes from prep session with Dr. Antommara.	0.50	\$ 175.00	\$ 87.50
2379	9/19/2022	Jonathan G. Lester	Revising and distributing notes from Dylan Brandt witness prep call.	0.50	\$ 175.00	\$ 87.50
2380	9/19/2022	Jonathan G. Lester	Prep session with Dylan Brandt.	1.00	\$ 175.00	\$ 175.00
2381	9/19/2022	Jonathan G. Lester	Call with A. Halpern to discuss Jennen medical records chart.	0.25	\$ 175.00	\$ 43.75
2382	9/19/2022	Jonathan G. Lester	Communicating updated Sabrina Jennen binder to co-counsel.	0.25	\$ 175.00	\$ 43.75
2383	9/19/2022	Jonathan G. Lester	Updating background research sweep for Dr. Antommara.	0.25	\$ 175.00	\$ 43.75
2384	9/19/2022	Jonathan G. Lester	Prep session with expert witness Dr. Antommara.	1.50	\$ 175.00	\$ 262.50
2385	9/19/2022	Daniel J. Richardson	Antommara witness prep meeting	1.50	\$ 430.00	\$ 645.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2386	9/19/2022	Daniel J. Richardson	Continued work on Regnerus cross-examination outline.	2.00	\$ 430.00	\$ 860.00
2387	9/19/2022	Daniel J. Richardson	Emailed summary of Antommara cross topics; reviewed Lundstrum designations and sent email with analysis re same.	1.00	\$ 430.00	\$ 430.00
2388	9/19/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and L. Cooper (ACLU) about pretrial order.	0.25	\$ 550.00	\$ 137.50
2389	9/19/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and M. Matthew about witness prep.	0.00	\$ 550.00	\$ -
2390	9/19/2022	Lauren M. Goldsmith	Call w/ co-counsel.	1.00	\$ 550.00	\$ 550.00
2391	9/19/2022	Lauren M. Goldsmith	Emails w/ team about exhibit list.	0.25	\$ 550.00	\$ 137.50
2392	9/19/2022	Lauren M. Goldsmith	Reviewing memo about SOC 8.	0.50	\$ 550.00	\$ 275.00
2393	9/19/2022	Lauren M. Goldsmith	Emails w/ Lundstrum prep. team.	0.25	\$ 550.00	\$ 137.50
2394	9/19/2022	Arun Bodapati	Revising cross prep outline for Amanda/Shayne Dennis and circulating to prep team.	2.25	\$ 450.00	\$ 1,012.50
2395	9/19/2022	Arun Bodapati	Updating exhibit list and set for exchange with Defendants on 9/21.	4.75	\$ 450.00	\$ 2,137.50
2396	9/20/2022	Aviv S. Halpern	Edited exhibit list. Communicated with A. Bodapati re same. Coordinated trial logistics. Communicated with team re ADF conferences. Turban prep. Drafted Jennen witness prep materials. Meeting re Jennen prep.	9.25	\$ 400.00	\$ 3,700.00
2397	9/20/2022	Jonathan G. Lester	Reviewing for opposition expert comments on Dr. Adkins.	1.25	\$ 175.00	\$ 218.75
2398	9/20/2022	Jonathan G. Lester	Reviewing [materials for trial].	0.75	\$ 175.00	\$ 131.25
2399	9/20/2022	Daniel J. Richardson	Continued work on Regnerus cross examination outline.	1.75	\$ 430.00	\$ 752.50
2400	9/20/2022	Daniel J. Richardson	Reviewed email from opposing counsel re petition for review and circulated comments to full team re same	0.25	\$ 430.00	\$ 107.50
2401	9/20/2022	Lauren M. Goldsmith	Participating in Jennen witness prep.	1.50	\$ 550.00	\$ 825.00
2402	9/20/2022	Lauren M. Goldsmith	Leading Dennis witness prep.	1.25	\$ 550.00	\$ 687.50
2403	9/20/2022	Lauren M. Goldsmith	Prep. for Dennis prep. call.	0.50	\$ 550.00	\$ 275.00
2404	9/20/2022	Lauren M. Goldsmith	Emails w/ Lundstrum prep. team.	0.25	\$ 550.00	\$ 137.50
2405	9/20/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about witness prep.	0.50	\$ 550.00	\$ 275.00
2406	9/20/2022	Arun Bodapati	Additional work on exhibit list and set to be finalized on 9/21.	9.00	\$ 450.00	\$ 4,050.00
2407	9/20/2022	Arun Bodapati	Reviewing/revising Adkins prep materials.	0.50	\$ 450.00	\$ 225.00
2408	9/20/2022	Arun Bodapati	Initial prep session for Amanda Dennis.	1.25	\$ 450.00	\$ 562.50
2409	9/21/2022	Garrard R. Beene	Emails re trial issues.	0.25	\$ 800.00	\$ 200.00
2410	9/21/2022	Aviv S. Halpern	Edited and reviewed exhibit list. Attn to Defendants exhibit and witness list. Communicated with team re same. Drafted preliminary list of objections. Turban prep. Call with trial tech companies. Campbell prep. Attn to Hruz transcript.	12.25	\$ 400.00	\$ 4,900.00
2411	9/21/2022	Daniel J. Richardson	Call with Stambough team	1.00	\$ 430.00	\$ 430.00
2412	9/21/2022	Daniel J. Richardson	Reviewed Lundstrum exhibits and sent email re same.	0.25	\$ 430.00	\$ 107.50
2413	9/21/2022	Daniel J. Richardson	Reviewed defendants exhibit list and sent emails re same.	0.25	\$ 430.00	\$ 107.50
2414	9/21/2022	Lauren M. Goldsmith	Emails about exhibit and witness list.	0.75	\$ 550.00	\$ 412.50
2415	9/21/2022	Lauren M. Goldsmith	Emails w/ Lundstrum prep. team.	0.25	\$ 550.00	\$ 137.50
2416	9/21/2022	Lauren M. Goldsmith	Revising Dennis direct outline.	1.25	\$ 550.00	\$ 687.50
2417	9/21/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and L. Cooper (ACLU) about pretrial order.	0.50	\$ 550.00	\$ 275.00
2418	9/21/2022	Lauren M. Goldsmith	Calls w/ L. Goldsmith and A. Halpern about pretrial order, exhibit and witness list, witness prep.	1.50	\$ 550.00	\$ 825.00
2419	9/21/2022	Arun Bodapati	Commenting on first draft of prep outline for Dr. Stambough.	0.50	\$ 450.00	\$ 225.00
2420	9/21/2022	Arun Bodapati	Filling in key points for Adkins prep outline.	3.50	\$ 450.00	\$ 1,575.00
2421	9/21/2022	Arun Bodapati	Finalizing exhibit list and set for exchange with Defendants.	5.50	\$ 450.00	\$ 2,475.00
2422	9/21/2022	Arun Bodapati	Initial planning call for Stambough prep team.	1.00	\$ 450.00	\$ 450.00
2423	9/21/2022	Kenza Nadifi	Located and sent PDF versions of K. Stambough.	0.50	\$ 100.00	\$ 50.00
2424	9/22/2022	Laura Kabler Oswell	Call with Goldsmith and Halpern re. Brandt trial planning.	0.50	\$ 650.00	\$ 325.00
2425	9/22/2022	Aviv S. Halpern	Coordinated trial logistics. Turban prep session. Compiled documents for Turban prep session. Put together documents for Jennen and Campbell prep. Edited Campbell cross outline. Drafted objections to Defendants' exhibits. Call re same. Calls with trial techs. Edited pretrial order. Attn to hotel contract.	11.50	\$ 400.00	\$ 4,600.00
2426	9/22/2022	Jonathan G. Lester	Prep session with Dr. Antommara.	2.00	\$ 175.00	\$ 350.00
2427	9/22/2022	Jonathan G. Lester	Joanna Brandt witness prep session (partial).	1.00	\$ 175.00	\$ 175.00
2428	9/22/2022	Jonathan G. Lester	Updating Dr. Adkins direct outline	1.25	\$ 175.00	\$ 218.75
2429	9/22/2022	Daniel J. Richardson	Regnerus cross-examination prep	1.00	\$ 430.00	\$ 430.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2430	9/22/2022	Daniel J. Richardson	Antommara direct examination prep session	1.50	\$ 430.00	\$ 645.00
2431	9/22/2022	Lauren M. Goldsmith	Call w/ L. Oswell, L. Goldsmith, and A. Halpern about witness teams and travel arrangements.	0.50	\$ 550.00	\$ 275.00
2432	9/22/2022	Lauren M. Goldsmith	Emails about deposition designations.	0.25	\$ 550.00	\$ 137.50
2433	9/22/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Peacocke, A. Bodapati, and A. Halpern about trial prep.	0.75	\$ 550.00	\$ 412.50
2434	9/22/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith about A. Halpern trial logistics.	1.25	\$ 550.00	\$ 687.50
2435	9/22/2022	Lauren M. Goldsmith	Call w/ J. Brandt (witness prep.).	1.25	\$ 550.00	\$ 687.50
2436	9/22/2022	Lauren M. Goldsmith	Emails about exhibit list and witness list.	0.25	\$ 550.00	\$ 137.50
2437	9/22/2022	Arun Bodapati	Meeting with Lauren Goldsmith, Aviv Halpern, and Alex Peacocke to discuss various trial logistics.	0.75	\$ 450.00	\$ 337.50
2438	9/22/2022	Arun Bodapati	Reviewing Defendants' initial exhibits and considering potential objections.	9.25	\$ 450.00	\$ 4,162.50
2439	9/22/2022	Arun Bodapati	Revising Adkins outline to add more key points.	1.75	\$ 450.00	\$ 787.50
2440	9/22/2022	Alexander F.R. Peacocke	Reviewed email from LCOOPER@aclu.org regarding Dr. Ho prep	0.25	\$ 200.00	\$ 50.00
2441	9/22/2022	Alexander F.R. Peacocke	Reviewed email from ECFdocuments@pacerpro.com regarding New document: Brandt et al v. Rutledge et al (Doc# 196, E.D. Ark. 4:21-cv-00450-JM) Reviewed email from Lauren M. Goldsmith regarding New document: Brandt et al v. Rutledge et al (Doc# 196, E.D. Ark. 4:21-cv-00450-JM) Reviewed email from Lauren M. Goldsmith regarding New document: Brandt et al v. Rutledge et al (Doc# 196, E.D. Ark. 4:21-cv-00450-JM) Reviewed email from LCOOPER@aclu.org regarding New document: Brandt et al v. Rutledge et al (Doc# 196, E.D. Ark. 4:21-cv-00450-JM) Reviewed email from Lauren M. Goldsmith regarding Upcoming out of office - September & October	0.50	\$ 200.00	\$ 100.00
2442	9/22/2022	Alexander F.R. Peacocke	Reviewed email from Aviv S. Halpern regarding Third Party Witness Timing	0.25	\$ 200.00	\$ 50.00
2443	9/22/2022	Alexander F.R. Peacocke	Reviewed document Stephanie Ho (NONCONFIDENTIAL) - FINAL - USE THIS ONE_fulltranscript.pdf - Adobe Acrobat Standard DC (32-bit)	1.25	\$ 200.00	\$ 250.00
2444	9/22/2022	Kenza Nadifi	Revised document ACLU Brandt Depo Transcript Contacts (003).docx	0.25	\$ 100.00	\$ 25.00
2445	9/22/2022	Kenza Nadifi	Created new subfolders in ND space and uploaded exhibit and witness list documents.	1.25	\$ 100.00	\$ 125.00
2446	9/22/2022	Kenza Nadifi	Call with Veritext to determine why only three out of J. Cathey's deposition exhibits were sent when all were requested weeks ago.	0.25	\$ 100.00	\$ 25.00
2447	9/22/2022	Kenza Nadifi	Hunted for remaining outstanding plaintiffs' exhibits.	2.00	\$ 100.00	\$ 200.00
2448	9/22/2022	Kenza Nadifi	Compiled the exhibits from Defendants' exhibit list with assistance from C. Llewellyn.	4.00	\$ 100.00	\$ 400.00
2449	9/22/2022	Cate M. Llewellyn	Reviewed Defendants' exhibit list.	2.50	\$ 100.00	\$ 250.00
2450	9/23/2022	Aviv S. Halpern	Communicated with associates re evidence cheat sheet. Edited same. Coordinated trial logistics. Turban prep session. Drafted proposed findings of fact. Emailed with A. Bodapati re objections to Defendants' exhibits. Other trial prep.	4.50	\$ 400.00	\$ 1,800.00
2451	9/23/2022	Daniel J. Richardson	Emailed full team and plan for trial preparation and major themes to explore on cross-examination.	0.50	\$ 430.00	\$ 215.00
2452	9/23/2022	Arun Bodapati	Considering objections to Defendants' exhibits.	1.75	\$ 450.00	\$ 787.50
2453	9/23/2022	Arun Bodapati	Providing comments and edits to update outline for prep of Dr. Michele Hutchison.	3.50	\$ 450.00	\$ 1,575.00
2454	9/23/2022	Arun Bodapati	Witness prep session for Dr. Michele Hutchison, and sending Dr. Hutchison medical records for her review.	1.50	\$ 450.00	\$ 675.00
2455	9/23/2022	Alexander F.R. Peacocke	Reviewed document Stephanie Ho (CONFIDENTIAL) - FINAL - USE THIS ONE_full_ex.pdf - Adobe Acrobat Standard DC (32-bit) Reviewed document Stephanie Ho (CONFIDENTIAL) - FINAL - USE THIS ONE_full_ex.pdf - Adobe Acrobat Standard DC (32-bit) Reviewed document Stephanie Ho (CONFIDENTIAL) - FINAL - USE THIS ONE_full_ex.pdf - Adobe Acrobat Standard DC (32-bit) Reviewed document Stephanie Ho (CONFIDENTIAL) - FINAL - USE THIS ONE_full_ex.pdf - Adobe Acrobat Standard DC (32-bit)	0.75	\$ 200.00	\$ 150.00
2456	9/23/2022	Kenza Nadifi	Determined which publications from plaintiffs' exhibits are free for download, coordinated with the help desk to locate and pull them, added said articles to box folder, and circulated.	4.50	\$ 100.00	\$ 450.00
2457	9/23/2022	Kenza Nadifi	Collected office and cell phone numbers from the S&C team, put together in a spreadsheet, and circulated.	1.00	\$ 100.00	\$ 100.00
2458	9/23/2022	Cate M. Llewellyn	Admin re troubleshooting problems with ND workspace for 900001.03506.	0.25	\$ 100.00	\$ 25.00
2459	9/24/2022	Aviv S. Halpern	Emailed with ACLU re trial witness estimates. Attn to Turban materials sent by G. Smith. Edited Turban materials. Reviewed cross-examination prep outline for Perry. Emailed with D. Richardson re same. Perry cross prep.	3.00	\$ 400.00	\$ 1,200.00
2460	9/24/2022	Jonathan G. Lester	Witness prep meeting with Dylan Brandt.	0.75	\$ 175.00	\$ 131.25
2461	9/24/2022	Daniel J. Richardson	Emailed ACLU team about cross-examination prep for Regnerus.	0.25	\$ 430.00	\$ 107.50
2462	9/24/2022	Alexander F.R. Peacocke	Reviewing Dr. Ho deposition transcript.	2.00	\$ 200.00	\$ 400.00
2463	9/24/2022	Alexander F.R. Peacocke	Meeting with Alexander Peacocke, Donnie, ECHOLS, Gregory L. Smith, Robert Stodola, Sarah Everett regarding Donnie Saxton Witness Prep Session #1	1.25	\$ 200.00	\$ 250.00
2464	9/25/2022	Garrard R. Beeneey	Emails with Cooper re schedule.	0.25	\$ 800.00	\$ 200.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2465	9/25/2022	Aviv S. Halpern	Expert witness prep. Coordinated trial logistics. Reviewed revised conclusions of law. Drafted proposed findings of fact. Emailed with A. Bodapati and L. Goldsmith re defendants' exhibits.	5.00	\$ 400.00	\$ 2,000.00
2466	9/25/2022	Jonathan G. Lester	Revising meeting notes with Dr. Adkins.	0.25	\$ 175.00	\$ 43.75
2467	9/25/2022	Jonathan G. Lester	Prep session with Dr. Adkins.	1.50	\$ 175.00	\$ 262.50
2468	9/25/2022	Daniel J. Richardson	Continued work on Regnerus cross outline; finished conclusions of law; reviewed objections to deft's exhibit list.	2.25	\$ 430.00	\$ 967.50
2469	9/25/2022	Arun Bodapati	Preparing cross prep points for Dr. Hutchison.	2.50	\$ 450.00	\$ 1,125.00
2470	9/25/2022	Arun Bodapati	Witness prep session for Dr. Michele Hutchison.	1.75	\$ 450.00	\$ 787.50
2471	9/25/2022	Arun Bodapati	Witness prep session for Dr. Deanna Adkins.	1.50	\$ 450.00	\$ 675.00
2472	9/25/2022	Kenza Nadifi	Updated box folder of exhibits and shared with all relevant parties.	0.50	\$ 100.00	\$ 50.00
2473	9/25/2022	Kenza Nadifi	Communicated with S&C and ACLU associates about Box folder access issues, and box log on instructions for external users.	1.25	\$ 100.00	\$ 125.00
2474	9/26/2022	Laura Kabler Oswell	Attend team call with ACLU, S&C and Arkansas teams.	0.50	\$ 650.00	\$ 325.00
2475	9/26/2022	Jonathan G. Lester	Dr. Adkins prep session.	2.25	\$ 175.00	\$ 393.75
2476	9/26/2022	Jonathan G. Lester	Drafting questions for Dr. Antommara cross-exam prep.	1.25	\$ 175.00	\$ 218.75
2477	9/26/2022	Jonathan G. Lester	Call with D. Richardson to debrief after prep session with Dr. Antommara.	0.25	\$ 175.00	\$ 43.75
2478	9/26/2022	Jonathan G. Lester	Prep session with Dr. Antommara.	1.75	\$ 175.00	\$ 306.25
2479	9/26/2022	Daniel J. Richardson	Antommara cross-examination prep	2.00	\$ 430.00	\$ 860.00
2480	9/26/2022	Arun Bodapati	Working on draft objections to Defendants' exhibits.	1.50	\$ 450.00	\$ 675.00
2481	9/26/2022	Arun Bodapati	Working with paralegals to create binder of prep materials for Dr. Michele Hutchison.	0.25	\$ 450.00	\$ 112.50
2482	9/26/2022	Arun Bodapati	Drafting cross prep outline for Dr. Hutchison.	3.75	\$ 450.00	\$ 1,687.50
2483	9/26/2022	Arun Bodapati	Prep session for Dr. Deanna Adkins.	1.50	\$ 450.00	\$ 675.00
2484	9/26/2022	Alexander F.R. Peacocke	Reviewed document Defendants Brandt Trial Brief - Final.pdf - Adobe Acrobat Standard DC (32-bit)	0.50	\$ 200.00	\$ 100.00
2485	9/26/2022	Alexander F.R. Peacocke	Dr. Ho deposition analysis for points to hit; Karasic materials review	2.25	\$ 200.00	\$ 450.00
2486	9/26/2022	Kenza Nadifi	Coordinated Opus access for M. Reinbrecht.	0.25	\$ 100.00	\$ 25.00
2487	9/26/2022	Cate M. Llewellyn	Reviewed approx 7 docs re Hutchison witness prep.	2.00	\$ 100.00	\$ 200.00
2488	9/27/2022	Jonathan G. Lester	Meeting with A. Peacocke, Leslie Cooper and counsel for third-party witness Dr. Ho to discuss witness prep.	1.25	\$ 175.00	\$ 218.75
2489	9/27/2022	Daniel J. Richardson	Witness prep session with Dr. Stambough.	1.50	\$ 430.00	\$ 645.00
2490	9/27/2022	Arun Bodapati	Witness prep session for Dr. Stambough.	1.25	\$ 450.00	\$ 562.50
2491	9/27/2022	Arun Bodapati	QCing binder of prep materials for Dr. Hutchison and arranging for hard copy binders to be mailed.	1.00	\$ 450.00	\$ 450.00
2492	9/27/2022	Arun Bodapati	Reviewing exhibits provided by Defendants for purposes of drafting objections.	6.75	\$ 450.00	\$ 3,037.50
2493	9/27/2022	Alexander F.R. Peacocke	Meeting with Counsel to Dr. Ho to prepare for trial.	1.25	\$ 200.00	\$ 250.00
2494	9/27/2022	Kenza Nadifi	Updated contact list, formatted contact list, and circulated contact list to the team.	1.00	\$ 100.00	\$ 100.00
2495	9/27/2022	Cate M. Llewellyn	Reviewed prep docs re Hutchison witness preparation.	1.25	\$ 100.00	\$ 125.00
2496	9/28/2022	Garrard R. Beene	Emails re trial preparation.	0.25	\$ 800.00	\$ 200.00
2497	9/28/2022	Aviv S. Halpern	Edited pretrial order. Edited evidence cheat sheet. Met with A. Peacocke re witness prep. Coordinated trial logistics. Attn to expert review chart. Meeting re expected expert testimony. Other trial prep.	8.75	\$ 400.00	\$ 3,500.00
2498	9/28/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith about A. Halpern trial logistics, pretrial order.	0.50	\$ 550.00	\$ 275.00
2499	9/28/2022	Lauren M. Goldsmith	Witness prep.	1.00	\$ 550.00	\$ 550.00
2500	9/28/2022	Lauren M. Goldsmith	Responding to emails about trial prep.	0.75	\$ 550.00	\$ 412.50
2501	9/28/2022	Lauren M. Goldsmith	Emails about pretrial order.	0.50	\$ 550.00	\$ 275.00
2502	9/28/2022	Lauren M. Goldsmith	Revising direct outline.	2.25	\$ 550.00	\$ 1,237.50
2503	9/28/2022	Lauren M. Goldsmith	Leading co-counsel team call.	1.00	\$ 550.00	\$ 550.00
2504	9/28/2022	Arun Bodapati	Drafting/revising objections to Defendants' exhibits.	13.75	\$ 450.00	\$ 6,187.50
2505	9/28/2022	Alexander F.R. Peacocke	Reviewed document Defendants Brandt Trial Brief - Final.pdf - Adobe Acrobat Standard DC (32-bit)	1.00	\$ 200.00	\$ 200.00
2506	9/28/2022	Alexander F.R. Peacocke	Meeting with Alexander Peacocke, Aviv S. Halpern regarding Aviv S. Halpern's Zoom Meeting re: pretrial order.	0.25	\$ 200.00	\$ 50.00
2507	9/28/2022	Kenza Nadifi	Added additional contacts to contact list and recirculated to team.	0.75	\$ 100.00	\$ 75.00
2508	9/28/2022	Cate M. Llewellyn	Sent team invites re Petition for Rehearing deadlines.	0.75	\$ 100.00	\$ 75.00
2509	9/28/2022	Cate M. Llewellyn	Reviewed Hutchison witness prep docs.	1.25	\$ 100.00	\$ 125.00
2510	9/29/2022	Garrard R. Beene	Media order.	0.25	\$ 800.00	\$ 200.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2511	9/29/2022	Aviv S. Halpern	Meeting re Dennis witness prep. Meeting re Campbell witness prep. Attn to email re exhibit list and witness lists. Edited Campbell cross outline. Drafted proposed findings of fact. Coordinated trial logistics. Call with L. Goldsmith.	8.25	\$ 400.00	\$ 3,300.00
2512	9/29/2022	Jonathan G. Lester	Expert working group meeting.	1.75	\$ 175.00	\$ 306.25
2513	9/29/2022	Jonathan G. Lester	Dr. Antommara cross-exam prep session.	2.00	\$ 175.00	\$ 350.00
2514	9/29/2022	Jonathan G. Lester	Drafting additional cross-exam prep questions for Dr. Antommara.	2.25	\$ 175.00	\$ 393.75
2515	9/29/2022	Daniel J. Richardson	Antommara prep session; expert working group meeting.	2.00	\$ 430.00	\$ 860.00
2516	9/29/2022	Lauren M. Goldsmith	Responding to emails about trial prep.	1.00	\$ 550.00	\$ 550.00
2517	9/29/2022	Lauren M. Goldsmith	Reviewing revised pretrial order.	0.25	\$ 550.00	\$ 137.50
2518	9/29/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about Defendants' objections to exhibit list.	0.50	\$ 550.00	\$ 275.00
2519	9/29/2022	Lauren M. Goldsmith	Expert team prep. call.	1.75	\$ 550.00	\$ 962.50
2520	9/29/2022	Lauren M. Goldsmith	Prep for expert team call.	0.75	\$ 550.00	\$ 412.50
2521	9/29/2022	Lauren M. Goldsmith	Dennis witness prep.	1.25	\$ 550.00	\$ 687.50
2522	9/29/2022	Lauren M. Goldsmith	Reviewing draft objections to exhibit list, emails about same.	0.75	\$ 550.00	\$ 412.50
2523	9/29/2022	Arun Bodapati	Finalizing objections to Defendants' exhibits and sending to Defendants.	5.00	\$ 450.00	\$ 2,250.00
2524	9/29/2022	Arun Bodapati	Drafting cross outline for Dr. Hutchison.	1.00	\$ 450.00	\$ 450.00
2525	9/29/2022	Arun Bodapati	Attending meeting of expert witness teams.	2.00	\$ 450.00	\$ 900.00
2526	9/29/2022	Arun Bodapati	Prep session for Amanda Dennis.	1.00	\$ 450.00	\$ 450.00
2527	9/29/2022	Alexander F.R. Peacocke	Meeting with LCOOPER , Alexander Peacocke, Maxime D. Matthew, Jonathan G. Lester, Gregory L. Smith, Daniel J. Richardson, Mann , Lauren M. Goldsmith, Jesseks , Arun Bodapati, Cstrangio regarding Experts team meeting	1.50	\$ 200.00	\$ 300.00
2528	9/29/2022	Cate M. Llewellyn	Revised list of supplies & tech for trial.	2.00	\$ 100.00	\$ 200.00
2529	9/30/2022	Aviv S. Halpern	Communicated with team re draft pretrial order. Turban trial prep. Meet and confer prep with A. Bodapati and L. Goldsmith. Coordinated trial logistics. Met with trial logistics team. Drafted and edited proposed findings of fact. Hruz prep.	6.00	\$ 400.00	\$ 2,400.00
2530	9/30/2022	Lauren M. Goldsmith	Calls and emails about trial logistics.	0.75	\$ 550.00	\$ 412.50
2531	9/30/2022	Lauren M. Goldsmith	Emails about witness prep.	0.25	\$ 550.00	\$ 137.50
2532	9/30/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and L. Cooper (ACLU) about witness prep.	1.00	\$ 550.00	\$ 550.00
2533	9/30/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Halpern, and paralegal team about trial logistics.	0.25	\$ 550.00	\$ 137.50
2534	9/30/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith (partial), A. Bodapati, and A. Halpern about Defendants' objections to exhibit list.	1.00	\$ 550.00	\$ 550.00
2535	9/30/2022	Lauren M. Goldsmith	Reviewing Defendants' objections to exhibit list.	1.00	\$ 550.00	\$ 550.00
2536	9/30/2022	Arun Bodapati	Drafting cross prep outline for Dr. Hutchison.	4.50	\$ 450.00	\$ 2,025.00
2537	9/30/2022	Arun Bodapati	Meeting with Lauren Goldsmith and Aviv Halpern to prepare for meet and confer with Defendants re exhibit lists and objections.	1.75	\$ 450.00	\$ 787.50
2538	9/30/2022	Alexander F.R. Peacocke	Taking notes on Branman deposition for questioning.	1.00	\$ 200.00	\$ 200.00
2539	9/30/2022	Alexander F.R. Peacocke	Dan Karasic witness prep.	2.25	\$ 200.00	\$ 450.00
2540	9/30/2022	Kenza Nadifi	Meeting with Cate M. Llewellyn, Aviv S. Halpern, Kenza Nadifi, Lauren M. Goldsmith regarding Trial logistics	0.25	\$ 100.00	\$ 25.00
2541	9/30/2022	Kenza Nadifi	Uploaded requested documents to ND.	1.00	\$ 100.00	\$ 100.00
2542	9/30/2022	Cate M. Llewellyn	Reviewed all filed Defendants' Expert Reports.	2.50	\$ 100.00	\$ 250.00
2543	9/30/2022	Cate M. Llewellyn	Met with case team re trial planning.	0.25	\$ 100.00	\$ 25.00
2544	9/30/2022	Cate M. Llewellyn	Reviewed supply list for Little Rock trial.	1.50	\$ 100.00	\$ 150.00
2545	9/30/2022	Cate M. Llewellyn	Reviewed all filed Plaintiffs' Expert Reports.	2.50	\$ 100.00	\$ 250.00
2546	10/1/2022	Aviv S. Halpern	Campbell witness prep.	2.00	\$ 400.00	\$ 800.00
2547	10/1/2022	Arun Bodapati	Drafting points for 10/4 meet and confer with Defendants.	2.00	\$ 450.00	\$ 900.00
2548	10/2/2022	Aviv S. Halpern	Edited pretrial order. Communicated with trial techs and with team re same. Coordinated trial logistics. Drafted proposed findings of fact. Turban witness prep. Drafted materials for Jennen witness prep. Attn to Hruz outline.	7.75	\$ 400.00	\$ 3,100.00
2549	10/2/2022	Lauren M. Goldsmith	Reviewing comments on responses to Defendants' objections to exhibit list.	0.25	\$ 550.00	\$ 137.50
2550	10/2/2022	Arun Bodapati	Drafting and circulating points for 10/4 meet and confer with Defendants re trial exhibits.	1.75	\$ 450.00	\$ 787.50
2551	10/3/2022	Laura Kabler Oswell	Work on exhibit list and pre-trial matters.	3.50	\$ 650.00	\$ 2,275.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2552	10/3/2022	Aviv S. Halpern	Coordinated trial logistics. Calls with S&C team re trial logistics prep. Trial prep. Edited draft pretrial order. Communicated with team re Defendants lists and objections. Reviewed family directs and cross preps. Hruz cross prep.	9.25	\$ 400.00	\$ 3,700.00
2553	10/3/2022	Daniel J. Richardson	Stambough witness prep meeting; Regnerus cross-examination outline.	2.50	\$ 430.00	\$ 1,075.00
2554	10/3/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Halpern, G. Sullivan (ACLU) and L. Cooper (ACLU) about trial tech and logistics.	1.00	\$ 550.00	\$ 550.00
2555	10/3/2022	Lauren M. Goldsmith	Saxton witness prep.	1.25	\$ 550.00	\$ 687.50
2556	10/3/2022	Lauren M. Goldsmith	Calls to associate team about trial logistics.	0.75	\$ 550.00	\$ 412.50
2557	10/3/2022	Lauren M. Goldsmith	Call w/ L. Oswell, L. Goldsmith, and A. Halpern about trial logistics.	0.50	\$ 550.00	\$ 275.00
2558	10/3/2022	Lauren M. Goldsmith	Attending co-counsel team meeting.	1.00	\$ 550.00	\$ 550.00
2559	10/3/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Halpern, and G. Sullivan (ACLU) about trial logistics.	0.75	\$ 550.00	\$ 412.50
2560	10/3/2022	Lauren M. Goldsmith	Emails about pre-trial order.	0.25	\$ 550.00	\$ 137.50
2561	10/3/2022	Lauren M. Goldsmith	Dennis witness prep.	0.75	\$ 550.00	\$ 412.50
2562	10/3/2022	Lauren M. Goldsmith	Emails to Dennis prep team about prep.	0.50	\$ 550.00	\$ 275.00
2563	10/3/2022	Arun Bodapati	Work on witness prep materials for Amanda Dennis.	0.50	\$ 450.00	\$ 225.00
2564	10/3/2022	Arun Bodapati	Drafting outline for questioning of Amy Embry.	4.00	\$ 450.00	\$ 1,800.00
2565	10/3/2022	Arun Bodapati	Witness prep session for Dr. Stambough.	2.00	\$ 450.00	\$ 900.00
2566	10/3/2022	Alexander F.R. Peacocke	Donnie Saxon witness preparation session.	1.25	\$ 200.00	\$ 250.00
2567	10/3/2022	Alexander F.R. Peacocke	Karasic witness prep session.	2.00	\$ 200.00	\$ 400.00
2568	10/3/2022	Kenza Nadifi	Assisted with trial prep for October trial group.	1.00	\$ 100.00	\$ 100.00
2569	10/3/2022	Cate M. Llewellyn	Travel logistics & supplies logistics for trial prep.	2.25	\$ 100.00	\$ 225.00
2570	10/4/2022	Garrard R. Beene	Emails re trial preparation/ graphics.	0.25	\$ 800.00	\$ 200.00
2571	10/4/2022	Laura Kabler Oswell	Work on Lappert cross outline.	4.00	\$ 650.00	\$ 2,600.00
2572	10/4/2022	Aviv S. Halpern	Communicated with team re trial logistics and trial tech.	0.75	\$ 400.00	\$ 300.00
2573	10/4/2022	Aviv S. Halpern	Reviewed Jennen medical records. Jennen witness prep. Reviewed Campbell witness materials. Campbell cross prep. Hruz cross prep.	6.25	\$ 400.00	\$ 2,500.00
2574	10/4/2022	Jonathan G. Lester	Revising notes from Antommara prep session.	0.25	\$ 175.00	\$ 43.75
2575	10/4/2022	Jonathan G. Lester	Witness prep session with Armand Antommara.	2.00	\$ 175.00	\$ 350.00
2576	10/4/2022	Daniel J. Richardson	Witness prep session with Dr. Antommara	1.50	\$ 430.00	\$ 645.00
2577	10/4/2022	Lauren M. Goldsmith	Calls and emails about trial logistics.	0.75	\$ 550.00	\$ 412.50
2578	10/4/2022	Lauren M. Goldsmith	Witness prep.	0.75	\$ 550.00	\$ 412.50
2579	10/4/2022	Lauren M. Goldsmith	Dennis witness prep.	2.25	\$ 550.00	\$ 1,237.50
2580	10/4/2022	Arun Bodapati	Drafting questions for exam of Amy Embry.	3.75	\$ 450.00	\$ 1,687.50
2581	10/4/2022	Arun Bodapati	Prep for meet and confer with Defendants.	1.25	\$ 450.00	\$ 562.50
2582	10/4/2022	Arun Bodapati	Meet and confer with Defendants re trial exhibits.	1.00	\$ 450.00	\$ 450.00
2583	10/4/2022	Arun Bodapati	Witness prep session for Dr. Hutchison.	2.00	\$ 450.00	\$ 900.00
2584	10/4/2022	Alexander F.R. Peacocke	Revised document Karasic direct4.docx 4884-7622-2005 v.1.docx	0.25	\$ 200.00	\$ 50.00
2585	10/4/2022	Cate M. Llewellyn	Reviewed Karasic prep materials (reports & declarations; publications).	3.25	\$ 100.00	\$ 325.00
2586	10/4/2022	Cate M. Llewellyn	Team correspondence re tech needs & setup for trial.	0.75	\$ 100.00	\$ 75.00
2587	10/5/2022	Garrard R. Beene	Emails re trial procedure.	0.25	\$ 800.00	\$ 200.00
2588	10/5/2022	Laura Kabler Oswell	Review background materials for Lappert.	5.00	\$ 650.00	\$ 3,250.00
2589	10/5/2022	Jonathan G. Lester	Witness preparation session with Dr. Adkins.	2.00	\$ 175.00	\$ 350.00
2590	10/5/2022	Jonathan G. Lester	Reviewing notes from 10/04/2022 meet and confer.	0.25	\$ 175.00	\$ 43.75
2591	10/5/2022	Lauren M. Goldsmith	Witness prep.	0.50	\$ 550.00	\$ 275.00
2592	10/5/2022	Lauren M. Goldsmith	Emails about M&C.	0.50	\$ 550.00	\$ 275.00
2593	10/5/2022	Lauren M. Goldsmith	Emails about witness prep.	0.25	\$ 550.00	\$ 137.50
2594	10/5/2022	Arun Bodapati	Follow up from meet and confer re trial exhibits.	3.75	\$ 450.00	\$ 1,687.50
2595	10/5/2022	Arun Bodapati	Witness prep session for Dr. Adkins.	2.00	\$ 450.00	\$ 900.00
2596	10/5/2022	Arun Bodapati	Drafting Embry outline.	4.00	\$ 450.00	\$ 1,800.00
2597	10/5/2022	Alexander F.R. Peacocke	Reviewed email from Gregory L. Smith regarding 10.4 M&C Summary	0.25	\$ 200.00	\$ 50.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2598	10/5/2022	Alexander F.R. Peacocke	Meeting with Alexander Holland, Alexander Peacocke, Arun Bodapati, Emma C. Downing, Gregory L. Smith, Jonathan G. Lester, Laura Kabler Oswell, Maura A. Reinbrecht, Maxime D. Matthew regarding ACLU AR - quick call pre-trial	0.25	\$ 200.00	\$ 50.00
2599	10/5/2022	Alexander F.R. Peacocke	Reviewed Defendants & Plaintiffs Expert Reports.	1.00	\$ 200.00	\$ 200.00
2600	10/5/2022	Cate M. Llewellyn	Revised Karasic witness prep materials.	2.25	\$ 100.00	\$ 225.00
2601	10/6/2022	Laura Kabler Oswell	Review exhibits and other pretrial materials; Review background for expert witnesses.	4.50	\$ 650.00	\$ 2,925.00
2602	10/6/2022	Aviv S. Halpern	Reviewed Jennen medical records; edited Campbell cross. Emailed with logistics team re trial logistics. Call with L. Goldsmith re outstanding tasks and proposed findings of fact. Drafted proposed findings of fact. Edited Perry outline.	6.50	\$ 400.00	\$ 2,600.00
2603	10/6/2022	Jonathan G. Lester	Reviewing Defendants' 8th Circuit En Banc brief.	0.25	\$ 175.00	\$ 43.75
2604	10/6/2022	Jonathan G. Lester	Researching [potential legal issues for trial].	0.75	\$ 175.00	\$ 131.25
2605	10/6/2022	Jonathan G. Lester	Dylan Brandt witness prep session.	0.75	\$ 175.00	\$ 131.25
2606	10/6/2022	Jonathan G. Lester	Meeting with Dr. Ho's attorney to discuss on-going trial preparations.	0.50	\$ 175.00	\$ 87.50
2607	10/6/2022	Daniel J. Richardson	Stambough prep session; review petition for en banc and sent email re same.	1.50	\$ 430.00	\$ 645.00
2608	10/6/2022	Lauren M. Goldsmith	Dennis witness prep.	1.75	\$ 550.00	\$ 962.50
2609	10/6/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about trial logistics.	0.50	\$ 550.00	\$ 275.00
2610	10/6/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Halpern, M. Reinbrecht, and E. Downing about expert cheat sheet.	0.25	\$ 550.00	\$ 137.50
2611	10/6/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.50	\$ 550.00	\$ 275.00
2612	10/6/2022	Lauren M. Goldsmith	Discussing trial logistics w/ J. Klein.	0.25	\$ 550.00	\$ 137.50
2613	10/6/2022	Lauren M. Goldsmith	Witness prep.	3.00	\$ 550.00	\$ 1,650.00
2614	10/6/2022	Arun Bodapati	Witness prep session for Amanda Dennis.	1.50	\$ 450.00	\$ 675.00
2615	10/6/2022	Arun Bodapati	Reviewing materials for cross of Stephen Levine and proposing comments on draft outline.	8.50	\$ 450.00	\$ 3,825.00
2616	10/6/2022	Arun Bodapati	Witness prep session for Dr. Stambough.	2.00	\$ 450.00	\$ 900.00
2617	10/6/2022	Arun Bodapati	Revising cross prep outline for Amanda Dennis.	0.75	\$ 450.00	\$ 337.50
2618	10/6/2022	Alexander F.R. Peacocke	Reviewing expert reports/declarations.	0.50	\$ 200.00	\$ 100.00
2619	10/6/2022	Alexander F.R. Peacocke	Meeting with Alexander Peacocke, Bettina Brownstein, Jonathan G. Lester, Leslie Cooper regarding Prep re Dr. Ho Follow-Up	0.50	\$ 200.00	\$ 100.00
2620	10/6/2022	Alexander F.R. Peacocke	Reviewed & sent thoughts to team on en banc petition.	1.00	\$ 200.00	\$ 200.00
2621	10/6/2022	Alexander F.R. Peacocke	Karasic witness prep call.	2.00	\$ 200.00	\$ 400.00
2622	10/7/2022	Garrard R. Beeney	Emails re 8th circuit brief.	0.25	\$ 800.00	\$ 200.00
2623	10/7/2022	Garrard R. Beeney	Rehearing petition, 8th circuit order.	0.25	\$ 800.00	\$ 200.00
2624	10/7/2022	Laura Kabler Oswell	Work on expert cross outline and review background materials.	5.00	\$ 650.00	\$ 3,250.00
2625	10/7/2022	Aviv S. Halpern	Edited expert objection cheat sheet. Emailed with team re Defendants' witness list. Coordinated trial logistics. Emailed with team re en banc at CA8 and draft response.	3.00	\$ 400.00	\$ 1,200.00
2626	10/7/2022	Aviv S. Halpern	Drafted proposed findings of fact. Hruz cross prep. Edited extension request for CA8. Communicated with team re proposed CA8 arguments. Hruz prep.	9.25	\$ 400.00	\$ 3,700.00
2627	10/7/2022	Jonathan G. Lester	Drafting motion for extension of en banc reply.	2.00	\$ 175.00	\$ 350.00
2628	10/7/2022	Jonathan G. Lester	Discussion with L. Goldsmith regarding research for response to en banc briefing.	0.00	\$ 175.00	\$ -
2629	10/7/2022	Jonathan G. Lester	Continuing research on [potential issues for trial].	1.25	\$ 175.00	\$ 218.75
2630	10/7/2022	Daniel J. Richardson	Began drafting Opposition to Petition for en banc review.	2.00	\$ 430.00	\$ 860.00
2631	10/7/2022	Daniel J. Richardson	Reviewed rehearing petition in response to Eighth Circuit order	0.25	\$ 430.00	\$ 107.50
2632	10/7/2022	Daniel J. Richardson	Worked with junior associates on en banc petition research items.	0.25	\$ 430.00	\$ 107.50
2633	10/7/2022	Daniel J. Richardson	Meeting to discuss en banc opp.; began drafting opp	0.75	\$ 430.00	\$ 322.50
2634	10/7/2022	Lauren M. Goldsmith	Revising draft of request for extension, filing same.	0.75	\$ 550.00	\$ 412.50
2635	10/7/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and D. Richardson about response to en banc petition.	0.25	\$ 550.00	\$ 137.50
2636	10/7/2022	Lauren M. Goldsmith	Reviewing 8th Circuit petition.	0.50	\$ 550.00	\$ 275.00
2637	10/7/2022	Lauren M. Goldsmith	Emails with team about response to 8th Circuit petition.	1.25	\$ 550.00	\$ 687.50
2638	10/7/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.25	\$ 550.00	\$ 137.50
2639	10/7/2022	Lauren M. Goldsmith	Call w/ co-counsel team about response to 8th Circuit petition.	0.75	\$ 550.00	\$ 412.50
2640	10/7/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about cross prep.	0.75	\$ 550.00	\$ 412.50

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2641	10/7/2022	Lauren M. Goldsmith	Emails about Defendants' response to M&C on exhibit list.	0.50	\$ 550.00	\$ 275.00
2642	10/7/2022	Lauren M. Goldsmith	Emails about witness prep.	0.25	\$ 550.00	\$ 137.50
2643	10/7/2022	Arun Bodapati	Various points related to trial logistics and exhibits.	6.00	\$ 450.00	\$ 2,700.00
2644	10/7/2022	Arun Bodapati	Meeting re en banc petition response.	0.75	\$ 450.00	\$ 337.50
2645	10/7/2022	Arun Bodapati	Drafting Embry outline.	2.00	\$ 450.00	\$ 900.00
2646	10/7/2022	Alexander F.R. Peacocke	Reviewing and editing opposition to petition for rehearing en banc.	0.75	\$ 200.00	\$ 150.00
2647	10/7/2022	Alexander F.R. Peacocke	Meeting regarding Brandt En Banc Response Discussion	0.75	\$ 200.00	\$ 150.00
2648	10/7/2022	Alexander F.R. Peacocke	Meeting with Alexander Peacocke, Aviv S. Halpern regarding pretrial order.	0.25	\$ 200.00	\$ 50.00
2649	10/7/2022	Alexander F.R. Peacocke	Reviewing petition for rehearing en banc	0.75	\$ 200.00	\$ 150.00
2650	10/7/2022	Alexander F.R. Peacocke	Reviewing Branman Depo for trial.	2.00	\$ 200.00	\$ 400.00
2651	10/7/2022	Cate M. Llewellyn	Reviewed filed Motions in Limine & Motions to exclude.	2.50	\$ 100.00	\$ 250.00
2652	10/8/2022	Aviv S. Halpern	Emailled with team re extension for en banc petition. Emailled with team re trial logistics and witness prep during trial.	3.25	\$ 400.00	\$ 1,300.00
2653	10/8/2022	Jonathan G. Lester	Analyzed to En Banc Petition and conducted associated research.	0.50	\$ 175.00	\$ 87.50
2654	10/8/2022	Jonathan G. Lester	Discussing EPC section with D. Richardson.	0.75	\$ 175.00	\$ 131.25
2655	10/8/2022	Jonathan G. Lester	Drafting EPC portion of response to en banc petition.	1.75	\$ 175.00	\$ 306.25
2656	10/8/2022	Jonathan G. Lester	Researching en banc standard.	1.75	\$ 175.00	\$ 306.25
2657	10/8/2022	Daniel J. Richardson	Reviewed research on en banc petition and sent email re same.	0.50	\$ 430.00	\$ 215.00
2658	10/8/2022	Daniel J. Richardson	Drafted intro and background to Opp to Pet for en banc.	1.50	\$ 430.00	\$ 645.00
2659	10/8/2022	Lauren M. Goldsmith	Emails about response to en banc petition.	1.50	\$ 550.00	\$ 825.00
2660	10/8/2022	Arun Bodapati	Embry outline.	1.50	\$ 450.00	\$ 675.00
2661	10/8/2022	Arun Bodapati	Various prep for trial exhibits.	1.50	\$ 450.00	\$ 675.00
2662	10/8/2022	Kenza Nadifi	Trial preparations.	4.00	\$ 100.00	\$ 400.00
2663	10/9/2022	Daniel J. Richardson	Continued drafting Opp to Pet for en banc	1.50	\$ 430.00	\$ 645.00
2664	10/9/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and K. Nadifi about trial logistics.	0.50	\$ 550.00	\$ 275.00
2665	10/9/2022	Lauren M. Goldsmith	Emails about witness prep.	0.25	\$ 550.00	\$ 137.50
2666	10/9/2022	Arun Bodapati	Corresponding with Defendants re trial exhibits.	0.50	\$ 450.00	\$ 225.00
2667	10/9/2022	Arun Bodapati	Witness prep session for Dr. Stambough.	3.00	\$ 450.00	\$ 1,350.00
2668	10/9/2022	Arun Bodapati	Embry outline.	2.50	\$ 450.00	\$ 1,125.00
2669	10/9/2022	Alexander F.R. Peacocke	Prepared Initial Shell And Draft Of En Banc Opposition	3.75	\$ 200.00	\$ 750.00
2670	10/9/2022	Kenza Nadifi	Trial preparations.	7.00	\$ 100.00	\$ 700.00
2671	10/9/2022	Cate M. Llewellyn	Preparing materials for trial.	3.50	\$ 100.00	\$ 350.00
2672	10/10/2022	Laura Kabler Oswell	Work on Lappert cross; Meeting with S&C team re. same; Meeting with ACLU and S&C team re. trial prep.	3.00	\$ 650.00	\$ 1,950.00
2673	10/10/2022	Jonathan G. Lester	Joanna Brandt team meeting to discuss direct outline.	0.50	\$ 175.00	\$ 87.50
2674	10/10/2022	Jonathan G. Lester	Joanna Brandt prep session.	1.25	\$ 175.00	\$ 218.75
2675	10/10/2022	Jonathan G. Lester	Continued drafting of EPC section	5.50	\$ 175.00	\$ 962.50
2676	10/10/2022	Daniel J. Richardson	Drafted Part II of Opp to en banc.	1.50	\$ 430.00	\$ 645.00
2677	10/10/2022	Daniel J. Richardson	Reviewed Regnerus cross examination notes from co-counsel and responded re same.	0.50	\$ 430.00	\$ 215.00
2678	10/10/2022	Lauren M. Goldsmith	Dennis witness prep.	0.75	\$ 550.00	\$ 412.50
2679	10/10/2022	Lauren M. Goldsmith	Witness prep.	2.00	\$ 550.00	\$ 1,100.00
2680	10/10/2022	Lauren M. Goldsmith	Attending co-counsel team meeting.	1.00	\$ 550.00	\$ 550.00
2681	10/10/2022	Lauren M. Goldsmith	Reviewing Perry cross outline.	0.75	\$ 550.00	\$ 412.50
2682	10/10/2022	Lauren M. Goldsmith	Emails about exhibit list and PTO.	0.25	\$ 550.00	\$ 137.50
2683	10/10/2022	Lauren M. Goldsmith	Brandt witness prep.	1.50	\$ 550.00	\$ 825.00
2684	10/10/2022	Arun Bodapati	Finalizing exhibit list and reviewing Defendants' updated exhibit list.	3.25	\$ 450.00	\$ 1,462.50
2685	10/10/2022	Arun Bodapati	Embry outline.	6.25	\$ 450.00	\$ 2,812.50
2686	10/10/2022	Arun Bodapati	Prep session for Dr. Hutchison.	2.00	\$ 450.00	\$ 900.00
2687	10/10/2022	Alexander F.R. Peacocke	Reviewing trial set up.	0.50	\$ 200.00	\$ 100.00
2688	10/10/2022	Kenza Nadifi	Tracked down and added witness phone numbers to contact list.	13.00	\$ 100.00	\$ 1,300.00
2689	10/10/2022	Cate M. Llewellyn	Reviewed S. Ho Deposition Exhibits.	1.50	\$ 100.00	\$ 150.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2689	10/10/2022	Cate M. Llewellyn	Reviewed motions in limine & daubert motions.	2.25	\$ 100.00	\$ 225.00
2690	10/10/2022	Cate M. Llewellyn	Preparing materials & tech setup for trial.	4.25	\$ 100.00	\$ 425.00
2691	10/10/2022	Cate M. Llewellyn	Meet with case team re preparing materials for trial.	1.75	\$ 100.00	\$ 175.00
2692	10/11/2022	Aviv S. Halpern	Trial prep.	5.25	\$ 400.00	\$ 2,100.00
2693	10/11/2022	Jonathan G. Lester	Editing en banc response brief.	0.75	\$ 175.00	\$ 131.25
2694	10/11/2022	Jonathan G. Lester	Editing notes from prep session with Dr. Antommaria.	0.25	\$ 175.00	\$ 43.75
2695	10/11/2022	Jonathan G. Lester	Prep session with witness Armand Antommaria.	2.25	\$ 175.00	\$ 393.75
2696	10/11/2022	Daniel J. Richardson	Witness prep meeting for Drs. Hutchinson and Stambough.	1.25	\$ 430.00	\$ 537.50
2697	10/11/2022	Daniel J. Richardson	Edited Opp to en banc and sent to associates for review.	2.50	\$ 430.00	\$ 1,075.00
2698	10/11/2022	Lauren M. Goldsmith	Working on 8th Circuit opp.	1.00	\$ 550.00	\$ 550.00
2699	10/11/2022	Lauren M. Goldsmith	Reviewing comments on Brandt outline.	0.25	\$ 550.00	\$ 137.50
2700	10/11/2022	Lauren M. Goldsmith	Emails about Perry cross outline.	0.25	\$ 550.00	\$ 137.50
2701	10/11/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.75	\$ 550.00	\$ 412.50
2702	10/11/2022	Lauren M. Goldsmith	Emails about exhibit list.	0.25	\$ 550.00	\$ 137.50
2703	10/11/2022	Arun Bodapati	Embry outline.	3.25	\$ 450.00	\$ 1,462.50
2704	10/11/2022	Arun Bodapati	Finalizing exhibit list and sending to Court, and signing off on Defendants' updated exhibits and exhibit list.	2.50	\$ 450.00	\$ 1,125.00
2705	10/11/2022	Arun Bodapati	Joint Hutchison/Stambough prep session.	2.00	\$ 450.00	\$ 900.00
2706	10/11/2022	Alexander F.R. Peacocke	Revising and editing opposition to petition for rehearing en banc.	2.00	\$ 200.00	\$ 400.00
2707	10/11/2022	Alexander F.R. Peacocke	Preparing Branman witness outline, reviewing and taking notes on deposition.	2.50	\$ 200.00	\$ 500.00
2708	10/11/2022	Kenza Nadifi	Trial preparations.	9.25	\$ 100.00	\$ 925.00
2709	10/11/2022	Cate M. Llewellyn	Trial prep (materials & logistics).	7.25	\$ 100.00	\$ 725.00
2710	10/12/2022	Aviv S. Halpern	Witness prep. War room set up. Hruz prep. Campbell Prep. Perry prep. Jennen prep. Edited proposed findings of fact. Coordinated with local counsel and ACLU teams.	16.00	\$ 400.00	\$ 6,400.00
2711	10/12/2022	Jonathan G. Lester	Sending request to Research Desk to update research on Dr. Hruz.	0.25	\$ 175.00	\$ 43.75
2712	10/12/2022	Jonathan G. Lester	Meeting to discuss cross-exam prep for Dr. Hruz.	0.75	\$ 175.00	\$ 131.25
2713	10/12/2022	Jonathan G. Lester	Adkins cross-exam preparation.	2.50	\$ 175.00	\$ 437.50
2714	10/12/2022	Jonathan G. Lester	Discussion about Dr. Adkins trial prep.	0.25	\$ 175.00	\$ 43.75
2715	10/12/2022	Daniel J. Richardson	Reviewed edits to Regnerus outline and sent comments re same; attended meeting to discuss Hruz testimony.	1.00	\$ 430.00	\$ 430.00
2716	10/12/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.75	\$ 550.00	\$ 412.50
2717	10/12/2022	Lauren M. Goldsmith	Reviewing and revising 8th Circuit opp.	3.00	\$ 550.00	\$ 1,650.00
2718	10/12/2022	Lauren M. Goldsmith	Meeting w/ L. Goldsmith, A. Bodapati, and A. Halpern about witness prep.	0.50	\$ 550.00	\$ 275.00
2719	10/12/2022	Lauren M. Goldsmith	Meeting w/ L. Goldsmith, A. Bodapati, and A. Peacocke about trial logistics and prep.	1.00	\$ 550.00	\$ 550.00
2720	10/12/2022	Arun Bodapati	Assorted trial prep - finalizing exhibit list and sending to Court, Embry outline, other logistics surrounding witness preps.	13.00	\$ 450.00	\$ 5,850.00
2721	10/12/2022	Arun Bodapati	Discussion with Adkins prep team.	0.50	\$ 450.00	\$ 225.00
2722	10/12/2022	Alexander F.R. Peacocke	Preparing Branman examination outline.	3.00	\$ 200.00	\$ 600.00
2723	10/12/2022	Kenza Nadifi	Trial preparations.	12.50	\$ 100.00	\$ 1,250.00
2724	10/12/2022	Cate M. Llewellyn	Reviewed Hruz prior testimony & appearances.	3.75	\$ 100.00	\$ 375.00
2725	10/12/2022	Cate M. Llewellyn	Trial prep (materials & logistics).	7.50	\$ 100.00	\$ 750.00
2726	10/12/2022	Cate M. Llewellyn	Reviewed Hruz witness materials.	2.50	\$ 100.00	\$ 250.00
2727	10/13/2022	Garrard R. Beeney	Witness prep.	0.25	\$ 800.00	\$ 200.00
2728	10/13/2022	Laura Kabler Oswell	Review draft cross outlines and work on Lappert outline.	2.25	\$ 650.00	\$ 1,462.50
2729	10/13/2022	Aviv S. Halpern	Trial preparation. Hruz prep. Reviewed Hruz depositions from other cases. Campbell cross prep. Drafted trial prep materials. Perry prep.	14.75	\$ 400.00	\$ 5,900.00
2730	10/13/2022	Jonathan G. Lester	Witness prep session with Dylan Brandt.	1.00	\$ 175.00	\$ 175.00
2731	10/13/2022	Jonathan G. Lester	Updating Antommaria deposition prep outline.	1.75	\$ 175.00	\$ 306.25
2732	10/13/2022	Jonathan G. Lester	Revising opposition motion to en banc rehearing.	0.75	\$ 175.00	\$ 131.25
2733	10/13/2022	Daniel J. Richardson	Reviewed Levine cross outline and sent email re same.	0.25	\$ 430.00	\$ 107.50
2734	10/13/2022	Daniel J. Richardson	Prepared Regnerus cross-examination prep.	0.50	\$ 430.00	\$ 215.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2735	10/13/2022	Daniel J. Richardson	Stambough witness prep; edited opp to en banc pet	2.25	\$ 430.00	\$ 967.50
2736	10/13/2022	Daniel J. Richardson	Reviewed edits to en banc opp and sent edits re same	0.25	\$ 430.00	\$ 107.50
2737	10/13/2022	Daniel J. Richardson	Began updating Regnerus cross-examination outline in response to co-counsel feedback.	0.50	\$ 430.00	\$ 215.00
2738	10/13/2022	Daniel J. Richardson	Updated Regnerus outline and emailed to team for review.	1.50	\$ 430.00	\$ 645.00
2739	10/13/2022	Lauren M. Goldsmith	Coordinating trial logistics.	5.00	\$ 550.00	\$ 2,750.00
2740	10/13/2022	Lauren M. Goldsmith	Leading team meeting.	0.50	\$ 550.00	\$ 275.00
2741	10/13/2022	Lauren M. Goldsmith	Hruz prep.	4.75	\$ 550.00	\$ 2,612.50
2742	10/13/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.50	\$ 550.00	\$ 275.00
2743	10/13/2022	Lauren M. Goldsmith	Working on 8th Circuit opp.	1.75	\$ 550.00	\$ 962.50
2744	10/13/2022	Lauren M. Goldsmith	Witness prep.	0.75	\$ 550.00	\$ 412.50
2745	10/13/2022	Arun Bodapati	Assorted trial prep for various witness teams, and preparing for meet and confer with Defendants re: logistical issues ahead of first day of trial.	10.00	\$ 450.00	\$ 4,500.00
2746	10/13/2022	Arun Bodapati	Stambough prep session.	2.00	\$ 450.00	\$ 900.00
2747	10/13/2022	Arun Bodapati	Meeting with Levine cross team.	0.50	\$ 450.00	\$ 225.00
2748	10/13/2022	Alexander F.R. Peacocke	Trial Prep.	13.00	\$ 200.00	\$ 2,600.00
2749	10/13/2022	Alexander F.R. Peacocke	Revising and incorporating comments on opposition to petition for rehearing en banc.	2.50	\$ 200.00	\$ 500.00
2750	10/13/2022	Alexander F.R. Peacocke	Reviewing Lappert materials in preparation for assistance on cross examination.	1.50	\$ 200.00	\$ 300.00
2751	10/13/2022	Kenza Nadifi	Trial preparations.	2.00	\$ 100.00	\$ 200.00
2752	10/13/2022	Kenza Nadifi	Trial preparations.	12.50	\$ 100.00	\$ 1,250.00
2753	10/13/2022	Cate M. Llewellyn	Trial prep (materials & logistics).	5.50	\$ 100.00	\$ 550.00
2754	10/13/2022	Cate M. Llewellyn	Reviewed Adkins witness material.	2.25	\$ 100.00	\$ 225.00
2755	10/13/2022	Cate M. Llewellyn	Reviewed Plaintiffs Exhibit list for submission to court.	2.75	\$ 100.00	\$ 275.00
2756	10/13/2022	Cate M. Llewellyn	Reviewed Hruz prior testimony.	1.00	\$ 100.00	\$ 100.00
2757	10/14/2022	Garrard R. Beene	8th circuit order re amicus.	0.25	\$ 800.00	\$ 200.00
2758	10/14/2022	Laura Kabler Oswell	Review revised draft opposition to en banc reconsideration.	0.50	\$ 650.00	\$ 325.00
2759	10/14/2022	Laura Kabler Oswell	Calls and emails re. trial preparation.	0.50	\$ 650.00	\$ 325.00
2760	10/14/2022	Aviv S. Halpern	Prep for meet and confer with Defendants and meet and confer.	1.00	\$ 400.00	\$ 400.00
2761	10/14/2022	Aviv S. Halpern	Court walkthrough and technology check.	0.75	\$ 400.00	\$ 300.00
2762	10/14/2022	Aviv S. Halpern	Reviewed Hruz documents and drafted Hruz cross.	3.00	\$ 400.00	\$ 1,200.00
2763	10/14/2022	Jonathan G. Lester	Call with G. Smith to discuss citation formatting for en banc response brief.	0.25	\$ 175.00	\$ 43.75
2764	10/14/2022	Jonathan G. Lester	Reviewing materials prior to cross-exam prep of Dr. Adkins.	0.25	\$ 175.00	\$ 43.75
2765	10/14/2022	Jonathan G. Lester	Coordinating cite check for response to en banc hearing brief.	0.25	\$ 175.00	\$ 43.75
2766	10/14/2022	Jonathan G. Lester	Witness prep session with Dr. Antommaria.	1.00	\$ 175.00	\$ 175.00
2767	10/14/2022	Jonathan G. Lester	Cite checking response to state's motion for en banc rehearing.	1.00	\$ 175.00	\$ 175.00
2768	10/14/2022	Jonathan G. Lester	Cross-exam prep session with Dr. Adkins.	2.00	\$ 175.00	\$ 350.00
2769	10/14/2022	Jonathan G. Lester	Drafting portion of Dr. Hruz cross-exam outline.	1.75	\$ 175.00	\$ 306.25
2770	10/14/2022	Jonathan G. Lester	Reviewing files prior to Dr. Antommaria prep session.	0.25	\$ 175.00	\$ 43.75
2771	10/14/2022	Daniel J. Richardson	Updated Regnerus cross-examination outline in response to co-counsel feedback.	1.25	\$ 430.00	\$ 537.50
2772	10/14/2022	Daniel J. Richardson	Antommaria witness prep session.	1.25	\$ 430.00	\$ 537.50
2773	10/14/2022	Daniel J. Richardson	Reviewed edits to Regnerus cross outline; emailed team re en banc procedure.	0.50	\$ 430.00	\$ 215.00
2774	10/14/2022	Lauren M. Goldsmith	Hruz prep.	0.25	\$ 550.00	\$ 137.50
2775	10/14/2022	Lauren M. Goldsmith	Dennis witness prep and debrief with team.	2.00	\$ 550.00	\$ 1,100.00
2776	10/14/2022	Lauren M. Goldsmith	Reviewing revised 8th Circuit opp.	2.00	\$ 550.00	\$ 1,100.00
2777	10/14/2022	Lauren M. Goldsmith	Attending tech walk through at courthouse.	2.00	\$ 550.00	\$ 1,100.00
2778	10/14/2022	Lauren M. Goldsmith	Witness prep.	0.25	\$ 550.00	\$ 137.50
2779	10/14/2022	Lauren M. Goldsmith	Calls w/ L. Oswell and L. Goldsmith about witness prep and trial logistics.	0.50	\$ 550.00	\$ 275.00
2780	10/14/2022	Lauren M. Goldsmith	Prep for M&C w/ Defendants about trial logistics.	0.25	\$ 550.00	\$ 137.50
2781	10/14/2022	Lauren M. Goldsmith	M&C w/ Defendants about trial logistics.	0.25	\$ 550.00	\$ 137.50
2782	10/14/2022	Lauren M. Goldsmith	Coordinating trial logistics.	4.25	\$ 550.00	\$ 2,337.50

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2783	10/14/2022	Lauren M. Goldsmith	Coordinating trial logistics.	2.00	\$ 550.00	\$ 1,100.00
2784	10/14/2022	Arun Bodapati	Witness prep session for Amanda Dennis.	1.00	\$ 450.00	\$ 450.00
2785	10/14/2022	Arun Bodapati	Assorted trial prep ahead of first day of trial.	11.00	\$ 450.00	\$ 4,950.00
2786	10/14/2022	Arun Bodapati	Meet and confer with Defendants re logistical issues like sealing confidential records, providing Court and media with exhibits, etc.	0.50	\$ 450.00	\$ 225.00
2787	10/14/2022	Arun Bodapati	Witness prep session for Dr. Adkins.	2.00	\$ 450.00	\$ 900.00
2788	10/14/2022	Alexander F.R. Peacocke	Reviewing Lappert materials for preparation of cross examination.	0.50	\$ 200.00	\$ 100.00
2789	10/14/2022	Alexander F.R. Peacocke	Inputting final comments and finalizing opposition to rehearing en banc in 8th Circuit.	3.75	\$ 200.00	\$ 750.00
2790	10/14/2022	Alexander F.R. Peacocke	Courtroom technology walkthrough session.	0.75	\$ 200.00	\$ 150.00
2791	10/14/2022	Kenza Nadifi	Trial preparations.	13.50	\$ 100.00	\$ 1,350.00
2792	10/14/2022	Cate M. Llewellyn	Trial tech setup (admin permissions for team, etc).	2.50	\$ 100.00	\$ 250.00
2793	10/14/2022	Cate M. Llewellyn	Reviewed Burleigh depo materials.	1.50	\$ 100.00	\$ 150.00
2794	10/14/2022	Cate M. Llewellyn	Trial prep (daily court procedures, Opus designations, review of exhibits, etc).	6.00	\$ 100.00	\$ 600.00
2795	10/14/2022	Cate M. Llewellyn	Reviewed expert report materials.	3.25	\$ 100.00	\$ 325.00
2796	10/15/2022	Garrard R. Beene	Witness prep emails.	0.25	\$ 800.00	\$ 200.00
2797	10/15/2022	Aviv S. Halpern	Coordinated trial logistics. Reviewed Hruz depositions and drafted Hruz cross outline. Edited Campbell cross outline. Emailed with team re Turban prep and testimony. Emailed team re proposed findings of fact.	3.75	\$ 400.00	\$ 1,500.00
2798	10/15/2022	Jonathan G. Lester	Providing feedback to junior associate cite checks for en banc response brief.	0.50	\$ 175.00	\$ 87.50
2799	10/15/2022	Daniel J. Richardson	Stambough witness prep session; finalized Regnerus cross-examination outline; reviewed Hruz depositions for cross-examination outline.	3.25	\$ 430.00	\$ 1,397.50
2800	10/15/2022	Daniel J. Richardson	Reviewed Regnerus expert report in preparation for cross-examination.	0.50	\$ 430.00	\$ 215.00
2801	10/15/2022	Lauren M. Goldsmith	Hruz prep.	1.00	\$ 550.00	\$ 550.00
2802	10/15/2022	Lauren M. Goldsmith	Working on 8th Circuit opp.	0.50	\$ 550.00	\$ 275.00
2803	10/15/2022	Lauren M. Goldsmith	Coordinating trial logistics.	3.50	\$ 550.00	\$ 1,925.00
2804	10/15/2022	Lauren M. Goldsmith	Hruz prep.	2.00	\$ 550.00	\$ 1,100.00
2805	10/15/2022	Arun Bodapati	Assorted trial prep.	10.00	\$ 450.00	\$ 4,500.00
2806	10/15/2022	Arun Bodapati	Witness prep session for Dr. Stambough.	2.50	\$ 450.00	\$ 1,125.00
2807	10/15/2022	Arun Bodapati	Witness prep session for Dr. Adkins.	1.50	\$ 450.00	\$ 675.00
2808	10/15/2022	Kenza Nadifi	Trial preparations.	11.25	\$ 100.00	\$ 1,125.00
2809	10/15/2022	Kenza Nadifi	Trial preparations.	0.75	\$ 100.00	\$ 75.00
2810	10/15/2022	Cate M. Llewellyn	Trial prep -- materials for witnesses (Adkins, Karasic).	4.00	\$ 100.00	\$ 400.00
2811	10/15/2022	Cate M. Llewellyn	Tech setup for trial.	3.00	\$ 100.00	\$ 300.00
2812	10/16/2022	Garrard R. Beene	Trial prep, opposition to en banc.	0.25	\$ 800.00	\$ 200.00
2813	10/16/2022	Aviv S. Halpern	Trial preparation. Emailed with team re trial logistics. Edited Hruz, Jennen, Campbell, and Perry outlines. Meetings re trial strategy and case management. Prepared materials for trial. Meeting re Turban prep. Emailed with team re disclosures.	15.00	\$ 400.00	\$ 6,000.00
2814	10/16/2022	Aviv S. Halpern	Turban and Hruz witness prep.	3.25	\$ 400.00	\$ 1,300.00
2815	10/16/2022	Jonathan G. Lester	Witness preparation, trial research, other trial preparations.	10.75	\$ 175.00	\$ 1,881.25
2816	10/16/2022	Daniel J. Richardson	Team meeting; call with Regnerus prep group.	0.50	\$ 430.00	\$ 215.00
2817	10/16/2022	Lauren M. Goldsmith	Attending team meeting.	0.75	\$ 550.00	\$ 412.50
2818	10/16/2022	Lauren M. Goldsmith	Witness prep.	2.75	\$ 550.00	\$ 1,512.50
2819	10/16/2022	Lauren M. Goldsmith	Coordinating trial logistics.	9.50	\$ 550.00	\$ 5,225.00
2820	10/16/2022	Arun Bodapati	Prep for Day 1 of trial - prep for Dr. Deanna Adkins, various prep related to initial conference on housekeeping matters, QCing hard copy materials, etc.	15.25	\$ 450.00	\$ 6,862.50
2821	10/16/2022	Alexander F.R. Peacocke	Revising and finalizing opposition to rehearing en banc.	1.50	\$ 200.00	\$ 300.00
2822	10/16/2022	Alexander F.R. Peacocke	Organizing and transporting Karasic for alternate witness accommodation.	3.00	\$ 200.00	\$ 600.00
2823	10/16/2022	Alexander F.R. Peacocke	Dan Karasic witness prep session.	6.00	\$ 200.00	\$ 1,200.00
2824	10/16/2022	Kenza Nadifi	Trial preparations.	2.25	\$ 100.00	\$ 225.00
2825	10/16/2022	Kenza Nadifi	Trial preparations.	12.00	\$ 100.00	\$ 1,200.00
2826	10/16/2022	Cate M. Llewellyn	Trial Prep.	9.75	\$ 100.00	\$ 975.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2827	10/16/2022	Cate M. Llewellyn	Prepared Plaintiffs' Exhibits for court.	4.75	\$ 100.00	\$ 475.00
2828	10/17/2022	Garrard R. Beeney	Orders and trial plan.	0.25	\$ 800.00	\$ 200.00
2829	10/17/2022	Laura Kabler Oswell	Review materials for witness prep and draft direct and cross outlines.	4.25	\$ 650.00	\$ 2,762.50
2830	10/17/2022	Aviv S. Halpern	Trial and trial-related tasks. Turban witness prep meeting. Jennen witness prep meeting.	6.25	\$ 400.00	\$ 2,500.00
2831	10/17/2022	Jonathan G. Lester	Trial preparation, first day of trial, additional witness prep and legal research for trial	18.25	\$ 175.00	\$ 3,193.75
2832	10/17/2022	Daniel J. Richardson	Completed and filed opp to rehearing petition; prepared for Regnerus cross-examination.	4.75	\$ 430.00	\$ 2,042.50
2833	10/17/2022	Lauren M. Goldsmith	Witness prep.	2.00	\$ 550.00	\$ 1,100.00
2834	10/17/2022	Lauren M. Goldsmith	Attending trial.	12.00	\$ 550.00	\$ 6,600.00
2835	10/17/2022	Lauren M. Goldsmith	Prep for next day of trial.	3.00	\$ 550.00	\$ 1,650.00
2836	10/17/2022	Arun Bodapati	Day 1 of trial.	16.50	\$ 450.00	\$ 7,425.00
2837	10/17/2022	Alexander F.R. Peacocke	Attending Trial	12.00	\$ 200.00	\$ 2,400.00
2838	10/17/2022	Kenza Nadifi	Trial preparations.	6.75	\$ 100.00	\$ 675.00
2839	10/17/2022	Kenza Nadifi	In court.	12.00	\$ 100.00	\$ 1,200.00
2840	10/17/2022	Cate M. Llewellyn	Trial prep (Turban & Antommara), and expert reports.	8.00	\$ 100.00	\$ 800.00
2841	10/17/2022	Cate M. Llewellyn	Trial Prep.	3.00	\$ 100.00	\$ 300.00
2842	10/17/2022	Cate M. Llewellyn	Trial prep - preparing materials for court room etc.	2.00	\$ 100.00	\$ 200.00
2843	10/18/2022	Garrard R. Beeney	Emails re schedule; review transcript.	0.50	\$ 800.00	\$ 400.00
2844	10/18/2022	Laura Kabler Oswell	Meeting with team.	3.00	\$ 650.00	\$ 1,950.00
2845	10/18/2022	Aviv S. Halpern	Trial and trial-related tasks.	18.75	\$ 400.00	\$ 7,500.00
2846	10/18/2022	Jonathan G. Lester	Trial preparation, second day of trial, witness preparation, additional legal research for trial.	18.00	\$ 175.00	\$ 3,150.00
2847	10/18/2022	Daniel J. Richardson	Reviewed judicial notice research notes and emailed co-counsel re same.	0.25	\$ 430.00	\$ 107.50
2848	10/18/2022	Lauren M. Goldsmith	Prep for oral argument.	1.00	\$ 550.00	\$ 550.00
2849	10/18/2022	Lauren M. Goldsmith	Attending trial.	8.00	\$ 550.00	\$ 4,400.00
2850	10/18/2022	Lauren M. Goldsmith	Prep for direct.	1.00	\$ 550.00	\$ 550.00
2851	10/18/2022	Arun Bodapati	Day 2 of trial, and prep for day 3 (e.g. prep for direct exams of Drs. Hutchison and Stambough and Amanda Dennis).	16.00	\$ 450.00	\$ 7,200.00
2852	10/18/2022	Alexander F.R. Peacocke	Attending Trial	8.00	\$ 200.00	\$ 1,600.00
2853	10/18/2022	Kenza Nadifi	Trial preparations.	0.75	\$ 100.00	\$ 75.00
2854	10/18/2022	Kenza Nadifi	Trial preparations.	16.25	\$ 100.00	\$ 1,625.00
2855	10/18/2022	Cate M. Llewellyn	Trial - preparing materials to bring to & from court, compiling witness materials.	5.75	\$ 100.00	\$ 575.00
2856	10/18/2022	Cate M. Llewellyn	In court.	7.75	\$ 100.00	\$ 775.00
2857	10/18/2022	Cate M. Llewellyn	Reviewed filings re scheduling.	1.25	\$ 100.00	\$ 125.00
2858	10/18/2022	Cate M. Llewellyn	Trial prep for Antommara & Turban.	1.50	\$ 100.00	\$ 150.00
2859	10/18/2022	Cate M. Llewellyn	Reviewed witness materials for Dennis, Brandts.	2.75	\$ 100.00	\$ 275.00
2860	10/19/2022	Garrard R. Beeney	Emails re examinations; 8th cir order	0.50	\$ 800.00	\$ 400.00
2861	10/19/2022	Laura Kabler Oswell	Attend trial and meetings re. trial prep.	10.00	\$ 650.00	\$ 6,500.00
2862	10/19/2022	Aviv S. Halpern	Trial and trial-related tasks. Meetings re Campbell prep. Calls with local counsel. Meetings re Ho and Cathey prep. Edited outlines, etc.	18.25	\$ 400.00	\$ 7,300.00
2863	10/19/2022	Jonathan G. Lester	Legal Research, Trial Preparation, Time at Trial.	8.25	\$ 175.00	\$ 1,443.75
2864	10/19/2022	Daniel J. Richardson	Researched evidence law in response to question from trial.	0.50	\$ 430.00	\$ 215.00
2865	10/19/2022	Lauren M. Goldsmith	Attending team meeting.	0.50	\$ 550.00	\$ 275.00
2866	10/19/2022	Lauren M. Goldsmith	Prep for trial.	2.00	\$ 550.00	\$ 1,100.00
2867	10/19/2022	Lauren M. Goldsmith	Attending trial.	8.00	\$ 550.00	\$ 4,400.00
2868	10/19/2022	Arun Bodapati	Day 3 of trial, and follow-up/prep for day 4 of trial.	14.00	\$ 450.00	\$ 6,300.00
2869	10/19/2022	Alexander F.R. Peacocke	Attending Trial	4.50	\$ 200.00	\$ 900.00
2870	10/19/2022	Kenza Nadifi	Trial preparations.	1.50	\$ 100.00	\$ 150.00
2871	10/19/2022	Kenza Nadifi	In court, then cleaning up lawyer room in courthouse.	10.00	\$ 100.00	\$ 1,000.00
2872	10/19/2022	Kenza Nadifi	Trial preparations.	5.50	\$ 100.00	\$ 550.00
2873	10/19/2022	Cate M. Llewellyn	Trial prep re witness materials & logistics.	2.50	\$ 100.00	\$ 250.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2874	10/19/2022	Cate M. Llewellyn	Preparing & organizing materials for witnesses in court; court time.	10.25	\$ 100.00	\$ 1,025.00
2875	10/19/2022	Cate M. Llewellyn	Reviewed Hutch & Stambough materials.	1.75	\$ 100.00	\$ 175.00
2876	10/20/2022	Garrard R. Beene	Schedule issues; trial reports; letters to 8th cir.	0.25	\$ 800.00	\$ 200.00
2877	10/20/2022	Laura Kabler Oswell	Review witness outlines and background material for defense witnesses; meetings with team re. same.	5.00	\$ 650.00	\$ 3,250.00
2878	10/20/2022	Aviv S. Halpern	Hruz and Campbell witness prep. Edited Campbell outline. Attn to Jennen medical records and had meetings re Ho prep. Meetings re Campbell prep outline. Meetings re trial and trial logistics. Other trial-related tasks.	19.75	\$ 400.00	\$ 7,900.00
2879	10/20/2022	Maxime D. Matthew	Reviewed and revised Perry cross outline.	0.50	\$ 175.00	\$ 87.50
2880	10/20/2022	Maxime D. Matthew	Assisted and supervised paralegals re binders for Campbell cross.	0.50	\$ 175.00	\$ 87.50
2881	10/20/2022	Maxime D. Matthew	Drafted and revised Campbell cross outline, including re-reviewing medical records and deposition.	9.25	\$ 175.00	\$ 1,618.75
2882	10/20/2022	Maxime D. Matthew	Correspondence with Maura Reinbrecht re Perry cross outline.	0.25	\$ 175.00	\$ 43.75
2883	10/20/2022	Maxime D. Matthew	Correspondence with team re Eight Circuit letter from State.	0.25	\$ 175.00	\$ 43.75
2884	10/20/2022	Maxime D. Matthew	Meeting with co-counsel re Ho/Cathey/Campbell outlines.	1.25	\$ 175.00	\$ 218.75
2885	10/20/2022	Maxime D. Matthew	Meeting with Aviv Halpern and Leslie Cooper re Campbell final outline.	0.25	\$ 175.00	\$ 43.75
2886	10/20/2022	Maxime D. Matthew	Correspondence with Aviv Halpern, Chase Strangio, Sarah Everett, and Beth Echols re touching base with Jennens about trial testimony.	0.50	\$ 175.00	\$ 87.50
2887	10/20/2022	Jonathan G. Lester	Trial preparation (Dr. Ho testimony).	6.50	\$ 175.00	\$ 1,137.50
2888	10/20/2022	Daniel J. Richardson	Reviewed communications about Eighth Circuit filing and sent email re same.	0.25	\$ 430.00	\$ 107.50
2889	10/20/2022	Lauren M. Goldsmith	Attending team meeting.	0.50	\$ 550.00	\$ 275.00
2890	10/20/2022	Lauren M. Goldsmith	Prep for trial.	6.00	\$ 550.00	\$ 3,300.00
2891	10/20/2022	Lauren M. Goldsmith	Coordinating trial logistics.	4.00	\$ 550.00	\$ 2,200.00
2892	10/20/2022	Arun Bodapati	Prep for day 4 of trial, focusing particularly on prep for cross of Dr. Janet Cathey.	14.00	\$ 450.00	\$ 6,300.00
2893	10/20/2022	Alexander F.R. Peacocke	Preparing for Dr. Ho Cross examination	5.50	\$ 200.00	\$ 1,100.00
2894	10/20/2022	Kenza Nadifi	Trial preparations.	18.00	\$ 100.00	\$ 1,800.00
2895	10/20/2022	Cate M. Llewellyn	Prepared witness prep documents for Ho, Campbell, & Cathey; logistics planning re early departure due to shortened trial.	7.75	\$ 100.00	\$ 775.00
2896	10/20/2022	Cate M. Llewellyn	Reviewed & prepared Jennen Medical records re Campbell cross examination.	6.25	\$ 100.00	\$ 625.00
2897	10/21/2022	Laura Kabler Oswell	Attend trial; meetings with team.	10.00	\$ 650.00	\$ 6,500.00
2898	10/21/2022	Aviv S. Halpern	Edited Campbell cross outline. Prepared for trial. Attended trial. Communicated with team re November strategy.	9.00	\$ 400.00	\$ 3,600.00
2899	10/21/2022	Maxime D. Matthew	Assisted and supervised paralegals re updating binders for Campbell cross.	0.50	\$ 175.00	\$ 87.50
2900	10/21/2022	Maxime D. Matthew	Finalized Campbell cross outline.	1.75	\$ 175.00	\$ 306.25
2901	10/21/2022	Maxime D. Matthew	Correspondence with team and Dan Karasic.	3.75	\$ 175.00	\$ 656.25
2902	10/21/2022	Maxime D. Matthew	Attended court, including second chairing Cathy Campbell.	5.75	\$ 175.00	\$ 1,006.25
2903	10/21/2022	Jonathan G. Lester	Trial Day 4 (Third-Party Witnesses).	5.25	\$ 175.00	\$ 918.75
2904	10/21/2022	Lauren M. Goldsmith	Attending trial.	5.00	\$ 550.00	\$ 2,750.00
2905	10/21/2022	Arun Bodapati	Day 4 of trial.	6.25	\$ 450.00	\$ 2,812.50
2906	10/21/2022	Alexander F.R. Peacocke	Attending Trial	4.50	\$ 200.00	\$ 900.00
2907	10/21/2022	Kenza Nadifi	Trial preparations.	3.75	\$ 100.00	\$ 375.00
2908	10/21/2022	Kenza Nadifi	Trial preparations.	3.00	\$ 100.00	\$ 300.00
2909	10/21/2022	Cate M. Llewellyn	Trial breakdown.	6.00	\$ 100.00	\$ 600.00
2910	10/21/2022	Cate M. Llewellyn	Reviewed Jennen materials for Ho testimony.	1.50	\$ 100.00	\$ 150.00
2911	10/21/2022	Cate M. Llewellyn	Court time (preparing materials for, time in court, & organizing materials from).	5.50	\$ 100.00	\$ 550.00
2912	10/22/2022	Maxime D. Matthew	Correspondence with team.	1.25	\$ 175.00	\$ 218.75
2913	10/22/2022	Cate M. Llewellyn	Call with L. Goldsmith re post-trial planning.	0.50	\$ 100.00	\$ 50.00
2914	10/23/2022	Aviv S. Halpern	Attn to rough trial transcripts.	2.50	\$ 400.00	\$ 1,000.00
2915	10/23/2022	Aviv S. Halpern	Call with L. Goldsmith re trial logistics re breakdown and for November trial.	0.00	\$ 400.00	\$ -
2916	10/23/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.50	\$ 550.00	\$ 275.00
2917	10/23/2022	Lauren M. Goldsmith	Calls w/ paralegals about trial.	0.50	\$ 550.00	\$ 275.00
2918	10/23/2022	Cate M. Llewellyn	Call with teammates re post-trial planning.	0.75	\$ 100.00	\$ 75.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2919	10/24/2022	Aviv S. Halpern	Emailed with team re trial strategy for November trial. Meeting with L. Goldsmith re same. Meeting with L. Oswell re same and next steps.	0.75	\$ 400.00	\$ 300.00
2920	10/24/2022	Aviv S. Halpern	Communicated with L. Goldsmith re trial logistics. Attn to emails re transcript and communicated with team re same. Call with D. Richardson re November trial.	0.75	\$ 400.00	\$ 300.00
2921	10/24/2022	Maxime D. Matthew	Correspondence with Lauren Goldsmith, Leslie Cooper, and Breean Walas re meeting today.	0.25	\$ 175.00	\$ 43.75
2922	10/24/2022	Maxime D. Matthew	Correspondence with Cate Llewellyn and Kenza Nadifi re documents from trial.	0.25	\$ 175.00	\$ 43.75
2923	10/24/2022	Maxime D. Matthew	Correspondence with Gregory Smith re documents in Little Rock.	0.25	\$ 175.00	\$ 43.75
2924	10/24/2022	Maxime D. Matthew	Call with Andrew Williams re documents in Little Rock.	0.25	\$ 175.00	\$ 43.75
2925	10/24/2022	Maxime D. Matthew	Correspondence with Jonathan Lester and Gregory Smith and reviewing email from Laura Kabler Oswell.	0.00	\$ 175.00	\$ -
2926	10/24/2022	Maxime D. Matthew	Researched Billy Burleigh.	0.25	\$ 175.00	\$ 43.75
2927	10/24/2022	Daniel J. Richardson	Met with associate on trial team to discuss logistics for second week of trial in November.	0.25	\$ 430.00	\$ 107.50
2928	10/24/2022	Lauren M. Goldsmith	Call w/ C. Behan about trial logistics.	0.50	\$ 550.00	\$ 275.00
2929	10/24/2022	Lauren M. Goldsmith	Call w/ A. Halpern about trial logistics.	0.50	\$ 550.00	\$ 275.00
2930	10/24/2022	Lauren M. Goldsmith	Attending team meeting.	0.50	\$ 550.00	\$ 275.00
2931	10/24/2022	Arun Bodapati	Reviewing materials for cross of defense witness Billie Burleigh.	3.75	\$ 450.00	\$ 1,687.50
2932	10/24/2022	Kenza Nadifi	Saved trial transcripts to ND.	1.00	\$ 100.00	\$ 100.00
2933	10/25/2022	Aviv S. Halpern	Email correspondence with Williama@sullcrom.com regarding Little Rock Breakdown; communicated with team re same. Began coordinating trial logistics for November trial.	2.75	\$ 400.00	\$ 1,100.00
2934	10/25/2022	Maxime D. Matthew	Reviewed and revised Perry cross.	0.50	\$ 175.00	\$ 87.50
2935	10/25/2022	Maxime D. Matthew	Reviewed court transcript.	0.50	\$ 175.00	\$ 87.50
2936	10/25/2022	Maxime D. Matthew	Correspondence with Aviv Halpern re Perry cross.	0.25	\$ 175.00	\$ 43.75
2937	10/25/2022	Lauren M. Goldsmith	Call w/ A. Halpern about trial logistics.	0.25	\$ 550.00	\$ 137.50
2938	10/25/2022	Lauren M. Goldsmith	Call w/ L. Mazzella about trial logistics.	0.75	\$ 550.00	\$ 412.50
2939	10/25/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.50	\$ 550.00	\$ 275.00
2940	10/25/2022	Arun Bodapati	Reviewing transcript and video of deposition of Billy Burleigh.	6.25	\$ 450.00	\$ 2,812.50
2941	10/25/2022	Arun Bodapati	Reviewing rough transcripts of trial week 1.	0.75	\$ 450.00	\$ 337.50
2942	10/25/2022	Alexander F.R. Peacocke	Revised Cross-examination of Roger Hiatt - outline to provide comments to B. Walas (Walas Law Firm).	1.00	\$ 200.00	\$ 200.00
2943	10/25/2022	Alexander F.R. Peacocke	Email correspondence with Arun Bodapati, Lauren M. Goldsmith, Aviv S. Halpern regarding post trial status.	0.50	\$ 200.00	\$ 100.00
2944	10/25/2022	Alexander F.R. Peacocke	Reviewing Hiatt testimony before Arkansas General Assembly for cross examination prep.	2.50	\$ 200.00	\$ 500.00
2945	10/25/2022	Kenza Nadifi	Coordinated with ACLU billing department to settle invoices for court transcripts.	0.75	\$ 100.00	\$ 75.00
2946	10/26/2022	Aviv S. Halpern	Meeting with L. Goldsmith re November trial. Coordinated trial logistics for team. Communicated with associates re proposed findings of fact and conclusions of law. Attn to Hruz outline.	4.50	\$ 400.00	\$ 1,800.00
2947	10/26/2022	Maxime D. Matthew	Reviewed emails from court re rough transcripts.	0.25	\$ 175.00	\$ 43.75
2948	10/26/2022	Maxime D. Matthew	Reviewed rough transcript.	0.25	\$ 175.00	\$ 43.75
2949	10/26/2022	Maxime D. Matthew	Correspondence with Alex Peacocke re trial follow-up.	0.25	\$ 175.00	\$ 43.75
2950	10/26/2022	Maxime D. Matthew	Correspondence with Aviv Halpern and Maura Reinbrecht re Perry cross.	0.25	\$ 175.00	\$ 43.75
2951	10/26/2022	Maxime D. Matthew	Correspondence with Aviv Halpern and Jonathan Lester re findings of fact.	0.25	\$ 175.00	\$ 43.75
2952	10/26/2022	Maxime D. Matthew	Correspondence with team re Eighth Circuit letter.	0.25	\$ 175.00	\$ 43.75
2953	10/26/2022	Maxime D. Matthew	Meeting with Alex Peacocke re trial logistics.	0.25	\$ 175.00	\$ 43.75
2954	10/26/2022	Maxime D. Matthew	Reviewed updated Perry cross.	0.25	\$ 175.00	\$ 43.75
2955	10/26/2022	Maxime D. Matthew	Correspondence with full team re Opposition to En Banc.	0.25	\$ 175.00	\$ 43.75
2956	10/26/2022	Maxime D. Matthew	Correspondence with full team re updated Opposition to En Banc.	0.25	\$ 175.00	\$ 43.75
2957	10/26/2022	Maxime D. Matthew	Correspondence with Jonathan Lester re Arkansas trial logistics.	0.25	\$ 175.00	\$ 43.75
2958	10/26/2022	Lauren M. Goldsmith	Call w/ A. Halpern about trial prep.	1.25	\$ 550.00	\$ 687.50
2959	10/26/2022	Lauren M. Goldsmith	Meeting w/ A. Holland about findings of fact.	0.25	\$ 550.00	\$ 137.50
2960	10/26/2022	Arun Bodapati	Reviewing trial transcripts.	4.25	\$ 450.00	\$ 1,912.50
2961	10/26/2022	Alexander F.R. Peacocke	Reviewed email from B. Walas (Walas Law Firm) regarding Hiatt cross	0.25	\$ 200.00	\$ 50.00
2962	10/26/2022	Alexander F.R. Peacocke	Reviewed document PX22 - Transcript of March 10, 2021 House Hearing Regarding HB1570.pdf - Adobe Acrobat Standard (32-bit)	0.25	\$ 200.00	\$ 50.00
2963	10/26/2022	Kenza Nadifi	Uploaded new court transcripts to ND, including renaming, and reorganizing folders.	1.00	\$ 100.00	\$ 100.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
2964	10/27/2022	Laura Kabler Oswell	Call with Goldsmith and Halpern re. prep for defense case.	1.00	\$ 650.00	\$ 650.00
2965	10/27/2022	Aviv S. Halpern	Edited Hruz witness prep outline.	1.00	\$ 400.00	\$ 400.00
2966	10/27/2022	Aviv S. Halpern	Call with A. Holland re next steps in witness prep and case management.	0.50	\$ 400.00	\$ 200.00
2967	10/27/2022	Aviv S. Halpern	Call with D. Richardson re November trial and Regnerus cross.	0.25	\$ 400.00	\$ 100.00
2968	10/27/2022	Aviv S. Halpern	Call with L. Oswell, L. Goldsmith re logistics for second part of trial and trial strategy. Call with M. Matthew and M. Reinbrecht re Perry cross outline.	2.25	\$ 400.00	\$ 900.00
2969	10/27/2022	Maxime D. Matthew	Meeting with Aviv Halpern and Maura Reinbrecht re Perry cross.	1.00	\$ 175.00	\$ 175.00
2970	10/27/2022	Maxime D. Matthew	Correspondence with Aviv Halpern and Maura Reinbrecht re Perry cross and meeting.	0.25	\$ 175.00	\$ 43.75
2971	10/27/2022	Daniel J. Richardson	Call with associate to discuss trial logistics.	0.25	\$ 430.00	\$ 107.50
2972	10/27/2022	Lauren M. Goldsmith	Call w/ L. Oswell, L. Goldsmith, and A. Halpern about trial prep.	1.00	\$ 550.00	\$ 550.00
2973	10/27/2022	Lauren M. Goldsmith	Reviewing Hiatt material.	2.25	\$ 550.00	\$ 1,237.50
2974	10/27/2022	Arun Bodapati	Reviewing trial transcripts.	3.25	\$ 450.00	\$ 1,462.50
2975	10/27/2022	Cate M. Llewellyn	Reviewed final trial transcripts.	0.75	\$ 100.00	\$ 75.00
2976	10/28/2022	Laura Kabler Oswell	Review cross examination outlines.	2.00	\$ 650.00	\$ 1,300.00
2977	10/28/2022	Laura Kabler Oswell	Call with Esseks and Cooper re trial.	0.50	\$ 650.00	\$ 325.00
2978	10/28/2022	Aviv S. Halpern	Communicated with team re proposed findings of fact and trial strategy. Attn to trial transcripts. Incorporated edits to Perry outline. Edited Hruz witness outline. Coordinated trial logistics for November trial.	2.00	\$ 400.00	\$ 800.00
2979	10/28/2022	Maxime D. Matthew	Correspondence with Austin Feuer re Karasic findings of fact work allocation and follow-up questions.	0.50	\$ 175.00	\$ 87.50
2980	10/28/2022	Maxime D. Matthew	Correspondence with Alex Holland and Austin Feuer re Karasic findings of fact.	0.25	\$ 175.00	\$ 43.75
2981	10/28/2022	Maxime D. Matthew	Correspondence with Aviv Halpern and Emma Downing re findings of fact.	0.25	\$ 175.00	\$ 43.75
2982	10/28/2022	Jonathan G. Lester	Hruz cross-examination outline drafting.	0.75	\$ 175.00	\$ 131.25
2983	10/28/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.25	\$ 550.00	\$ 137.50
2984	10/28/2022	Lauren M. Goldsmith	Reviewing Hiatt material.	2.50	\$ 550.00	\$ 1,375.00
2985	10/28/2022	Cate M. Llewellyn	Reviewed final trial transcripts re witness testimony index.	2.75	\$ 100.00	\$ 275.00
2986	10/30/2022	Aviv S. Halpern	Emailed with team re November trial. Updated Perry outline. Reviewed Hruz depositions.	0.75	\$ 400.00	\$ 300.00
2987	10/31/2022	Garrard R. Beene	Regenerus cross.	0.25	\$ 800.00	\$ 200.00
2988	10/31/2022	Laura Kabler Oswell	Weekly team meeting with ACLU and outside counsel teams.	0.50	\$ 650.00	\$ 325.00
2989	10/31/2022	Aviv S. Halpern	Call with Alex Holland re findings of fact. Team call re case management and next steps. Call with L. Goldsmith re witness order, cross outlines, and proposed findings of fact.	3.75	\$ 400.00	\$ 1,500.00
2990	10/31/2022	Maxime D. Matthew	Correspondence re depo designations.	0.25	\$ 175.00	\$ 43.75
2991	10/31/2022	Maxime D. Matthew	Reviewed Regnerus outline.	0.50	\$ 175.00	\$ 87.50
2992	10/31/2022	Maxime D. Matthew	Correspondence with Austin Feuer re Findings of Fact follow-up questions.	0.25	\$ 175.00	\$ 43.75
2993	10/31/2022	Maxime D. Matthew	Reviewed email from Dan Richardson re Regnerus outline.	0.25	\$ 175.00	\$ 43.75
2994	10/31/2022	Maxime D. Matthew	Correspondence with Maura Reinbrecht re responses to objections draft.	0.25	\$ 175.00	\$ 43.75
2995	10/31/2022	Maxime D. Matthew	Correspondence re Exhibit and Witness List.	0.25	\$ 175.00	\$ 43.75
2996	10/31/2022	Maxime D. Matthew	Correspondence re Jennen timeline.	0.25	\$ 175.00	\$ 43.75
2997	10/31/2022	Maxime D. Matthew	Correspondence with Alex Holland and Austin Feuer re Findings of Fact.	0.25	\$ 175.00	\$ 43.75
2998	10/31/2022	Maxime D. Matthew	Correspondence with paralegals re MIL.	0.25	\$ 175.00	\$ 43.75
2999	10/31/2022	Maxime D. Matthew	Correspondence with Emma Downing re Findings of Fact follow-up questions.	0.25	\$ 175.00	\$ 43.75
3000	10/31/2022	Maxime D. Matthew	Reviewed responses to objections draft and provided feedback.	0.75	\$ 175.00	\$ 131.25
3001	10/31/2022	Jonathan G. Lester	Drafting findings of fact for Adkins, Antommara, and the Brandts.	0.50	\$ 175.00	\$ 87.50
3002	10/31/2022	Jonathan G. Lester	Compiling Hruz deposition transcripts for printing.	0.25	\$ 175.00	\$ 43.75
3003	10/31/2022	Daniel J. Richardson	Updated outline of Regnerus cross-examination outline in response to co-counsel feedback and circulated to full team.	0.50	\$ 430.00	\$ 215.00
3004	10/31/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about witness prep., findings of fact and conclusions of law, and trial logistics.	1.00	\$ 550.00	\$ 550.00
3005	10/31/2022	Lauren M. Goldsmith	Emails about team meeting agenda.	0.25	\$ 550.00	\$ 137.50
3006	10/31/2022	Lauren M. Goldsmith	Emails about cross prep. teams.	0.25	\$ 550.00	\$ 137.50
3007	10/31/2022	Lauren M. Goldsmith	Attending co-counsel team meeting.	0.75	\$ 550.00	\$ 412.50
3008	10/31/2022	Arun Bodapati	Going through various materials to prep cross outline of Billy Burleigh.	7.00	\$ 450.00	\$ 3,150.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
3009	10/31/2022	Alexander F.R. Peacocke	Reviewed document RogerHiattJrMD_06.pdf - Adobe Acrobat Standard (32-bit)	0.50	\$ 200.00	\$ 100.00
3010	10/31/2022	Alexander F.R. Peacocke	Meeting with Alexander Holland, Alexander Peacocke, Maura A. Reinbrecht regarding Brandt Hiatt Call	0.75	\$ 200.00	\$ 150.00
3011	10/31/2022	Kenza Nadifi	Located and pulled Hruz deposition from previous case.	0.25	\$ 100.00	\$ 25.00
3012	10/31/2022	Kenza Nadifi	Looked for and pulled all requested motions on Pacer Pro.	0.25	\$ 100.00	\$ 25.00
3013	10/31/2022	Cate M. Llewellyn	Reviewed final trial transcripts.	3.75	\$ 100.00	\$ 375.00
3014	10/31/2022	Cate M. Llewellyn	Reviewed Motions in Limine.	1.00	\$ 100.00	\$ 100.00
3015	11/1/2022	Maxime D. Matthew	Drafted Karasic findings of fact.	2.50	\$ 175.00	\$ 437.50
3016	11/1/2022	Maxime D. Matthew	Correspondence with Maura Reinbrecht re responses to objections draft follow-up questions.	0.50	\$ 175.00	\$ 87.50
3017	11/1/2022	Maxime D. Matthew	Correspondence with Maura Reinbrecht re draft email to Aviv Halpern and revised email.	0.25	\$ 175.00	\$ 43.75
3018	11/1/2022	Maxime D. Matthew	Correspondence with Austin Feuer re Karasic CV.	0.25	\$ 175.00	\$ 43.75
3019	11/1/2022	Maxime D. Matthew	Reviewed emails re trial transcripts.	0.25	\$ 175.00	\$ 43.75
3020	11/1/2022	Maxime D. Matthew	Correspondence with Maura Reinbrecht re finalized evidentiary objections.	0.25	\$ 175.00	\$ 43.75
3021	11/1/2022	Maxime D. Matthew	Correspondence with Austin Feuer re Karasic findings of fact.	0.50	\$ 175.00	\$ 87.50
3022	11/1/2022	Maxime D. Matthew	Correspondence with Maura Reinbrecht re responses to objections draft.	0.25	\$ 175.00	\$ 43.75
3023	11/1/2022	Maxime D. Matthew	Correspondence with Maura Reinbrecht re finalizing discrete assignment and Perry cross.	0.25	\$ 175.00	\$ 43.75
3024	11/1/2022	Maxime D. Matthew	Reviewed and revised responses to objections draft.	0.25	\$ 175.00	\$ 43.75
3025	11/1/2022	Jonathan G. Lester	Continuing work on Paul Hruz cross-examination outline.	1.75	\$ 175.00	\$ 306.25
3026	11/1/2022	Jonathan G. Lester	Adkins findings of fact.	1.00	\$ 175.00	\$ 175.00
3027	11/1/2022	Lauren M. Goldsmith	Reviewing revised Perry outline.	1.50	\$ 550.00	\$ 825.00
3028	11/1/2022	Arun Bodapati	Drafting cross outline for Billy Burleigh.	1.75	\$ 450.00	\$ 787.50
3029	11/1/2022	Kenza Nadifi	Coordinated meeting room for Friday deposition video viewing and research session.	0.25	\$ 100.00	\$ 25.00
3030	11/1/2022	Cate M. Llewellyn	Reviewed Hruz materials marked as exhibits.	0.50	\$ 100.00	\$ 50.00
3031	11/2/2022	Garrard R. Beene	Record transmittal; finding of facts.	0.25	\$ 800.00	\$ 200.00
3032	11/2/2022	Aviv S. Halpern	Emailed with team re Lappert and Burleigh interviews. Attn to Lappert draft. Incorporated comments to Perry outline.	2.00	\$ 400.00	\$ 800.00
3033	11/2/2022	Maxime D. Matthew	Correspondence with Austin Feuer re Karasic findings of fact follow-up questions.	0.25	\$ 175.00	\$ 43.75
3034	11/2/2022	Maxime D. Matthew	Correspondence with Emma Downing re Stambough findings of fact.	0.25	\$ 175.00	\$ 43.75
3035	11/2/2022	Daniel J. Richardson	Reviewed updated expert cross examination outlines.	0.25	\$ 430.00	\$ 107.50
3036	11/2/2022	Lauren M. Goldsmith	Revising email to Defendants about post-trial submission, emails about same.	0.50	\$ 550.00	\$ 275.00
3037	11/2/2022	Lauren M. Goldsmith	Calls w/ L. Goldsmith and A. Halpern about outreach to Defendants.	0.00	\$ 550.00	\$ -
3038	11/2/2022	Arun Bodapati	Drafting outline for cross exam of Billy Burleigh.	6.50	\$ 450.00	\$ 2,925.00
3039	11/2/2022	Alexander F.R. Peacocke	Reviewing Lappert expert report to prepare cross outline.	2.00	\$ 200.00	\$ 400.00
3040	11/2/2022	Kenza Nadifi	Located and sent specific stamped exhibits.	0.25	\$ 100.00	\$ 25.00
3041	11/3/2022	Aviv S. Halpern	Drafted and edited Hruz cross outline and reviewed associated materials.	1.25	\$ 400.00	\$ 500.00
3042	11/3/2022	Aviv S. Halpern	Edited Regnerus cross outline.	0.75	\$ 400.00	\$ 300.00
3043	11/3/2022	Aviv S. Halpern	Communicated with team re Hruz cross.	0.25	\$ 400.00	\$ 100.00
3044	11/3/2022	Maxime D. Matthew	Correspondence with Austin Feuer re Karasic qualifications.	0.25	\$ 175.00	\$ 43.75
3045	11/3/2022	Maxime D. Matthew	Reviewed Stambough findings of fact and provided feedback to Emma Downing.	2.50	\$ 175.00	\$ 437.50
3046	11/3/2022	Maxime D. Matthew	Drafted and edited Stambough findings of fact.	1.00	\$ 175.00	\$ 175.00
3047	11/3/2022	Maxime D. Matthew	Correspondence with Aviv Halpern re findings of fact edits.	0.25	\$ 175.00	\$ 43.75
3048	11/3/2022	Maxime D. Matthew	Drafted and edited Karasic findings of fact.	9.25	\$ 175.00	\$ 1,618.75
3049	11/3/2022	Maxime D. Matthew	Reviewed and drafted Karasic qualifications section and provided feedback to Austin Feuer.	1.00	\$ 175.00	\$ 175.00
3050	11/3/2022	Jonathan G. Lester	Dr. Adkins findings of fact updates.	1.75	\$ 175.00	\$ 306.25
3051	11/3/2022	Daniel J. Richardson	Updated Regnerus cross outline in response to team feedback.	0.50	\$ 430.00	\$ 215.00
3052	11/3/2022	Arun Bodapati	Reviewing latest outline for cross of Stephen Levine and supporting materials.	2.75	\$ 450.00	\$ 1,237.50
3053	11/3/2022	Arun Bodapati	Drafting outline for cross exam of Billy Burleigh.	4.00	\$ 450.00	\$ 1,800.00
3054	11/3/2022	Alexander F.R. Peacocke	Hiatt cross prep call with L. Cooper, C. Strangio, B. Walas, S. Everett (partial).	1.25	\$ 200.00	\$ 250.00
3055	11/3/2022	Kenza Nadifi	Downloaded Levine files from ND and uploaded to Box.com for L. Cooper.	0.75	\$ 100.00	\$ 75.00
3056	11/3/2022	Cate M. Llewellyn	Met with team members re trial logistics (AR Gender Affirming Care).	1.00	\$ 100.00	\$ 100.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
3057	11/4/2022	Aviv S. Halpern	Coordinated trial logistics.	0.75	\$ 400.00	\$ 300.00
3058	11/4/2022	Maxime D. Matthew	Call with Word Pro re findings of fact formatting.	0.25	\$ 175.00	\$ 43.75
3059	11/4/2022	Maxime D. Matthew	Drafted and edited Stambough findings of fact.	4.50	\$ 175.00	\$ 787.50
3060	11/4/2022	Maxime D. Matthew	Correspondence with Austin Feuer re findings of fact follow-up questions.	0.25	\$ 175.00	\$ 43.75
3061	11/4/2022	Maxime D. Matthew	Correspondence with Word Pro re Stambough findings of fact.	0.25	\$ 175.00	\$ 43.75
3062	11/4/2022	Maxime D. Matthew	Correspondence with Emma Downing re finalizing Stambough findings of fact and edits.	0.25	\$ 175.00	\$ 43.75
3063	11/4/2022	Maxime D. Matthew	Edited Karasic findings of fact based on feedback from Alex Holland.	2.50	\$ 175.00	\$ 437.50
3064	11/4/2022	Maxime D. Matthew	Call with Emma Downing re Stambough finding of fact final edits.	0.25	\$ 175.00	\$ 43.75
3065	11/4/2022	Maxime D. Matthew	Reviewed email and draft section from Austin Feuer re Karasic, Cathey, and Campbell findings of fact.	0.25	\$ 175.00	\$ 43.75
3066	11/4/2022	Maxime D. Matthew	Correspondence with Word Pro re Karasic findings of fact.	0.25	\$ 175.00	\$ 43.75
3067	11/4/2022	Maxime D. Matthew	Correspondence with Alex Holland and Austin Feuer re finalizing Karasic findings of fact.	0.25	\$ 175.00	\$ 43.75
3068	11/4/2022	Maxime D. Matthew	Reviewed and edited Stambough findings of fact and provided feedback to Emma Downing.	1.00	\$ 175.00	\$ 175.00
3069	11/4/2022	Daniel J. Richardson	Reviewed new material regarding Florida state restrictions on gender-affirming medical care.	0.25	\$ 430.00	\$ 107.50
3070	11/4/2022	Arun Bodapati	Reviewing latest outline for cross of Stephen Levine and supporting materials.	8.25	\$ 450.00	\$ 3,712.50
3071	11/4/2022	Alexander F.R. Peacocke	Reviewed Lappert Depo for cross.	5.50	\$ 200.00	\$ 1,100.00
3072	11/4/2022	Cate M. Llewellyn	Reviewed final trial transcripts.	1.50	\$ 100.00	\$ 150.00
3073	11/5/2022	Aviv S. Halpern	Communicate with L. Goldsmith re trial preparation.	0.25	\$ 400.00	\$ 100.00
3074	11/5/2022	Arun Bodapati	Reviewing latest outline for cross of Stephen Levine and supporting materials.	3.75	\$ 450.00	\$ 1,687.50
3075	11/6/2022	Maxime D. Matthew	Reviewed email from Aviv Halpern re Stambough findings of fact.	0.25	\$ 175.00	\$ 43.75
3076	11/6/2022	Arun Bodapati	Reviewing latest outline for cross of Stephen Levine and supporting materials.	2.25	\$ 450.00	\$ 1,012.50
3077	11/7/2022	Aviv S. Halpern	Reviewed trial testimony in preparation for drafting proposed findings of fact.	1.50	\$ 400.00	\$ 600.00
3078	11/7/2022	Aviv S. Halpern	Edited draft proposed finding of fact.	0.75	\$ 400.00	\$ 300.00
3079	11/7/2022	Aviv S. Halpern	Call with ACLU re proposed findings of fact and closing. Call with L. Goldsmith and A. Holland re same.	0.75	\$ 400.00	\$ 300.00
3080	11/7/2022	Aviv S. Halpern	Call with L. Goldsmith re findings of fact and conclusions of law, trial logistics.	0.50	\$ 400.00	\$ 200.00
3081	11/7/2022	Lauren M. Goldsmith	Calls w/ A. Halpern about trial logistics.	0.75	\$ 550.00	\$ 412.50
3082	11/7/2022	Lauren M. Goldsmith	Call w/ L. Oswell and L. Goldsmith about trial logistics.	0.25	\$ 550.00	\$ 137.50
3083	11/7/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Halpern, A. Holland, J. Esseks (ACLU), L. Cooper (ACLU), C. Strangio (ACLU) about strategy for proposed findings of fact/conclusions of law.	0.50	\$ 550.00	\$ 275.00
3084	11/7/2022	Lauren M. Goldsmith	Attending co-counsel meeting.	0.50	\$ 550.00	\$ 275.00
3085	11/7/2022	Lauren M. Goldsmith	Call w/ L. Cooper (ACLU) about trial prep.	0.25	\$ 550.00	\$ 137.50
3086	11/7/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Halpern, and A. Holland about strategy for proposed findings of fact/conclusions of law and closing argument.	0.50	\$ 550.00	\$ 275.00
3087	11/7/2022	Lauren M. Goldsmith	Emails with A. Halpern about trial logistics.	0.25	\$ 550.00	\$ 137.50
3088	11/7/2022	Arun Bodapati	Revising Burleigh outline.	5.00	\$ 450.00	\$ 2,250.00
3089	11/7/2022	Arun Bodapati	Sending updated thoughts and edits on Levine cross outline to Leslie Cooper.	1.50	\$ 450.00	\$ 675.00
3090	11/7/2022	Cate M. Llewellyn	Reviewed Lappert depo exhibits (audio & video).	1.00	\$ 100.00	\$ 100.00
3091	11/8/2022	Aviv S. Halpern	Reviewed and revised Lappert outline. Meeting with Lappert team. Reviewed and revised Burleigh outline. Meeting with G. Smith and A. Feuer re Lappert. Attn to trial logistics and invoices. Call with L. Goldsmith re November trial and related tasks.	4.50	\$ 400.00	\$ 1,800.00
3092	11/8/2022	Aviv S. Halpern	Meeting re Hruz cross prep.	1.00	\$ 400.00	\$ 400.00
3093	11/8/2022	Jonathan G. Lester	Continuing findings of fact for Dr. Adkins.	1.75	\$ 175.00	\$ 306.25
3094	11/8/2022	Jonathan G. Lester	Hruz cross-exam discussion with ACLU.	0.75	\$ 175.00	\$ 131.25
3095	11/8/2022	Daniel J. Richardson	Meeting to discuss Hruz cross-examination outline	0.75	\$ 430.00	\$ 322.50
3096	11/8/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about Burleigh and Hruz cross.	0.50	\$ 550.00	\$ 275.00
3097	11/8/2022	Lauren M. Goldsmith	Reviewing Burleigh cross outline.	1.75	\$ 550.00	\$ 962.50
3098	11/8/2022	Lauren M. Goldsmith	Emails with L. Mazzella about trial logistics.	0.50	\$ 550.00	\$ 275.00
3099	11/8/2022	Lauren M. Goldsmith	Call w/ L. Mazzella about trial logistics.	0.75	\$ 550.00	\$ 412.50
3100	11/8/2022	Arun Bodapati	Revising Burleigh outline.	3.50	\$ 450.00	\$ 1,575.00
3101	11/8/2022	Alexander F.R. Peacocke	Call re Lappert outline. Participants: A. Peacocke, A. Halpern, R. Kadosh, G. Smith, A. Feuer.	0.50	\$ 200.00	\$ 100.00
3102	11/9/2022	Aviv S. Halpern	Revised Perry outline. Edited Hruz outline. Drafted proposed findings of fact.	4.25	\$ 400.00	\$ 1,700.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
3103	11/9/2022	Aviv S. Halpern	Call with L. Goldsmith re witness order and plan.	0.25	\$ 400.00	\$ 100.00
3104	11/9/2022	Aviv S. Halpern	Revised Burleigh outline.	1.50	\$ 400.00	\$ 600.00
3105	11/9/2022	Jonathan G. Lester	Reviewing Dr. Antommaria Findings of Fact.	2.25	\$ 175.00	\$ 393.75
3106	11/9/2022	Jonathan G. Lester	Finalizing Dr. Adkins Findings of Fact.	2.50	\$ 175.00	\$ 437.50
3107	11/9/2022	Jonathan G. Lester	Drafting Joanna and Dylan Brandt Findings of Fact.	2.75	\$ 175.00	\$ 481.25
3108	11/9/2022	Lauren M. Goldsmith	Calls w/ A. Halpern about cross prep.	0.25	\$ 550.00	\$ 137.50
3109	11/9/2022	Lauren M. Goldsmith	Prep for call w/ opposing counsel.	0.25	\$ 550.00	\$ 137.50
3110	11/9/2022	Lauren M. Goldsmith	Reviewing Hruz cross outline.	0.75	\$ 550.00	\$ 412.50
3111	11/9/2022	Lauren M. Goldsmith	Reviewing further comments on Burleigh cross outline.	0.25	\$ 550.00	\$ 137.50
3112	11/9/2022	Arun Bodapati	Revising Burleigh outline to address comments by Lauren Goldsmith and Aviv Halpern.	3.25	\$ 450.00	\$ 1,462.50
3113	11/9/2022	Alexander F.R. Peacocke	Revised Notes on Legislative Transcripts	0.50	\$ 200.00	\$ 100.00
3114	11/9/2022	Alexander F.R. Peacocke	Reviewing legislative hearing transcript, lappert expert report, for week 2 trial prep.	2.50	\$ 200.00	\$ 500.00
3115	11/10/2022	Laura Kabler Oswell	Call with Goldsmith re. defense case preparation.	0.50	\$ 650.00	\$ 325.00
3116	11/10/2022	Laura Kabler Oswell	Review Lappert video and prepare for cross examination	1.50	\$ 650.00	\$ 975.00
3117	11/10/2022	Aviv S. Halpern	Drafted proposed findings of fact.	12.00	\$ 400.00	\$ 4,800.00
3118	11/10/2022	Aviv S. Halpern	Emailed with Lappert team re cross. Reviewed outline status.	0.25	\$ 400.00	\$ 100.00
3119	11/10/2022	Aviv S. Halpern	Revised Perry Cross Outline and communicated with team re same.	1.00	\$ 400.00	\$ 400.00
3120	11/10/2022	Maxime D. Matthew	Researched detransitioners.	0.25	\$ 175.00	\$ 43.75
3121	11/10/2022	Maxime D. Matthew	Correspondence with Aviv Halpern and Maura Reinbrecht re Perry cross outline.	0.25	\$ 175.00	\$ 43.75
3122	11/10/2022	Maxime D. Matthew	Review Perry cross outline and provided comments.	0.50	\$ 175.00	\$ 87.50
3123	11/10/2022	Daniel J. Richardson	Spoke with associate about findings of fact and conclusions of law; emailed co-counsel regarding international citations for cross-examination prep.	0.50	\$ 430.00	\$ 215.00
3124	11/10/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about findings of fact.	0.50	\$ 550.00	\$ 275.00
3125	11/10/2022	Lauren M. Goldsmith	Call w/ L. Oswell and L. Goldsmith about trial prep.	0.50	\$ 550.00	\$ 275.00
3126	11/10/2022	Arun Bodapati	Revising Billy Burleigh outline.	4.00	\$ 450.00	\$ 1,800.00
3127	11/10/2022	Cate M. Llewellyn	Met with case team re logistics for upcoming trial.	2.00	\$ 100.00	\$ 200.00
3128	11/11/2022	Aviv S. Halpern	Drafted and edited proposed findings of fact. Reviewed trial transcripts.	9.50	\$ 400.00	\$ 3,800.00
3129	11/11/2022	Jonathan G. Lester	Updating Dr. Hruz cross-exam outline.	1.75	\$ 175.00	\$ 306.25
3130	11/11/2022	Lauren M. Goldsmith	Reviewing revised draft of Burleigh cross outline.	1.75	\$ 550.00	\$ 962.50
3131	11/11/2022	Lauren M. Goldsmith	Discussing findings of fact w/ L. Goldsmith and A. Halpern.	0.25	\$ 550.00	\$ 137.50
3132	11/11/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.25	\$ 550.00	\$ 137.50
3133	11/11/2022	Arun Bodapati	Drafting findings of fact based on testimony of expert witnesses during first week of trial.	1.25	\$ 450.00	\$ 562.50
3134	11/11/2022	Arun Bodapati	Revising Burleigh outline.	4.75	\$ 450.00	\$ 2,137.50
3135	11/11/2022	Alexander F.R. Peacocke	Revised document Notes on Legislative Transcripts.docx Revised document Notes on Legislative Transcripts.docx	0.50	\$ 200.00	\$ 100.00
3136	11/11/2022	Alexander F.R. Peacocke	Reviewing legislative hearing transcripts.	0.50	\$ 200.00	\$ 100.00
3137	11/12/2022	Arun Bodapati	Assisting with drafting of findings of fact, focusing on expert testimony.	7.00	\$ 450.00	\$ 3,150.00
3138	11/13/2022	Aviv S. Halpern	Edited proposed findings of fact. Edited Hruz cross outline. Conducted additional research for Perry prep. Call with L. Goldsmith re trial prep. Coordinated trial logistics.	4.25	\$ 400.00	\$ 1,700.00
3139	11/13/2022	Daniel J. Richardson	Reviewed international reports related to gender-affirming medical care for use in cross-examination.	0.25	\$ 430.00	\$ 107.50
3140	11/13/2022	Arun Bodapati	Updating Burleigh outline.	0.25	\$ 450.00	\$ 112.50
3141	11/13/2022	Alexander F.R. Peacocke	Reviewing legislative hearing transcripts.	3.00	\$ 200.00	\$ 600.00
3142	11/14/2022	Aviv S. Halpern	Revised proposed findings of fact. Communicated with team re trial logistics. Edited Hruz outline.	3.00	\$ 400.00	\$ 1,200.00
3143	11/14/2022	Daniel J. Richardson	Review of recent articles about efficacy of care.	0.00	\$ 430.00	\$ -
3144	11/14/2022	Lauren M. Goldsmith	Reviewing Levine cross.	0.25	\$ 550.00	\$ 137.50
3145	11/14/2022	Lauren M. Goldsmith	Calls w/ L. Goldsmith and A. Halpern about findings of fact.	1.00	\$ 550.00	\$ 550.00
3146	11/14/2022	Lauren M. Goldsmith	Attending co-counsel team meeting.	0.75	\$ 550.00	\$ 412.50
3147	11/14/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith, A. Bodapati, and A. Halpern about findings of fact.	0.50	\$ 550.00	\$ 275.00
3148	11/14/2022	Lauren M. Goldsmith	Emails w/ L. Cooper about team meeting agenda.	0.25	\$ 550.00	\$ 137.50

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
3149	11/14/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.50	\$ 550.00	\$ 275.00
3150	11/14/2022	Lauren M. Goldsmith	Reviewing further revised draft of Burleigh cross outline.	0.25	\$ 550.00	\$ 137.50
3151	11/14/2022	Arun Bodapati	Meeting with Lauren Goldsmith and Aviv Halpern to discuss draft findings of fact.	0.50	\$ 450.00	\$ 225.00
3152	11/14/2022	Arun Bodapati	Reviewing/revising draft findings of fact.	6.50	\$ 450.00	\$ 2,925.00
3153	11/14/2022	Arun Bodapati	Considering logistics for second week of trial, e.g. materials to print.	0.25	\$ 450.00	\$ 112.50
3154	11/14/2022	Alexander F.R. Peacocke	Reviewing legislative transcripts.	1.00	\$ 200.00	\$ 200.00
3155	11/14/2022	Kenza Nadifi	[Research regarding trial witnesses.]	2.25	\$ 100.00	\$ 225.00
3156	11/14/2022	Kenza Nadifi	Meeting with Aviv S. Halpern, Cate Llewellyn, Kenza Nadifi discussing social media sweep of L. Perry.	0.00	\$ 100.00	\$ -
3157	11/15/2022	Laura Kabler Oswell	Work on Lappert cross outline.	1.00	\$ 650.00	\$ 650.00
3158	11/15/2022	Aviv S. Halpern	Communicated with team re international reports. Reviewed and edited Lappert draft. Reviewed Lappert materials. Edited Hruz cross. Coordinated trial logistics. Edited Burleigh outline and communicated with A. Bodapati re same.	5.50	\$ 400.00	\$ 2,200.00
3159	11/15/2022	Daniel J. Richardson	Updated Regnerus cross outline and emailed team re same.	0.75	\$ 430.00	\$ 322.50
3160	11/15/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.75	\$ 550.00	\$ 412.50
3161	11/15/2022	Lauren M. Goldsmith	Emails about Burleigh cross strategy, watching Burleigh video.	0.75	\$ 550.00	\$ 412.50
3162	11/15/2022	Lauren M. Goldsmith	Calls w/ L. Goldsmith and A. Halpern about trial logistics.	0.00	\$ 550.00	\$ -
3163	11/15/2022	Lauren M. Goldsmith	Emails about learned treatise case law.	0.25	\$ 550.00	\$ 137.50
3164	11/15/2022	Arun Bodapati	[Research regarding trial witnesses.]	5.75	\$ 450.00	\$ 2,587.50
3165	11/15/2022	Alexander F.R. Peacocke	Revising and restructuring Lappert cross outline.	4.00	\$ 200.00	\$ 800.00
3166	11/15/2022	Kenza Nadifi	Located and pulled first section of Regnerus cross examination documents.	1.75	\$ 100.00	\$ 175.00
3167	11/16/2022	Garrard R. Beene	Denial of rehearing.	0.25	\$ 800.00	\$ 200.00
3168	11/16/2022	Aviv S. Halpern	Revised Perry outline. Emailed with team re same. Coordinated trial logistics.	1.25	\$ 400.00	\$ 500.00
3169	11/16/2022	Maxime D. Matthew	Correspondence with Maura Reinbrecht and Cate Llewellyn re materials to print.	0.25	\$ 175.00	\$ 43.75
3170	11/16/2022	Maxime D. Matthew	Correspondence re Hruz cross outline and reviewed outline.	0.50	\$ 175.00	\$ 87.50
3171	11/16/2022	Maxime D. Matthew	Correspondence with Maura Reinbrecht re Perry blog posts.	0.25	\$ 175.00	\$ 43.75
3172	11/16/2022	Maxime D. Matthew	Correspondence with Aviv Halpern re Perry cross outline and reviewed outline.	0.25	\$ 175.00	\$ 43.75
3173	11/16/2022	Maxime D. Matthew	Correspondence with Arun Bodapati re Burleigh cross outline and reviewed outline.	0.25	\$ 175.00	\$ 43.75
3174	11/16/2022	Maxime D. Matthew	Correspondence with Aviv Halpern and Maura Reinbrecht re Perry cross outline follow-up.	0.25	\$ 175.00	\$ 43.75
3175	11/16/2022	Maxime D. Matthew	Correspondence with team re en banc decision and reviewed decision.	0.25	\$ 175.00	\$ 43.75
3176	11/16/2022	Daniel J. Richardson	Reviewed en banc decision and emailed associate re same.	0.25	\$ 430.00	\$ 107.50
3177	11/16/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about findings of fact, posttrial briefing, and trial logistics.	0.00	\$ 550.00	\$ -
3178	11/16/2022	Lauren M. Goldsmith	Call w/ paralegals about trial logistics.	0.50	\$ 550.00	\$ 275.00
3179	11/16/2022	Lauren M. Goldsmith	Reviewing court order.	0.25	\$ 550.00	\$ 137.50
3180	11/16/2022	Lauren M. Goldsmith	Emails about Burleigh cross strategy.	0.25	\$ 550.00	\$ 137.50
3181	11/16/2022	Lauren M. Goldsmith	Reviewing cross outline.	0.50	\$ 550.00	\$ 275.00
3182	11/16/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.50	\$ 550.00	\$ 275.00
3183	11/16/2022	Arun Bodapati	Revising Burleigh outline further, circulating to full team, and compiling supporting materials for printing.	3.75	\$ 450.00	\$ 1,687.50
3184	11/16/2022	Alexander F.R. Peacocke	Revised Hiatt - Cross Outline	1.25	\$ 200.00	\$ 250.00
3185	11/16/2022	Alexander F.R. Peacocke	Reviewing Burleigh Cross Outline (Circulation 11.16.22) [Read-Only].docx	0.25	\$ 200.00	\$ 50.00
3186	11/16/2022	Alexander F.R. Peacocke	Reviewing Hiatt materials to revise cross outline.	0.75	\$ 200.00	\$ 150.00
3187	11/16/2022	Kenza Nadifi	Meeting with Aviv S. Halpern, Cate Llewellyn, Kenza Nadifi, Lauren M. Goldsmith regarding planning for second half of trial.	0.50	\$ 100.00	\$ 50.00
3188	11/16/2022	Cate M. Llewellyn	Trial prep re reviewing depositions & expert reports for witnesses, re on-site trial material.	3.25	\$ 100.00	\$ 325.00
3189	11/17/2022	Laura Kabler Oswell	Revised document Lappert Cross Outline.	0.50	\$ 650.00	\$ 325.00
3190	11/17/2022	Aviv S. Halpern	Revised Perry cross outline. Revised Hruz outline. Meetings with associates. Edited findings of fact. Coordinated trial logistics. Other trial prep.	6.25	\$ 400.00	\$ 2,500.00
3191	11/17/2022	Maxime D. Matthew	Correspondence with team re printing materials for trial.	0.25	\$ 175.00	\$ 43.75
3192	11/17/2022	Maxime D. Matthew	Reviewed email from Aviv Halpern re printing trial materials.	0.25	\$ 175.00	\$ 43.75
3193	11/17/2022	Maxime D. Matthew	Reviewed email from Leslie Cooper re Perry outline and comments.	0.25	\$ 175.00	\$ 43.75
3194	11/17/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.50	\$ 550.00	\$ 275.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
3195	11/17/2022	Lauren M. Goldsmith	Calls w/ L. Goldsmith and A. Halpern about trial logistics.	0.50	\$ 550.00	\$ 275.00
3196	11/17/2022	Arun Bodapati	Compiling and QCing Levine cross materials for printing.	2.25	\$ 450.00	\$ 1,012.50
3197	11/17/2022	Alexander F.R. Peacocke	Email correspondence with Alexander S. Holland, Maura A. Reinbrecht regarding Hiatt cross outline.	0.25	\$ 200.00	\$ 50.00
3198	11/17/2022	Alexander F.R. Peacocke	Lappert deposition review for outline prep.	0.50	\$ 200.00	\$ 100.00
3199	11/17/2022	Kenza Nadifi	Created index for impeachment binder.	1.50	\$ 100.00	\$ 150.00
3200	11/17/2022	Kenza Nadifi	QC'd binders to be shipped to trial in Arkansas.	1.25	\$ 100.00	\$ 125.00
3201	11/17/2022	Kenza Nadifi	Coordinated printing of assorted trial materials.	0.75	\$ 100.00	\$ 75.00
3202	11/17/2022	Kenza Nadifi	Organized and prepared first trial shipment, including tracking inventory/location of documents for the associates in Arkansas, and transporting boxes via cart to/from service.	2.25	\$ 100.00	\$ 225.00
3203	11/17/2022	Kenza Nadifi	Created and coordinated printing of all Levine binders.	2.25	\$ 100.00	\$ 225.00
3204	11/17/2022	Kenza Nadifi	Created cover pages and spines for all binders in first shipment and inserted them into binders, manually.	2.00	\$ 100.00	\$ 200.00
3205	11/17/2022	Cate M. Llewellyn	Trial prep re materials to bring to AR (impeachment materials, depo transcripts, & plaintiffs and defendants exhibits).	5.00	\$ 100.00	\$ 500.00
3206	11/17/2022	Cate M. Llewellyn	Reviewed printed materials for trial.	1.50	\$ 100.00	\$ 150.00
3207	11/18/2022	Aviv S. Halpern	Call with M. Reinbrecht and E. Downing re closing. Revised closing draft. Communicated with team re same. Coordinated trial logistics.	1.75	\$ 400.00	\$ 700.00
3208	11/18/2022	Maxime D. Matthew	Correspondence with Maura Reinbrecht re ACLU comments on Perry cross outline.	0.25	\$ 175.00	\$ 43.75
3209	11/18/2022	Maxime D. Matthew	Correspondence with Arkansas associates re Hruz outline.	0.25	\$ 175.00	\$ 43.75
3210	11/18/2022	Maxime D. Matthew	Reviewed email from Leslie Cooper re Burleigh outline and reviewed outline and comments.	0.50	\$ 175.00	\$ 87.50
3211	11/18/2022	Maxime D. Matthew	Correspondence with Aviv Halpern and Maura Reinbrecht re Perry cross outline.	0.25	\$ 175.00	\$ 43.75
3212	11/18/2022	Maxime D. Matthew	Reviewed email from Breean Walas re Hiatt and reviewed outline.	0.50	\$ 175.00	\$ 87.50
3213	11/18/2022	Maxime D. Matthew	Reviewed Perry outline with ACLU comments and edited draft and responded to comments.	1.00	\$ 175.00	\$ 175.00
3214	11/18/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.25	\$ 550.00	\$ 137.50
3215	11/18/2022	Arun Bodapati	Revising Burleigh outline to address comments by ACLU team.	0.75	\$ 450.00	\$ 337.50
3216	11/18/2022	Alexander F.R. Peacocke	Reviewing & preparing notes on Lappert Kadel depo	4.00	\$ 200.00	\$ 800.00
3217	11/18/2022	Alexander F.R. Peacocke	Reviewing draft of Perry cross outline.	0.25	\$ 200.00	\$ 50.00
3218	11/18/2022	Alexander F.R. Peacocke	Meeting with Alexander Peacocke, Austin A. Feuer, Gregory L. Smith regarding Lappert witness outline next steps.	0.50	\$ 200.00	\$ 100.00
3219	11/18/2022	Kenza Nadifi	Prepared and coordinated printing of Regnerus binder for trial, including time spent making index and locating documents.	4.25	\$ 100.00	\$ 425.00
3220	11/18/2022	Kenza Nadifi	Collected and prepared remaining trial items for shipment.	3.25	\$ 100.00	\$ 325.00
3221	11/18/2022	Kenza Nadifi	Completed social media sweep on L. Perry, compiled resulting items of interest in word doc and sent to A. Halpern.	1.00	\$ 100.00	\$ 100.00
3222	11/18/2022	Cate M. Llewellyn	Reviewed impeachment materials & international reports for upcoming trial prep.	4.50	\$ 100.00	\$ 450.00
3223	11/19/2022	Arun Bodapati	Revising Burleigh outline to address comments by ACLU team.	3.50	\$ 450.00	\$ 1,575.00
3224	11/19/2022	Alexander F.R. Peacocke	Lappert & Hiatt witness outline preparation.	2.00	\$ 200.00	\$ 400.00
3225	11/20/2022	Garrard R. Beeney	Emails re examination outlines.	0.25	\$ 800.00	\$ 200.00
3226	11/20/2022	Daniel J. Richardson	Revised Regnerus cross-examination outline to conform to other defense expert outlines.	0.50	\$ 430.00	\$ 215.00
3227	11/20/2022	Arun Bodapati	Further revising Burleigh outline.	0.50	\$ 450.00	\$ 225.00
3228	11/20/2022	Alexander F.R. Peacocke	Lappert & Hiatt witness prep.	3.00	\$ 200.00	\$ 600.00
3229	11/21/2022	Aviv S. Halpern	Call with L. Goldsmith. Emailed with team re findings of fact and closing. Drafted email to opposing counsel re Regnerus. Communicated with team re same. Coordinated trial logistics. Incorporated edits to Perry outline.	3.50	\$ 400.00	\$ 1,400.00
3230	11/21/2022	Jonathan G. Lester	Reviewing updated Hruz cross-examination outline and submitting documents for printing.	1.00	\$ 175.00	\$ 175.00
3231	11/21/2022	Jonathan G. Lester	Communicating with paralegals about printing materials for Dr. Hruz cross.	0.25	\$ 175.00	\$ 43.75
3232	11/21/2022	Daniel J. Richardson	Reviewed email to opposing counsel regarding remote depositions and sent email re same	0.25	\$ 430.00	\$ 107.50
3233	11/21/2022	Lauren M. Goldsmith	Attending co-counsel meeting.	1.00	\$ 550.00	\$ 550.00
3234	11/21/2022	Lauren M. Goldsmith	Emails about team meeting agenda.	0.25	\$ 550.00	\$ 137.50
3235	11/21/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.75	\$ 550.00	\$ 412.50
3236	11/21/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about trial logistics.	0.50	\$ 550.00	\$ 275.00
3237	11/21/2022	Arun Bodapati	Further revising Burleigh outline in response to ACLU comments and circulating updated version to team.	2.50	\$ 450.00	\$ 1,125.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
3238	11/21/2022	Alexander F.R. Peacocke	Email correspondence with Gregory L. Smith, Austin A. Feuer regarding MIL & Daubert Motions Binders Email correspondence with Gregory L. Smith, Austin A. Feuer regarding MIL & Daubert Motions Binders	0.25	\$ 200.00	\$ 50.00
3239	11/21/2022	Alexander F.R. Peacocke	Email correspondence with BrandtParalegals@sullcrom.com, Gregory L. Smith, Austin A. Feuer regarding Lappert Materials to Print & Send Reviewed email from Cate M. Llewellyn regarding Lappert Materials to Print & Send	0.25	\$ 200.00	\$ 50.00
3240	11/21/2022	Alexander F.R. Peacocke	Email correspondence with Lauren M. Goldsmith, Aviv S. Halpern regarding Brandt Reviewed email from Lauren M. Goldsmith regarding Brandt trial.	0.25	\$ 200.00	\$ 50.00
3241	11/21/2022	Alexander F.R. Peacocke	Reviewed Burleigh Cross Outline (Circulation 11.21.22) [Read-Only].docx	0.25	\$ 200.00	\$ 50.00
3242	11/21/2022	Alexander F.R. Peacocke	Revising and editing Lappert cross outline.	2.00	\$ 200.00	\$ 400.00
3243	11/21/2022	Alexander F.R. Peacocke	Revised List of Hiatt Materials to Print for Trial.docx	0.25	\$ 200.00	\$ 50.00
3244	11/21/2022	Kenza Nadifi	Created Hiatt binder and index.	1.75	\$ 100.00	\$ 175.00
3245	11/21/2022	Kenza Nadifi	Coordinated printing of additional Regnerus materials for shipment to Arkansas.	0.75	\$ 100.00	\$ 75.00
3246	11/21/2022	Cate M. Llewellyn	Reviewed Hruz impeachment materials.	2.25	\$ 100.00	\$ 225.00
3247	11/21/2022	Cate M. Llewellyn	Reviewed motions in limine and daubert motions.	1.00	\$ 100.00	\$ 100.00
3248	11/22/2022	Garrard R. Beeney	Witness outlines.	0.25	\$ 800.00	\$ 200.00
3249	11/22/2022	Laura Kabler Oswell	Work on Lappert cross.	2.00	\$ 650.00	\$ 1,300.00
3250	11/22/2022	Aviv S. Halpern	Coordinated trial logistics.	0.50	\$ 400.00	\$ 200.00
3251	11/22/2022	Daniel J. Richardson	Reviewed Hruz and Levine cross examination outlines.	0.25	\$ 430.00	\$ 107.50
3252	11/22/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.25	\$ 550.00	\$ 137.50
3253	11/22/2022	Arun Bodapati	Phone call with Leslie Cooper to discuss status of prep for Levine and Burleigh cross exams.	0.50	\$ 450.00	\$ 225.00
3254	11/22/2022	Alexander F.R. Peacocke	Reviewing DRAFT Hruz cross 11.20.22 (002) [Read-Only].docx	0.25	\$ 200.00	\$ 50.00
3255	11/22/2022	Alexander F.R. Peacocke	Revised Lappert Cross Outline	1.25	\$ 200.00	\$ 250.00
3256	11/22/2022	Alexander F.R. Peacocke	Reviewing Lappert materials for cross outline prep.	2.00	\$ 200.00	\$ 400.00
3257	11/22/2022	Kenza Nadifi	Revised document Hiatt Binder Index.docx and corresponding documents.	1.50	\$ 100.00	\$ 150.00
3258	11/22/2022	Kenza Nadifi	Coordinated printing, organization, and shipping of Hiatt materials as part of second Arkansas trial shipment.	0.75	\$ 100.00	\$ 75.00
3259	11/22/2022	Cate M. Llewellyn	Draft summary re materials sent to Arkansas for trial.	2.00	\$ 100.00	\$ 200.00
3260	11/23/2022	Laura Kabler Oswell	Emails and calls re. trial planning.	0.50	\$ 650.00	\$ 325.00
3261	11/23/2022	Laura Kabler Oswell	Revise Lappert cross outline.	0.50	\$ 650.00	\$ 325.00
3262	11/23/2022	Aviv S. Halpern	Revised Lappert outline. Reviewed Hiatt materials in preparation for trial. Other trial prep. Revised Perry cross. Edited proposed findings of fact. Coordinated trial logistics.	6.50	\$ 400.00	\$ 2,600.00
3263	11/23/2022	Daniel J. Richardson	Coordinated with associate about cross-examination of Regnerus; reviewed cross-outline.	0.25	\$ 430.00	\$ 107.50
3264	11/23/2022	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about trial prep.	0.00	\$ 550.00	\$ -
3265	11/23/2022	Lauren M. Goldsmith	Reviewing draft of cross outline.	0.50	\$ 550.00	\$ 275.00
3266	11/23/2022	Lauren M. Goldsmith	Emails about trial logistics.	0.25	\$ 550.00	\$ 137.50
3267	11/23/2022	Lauren M. Goldsmith	Reviewing WPATH statement.	0.25	\$ 550.00	\$ 137.50
3268	11/23/2022	Alexander F.R. Peacocke	Incorporating comments, making edits on Lappert cross.	3.75	\$ 200.00	\$ 750.00
3269	11/23/2022	Alexander F.R. Peacocke	Meeting with Alexander Peacocke, Austin A. Feuer, Gregory L. Smith regarding Lappert Cross outline.	0.00	\$ 200.00	\$ -
3270	11/24/2022	Garrard R. Beeney	Docket update for mandate; emails re Lundstrum.	0.25	\$ 800.00	\$ 200.00
3271	11/25/2022	Garrard R. Beeney	Emails re cross.	0.25	\$ 800.00	\$ 200.00
3272	11/25/2022	Maxime D. Matthew	Correspondence with team re trial logistics.	0.25	\$ 175.00	\$ 43.75
3273	11/26/2022	Aviv S. Halpern	Coordinated trial logistics and arrival times.	1.25	\$ 400.00	\$ 500.00
3274	11/26/2022	Maxime D. Matthew	Correspondence with team re Lappert exhibits and reviewed exhibits.	0.25	\$ 175.00	\$ 43.75
3275	11/26/2022	Maxime D. Matthew	Reviewed email from State re Day 1 of trial.	0.25	\$ 175.00	\$ 43.75
3276	11/26/2022	Daniel J. Richardson	Continued preparing for Regnerus cross-examination.	0.50	\$ 430.00	\$ 215.00
3277	11/26/2022	Daniel J. Richardson	Prepared for Regnerus cross-examination	3.00	\$ 430.00	\$ 1,290.00
3278	11/26/2022	Arun Bodapati	Preparing for first day of trial, including corresponding with Defendants regarding which witnesses they intend to call.	0.50	\$ 450.00	\$ 225.00
3279	11/27/2022	Garrard R. Beeney	Hearing resumption emails.	0.25	\$ 800.00	\$ 200.00
3280	11/27/2022	Laura Kabler Oswell	Prepare for Lappert cross.	3.00	\$ 650.00	\$ 1,950.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
3281	11/27/2022	Aviv S. Halpern	Travel time (Reviewed Perry cross materials. Revised impeachment materials for Hruz. Reviewed Hiatt outline and Lappert outline.)	17.75	\$ 400.00	\$ 7,100.00
3282	11/27/2022	Maxime D. Matthew	Reviewed email re closing and reviewed closing.	0.25	\$ 175.00	\$ 43.75
3283	11/27/2022	Maxime D. Matthew	Reviewed Lappert correspondence and cross outline.	0.50	\$ 175.00	\$ 87.50
3284	11/27/2022	Maxime D. Matthew	Correspondence re witnesses and objections.	0.25	\$ 175.00	\$ 43.75
3285	11/27/2022	Maxime D. Matthew	Correspondence re team call and logistics.	0.25	\$ 175.00	\$ 43.75
3286	11/27/2022	Maxime D. Matthew	Reviewed emails re trial transcripts.	0.25	\$ 175.00	\$ 43.75
3287	11/27/2022	Maxime D. Matthew	Reviewed emails re trial exhibits.	0.25	\$ 175.00	\$ 43.75
3288	11/27/2022	Jonathan G. Lester	Revising Hruz cross-exam outline.	1.00	\$ 175.00	\$ 175.00
3289	11/27/2022	Jonathan G. Lester	Pulling discovery materials related to third party individual and organization.	2.00	\$ 175.00	\$ 350.00
3290	11/27/2022	Daniel J. Richardson	Trial preparation for second week of trial.	11.25	\$ 430.00	\$ 4,837.50
3291	11/27/2022	Lauren M. Goldsmith	Prepping for trial.	5.00	\$ 550.00	\$ 2,750.00
3292	11/27/2022	Lauren M. Goldsmith	Reviewing documents related to TreVoices.	0.25	\$ 550.00	\$ 137.50
3293	11/27/2022	Lauren M. Goldsmith	Call w/ D. Richardson (ACLU) about trial logistics.	0.25	\$ 550.00	\$ 137.50
3294	11/27/2022	Lauren M. Goldsmith	Coordinating logistics for trial.	0.50	\$ 550.00	\$ 275.00
3295	11/27/2022	Lauren M. Goldsmith	Reviewing draft of closing argument.	0.50	\$ 550.00	\$ 275.00
3296	11/27/2022	Lauren M. Goldsmith	Attending team meeting.	0.50	\$ 550.00	\$ 275.00
3297	11/27/2022	Lauren M. Goldsmith	Call w/ L. Cooper (ACLU) about trial logistics.	0.25	\$ 550.00	\$ 137.50
3298	11/27/2022	Arun Bodapati	Prep for first day of trial, particularly focused on prep for cross of Stephen Levine.	12.00	\$ 450.00	\$ 5,400.00
3299	11/27/2022	Alexander F.R. Peacocke	Meeting with Alexander Peacocke, Austin A. Feuer, Chase Strangio, Gregory L. Smith, James Esseks, Laura Oswell's iPhone, Leslie Cooper regarding Lappert Call	1.00	\$ 200.00	\$ 200.00
3300	11/27/2022	Cate M. Llewellyn	Reviewed trial exhibits.	1.50	\$ 100.00	\$ 150.00
3301	11/28/2022	Garrard R. Beene	Attention to case filings; and witness outlines.	0.25	\$ 800.00	\$ 200.00
3302	11/28/2022	Laura Kabler Oswell	Attend Brandt trial; Team meeting; Revise draft Lappert outline.	11.50	\$ 650.00	\$ 7,475.00
3303	11/28/2022	Aviv S. Halpern	Attended Trial. Trial prep and logistics.	19.25	\$ 400.00	\$ 7,700.00
3304	11/28/2022	Maxime D. Matthew	Correspondence re tech order.	0.25	\$ 175.00	\$ 43.75
3305	11/28/2022	Maxime D. Matthew	Reviewed correspondence and Regnerus outline.	0.25	\$ 175.00	\$ 43.75
3306	11/28/2022	Maxime D. Matthew	Reviewed email re State witness order.	0.25	\$ 175.00	\$ 43.75
3307	11/28/2022	Maxime D. Matthew	Reviewed correspondence and rough transcript of day one.	1.75	\$ 175.00	\$ 306.25
3308	11/28/2022	Maxime D. Matthew	Correspondence re Levine outline and reviewed cross outline and Levine published comment.	1.00	\$ 175.00	\$ 175.00
3309	11/28/2022	Maxime D. Matthew	Reviewed Lappert correspondence and cross outline.	1.25	\$ 175.00	\$ 218.75
3310	11/28/2022	Maxime D. Matthew	Reviewed emails and orders from PacerPro.	0.25	\$ 175.00	\$ 43.75
3311	11/28/2022	Jonathan G. Lester	Highlighting cross-examination materials for Dr. Hruz testimony.	0.75	\$ 175.00	\$ 131.25
3312	11/28/2022	Jonathan G. Lester	Retrieving and circulating research on the public documents exception to hearsay.	0.50	\$ 175.00	\$ 87.50
3313	11/28/2022	Daniel J. Richardson	Prepared to cross-examine Mark Regnerus in gender affirming care litigation.	2.00	\$ 430.00	\$ 860.00
3314	11/28/2022	Daniel J. Richardson	Day 1 of trial in gender-affirming care litigation.	7.50	\$ 430.00	\$ 3,225.00
3315	11/28/2022	Daniel J. Richardson	Preparation for Day 1 of trial.	1.25	\$ 430.00	\$ 537.50
3316	11/28/2022	Lauren M. Goldsmith	Revising Lappert cross materials.	1.00	\$ 550.00	\$ 550.00
3317	11/28/2022	Lauren M. Goldsmith	Attending team meeting.	0.50	\$ 550.00	\$ 275.00
3318	11/28/2022	Lauren M. Goldsmith	Attending trial, pre-trial set up, post-trial debrief.	10.50	\$ 550.00	\$ 5,775.00
3319	11/28/2022	Lauren M. Goldsmith	Coordinating trial logistics.	0.50	\$ 550.00	\$ 275.00
3320	11/28/2022	Lauren M. Goldsmith	Working on Perry/Burleigh cross prep.	1.00	\$ 550.00	\$ 550.00
3321	11/28/2022	Arun Bodapati	Prep for days 5 and 6 of trial.	7.00	\$ 450.00	\$ 3,150.00
3322	11/28/2022	Arun Bodapati	Day 5 of trial.	9.00	\$ 450.00	\$ 4,050.00
3323	11/28/2022	Alexander F.R. Peacocke	Incorporating comments on Lappert cross outline.	3.50	\$ 200.00	\$ 700.00
3324	11/28/2022	Alexander F.R. Peacocke	Research, summarizing caselaw on exclusion of exhibits/opinions not referenced in expert report for Lappert cross prep.	1.50	\$ 200.00	\$ 300.00
3325	11/29/2022	Garrard R. Beene	Outline emails, orders.	0.25	\$ 800.00	\$ 200.00
3326	11/29/2022	Laura Kabler Oswell	Attend Brandt trial and related meetings; Review draft cross outlines and outline for argument opposing judgment as a matter of law.	9.00	\$ 650.00	\$ 5,850.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
3327	11/29/2022	Aviv S. Halpern	Prepped for Perry cross.	1.00	\$ 400.00	\$ 400.00
3328	11/29/2022	Aviv S. Halpern	Attended trial and engaged in trial prep (outlines, closing, findings of fact).	17.25	\$ 400.00	\$ 6,900.00
3329	11/29/2022	Maxime D. Matthew	Reviewed emails from PacerPro re Court orders.	0.25	\$ 175.00	\$ 43.75
3330	11/29/2022	Maxime D. Matthew	Correspondence about closing and reviewed closing.	0.50	\$ 175.00	\$ 87.50
3331	11/29/2022	Maxime D. Matthew	Correspondence with State re witness sequestration.	0.25	\$ 175.00	\$ 43.75
3332	11/29/2022	Maxime D. Matthew	Reviewed email and rough transcript.	1.00	\$ 175.00	\$ 175.00
3333	11/29/2022	Maxime D. Matthew	Correspondence re Perry outline and reviewed outline.	0.25	\$ 175.00	\$ 43.75
3334	11/29/2022	Maxime D. Matthew	Correspondence with team re [potential legal issue for trial].	0.25	\$ 175.00	\$ 43.75
3335	11/29/2022	Maxime D. Matthew	Reviewed email and updated Regnerus and Lappert cross outlines.	0.25	\$ 175.00	\$ 43.75
3336	11/29/2022	Jonathan G. Lester	Reviewing [witness testimony in preparation for trial].	4.50	\$ 175.00	\$ 787.50
3337	11/29/2022	Daniel J. Richardson	Prep for Day 3 witness cross-examinations.	1.00	\$ 430.00	\$ 430.00
3338	11/29/2022	Daniel J. Richardson	Prepared to cross-examine Mark Regnerus for trial.	2.25	\$ 430.00	\$ 967.50
3339	11/29/2022	Daniel J. Richardson	Meeting with ACLU team to discuss judgment as a matter of law argument	0.50	\$ 430.00	\$ 215.00
3340	11/29/2022	Daniel J. Richardson	Day 2 of Arkansas gender-affirming care trial.	6.25	\$ 430.00	\$ 2,687.50
3341	11/29/2022	Lauren M. Goldsmith	Breaking down trial set up.	0.50	\$ 550.00	\$ 275.00
3342	11/29/2022	Lauren M. Goldsmith	Prep for trial.	2.00	\$ 550.00	\$ 1,100.00
3343	11/29/2022	Lauren M. Goldsmith	Attending team meeting.	0.50	\$ 550.00	\$ 275.00
3344	11/29/2022	Lauren M. Goldsmith	Meeting w/ L. Cooper (ACLU) and A. Halpern about Perry/Hiatt cross prep.	0.50	\$ 550.00	\$ 275.00
3345	11/29/2022	Lauren M. Goldsmith	Attending trial, pre-trial set up, post-trial debrief.	7.00	\$ 550.00	\$ 3,850.00
3346	11/29/2022	Lauren M. Goldsmith	Meeting w/ J. Esseks, A. Bodapati, and A. Halpern about email from Defendants' counsel.	0.50	\$ 550.00	\$ 275.00
3347	11/29/2022	Arun Bodapati	Day 6 of trial.	5.50	\$ 450.00	\$ 2,475.00
3348	11/29/2022	Arun Bodapati	Prep for days 6 and 7 of trial.	6.00	\$ 450.00	\$ 2,700.00
3349	11/29/2022	Alexander F.R. Peacocke	Reviewed Hiatt Jr Depo Transcript for cross examination prep.	2.25	\$ 200.00	\$ 450.00
3350	11/29/2022	Kenza Nadifi	Uploaded new rough court transcripts to ND and collabspace on ND.	0.25	\$ 100.00	\$ 25.00
3351	11/30/2022	Garrard R. Beene	Cross outlines.	0.25	\$ 800.00	\$ 200.00
3352	11/30/2022	Laura Kabler Oswell	Attend trial and related meetings for Brandt case; Review draft cross outline.	7.00	\$ 650.00	\$ 4,550.00
3353	11/30/2022	Aviv S. Halpern	Attended trial and trial prep.	17.50	\$ 400.00	\$ 7,000.00
3354	11/30/2022	Aviv S. Halpern	Trial prep.	0.75	\$ 400.00	\$ 300.00
3355	11/30/2022	Maxime D. Matthew	Correspondence with associates re Arkansas trial.	0.25	\$ 175.00	\$ 43.75
3356	11/30/2022	Maxime D. Matthew	Reviewed email and rough transcript.	0.25	\$ 175.00	\$ 43.75
3357	11/30/2022	Maxime D. Matthew	Correspondence and reviewed Burleigh outline.	0.25	\$ 175.00	\$ 43.75
3358	11/30/2022	Maxime D. Matthew	Correspondence re Perry outline.	0.25	\$ 175.00	\$ 43.75
3359	11/30/2022	Maxime D. Matthew	Correspondence and reviewed Hiatt cross outline.	0.25	\$ 175.00	\$ 43.75
3360	11/30/2022	Maxime D. Matthew	Reviewed emails and orders from PacerPro.	0.25	\$ 175.00	\$ 43.75
3361	11/30/2022	Jonathan G. Lester	Updating impeachment materials for Dr. Hruz cross.	1.50	\$ 175.00	\$ 262.50
3362	11/30/2022	Daniel J. Richardson	Day 3 of trial in Arkansas gender-affirming care trial.	3.00	\$ 430.00	\$ 1,290.00
3363	11/30/2022	Lauren M. Goldsmith	Attending team meeting.	0.75	\$ 550.00	\$ 412.50
3364	11/30/2022	Lauren M. Goldsmith	Coordinating trial logistics.	2.00	\$ 550.00	\$ 1,100.00
3365	11/30/2022	Lauren M. Goldsmith	Working on Hruz cross prep.	1.00	\$ 550.00	\$ 550.00
3366	11/30/2022	Lauren M. Goldsmith	Attending trial, pre-trial set up, post-trial debrief.	6.50	\$ 550.00	\$ 3,575.00
3367	11/30/2022	Arun Bodapati	Prep for days 7 and 8 of trial.	10.00	\$ 450.00	\$ 4,500.00
3368	11/30/2022	Arun Bodapati	Day 7 of trial.	5.50	\$ 450.00	\$ 2,475.00
3369	11/30/2022	Alexander F.R. Peacocke	Reviewing prior day's trial transcripts.	0.75	\$ 200.00	\$ 150.00
3370	11/30/2022	Kenza Nadifi	Collected and uploaded new rough court transcripts to ND and ND ACLU collabspace.	0.75	\$ 100.00	\$ 75.00
3371	12/1/2022	Laura Kabler Oswell	Attend trial.	5.00	\$ 650.00	\$ 3,250.00
3372	12/1/2022	Aviv S. Halpern	Trial prep, and attended trial. Trial breakdown.	8.75	\$ 400.00	\$ 3,500.00
3373	12/1/2022	Aviv S. Halpern	Trial prep.	1.00	\$ 400.00	\$ 400.00
3374	12/1/2022	Maxime D. Matthew	Reviewed correspondence and rough transcripts.	1.25	\$ 175.00	\$ 218.75
3375	12/1/2022	Maxime D. Matthew	Correspondence and reviewed Hiatt outline.	0.25	\$ 175.00	\$ 43.75

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
3376	12/1/2022	Jonathan G. Lester	Reviewing trial transcripts from 11/29 and 11/30.	0.75	\$ 175.00	\$ 131.25
3377	12/1/2022	Lauren M. Goldsmith	Breaking down trial set up.	1.00	\$ 550.00	\$ 550.00
3378	12/1/2022	Lauren M. Goldsmith	Attending trial, pre-trial set up, post-trial debrief.	7.00	\$ 550.00	\$ 3,850.00
3379	12/1/2022	Arun Bodapati	Prep for day 8 of trial.	1.00	\$ 450.00	\$ 450.00
3380	12/1/2022	Arun Bodapati	Day 8 of trial.	6.75	\$ 450.00	\$ 3,037.50
3381	12/1/2022	Alexander F.R. Peacocke	Reviewing Trial day 11/30 Transcript.	2.00	\$ 200.00	\$ 400.00
3382	12/2/2022	Maxime D. Matthew	Reviewed Defendants' exhibits and witness list.	0.25	\$ 175.00	\$ 43.75
3383	12/2/2022	Maxime D. Matthew	Reviewed Plaintiffs' exhibit and witness list.	0.25	\$ 175.00	\$ 43.75
3384	12/2/2022	Jonathan G. Lester	Reviewing trial transcript from 12/02.	0.50	\$ 175.00	\$ 87.50
3385	12/5/2022	Aviv S. Halpern	Call re findings of fact.	0.25	\$ 400.00	\$ 100.00
3386	12/6/2022	Aviv S. Halpern	Call with L. Cooper and A. Bodapati re proposed findings of fact. Call with A. Bodapati re same.	1.50	\$ 400.00	\$ 600.00
3387	12/6/2022	Maxime D. Matthew	Reviewed email re findings of fact for second half of trial.	0.25	\$ 175.00	\$ 43.75
3388	12/6/2022	Lauren M. Goldsmith	Reviewing notes of weekly team call.	0.25	\$ 550.00	\$ 137.50
3389	12/6/2022	Arun Bodapati	Meeting with Leslie Cooper and Aviv Halpern to discuss drafting proposed findings of fact for Court.	1.25	\$ 450.00	\$ 562.50
3390	12/6/2022	Arun Bodapati	Assigning review of week two trial transcripts for purpose of preparing findings of fact.	1.00	\$ 450.00	\$ 450.00
3391	12/6/2022	Alexander F.R. Peacocke	Meeting with Alexander Peacocke, Austin A. Feuer regarding 8th Circuit research.	0.00	\$ 200.00	\$ -
3392	12/7/2022	Aviv S. Halpern	Drafted and revised proposed findings of fact.	1.25	\$ 400.00	\$ 500.00
3393	12/7/2022	Maxime D. Matthew	Correspondence re post-trial briefing schedule.	0.25	\$ 175.00	\$ 43.75
3394	12/7/2022	Maxime D. Matthew	Correspondence re Perry findings of fact.	0.25	\$ 175.00	\$ 43.75
3395	12/7/2022	Maxime D. Matthew	Correspondence re Burleigh findings of fact.	0.25	\$ 175.00	\$ 43.75
3396	12/7/2022	Maxime D. Matthew	Correspondence re post-trial briefing.	0.25	\$ 175.00	\$ 43.75
3397	12/7/2022	Jonathan G. Lester	Internal emails regarding post-trial briefing schedule.	0.25	\$ 175.00	\$ 43.75
3398	12/7/2022	Daniel J. Richardson	Emailed with team about arguments for pos-trial briefing.	0.25	\$ 430.00	\$ 107.50
3399	12/7/2022	Lauren M. Goldsmith	Call w/ A. Halpern about post-trial brief and findings of fact.	0.50	\$ 550.00	\$ 275.00
3400	12/7/2022	Lauren M. Goldsmith	Drafting response to Defendants' about briefing schedule.	0.25	\$ 550.00	\$ 137.50
3401	12/7/2022	Lauren M. Goldsmith	Call w/ L. Cooper about post-trial briefing.	0.50	\$ 550.00	\$ 275.00
3402	12/7/2022	Lauren M. Goldsmith	Emails w/ S&C team about post-trial brief.	0.25	\$ 550.00	\$ 137.50
3403	12/7/2022	Cate M. Llewellyn	Reviewed final trial transcripts.	1.00	\$ 100.00	\$ 100.00
3404	12/8/2022	Maxime D. Matthew	Correspondence re post-trial briefing schedule.	0.25	\$ 175.00	\$ 43.75
3405	12/8/2022	Maxime D. Matthew	Reviewed trial transcripts.	0.25	\$ 175.00	\$ 43.75
3406	12/8/2022	Maxime D. Matthew	Reviewed documents for drafting post-trial briefing.	0.50	\$ 175.00	\$ 87.50
3407	12/8/2022	Maxime D. Matthew	Meeting with associates re Post-Trial Briefing and findings of fact.	0.50	\$ 175.00	\$ 87.50
3408	12/8/2022	Maxime D. Matthew	Correspondence re Perry findings of fact.	0.25	\$ 175.00	\$ 43.75
3409	12/8/2022	Maxime D. Matthew	Correspondence re post-trial briefing.	0.25	\$ 175.00	\$ 43.75
3410	12/8/2022	Jonathan G. Lester	Meeting with M. Matthew to discuss post-trial briefing.	0.50	\$ 175.00	\$ 87.50
3411	12/8/2022	Lauren M. Goldsmith	Emails about post-trial brief.	0.25	\$ 550.00	\$ 137.50
3412	12/9/2022	Maxime D. Matthew	Correspondence with Emma Downing re Burleigh Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3413	12/9/2022	Maxime D. Matthew	Correspondence with Maura Reinbrecht re Perry Findings of Fact and reviewed document.	0.25	\$ 175.00	\$ 43.75
3414	12/9/2022	Lauren M. Goldsmith	Working on post-trial brief.	0.75	\$ 550.00	\$ 412.50
3415	12/9/2022	Lauren M. Goldsmith	Drafting email to opposing counsel about schedule for post-trial briefing.	0.25	\$ 550.00	\$ 137.50
3416	12/11/2022	Daniel J. Richardson	Began drafting post-trial brief remedy section	1.00	\$ 430.00	\$ 430.00
3417	12/12/2022	Laura Kabler Oswell	Call with Goldsmith re. post-trial briefing and emails with S&C and ACLU teams re. same.	0.50	\$ 650.00	\$ 325.00
3418	12/12/2022	Aviv S. Halpern	Reviewed current draft of proposed findings of fact. Call with L. Goldsmith re case management.	0.50	\$ 400.00	\$ 200.00
3419	12/12/2022	Maxime D. Matthew	Correspondence with Emma Downing re Burleigh Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3420	12/12/2022	Maxime D. Matthew	Drafted First Amendment section of Post-Trial Brief.	0.75	\$ 175.00	\$ 131.25
3421	12/12/2022	Maxime D. Matthew	Correspondence with Maura Reinbrecht re Perry Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3422	12/12/2022	Maxime D. Matthew	Edited Perry Findings of Fact and provided comments.	1.25	\$ 175.00	\$ 218.75
3423	12/12/2022	Maxime D. Matthew	Correspondence re Burleigh Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3424	12/12/2022	Maxime D. Matthew	Correspondence re briefing schedule and best strategy.	0.25	\$ 175.00	\$ 43.75

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
3425	12/12/2022	Maxime D. Matthew	Correspondence with Word Pro re Perry Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3426	12/12/2022	Jonathan G. Lester	Dr. Regnerus findings of fact	2.25	\$ 175.00	\$ 393.75
3427	12/12/2022	Daniel J. Richardson	Reviewed defendants' post trial brief to prepare arguments for remedy section.	0.25	\$ 430.00	\$ 107.50
3428	12/12/2022	Lauren M. Goldsmith	Call w/ A. Halpern about findings of fact and post-trial briefing.	0.25	\$ 550.00	\$ 137.50
3429	12/12/2022	Lauren M. Goldsmith	Call w/ A. Peacocke about post-trial briefing.	0.25	\$ 550.00	\$ 137.50
3430	12/12/2022	Lauren M. Goldsmith	Call w/ L. Cooper about post-trial briefing.	0.25	\$ 550.00	\$ 137.50
3431	12/12/2022	Lauren M. Goldsmith	Call w/ L. Oswell about post-trial briefing.	0.25	\$ 550.00	\$ 137.50
3432	12/12/2022	Lauren M. Goldsmith	Reviewing email from opposing counsel on post-trial briefing schedule, emails about same.	0.50	\$ 550.00	\$ 275.00
3433	12/12/2022	Alexander F.R. Peacocke	Reviewed email from dylan.jacobs@arkansasag.gov regarding Brandt v. Rutledge: Witnesses for Day 6 of Trial, 11/29/2022 Reviewed email from LCOOPER@aclu.org regarding Brandt v. Rutledge: Witnesses for Day 6 of Trial, 11/29/2022	0.25	\$ 200.00	\$ 50.00
3434	12/12/2022	Alexander F.R. Peacocke	Reviewed email from Lauren M. Goldsmith regarding Brandt v. Rutledge: Witnesses for Day 6 of Trial, 11/29/2022 Email correspondence with Lauren M. Goldsmith regarding Brandt v. Rutledge: Witnesses for Day 6 of Trial, 11/29/2022 Reviewed email from Lauren M. Goldsmith regarding Brandt v. Rutledge: Witnesses for Day 6 of Trial, 11/29/2022	0.25	\$ 200.00	\$ 50.00
3435	12/12/2022	Alexander F.R. Peacocke	Telecon re post trial briefing schedule. Participants: Lauren M. Goldsmith and Alexander F.R. Peacocke	0.25	\$ 200.00	\$ 50.00
3436	12/12/2022	Kenza Nadifi	Located and pulled requested document for D. Richardson.	0.75	\$ 100.00	\$ 75.00
3437	12/12/2022	Cate M. Llewellyn	Reviewed opposing counsel Motion for Directed Verdict.	1.00	\$ 100.00	\$ 100.00
3438	12/13/2022	Maxime D. Matthew	Drafted Burleigh Findings of Fact for Cross.	1.75	\$ 175.00	\$ 306.25
3439	12/13/2022	Maxime D. Matthew	Correspondence re research request of expert witness and reviewed article from scientist.	0.25	\$ 175.00	\$ 43.75
3440	12/13/2022	Maxime D. Matthew	Correspondence with Maura Reinbrecht re Perry Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3441	12/13/2022	Maxime D. Matthew	Correspondence with Emma Downing re Burleigh Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3442	12/13/2022	Maxime D. Matthew	Correspondence with associates re research drafting brief.	0.25	\$ 175.00	\$ 43.75
3443	12/13/2022	Maxime D. Matthew	Correspondence with Word Pro re Burleigh Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3444	12/13/2022	Maxime D. Matthew	Drafted First Amendment section of Post-Trial Brief.	1.25	\$ 175.00	\$ 218.75
3445	12/13/2022	Maxime D. Matthew	Edited Burleigh Findings of Fact for Direct and provided comments.	1.25	\$ 175.00	\$ 218.75
3446	12/13/2022	Maxime D. Matthew	Edited Perry Findings of Fact and provided comments.	0.75	\$ 175.00	\$ 131.25
3447	12/13/2022	Maxime D. Matthew	Correspondence re briefing schedule.	0.25	\$ 175.00	\$ 43.75
3448	12/13/2022	Maxime D. Matthew	Correspondence with Aviv Halpern re Findings of Fact and drafting Brief.	0.25	\$ 175.00	\$ 43.75
3449	12/13/2022	Jonathan G. Lester	Continued drafting of Dr. Regnerus findings of fact.	1.00	\$ 175.00	\$ 175.00
3450	12/13/2022	Lauren M. Goldsmith	Drafting email to Defendants about post-trial briefing schedule.	0.25	\$ 550.00	\$ 137.50
3451	12/14/2022	Garrard R. Beene	Emails re experts.	0.25	\$ 800.00	\$ 200.00
3452	12/14/2022	Aviv S. Halpern	Drafted and edited proposed findings of fact.	1.25	\$ 400.00	\$ 500.00
3453	12/14/2022	Maxime D. Matthew	Correspondence with Aviv S. Halpern re Perry Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3454	12/14/2022	Maxime D. Matthew	Correspondence re brief and reviewed draft stipulation.	0.50	\$ 175.00	\$ 87.50
3455	12/14/2022	Maxime D. Matthew	Correspondence with team re Findings of Fact for designation witnesses and reviewed Embry documents.	0.50	\$ 175.00	\$ 87.50
3456	12/14/2022	Maxime D. Matthew	Edited and finalized Perry Findings of Fact.	2.25	\$ 175.00	\$ 393.75
3457	12/14/2022	Maxime D. Matthew	Drafted Burleigh Findings of Fact for Cross.	1.00	\$ 175.00	\$ 175.00
3458	12/14/2022	Maxime D. Matthew	Edited Burleigh Findings of Fact for Direct and provided comments.	1.50	\$ 175.00	\$ 262.50
3459	12/14/2022	Maxime D. Matthew	Correspondence with Maura Reinbrecht re Perry Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3460	12/14/2022	Maxime D. Matthew	Correspondence with Emma Downing re Burleigh Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3461	12/14/2022	Jonathan G. Lester	Reviewing draft findings of fact for Dr. Hruz.	2.25	\$ 175.00	\$ 393.75
3462	12/14/2022	Jonathan G. Lester	Continued Regnerus Findings of Fact drafting.	1.25	\$ 175.00	\$ 218.75
3463	12/14/2022	Jonathan G. Lester	Drafting stipulation for post-trial briefing.	1.25	\$ 175.00	\$ 218.75
3464	12/14/2022	Lauren M. Goldsmith	Reviewing email from opposing counsel on post-trial briefing, emails about same.	0.25	\$ 550.00	\$ 137.50
3465	12/14/2022	Lauren M. Goldsmith	Reviewing draft stipulation about post-trial briefing schedule.	0.50	\$ 550.00	\$ 275.00
3466	12/14/2022	Arun Bodapati	Revising proposed findings of fact to incorporate key findings from Embry, Branman, and Lundstrum deposition designations.	6.75	\$ 450.00	\$ 3,037.50
3467	12/15/2022	Aviv S. Halpern	Drafted proposed findings of fact. Call with L. Cooper and A. Bodapati re same. Emailed with team re trial transcripts.	2.50	\$ 400.00	\$ 1,000.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
3468	12/15/2022	Maxime D. Matthew	Drafted, edited, and finalized Burleigh Findings of Fact.	2.00	\$ 175.00	\$ 350.00
3469	12/15/2022	Maxime D. Matthew	Correspondence with Aviv Halpern re Burleigh Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3470	12/15/2022	Maxime D. Matthew	Correspondence re brief and reviewed draft stipulations.	0.50	\$ 175.00	\$ 87.50
3471	12/15/2022	Jonathan G. Lester	Final review of Dr. Hruz findings of fact.	0.25	\$ 175.00	\$ 43.75
3472	12/15/2022	Jonathan G. Lester	Circulating draft stipulation to full team.	0.25	\$ 175.00	\$ 43.75
3473	12/15/2022	Jonathan G. Lester	Additional review of Dr. Regnerus findings of fact.	0.75	\$ 175.00	\$ 131.25
3474	12/15/2022	Daniel J. Richardson	Reviewed proposed stipulation	0.25	\$ 430.00	\$ 107.50
3475	12/15/2022	Lauren M. Goldsmith	Call w/ A. Bodapati, A. Halpern, L. Cooper (ACLU), and C. Strangio (ACLU) about findings of fact.	0.75	\$ 550.00	\$ 412.50
3476	12/15/2022	Lauren M. Goldsmith	Emails about post-trial briefing schedule, stipulation.	0.75	\$ 550.00	\$ 412.50
3477	12/15/2022	Lauren M. Goldsmith	Reviewing draft findings of fact.	0.75	\$ 550.00	\$ 412.50
3478	12/15/2022	Arun Bodapati	Meeting with Leslie Cooper, Lauren Goldsmith, and Aviv Halpern to discuss findings of fact.	0.75	\$ 450.00	\$ 337.50
3479	12/16/2022	Aviv S. Halpern	Drafted and edited proposed findings of fact.	1.50	\$ 400.00	\$ 600.00
3480	12/16/2022	Alexander F.R. Peacocke	Reviewed email from case-updates@pacerpro.com regarding Docket Update: Brandt et al v. Rutledge et al	0.25	\$ 200.00	\$ 50.00
3481	12/17/2022	Maxime D. Matthew	Correspondence re brief drafting schedule.	0.25	\$ 175.00	\$ 43.75
3482	12/17/2022	Daniel J. Richardson	Coordinated with team on status for trial brief drafts.	0.25	\$ 430.00	\$ 107.50
3483	12/17/2022	Lauren M. Goldsmith	Emails about post-trial brief.	0.25	\$ 550.00	\$ 137.50
3484	12/18/2022	Maxime D. Matthew	Correspondence re Findings of Fact draft.	0.25	\$ 175.00	\$ 43.75
3485	12/18/2022	Maxime D. Matthew	Reviewed Findings of Fact draft.	0.25	\$ 175.00	\$ 43.75
3486	12/18/2022	Arun Bodapati	Compiling summaries of testimony by witnesses at week 2 of trial and sending to Leslie Cooper for purposes of preparing findings of fact.	0.50	\$ 450.00	\$ 225.00
3487	12/19/2022	Laura Kabler Oswell	Trial debrief call.	0.75	\$ 650.00	\$ 487.50
3488	12/19/2022	Aviv S. Halpern	Emailled with L. Cooper re Saxton family and proposed findings of fact. Edited findings of fact and had document formatted.	2.75	\$ 400.00	\$ 1,100.00
3489	12/19/2022	Maxime D. Matthew	Correspondence with team re timeline for trial briefs.	0.25	\$ 175.00	\$ 43.75
3490	12/19/2022	Lauren M. Goldsmith	Call w/ trial team and clients about trial and next steps.	0.75	\$ 550.00	\$ 412.50
3491	12/19/2022	Lauren M. Goldsmith	Call w/ A. Halpern about findings of fact.	0.25	\$ 550.00	\$ 137.50
3492	12/19/2022	Lauren M. Goldsmith	Reviewing draft findings of fact.	0.50	\$ 550.00	\$ 275.00
3493	12/19/2022	Lauren M. Goldsmith	Emails w/ S&C team about post-trial brief.	0.25	\$ 550.00	\$ 137.50
3494	12/19/2022	Lauren M. Goldsmith	Emails w/ L. Cooper about team meeting, post-trial briefing.	0.50	\$ 550.00	\$ 275.00
3495	12/19/2022	Arun Bodapati	Drafting findings of fact for regulation of medicine in Arkansas and Act 626.	9.00	\$ 450.00	\$ 4,050.00
3496	12/20/2022	Jonathan G. Lester	Drafting post-trial brief.	3.25	\$ 175.00	\$ 568.75
3497	12/20/2022	Lauren M. Goldsmith	Reviewing draft findings of fact.	0.75	\$ 550.00	\$ 412.50
3498	12/20/2022	Arun Bodapati	Drafting findings of fact re: Act 626 and regulation of medicine in Arkansas.	5.25	\$ 450.00	\$ 2,362.50
3499	12/21/2022	Aviv S. Halpern	Edited proposed findings of fact.	1.00	\$ 400.00	\$ 400.00
3500	12/21/2022	Maxime D. Matthew	Reviewed Findings of Fact draft for drafting brief.	1.25	\$ 175.00	\$ 218.75
3501	12/21/2022	Arun Bodapati	Revising draft findings of fact, focusing on regulatory/Act 626 sections and supplementary findings from Defendants' lay witnesses.	6.25	\$ 450.00	\$ 2,812.50
3502	12/22/2022	Aviv S. Halpern	Communicated with A. Bodapati re findings of fact and case strategy.	0.25	\$ 400.00	\$ 100.00
3503	12/22/2022	Maxime D. Matthew	Reviewed Court Order for drafting brief.	0.25	\$ 175.00	\$ 43.75
3504	12/22/2022	Maxime D. Matthew	Reviewed Findings of Fact draft for drafting brief and drafted brief.	1.00	\$ 175.00	\$ 175.00
3505	12/22/2022	Maxime D. Matthew	Correspondence with Dan Richardson and Jonathan Lester re Findings of Fact for drafting brief.	0.25	\$ 175.00	\$ 43.75
3506	12/22/2022	Arun Bodapati	Revising draft proposed findings of fact, focusing on section re: the science of gender affirming medical care.	4.50	\$ 450.00	\$ 2,025.00
3507	12/23/2022	Aviv S. Halpern	Compiled and edited proposed findings of fact. Communicated with A. Bodapati re same.	4.75	\$ 400.00	\$ 1,900.00
3508	12/23/2022	Maxime D. Matthew	Correspondence re drafting brief and reviewed Jonathan Lester's section draft.	0.25	\$ 175.00	\$ 43.75
3509	12/23/2022	Maxime D. Matthew	Drafted Findings of Fact introductions for Plaintiffs' and Defendants' witnesses.	3.00	\$ 175.00	\$ 525.00
3510	12/23/2022	Maxime D. Matthew	Correspondence with Aviv Halpern re proposed Findings of Fact and drafting assignments.	0.25	\$ 175.00	\$ 43.75
3511	12/23/2022	Maxime D. Matthew	Drafted First Amendment section for brief.	0.25	\$ 175.00	\$ 43.75
3512	12/23/2022	Maxime D. Matthew	Call with Aviv Halpern re Findings of Fact introductions.	0.25	\$ 175.00	\$ 43.75
3513	12/23/2022	Maxime D. Matthew	Research on First Amendment cases for brief draft.	0.50	\$ 175.00	\$ 87.50

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
3514	12/23/2022	Maxime D. Matthew	Correspondence with paralegals re Court Order for drafting brief.	0.25	\$ 175.00	\$ 43.75
3515	12/23/2022	Lauren M. Goldsmith	Call w/ A. Halpern about findings of fact.	0.25	\$ 550.00	\$ 137.50
3516	12/25/2022	Maxime D. Matthew	Reviewed ACLU emails re Findings of Fact and meeting.	0.25	\$ 175.00	\$ 43.75
3517	12/26/2022	Aviv S. Halpern	Emailed with team re draft findings of fact.	0.25	\$ 400.00	\$ 100.00
3518	12/26/2022	Maxime D. Matthew	Correspondence re deadlines.	0.25	\$ 175.00	\$ 43.75
3519	12/26/2022	Maxime D. Matthew	Research for drafting brief, including email to Research Desk.	0.75	\$ 175.00	\$ 131.25
3520	12/26/2022	Maxime D. Matthew	Drafted First Amendment section of brief, including reviewing Findings of Fact.	2.25	\$ 175.00	\$ 393.75
3521	12/26/2022	Maxime D. Matthew	Correspondence re briefing.	0.25	\$ 175.00	\$ 43.75
3522	12/26/2022	Maxime D. Matthew	Reviewed emails re Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3523	12/26/2022	Daniel J. Richardson	Revised post-trial brief remedy section to reflect new trial citations.	1.50	\$ 430.00	\$ 645.00
3524	12/27/2022	Aviv S. Halpern	Edited and drafted proposed findings of fact.	3.50	\$ 400.00	\$ 1,400.00
3525	12/27/2022	Maxime D. Matthew	Call and email with Word Pro re draft of brief.	0.25	\$ 175.00	\$ 43.75
3526	12/27/2022	Maxime D. Matthew	Drafted brief.	4.25	\$ 175.00	\$ 743.75
3527	12/27/2022	Maxime D. Matthew	Correspondence re trial transcripts.	0.25	\$ 175.00	\$ 43.75
3528	12/27/2022	Maxime D. Matthew	Research for drafting brief, including correspondence with Research Desk.	2.75	\$ 175.00	\$ 481.25
3529	12/27/2022	Daniel J. Richardson	Updated draft of remedy section of trial brief to reflect new record cites.	1.00	\$ 430.00	\$ 430.00
3530	12/27/2022	Kenza Nadifi	Pulled and sent ECF 44 and all trial transcripts.	0.75	\$ 100.00	\$ 75.00
3531	12/28/2022	Aviv S. Halpern	Edited proposed findings of fact. Reviewed trial transcripts and inserted cites.	5.25	\$ 400.00	\$ 2,100.00
3532	12/28/2022	Maxime D. Matthew	Correspondence re brief draft and next steps, including review other brief section.	0.25	\$ 175.00	\$ 43.75
3533	12/28/2022	Maxime D. Matthew	Call and correspondence with Word Pro re draft of brief.	0.25	\$ 175.00	\$ 43.75
3534	12/28/2022	Maxime D. Matthew	Correspondence with Research Desk, including reviewing cases sent.	0.25	\$ 175.00	\$ 43.75
3535	12/28/2022	Maxime D. Matthew	Correspondence re updated Findings of Fact draft.	0.25	\$ 175.00	\$ 43.75
3536	12/28/2022	Maxime D. Matthew	Reviewed Findings of Fact draft from Gregory Smith.	0.25	\$ 175.00	\$ 43.75
3537	12/28/2022	Maxime D. Matthew	Drafted and finalized brief and researched First Amendment cases.	5.50	\$ 175.00	\$ 962.50
3538	12/28/2022	Daniel J. Richardson	Completed draft of remedy section of trial brief and circulated to team for review.	0.75	\$ 430.00	\$ 322.50
3539	12/28/2022	Alexander F.R. Peacocke	Research re: sealing proposed findings of fact, post trial brief.	2.50	\$ 200.00	\$ 500.00
3540	12/29/2022	Aviv S. Halpern	Drafted and edited proposed findings of fact.	12.25	\$ 400.00	\$ 4,900.00
3541	12/29/2022	Maxime D. Matthew	Correspondence with Dan Richardson re brief draft feedback and timeline.	0.25	\$ 175.00	\$ 43.75
3542	12/29/2022	Maxime D. Matthew	Correspondence with Research Desk re conduct and speech cases and news article.	0.25	\$ 175.00	\$ 43.75
3543	12/29/2022	Maxime D. Matthew	Edited brief section based on feedback.	1.25	\$ 175.00	\$ 218.75
3544	12/29/2022	Maxime D. Matthew	Correspondence re brief draft feedback and next steps.	0.25	\$ 175.00	\$ 43.75
3545	12/29/2022	Maxime D. Matthew	Reviewed updated Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3546	12/29/2022	Maxime D. Matthew	Correspondence re updated Findings of Fact draft.	0.25	\$ 175.00	\$ 43.75
3547	12/29/2022	Daniel J. Richardson	Reviewed associate edits to trial brief draft and communicated with associate about revisions.	0.25	\$ 430.00	\$ 107.50
3548	12/29/2022	Lauren M. Goldsmith	Call w/ A. Halpern about findings of fact.	0.25	\$ 550.00	\$ 137.50
3549	12/29/2022	Lauren M. Goldsmith	Reviewing post-trial brief.	3.00	\$ 550.00	\$ 1,650.00
3550	12/29/2022	Alexander F.R. Peacocke	Email correspondence with Lauren M. Goldsmith, Daniel J. Richardson, Maxime D. Matthew, Jonathan G. Lester, Arun Bodapati regarding Brandt: timeline for trial briefs Email correspondence with Lauren M. Goldsmith, Daniel J. Richardson, Maxime D. Matthew, Jonathan G. Lester, Arun Bodapati regarding Brandt: timeline for trial briefs	0.75	\$ 200.00	\$ 150.00
3551	12/29/2022	Alexander F.R. Peacocke	Researching ED Ark sealing practices.	3.00	\$ 200.00	\$ 600.00
3552	12/30/2022	Aviv S. Halpern	Emailed with ACLU team and S&C draft team re proposed findings of fact.	0.50	\$ 400.00	\$ 200.00
3553	12/30/2022	Maxime D. Matthew	Correspondence re Findings of Fact and edits.	0.25	\$ 175.00	\$ 43.75
3554	12/30/2022	Maxime D. Matthew	Correspondence re brief draft feedback and next steps.	0.25	\$ 175.00	\$ 43.75
3555	12/31/2022	Maxime D. Matthew	Reviewed updated Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3556	12/31/2022	Maxime D. Matthew	Correspondence re Findings of Fact and edits.	0.25	\$ 175.00	\$ 43.75
3557	1/1/2023	Maxime D. Matthew	Correspondence re Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3558	1/1/2023	Maxime D. Matthew	Correspondence with Dan Richardson re standing section of brief.	0.25	\$ 175.00	\$ 43.75
3559	1/1/2023	Maxime D. Matthew	Reviewed brief drafts for editing based on standing.	0.75	\$ 175.00	\$ 131.25
3560	1/1/2023	Daniel J. Richardson	Drafted new standing section of post-trial brief and emailed associate re same.	1.75	\$ 430.00	\$ 752.50

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
3561	1/2/2023	Aviv S. Halpern	Emailed with B. Walas re motions to seal. Communicated with L. Goldsmith re brief status. Reviewed draft briefs.	1.25	\$ 400.00	\$ 500.00
3562	1/2/2023	Maxime D. Matthew	Correspondence re post-trial brief.	0.25	\$ 175.00	\$ 43.75
3563	1/2/2023	Jonathan G. Lester	Editing due process section of post-trial brief.	2.75	\$ 175.00	\$ 481.25
3564	1/2/2023	Daniel J. Richardson	Reviewed edits to post-trial briefs and emailed team re same.	0.50	\$ 430.00	\$ 215.00
3565	1/3/2023	Aviv S. Halpern	Revised draft findings of fact.	0.50	\$ 400.00	\$ 200.00
3566	1/3/2023	Maxime D. Matthew	Correspondence with ACLU re post-trial brief.	0.25	\$ 175.00	\$ 43.75
3567	1/3/2023	Maxime D. Matthew	Correspondence with paralegals re trial materials.	0.25	\$ 175.00	\$ 43.75
3568	1/3/2023	Maxime D. Matthew	Correspondence re speech vs conduct cases.	0.25	\$ 175.00	\$ 43.75
3569	1/3/2023	Maxime D. Matthew	Edited brief based on feedback, including reviewing updated drafts of other sections, trial materials, and research.	6.00	\$ 175.00	\$ 1,050.00
3570	1/3/2023	Maxime D. Matthew	Correspondence re post-trial brief.	0.25	\$ 175.00	\$ 43.75
3571	1/3/2023	Daniel J. Richardson	Emailed with associate about edits to post-trial brief.	0.25	\$ 430.00	\$ 107.50
3572	1/3/2023	Lauren M. Goldsmith	Reviewing and revising post-trial brief.	1.25	\$ 550.00	\$ 687.50
3573	1/3/2023	Lauren M. Goldsmith	Emails about findings of fact, reviewing draft of same.	1.25	\$ 550.00	\$ 687.50
3574	1/3/2023	Lauren M. Goldsmith	Emails about sealing rules.	0.25	\$ 550.00	\$ 137.50
3575	1/3/2023	Arun Bodapati	Reviewing ACLU's proposed edits to expert testimony/medical care portions of findings of fact.	1.25	\$ 450.00	\$ 562.50
3576	1/4/2023	Aviv S. Halpern	Emailed with paralegals and L. Goldsmith re case management. Call with A. Bodapati re FOF. Call with L. Goldsmith re FOF. Reviewed trial transcripts.	1.25	\$ 400.00	\$ 500.00
3577	1/4/2023	Lauren M. Goldsmith	Reviewing and revising post-trial brief.	1.25	\$ 550.00	\$ 687.50
3578	1/4/2023	Lauren M. Goldsmith	Call w/ A. Halpern about findings of fact and post-trial brief.	0.50	\$ 550.00	\$ 275.00
3579	1/4/2023	Arun Bodapati	Reviewing and revising proposed findings of fact, particularly on sections re: gender affirming care, Act 626, and the regulation of medicine in Arkansas.	7.75	\$ 450.00	\$ 3,487.50
3580	1/5/2023	Aviv S. Halpern	Edited proposed FOF.	2.25	\$ 400.00	\$ 900.00
3581	1/5/2023	Lauren M. Goldsmith	Reviewing and revising post-trial brief.	2.25	\$ 550.00	\$ 1,237.50
3582	1/6/2023	Aviv S. Halpern	Edited draft findings of fact.	1.75	\$ 400.00	\$ 700.00
3583	1/6/2023	Lauren M. Goldsmith	Emails about cite checking findings of fact.	0.25	\$ 550.00	\$ 137.50
3584	1/7/2023	Aviv S. Halpern	Emailed with L. Goldsmith re proposed FOF.	0.25	\$ 400.00	\$ 100.00
3585	1/7/2023	Arun Bodapati	Reviewing draft findings of fact from ACLU re: plaintiffs and the harms if Act 626 went into effect.	2.00	\$ 450.00	\$ 900.00
3586	1/9/2023	Aviv S. Halpern	Edited draft FOF.	5.50	\$ 400.00	\$ 2,200.00
3587	1/9/2023	Maxime D. Matthew	Reviewed email re post-trial brief and next steps.	0.25	\$ 175.00	\$ 43.75
3588	1/9/2023	Maxime D. Matthew	Reviewed email re cite checking Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3589	1/9/2023	Lauren M. Goldsmith	Reviewing post-trial brief.	1.00	\$ 550.00	\$ 550.00
3590	1/9/2023	Lauren M. Goldsmith	Call w/ L. Cooper (ACLU), A. Bodapati, and A. Halpern about findings of fact.	0.50	\$ 550.00	\$ 275.00
3591	1/9/2023	Lauren M. Goldsmith	Call w/ A. Halpern about findings of fact.	0.50	\$ 550.00	\$ 275.00
3592	1/9/2023	Lauren M. Goldsmith	Call w/ L. Cooper about findings of fact, post-trial brief, and standing issues.	0.75	\$ 550.00	\$ 412.50
3593	1/9/2023	Arun Bodapati	Meeting with Leslie Cooper to discuss findings of fact.	0.50	\$ 450.00	\$ 225.00
3594	1/9/2023	Arun Bodapati	Revising findings of fact to incorporate additional sections from ACLU.	5.50	\$ 450.00	\$ 2,475.00
3595	1/10/2023	Maxime D. Matthew	Reviewed email re draft Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3596	1/10/2023	Jonathan G. Lester	Cite checking findings of fact.	2.25	\$ 175.00	\$ 393.75
3597	1/10/2023	Lauren M. Goldsmith	Reviewing findings of fact.	0.25	\$ 550.00	\$ 137.50
3598	1/10/2023	Arun Bodapati	Circulating draft findings of fact to full team.	0.50	\$ 450.00	\$ 225.00
3599	1/11/2023	Jonathan G. Lester	Continuing cite check on findings of fact.	2.75	\$ 175.00	\$ 481.25
3600	1/12/2023	Jonathan G. Lester	Continued work on findings of fact cite check.	4.25	\$ 175.00	\$ 743.75
3601	1/12/2023	Daniel J. Richardson	Reviewed edits to post-trial brief and emailed associate re same.	0.25	\$ 430.00	\$ 107.50
3602	1/12/2023	Lauren M. Goldsmith	Reviewing comments on post-trial brief.	0.50	\$ 550.00	\$ 275.00
3603	1/13/2023	Maxime D. Matthew	Reviewed email re cite checking Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3604	1/13/2023	Jonathan G. Lester	Finalizing cite check for findings of fact.	1.50	\$ 175.00	\$ 262.50
3605	1/13/2023	Arun Bodapati	Revising findings of fact to incorporate edits from cite check.	3.00	\$ 450.00	\$ 1,350.00
3606	1/14/2023	Arun Bodapati	Revising findings of fact to incorporate edits from cite check and ACLU.	5.00	\$ 450.00	\$ 2,250.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
3607	1/15/2023	Aviv S. Halpern	Incorporate cite check to findings of fact. Revised draft. Communicated with team re same.	6.75	\$ 400.00	\$ 2,700.00
3608	1/15/2023	Daniel J. Richardson	Revised trial brief to incorporate ACLU edits and emailed team re same.	4.00	\$ 430.00	\$ 1,720.00
3609	1/15/2023	Arun Bodapati	Revising findings of fact to account for facts asserted in post-trial brief.	2.50	\$ 450.00	\$ 1,125.00
3610	1/16/2023	Aviv S. Halpern	Edited draft FOF. Incorporated edits from ACLU.	2.25	\$ 400.00	\$ 900.00
3611	1/16/2023	Arun Bodapati	Further revising findings of fact.	6.75	\$ 450.00	\$ 3,037.50
3612	1/17/2023	Aviv S. Halpern	Edited draft FOF and incorporated edits from ACLU, team, and proofreaders.	5.50	\$ 400.00	\$ 2,200.00
3613	1/17/2023	Maxime D. Matthew	Correspondence with Jonathan Lester re post-trial brief and edits.	0.50	\$ 175.00	\$ 87.50
3614	1/17/2023	Maxime D. Matthew	Correspondence re post-trial brief and next steps and reviewed drafts.	0.50	\$ 175.00	\$ 87.50
3615	1/17/2023	Maxime D. Matthew	Reviewed emails re Findings of Fact and reviewed draft.	0.25	\$ 175.00	\$ 43.75
3616	1/17/2023	Lauren M. Goldsmith	Reviewing comments on findings of fact.	0.50	\$ 550.00	\$ 275.00
3617	1/17/2023	Lauren M. Goldsmith	Reviewing sealing papers.	0.75	\$ 550.00	\$ 412.50
3618	1/17/2023	Lauren M. Goldsmith	Calls w/ A. Halpern about findings of fact.	0.75	\$ 550.00	\$ 412.50
3619	1/17/2023	Lauren M. Goldsmith	Calls w/ L. Goldsmith, A. Bodapati, A. Halpern, L. Cooper (ACLU), and G. Sullivan (ACLU) about findings of fact.	0.50	\$ 550.00	\$ 275.00
3620	1/17/2023	Lauren M. Goldsmith	Emails about findings of fact.	0.25	\$ 550.00	\$ 137.50
3621	1/17/2023	Arun Bodapati	Meeting with Lauren Goldsmith, Aviv Halpern, Leslie Cooper (ACLU) and Gary Sullivan (ACLU) to discuss filing findings of fact and seeking confidential treatment for certain portions.	0.25	\$ 450.00	\$ 112.50
3622	1/17/2023	Arun Bodapati	Various logistical steps to prepare for filing of findings of fact.	2.75	\$ 450.00	\$ 1,237.50
3623	1/17/2023	Cate M. Llewellyn	Reviewed final trial transcripts re filing of Findings of Fact.	1.00	\$ 100.00	\$ 100.00
3624	1/18/2023	Aviv S. Halpern	Finalized draft FOF, drafted motion to seal. Communicated with G. Sullivan re same. Drafted protective order. Helped file.	4.00	\$ 400.00	\$ 1,600.00
3625	1/18/2023	Maxime D. Matthew	Correspondence re Proposed Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3626	1/18/2023	Maxime D. Matthew	Reviewed Plaintiffs' Proposed Findings of Fact.	0.25	\$ 175.00	\$ 43.75
3627	1/18/2023	Maxime D. Matthew	Reviewed Defendants' Proposed Findings of Fact.	0.50	\$ 175.00	\$ 87.50
3628	1/18/2023	Lauren M. Goldsmith	Reviewing findings of fact, finalizing to file.	1.50	\$ 550.00	\$ 825.00
3629	1/18/2023	Arun Bodapati	Finalizing and assisting with filing of draft findings of fact.	4.00	\$ 450.00	\$ 1,800.00
3630	1/18/2023	Kenza Nadifi	Revised document Proposed FOF (4855-5368-4806.9) v.9 [Read-Only].docx	0.75	\$ 100.00	\$ 75.00
3631	1/18/2023	Kenza Nadifi	Redacted and cleaned documents for filing.	1.25	\$ 100.00	\$ 125.00
3632	1/18/2023	Cate M. Llewellyn	Reviewed [materials for post-trial submission].	0.50	\$ 100.00	\$ 50.00
3633	1/19/2023	Aviv S. Halpern	Reviewed Defendants FOF. Coordinated cite check of Defendants FOF. Edited post-trial brief.	4.75	\$ 400.00	\$ 1,900.00
3634	1/19/2023	Maxime D. Matthew	Correspondence re Post-Trial Brief.	0.25	\$ 175.00	\$ 43.75
3635	1/19/2023	Maxime D. Matthew	Reviewed Plaintiffs' Proposed Findings of Fact.	2.00	\$ 175.00	\$ 350.00
3636	1/19/2023	Maxime D. Matthew	Reviewed Defendants' Proposed Findings of Fact.	0.50	\$ 175.00	\$ 87.50
3637	1/19/2023	Daniel J. Richardson	Revised trial brief and emailed new version of same	5.00	\$ 430.00	\$ 2,150.00
3638	1/19/2023	Lauren M. Goldsmith	Reviewing post-trial brief.	0.75	\$ 550.00	\$ 412.50
3639	1/19/2023	Lauren M. Goldsmith	Reviewing defendants' proposed findings of fact.	1.00	\$ 550.00	\$ 550.00
3640	1/19/2023	Arun Bodapati	Reviewing Defendants' proposed findings of fact.	1.50	\$ 450.00	\$ 675.00
3641	1/20/2023	Aviv S. Halpern	Emailed with team re Defendants findings of fact.	0.25	\$ 400.00	\$ 100.00
3642	1/20/2023	Lauren M. Goldsmith	Reviewing post-trial brief.	1.00	\$ 550.00	\$ 550.00
3643	1/21/2023	Daniel J. Richardson	Reviewed ACLU edits to trial brief	0.25	\$ 430.00	\$ 107.50
3644	1/22/2023	Daniel J. Richardson	Began revising ACLU draft of trial brief	1.00	\$ 430.00	\$ 430.00
3645	1/23/2023	Aviv S. Halpern	Edited draft brief. Communicated with team re motion to seal and next steps.	1.25	\$ 400.00	\$ 500.00
3646	1/23/2023	Maxime D. Matthew	Correspondence with Aviv Halpern re [post-trial submission].	0.25	\$ 175.00	\$ 43.75
3647	1/23/2023	Maxime D. Matthew	Checked Defendants' Proposed Findings of Fact [re post-trial submission].	3.50	\$ 175.00	\$ 612.50
3648	1/23/2023	Daniel J. Richardson	Finished revising ACLU draft of trial brief and emailed S&C team re same	2.75	\$ 430.00	\$ 1,182.50
3649	1/23/2023	Lauren M. Goldsmith	Leading weekly co-counsel call.	0.50	\$ 550.00	\$ 275.00
3650	1/23/2023	Lauren M. Goldsmith	Working on post-trial brief.	0.75	\$ 550.00	\$ 412.50
3651	1/24/2023	Daniel J. Richardson	Reviewed edits to trial brief and sent updated version of same.	0.25	\$ 430.00	\$ 107.50
3652	1/25/2023	Aviv S. Halpern	Edited draft post-trial brief. Communicated with team re same.	0.75	\$ 400.00	\$ 300.00

Entry No.	Date	Timekeeper	Narrative	Hours	Rate	Amount
3653	1/25/2023	Jonathan G. Lester	Cite checking Defendants' findings of fact.	1.75	\$ 175.00	\$ 306.25
3654	1/25/2023	Daniel J. Richardson	Revised trial brief to reflect associate feedback and circulated new version of same.	1.00	\$ 430.00	\$ 430.00
3655	1/25/2023	Lauren M. Goldsmith	Reviewing post-trial brief.	2.50	\$ 550.00	\$ 1,375.00
3656	1/25/2023	Arun Bodapati	Compiling results of cite check of Defendants' proposed findings of fact.	1.25	\$ 450.00	\$ 562.50
3657	1/26/2023	Aviv S. Halpern	Edited draft post-trial brief.	1.75	\$ 400.00	\$ 700.00
3658	1/27/2023	Aviv S. Halpern	Edited post-trial brief.	1.75	\$ 400.00	\$ 700.00
3659	1/27/2023	Lauren M. Goldsmith	Reviewing post-trial brief.	0.25	\$ 550.00	\$ 137.50
3660	1/28/2023	Daniel J. Richardson	Revised trial brief in response to ACLU feedback and emailed S&C team re same.	1.75	\$ 430.00	\$ 752.50
3661	1/29/2023	Aviv S. Halpern	Drafted motion to seal and proposed order. Edited post-trial brief.	1.50	\$ 400.00	\$ 600.00
3662	1/29/2023	Maxime D. Matthew	Correspondence re cite check.	0.25	\$ 175.00	\$ 43.75
3663	1/29/2023	Daniel J. Richardson	Revised trial brief in response to co-counsel feedback and coordinated cite check.	1.50	\$ 430.00	\$ 645.00
3664	1/30/2023	Aviv S. Halpern	Edited post-trial brief.	2.00	\$ 400.00	\$ 800.00
3665	1/30/2023	Maxime D. Matthew	Correspondence re post-trial brief and reviewed comments on brief from ACLU.	0.25	\$ 175.00	\$ 43.75
3666	1/30/2023	Maxime D. Matthew	Cite checked post-trial brief.	7.75	\$ 175.00	\$ 1,356.25
3667	1/30/2023	Maxime D. Matthew	Correspondence re cite check.	0.25	\$ 175.00	\$ 43.75
3668	1/30/2023	Jonathan G. Lester	Cite check of post-trial brief.	2.25	\$ 175.00	\$ 393.75
3669	1/30/2023	Daniel J. Richardson	Reviewed trial brief and emailed partner re same.	0.25	\$ 430.00	\$ 107.50
3670	1/30/2023	Lauren M. Goldsmith	Emails about post-trial brief.	0.50	\$ 550.00	\$ 275.00
3671	1/30/2023	Lauren M. Goldsmith	Attending weekly co-counsel call.	0.25	\$ 550.00	\$ 137.50
3672	1/31/2023	Aviv S. Halpern	Revised and finalized post-trial brief. Incorporated cite check edits. Incorporated proofing edits.	4.50	\$ 400.00	\$ 1,800.00
3673	1/31/2023	Maxime D. Matthew	Correspondence re post-trial brief.	0.25	\$ 175.00	\$ 43.75
3674	1/31/2023	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about post-trial brief.	0.25	\$ 550.00	\$ 137.50
3675	1/31/2023	Lauren M. Goldsmith	Reviewing sealing motion and order.	0.25	\$ 550.00	\$ 137.50
3676	1/31/2023	Lauren M. Goldsmith	Emails about post-trial brief.	0.25	\$ 550.00	\$ 137.50
3677	1/31/2023	Arun Bodapati	Updating post-trial brief to incorporate edits from cite check and ACLU team.	3.50	\$ 450.00	\$ 1,575.00
3678	2/1/2023	Laura Kabler Oswell	Review Defendants' trial brief.	1.00	\$ 650.00	\$ 650.00
3679	2/1/2023	Laura Kabler Oswell	Review and revise draft post-trial brief.	2.00	\$ 650.00	\$ 1,300.00
3680	2/1/2023	Aviv S. Halpern	Edited and finalized post-trial brief and motion to seal. Communicated with team re same. Coordinated filing.	4.75	\$ 400.00	\$ 1,900.00
3681	2/1/2023	Maxime D. Matthew	Reviewed Defendants' post-trial brief.	1.00	\$ 175.00	\$ 175.00
3682	2/1/2023	Maxime D. Matthew	Reviewed post-trial brief for final suggestions and reviewed motion to seal.	1.50	\$ 175.00	\$ 262.50
3683	2/1/2023	Maxime D. Matthew	Correspondence re post-trial briefs.	0.50	\$ 175.00	\$ 87.50
3684	2/1/2023	Daniel J. Richardson	Reviewed final edits of trial brief and emailed S&C team with comments re same.	0.25	\$ 430.00	\$ 107.50
3685	2/1/2023	Lauren M. Goldsmith	Call w/ L. Goldsmith and A. Halpern about post-trial brief.	0.25	\$ 550.00	\$ 137.50
3686	2/1/2023	Lauren M. Goldsmith	Reviewing post-trial brief, emails about finalizing same.	1.50	\$ 550.00	\$ 825.00
3687	2/1/2023	Arun Bodapati	Reviewing Defendants' post-trial brief.	0.25	\$ 450.00	\$ 112.50
3688	2/1/2023	Arun Bodapati	Assisting with finalizing and filing post-trial brief.	1.50	\$ 450.00	\$ 675.00
TOTALS				5,722.50	\$	1,873,337.50

Exhibit C

Brandt Itemized S&C Costs Sought in Motion

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
1	Repro - Color Copier	5/26/2021	Reproducing color documents 05/26/2021 - 13:40	20.00	\$ 0.25	\$ 5.00	
2	Repro - Copies	5/26/2021	Reproducing documents 05/26/2021 - 13:40	43.00	\$ 0.14	\$ 6.02	
3	Repro - Copies	6/4/2021	Reproducing documents 06/04/2021 - 08:22	59.00	\$ 0.14	\$ 8.26	
4	Repro - Color Copier	6/4/2021	Reproducing color documents 06/04/2021 - 08:22	35.00	\$ 0.25	\$ 8.75	
5	Travel - Lodging	7/8/2021	Travel and expenses : Expense Type: Hotel - Deposit Charge Hotel Name: AC Hotels Location: Little Rock Hotel Guest Name: Duncan C. Simpson LaGoy Arrival Date: 07/19/2021 Departure Date: 07/21/2021 Business Purpose: deposit S&C Attendees: Duncan C. Simpson LaGoy	1.00	\$ 45.15	\$ 45.15	
6	Repro - Copies	7/9/2021	Reproducing documents 07/09/2021 - 02:04	1.00	\$ 0.14	\$ 0.14	
7	Repro - Color Copier	7/9/2021	Reproducing color documents 07/09/2021 - 02:04	24.00	\$ 0.25	\$ 6.00	
8	Repro - Binding	7/9/2021	Repro - Binding 07/09/2021 - 04:31	6.00	\$ 3.25	\$ 19.50	
9	Repro - Copies	7/9/2021	Reproducing documents 07/09/2021 - 18:09	203.00	\$ 0.14	\$ 28.42	
10	Repro - Copies	7/9/2021	Reproducing documents 07/09/2021 - 01:54	2,763.00	\$ 0.14	\$ 386.82	
11	Repro - Binding	7/11/2021	Repro - Binding 07/11/2021 - 18:47	2.00	\$ 3.25	\$ 6.50	
12	Repro - Copies	7/11/2021	Reproducing documents 07/11/2021 - 21:17	1,019.00	\$ 0.14	\$ 142.66	
13	Repro - Copies	7/11/2021	Reproducing documents 07/11/2021 - 18:47	1,285.00	\$ 0.14	\$ 179.90	
14	Travel - Ride Share/UBER/Lyft	7/19/2021	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: San Francisco Pickup Time: 9:30am-5:29pm Pickup Location: 829 N. Claremont Street, San Mateo, CA Drop off Location: San Francisco Airport Purpose of Ride: Airport Business Purpose: Transportation from home to airport. S&C Attendees: Duncan C. Simpson LaGoy	1.00	\$ 20.96	\$ 20.96	
15	Travel - Taxi/Car Service/Shuttle	7/19/2021	Travel and expenses : Expense Type: Taxi Limo Shuttle - Out of Town Location: Little Rock Yellow Cab Pickup Time: 8:00pm-8:59pm Pickup Location: Hotel Drop off Location: airport Purpose of Ride: Court Business Purpose: Transportation from Airport to hotel S&C Attendees: Duncan C. Simpson LaGoy	1.00	\$ 21.30	\$ 21.30	
16	Travel - Meals (Dinner)	7/19/2021	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: COUSIN S BBQ Location: Dallas Texas Time of Meal: 5:30pm-6:59pm Business Purpose: Dinner meal S&C Attendees: Duncan C. Simpson LaGoy Total Guests: 1	1.00	\$ 28.91	\$ 28.91	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
17	Travel - Lodging	7/19/2021	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: AC Hotels Location: Little Rock Hotel Guest Name: Duncan C. Simpson LaGoy Arrival Date: 07/19/2021 Departure Date: 07/21/2021 Room Charge: 136.00 Taxes Total: 20.85 Business Purpose: Trip to Arkansa to attend hearing on PI Motion and MTD S&C Attendees: Duncan C. Simpson LaGoy	1.00	\$ 156.85	\$ 156.85	
18	Travel - Airfare	7/19/2021	Travel and expenses : Expense Type: Airfare Air Routing: SFO/DFW/LIT/DFW/SFO Air Carrier: AA Air Class Of Service: B Ticket Number: 0012186807129 Class Of Service Reason(Departure): Economy Date of Travel (Departure): 07/19/2021 Class Of Service Reason(Return): Economy Date of Travel (Return): 07/21/2021 Passenger Name: DUNCAN SIMPSON LAGOY Business Purpose: Trip to Arkansa to attend hearing on PI Motion and MTD S&C Attendees: Duncan C. Simpson LaGoy	1.00	\$ 760.39	\$ 760.39	
19	Travel - Meals (Other)	7/20/2021	Travel and Expenses : Expense Type: Hotel - Meals Other Hotel Name: AC Hotels Location: Little Rock Business Purpose: Trip to Arkansa to attend hearing on PI Motion and MTD S&C Attendees: Duncan C. Simpson LaGoy Total Guests: 1	1.00	\$ 5.00	\$ 5.00	
20	Travel - Meals (Breakfast)	7/20/2021	Travel and Expenses : Expense Type: Breakfast - Out of Town Name of Establishment: 2Twenty1 Location: Little Rock, Arkansa Time of Meal: 9:30am-5:29pm Business Purpose: Breakfast meal S&C Attendees: Duncan C. Simpson LaGoy Total Guests: 1	1.00	\$ 8.20	\$ 8.20	
21	Travel - Meals (Other)	7/20/2021	Travel and Expenses : Expense Type: Meal Other - Out of Town Name of Establishment: POTBELLY SANDWICH WORKS 5 Location: LITTLE ROCK, AR Time of Meal: 9:30am-5:29pm Business Purpose: Meal - other S&C Attendees: Duncan C. Simpson LaGoy Total Guests: 1	1.00	\$ 8.52	\$ 8.52	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
22	Travel - Lodging	7/20/2021	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: AC Hotels Location: Little Rock Hotel Guest Name: Duncan C. Simpson LaGoy Arrival Date: 07/19/2021 Departure Date: 07/21/2021 Room Charge: 96.00 Taxes Total: 14.40 Business Purpose: Trip to Arkansa to attend hearing on PI Motion and MTD S&C Attendees: Duncan C. Simpson LaGoy	1.00	\$ 110.40	\$ 110.40	
23	Travel - Meals (Other)	7/21/2021	Travel and Expenses : Expense Type: Meal Other - Out of Town Name of Establishment: CHIC FIL A Location: Little Rock, Arkansa Time of Meal: 9:30am-5:29pm Business Purpose: meal S&C Attendees: Duncan C. Simpson LaGoy Total Guests: 1	1.00	\$ 13.38	\$ 13.38	
24	Transcripts	7/21/2021	Transcript of hearing held on 07/21/2021 before Judge Moody (partial cost)	1.00	\$ 100.80	\$ 100.80	
25	Travel - Internet	7/22/2021	Travel and expenses : Expense Type: Internet Location: CARLSBAD, CA Start Date: 07/21/2021 Business Purpose: in flight wifi	1.00	\$ 16.00	\$ 16.00	
26	Travel - Ride Share/UBER/Lyft	7/22/2021	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: San Francisco,CA Pickup Time: 7:00pm-7:59pm Pickup Location: San Francisco Airport Drop off Location: 829 N Claremont St., San Mateo, CA Purpose of Ride: Home Business Purpose: Uber S&C Attendees: Duncan C. Simpson LaGoy	1.00	\$ 33.16	\$ 33.16	
27	Transcripts	9/3/2021	Transcript of hearing held on 07/21/2021 before Judge Moody (partial cost)	1.00	\$ 100.80	\$ 100.80	
28	Repro - Copies	10/12/2021	Reproducing documents 10/12/2021 - 12:31	2.00	\$ 0.14	\$ 0.28	
29	Repro - Color Copier	10/12/2021	Reproducing color documents 10/12/2021 - 12:31	25.00	\$ 0.25	\$ 6.25	
30	Repro - Copies	10/12/2021	Reproducing documents 10/12/2021 - 12:07	603.00	\$ 0.14	\$ 84.42	
31	Repro - Copies	10/12/2021	Reproducing documents 10/12/2021 - 12:33	643.00	\$ 0.14	\$ 90.02	
32	Repro - Copies	10/13/2021	Reproducing documents 10/13/2021 - 16:54	583.00	\$ 0.14	\$ 81.62	
33	Repro - Binding	11/10/2021	Repro - Binding 11/10/2021 - 14:23	4.00	\$ 3.25	\$ 13.00	
34	Repro - Copies	11/10/2021	Reproducing documents 11/10/2021 - 11:04	297.00	\$ 0.14	\$ 41.58	
36	Repro - Copies	12/13/2021	Reproducing documents 12/13/2021 - 13:21	355.00	\$ 0.14	\$ 49.70	
38	Repro - Binding	12/17/2021	Repro - Binding 12/17/2021 - 15:29	2.00	\$ 3.25	\$ 6.50	
39	Repro - Copies	12/17/2021	Reproducing documents 12/17/2021 - 14:56	1,036.00	\$ 0.14	\$ 145.04	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
40	Outside Reproduction	12/22/2021	Reproducing Documents : Merchant Name: CIOX HEALTH Location: ALPHARETTA, GA Business Purpose: Fees for medical records related to case from CIOX health. Reproduction Type: BW Copies Repro Qty: 9.00 Repro Rate: 395.80	1.00	\$ 395.80	\$ 395.80	
42	Delivery/Courier	1/14/2022	Courier Services FedEx to: 111 SOUTH 10TH STREET, THOMAS F EAGLETON COURTHOUSE , WayBill: 953635884769 , InvoiceNum: 763874619	1.00	\$ 67.39	\$ 67.39	
43	Delivery/Courier	1/14/2022	Courier Services FedEx to: OFFICE OF ARKANSAS ATTORNEY GE, OFFICE OF ARKANSAS ATTORNEY GE , WayBill: 953635884770 , InvoiceNum: 763874619	1.00	\$ 40.89	\$ 40.89	
44	Repro - Color Copier	2/4/2022	Reproducing color documents 02/04/2022 - 12:04	262.00	\$ 0.25	\$ 65.50	
45	Repro - Copies	2/4/2022	Reproducing documents 02/04/2022 - 12:04	8.00	\$ 0.14	\$ 1.12	
46	Repro - Copies	2/9/2022	Reproducing documents 02/09/2022 - 20:47	566.00	\$ 0.14	\$ 79.24	
47	Outside Professional Services	2/10/2022	Professional Services Rendered - Disb B - Use to be Cost Type 238/Court Services	1.00	\$ 49.00	\$ 49.00	
48	Repro - Copies	2/14/2022	Reproducing documents 02/14/2022 - 15:35	699.00	\$ 0.14	\$ 97.86	
49	Repro - Copies	2/15/2022	Reproducing documents 02/15/2022 - 11:38	191.00	\$ 0.14	\$ 26.74	
50	Repro - Copies	3/21/2022	Reproducing documents 03/21/2022 - 15:06	582.00	\$ 0.14	\$ 81.48	
51	Repro - Color Copier	3/21/2022	Reproducing color documents 03/21/2022 - 15:06	67.00	\$ 0.25	\$ 16.75	
52	Repro - Binding	3/21/2022	Repro - Binding 03/21/2022 - 15:50	2.00	\$ 3.25	\$ 6.50	
53	Repro - Copies	3/21/2022	Reproducing documents 03/21/2022 - 15:06	11.00	\$ 0.14	\$ 1.54	
54	Repro - Copies	4/1/2022	Reproducing documents 04/01/2022 - 05:40	400.00	\$ 0.14	\$ 56.00	
55	Travel - Airfare	4/4/2022	Travel and expenses RICHARDSON/DANIEL J - 4/4/2022Ticket # - 7756419518DCA/LIT/DFW/DCATPZFYV	1.00	\$ 552.29	\$ 552.29	
56	Travel - Lodging	4/4/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: Marriott Location: Little Rock Hotel Guest Name: Daniel James Richardson Arrival Date: 04/04/2022 Departure Date: 04/05/2022 Room Charge: 314.00 Taxes Total: 45.92 Business Purpose: Hotel stay in order to argument in pro bono case before judge in Arkansas. S&C Attendees: Daniel J. Richardson	1.00	\$ 359.92	\$ 359.92	
57	Travel - Airfare	4/4/2022	Travel and expenses HOLLAND/ALEXANDER ST - 4/4/2022Ticket # - 7697189038LGA/ATL/LITSXEBKX	1.00	\$ 348.30	\$ 348.30	
58	Travel - Lodging	4/4/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: Little Rock Marriott Location: LITTLE ROCK Hotel Guest Name: Alexander Holland Arrival Date: 04/04/2022 Departure Date: 04/06/2022 Room Charge: 220.00 Taxes Total: 32.18 Business Purpose: Hotel stay re deposition in Little Rock, AR. S&C Attendees: Alexander S. Holland	1.00	\$ 252.18	\$ 252.18	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
59	Travel - Ride Share/UBER/Lyft	4/4/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: New York Pickup Time: 9:30am-5:29pm Pickup Location: 125 Broad Street, New York, NY Drop off Location: LGA Purpose of Ride: Airport Business Purpose: Car to airport re deposition in Little Rock, AR. S&C Attendees: Alexander S. Holland	1.00	\$ 66.24	\$ 66.24	
60	Travel - Airfare Booking Fees	4/4/2022	Travel and expenses RICHARDSON/DANIEL J - 4/4/2022Ticket # - 7756419518DCA/LIT/DFW/DCATPZFYVY	1.00	\$ 60.00	\$ 60.00	
61	Travel - Meals (Lunch)	4/4/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Carrabba's Italian Grill Location: Atlanta, GA Time of Meal: 9:30am-5:29pm Business Purpose: Lunch at airport re deposition in Little Rock, AR. S&C Attendees: Alexander S. Holland Total Guests: 1	1.00	\$ 36.21	\$ 36.21	
62	Travel - Meals (Lunch)	4/4/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Wolfgang Puck Bar + Bites Location: Arlington, VA Time of Meal: 9:30am-5:29pm Business Purpose: Lunch at DCA before flight to Little Rock, Arkansas to argue motion in pro bono case. S&C Attendees: Daniel J. Richardson Total Guests: 1	1.00	\$ 31.91	\$ 31.91	
63	Travel - Airline Extras	4/4/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 04/04/2022 Air Extra: Additional Baggage Business Purpose: Baggage fee at airport re deposition in Little Rock, AR. S&C Attendees: Alexander S. Holland	1.00	\$ 30.00	\$ 30.00	
64	Travel - Meals (Dinner)	4/4/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: Flying Fish Location: Little Rock Time of Meal: 7:00pm-7:59pm Business Purpose: Lunch re deposition in Little Rock, AR. S&C Attendees: Alexander S. Holland Total Guests: 1	1.00	\$ 19.54	\$ 19.54	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
65	Travel - Meals (Dinner)	4/4/2022	Travel and Expenses : Expense Type: Hotel - Dinner Hotel Name: Marriott Location: Little Rock Business Purpose: Dinner at hotel after arguing motion in pro bono matter. S&C Attendees: Daniel J. Richardson Total Guests: 1	1.00	\$ 16.06	\$ 16.06	
66	Travel - Airline Extras	4/4/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 04/04/2022 Air Extra: Onboard Wireless Business Purpose: Wifi on flight to work on client-related material. S&C Attendees: Alexander S. Holland	1.00	\$ 5.00	\$ 5.00	
67	Deposition Transcripts	4/5/2022	Deposition Transcripts/ Witness: Laura Perry	1.00	\$ 2,961.10	\$ 2,961.10	
68	Deposition Transcripts	4/5/2022	Deposition Transcripts/ Witness: Laura Perry	1.00	\$ 1,855.50	\$ 1,855.50	
69	Travel - Lodging	4/5/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: Little Rock Marriott Location: LITTLE ROCK Hotel Guest Name: Alexander Holland Arrival Date: 04/04/2022 Departure Date: 04/06/2022 Room Charge: 180.00 Taxes Total: 26.33 Business Purpose: Hotel stay re deposition in Little Rock, AR. S&C Attendees: Alexander S. Holland	1.00	\$ 206.33	\$ 206.33	
70	Travel - Meals (Lunch)	4/5/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Samantha's Tap Room and Wood Grill Location: Little Rock, AR Time of Meal: 9:30am-5:29pm Business Purpose: Lunch after arguing motion in pro bono matter. S&C Attendees: Daniel J. Richardson Total Guests: 1	1.00	\$ 29.68	\$ 29.68	
71	Travel - Taxi/Car Service/Shuttle	4/5/2022	Travel and expenses : Expense Type: Taxi Limo Shuttle - Out of Town Location: Little Rock Pickup Time: 5:30pm-6:59pm Pickup Location: 1 Airport Rd, Little Rock, AR 72202 Drop off Location: 3 Statehouse Plaza, Little Roreck, AR 72201 Purpose of Ride: Other Business Purpose: Taxi from Little Rock Airport to hotel after flight arrived in Little Rock, AR. S&C Attendees: Daniel J. Richardson	1.00	\$ 25.00	\$ 25.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
72	Travel - Ride Share/UBER/Lyft	4/5/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock, AR Pickup Time: 7:00pm-7:59pm Pickup Location: 1 Airport Road, Little Rock, AR Drop off Location: 3 Statehouse Plaza, Little Rock, AR Purpose of Ride: Other Business Purpose: Car to hotel re deposition in Little Rock, AR S&C Attendees: Alexander S. Holland	1.00	\$ 24.99	\$ 24.99	
73	Travel - Meals (Breakfast)	4/5/2022	Travel and Expenses : Expense Type: Hotel - Breakfast Hotel Name: Marriott Location: Little Rock Business Purpose: Breakfast at Heritage Grille in hotel before arguing motion in pro bono matter. S&C Attendees: Daniel J. Richardson Total Guests: 1	1.00	\$ 22.49	\$ 22.49	
74	Travel - Meals (Breakfast)	4/5/2022	Travel and Expenses : Expense Type: Hotel - Breakfast Hotel Name: Marriott Little Rock Location: Little Rock Business Purpose: Breakfast re deposition in Little Rock, AR. S&C Attendees: Alexander S. Holland Total Guests: 1	1.00	\$ 15.49	\$ 15.49	
75	Travel - Meals (Lunch)	4/5/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Maryam's Grill Location: Little Rock, AR Time of Meal: 9:30am-5:29pm Business Purpose: Lunch during trip to Little Rock, AR re deposition. S&C Attendees: Alexander S. Holland Total Guests: 1	1.00	\$ 14.63	\$ 14.63	
76	Travel - Taxi/Car Service/Shuttle	4/6/2022	Travel and expenses : Expense Type: Taxi Limo Shuttle - Out of Town Location: Washington, DC Pickup Time: 10:00pm-4:59am Pickup Location: 2401 Smith Blvd, Arlington, VA 22202 Drop off Location: 5385 Oakview Gardens Drive, Falls Church VA Purpose of Ride: Home Business Purpose: Taxi from DCA to home after flight back from Little Rock, AR. S&C Attendees: Daniel J. Richardson	1.00	\$ 40.00	\$ 40.00	
77	Travel - Airline Extras	4/6/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 04/06/2022 Air Extra: Onboard Wireless Business Purpose: Wifi on flight re deposition in Little Rock, AR. S&C Attendees: Alexander S. Holland	1.00	\$ 25.00	\$ 25.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
78	Travel - Meals (Breakfast)	4/6/2022	Travel and Expenses : Expense Type: Breakfast - Out of Town Name of Establishment: Chick-Fil-A Location: Little Rock Time of Meal: 6:00am-6:59am Business Purpose: Breakfast re deposition in Little Rock, AR. S&C Attendees: Alexander S. Holland Total Guests: 1	1.00	\$ 13.15	\$ 13.15	
79	Travel - Meals (Other)	4/6/2022	Travel and Expenses : Expense Type: Meal Other - Out of Town Name of Establishment: Starbucks Location: Little Rock Time of Meal: 7:00am-9:29am Business Purpose: Coffee re deposition in Little Rock, AR. S&C Attendees: Alexander S. Holland Total Guests: 1	1.00	\$ 5.14	\$ 5.14	
80	Travel - Ride Share/UBER/Lyft	4/13/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: New York Pickup Time: 9:30am-5:29pm Pickup Location: JFK Airport Drop off Location: 21 Exchange Pl, New York, NY Purpose of Ride: Home Business Purpose: Car home from airport re deposition in Little Rock, AR. S&C Attendees: Alexander S. Holland	1.00	\$ 124.50	\$ 124.50	
81	Repro - Copies	4/14/2022	Reproducing documents 04/14/2022 - 11:11	774.00	\$ 0.14	\$ 108.36	
82	Repro - Copies	4/14/2022	Reproducing documents 04/14/2022 - 12:45	670.00	\$ 0.14	\$ 93.80	
83	Repro - Copies	4/14/2022	Reproducing documents 04/14/2022 - 12:20	670.00	\$ 0.14	\$ 93.80	
84	Repro - Copies	4/21/2022	Reproducing documents 04/21/2022 - 09:18	551.00	\$ 0.14	\$ 77.14	
85	Repro - Color Copier	4/21/2022	Reproducing color documents 04/21/2022 - 09:18	182.00	\$ 0.25	\$ 45.50	
86	Travel - Airfare	4/24/2022	Travel and expenses RODGERSON/BRANDYN J - 4/24/2022Ticket # - 7756419601LGA/ATL/LIT/ATL/LGAVZYKRG	1.00	\$ 709.27	\$ 709.27	
87	Travel - Lodging	4/24/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: AC Hotel by Marriott Location: Little Rock Hotel Guest Name: Brandyn Rodgeron Arrival Date: 04/24/2022 Departure Date: 04/28/2022 Room Charge: 96.00 Taxes Total: 29.25 Business Purpose: Depositions in Little Rock. S&C Attendees: Brandyn J. Rodgeron	1.00	\$ 125.25	\$ 125.25	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
88	Travel - Ride Share/UBER/Lyft	4/24/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: New York Pickup Time: 10:00pm-4:59am Pickup Location: 535 Dean Street, Brooklyn Drop off Location: LGA Purpose of Ride: Airport Business Purpose: Depositions in Little Rock. S&C Attendees: Brandyn J. Rodgerson	1.00	\$ 67.23	\$ 67.23	
89	Travel - Airfare	4/24/2022	Travel and expenses RODGERSON/BRANDYN J - 4/24/2022Ticket # - 7756419601LGA/ATL/LIT/ATL/LGAVZYKRG	1.00	\$ 60.00	\$ 60.00	
90	Travel - Taxi/Car Service/Shuttle	4/24/2022	Travel and expenses : Expense Type: Taxi Limo Shuttle - Out of Town Location: Little Rock, Arkansas Pickup Time: 9:30am-5:29pm Pickup Location: Little Rock Airport Drop off Location: AC Hotel Little Rock Purpose of Ride: Airport Business Purpose: Depositions in Little Rock. S&C Attendees: Brandyn J. Rodgerson	1.00	\$ 30.00	\$ 30.00	
91	Travel - Lodging	4/25/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: AC Hotel by Marriott Location: Little Rock Hotel Guest Name: Brandyn Rodgerson Arrival Date: 04/24/2022 Departure Date: 04/28/2022 Room Charge: 96.00 Taxes Total: 14.40 Business Purpose: Depositions in Little Rock. S&C Attendees: Brandyn J. Rodgerson	1.00	\$ 110.40	\$ 110.40	
92	Travel - Meals (Breakfast)	4/25/2022	Travel and Expenses : Expense Type: Hotel - Breakfast Hotel Name: AC Hotel by Marriott Location: Little Rock Business Purpose: Depositions in Little Rock. S&C Attendees: Brandyn J. Rodgerson Total Guests: 1	1.00	\$ 13.60	\$ 13.60	
93	Travel - Lodging	4/26/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: AC Hotel by Marriott Location: Little Rock Hotel Guest Name: Brandyn Rodgerson Arrival Date: 04/24/2022 Departure Date: 04/28/2022 Room Charge: 96.00 Taxes Total: 14.40 Business Purpose: Depositions in Little Rock. S&C Attendees: Brandyn J. Rodgerson	1.00	\$ 110.40	\$ 110.40	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
94	Repro - Color Copier	4/26/2022	Reproducing color documents 04/26/2022 - 10:14	283.00	\$ 0.25	\$ 70.75	
95	Library - Document Retrieval	4/26/2022	Library - Document Retrieval/ Springer	1.00	\$ 39.95	\$ 39.95	
96	Repro - Copies	4/26/2022	Reproducing documents 04/26/2022 - 10:14	223.00	\$ 0.14	\$ 31.22	
97	Travel - Meals (Breakfast)	4/26/2022	Travel and Expenses : Expense Type: Hotel - Breakfast Hotel Name: AC Hotel by Marriott Location: Little Rock Business Purpose: Depositions in Little Rock. S&C Attendees: Brandyn J. Rodgerson Total Guests: 1	1.00	\$ 14.72	\$ 14.72	
98	Repro - Color Copier	4/27/2022	Reproducing color documents 04/27/2022 - 14:30	1,390.00	\$ 0.25	\$ 347.50	
99	Repro - Copies	4/27/2022	Reproducing documents 04/27/2022 - 14:30	1,087.00	\$ 0.14	\$ 152.18	
100	Travel - Lodging	4/27/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: AC Hotel by Marriott Location: Little Rock Hotel Guest Name: Brandyn Rodgerson Arrival Date: 04/24/2022 Departure Date: 04/28/2022 Room Charge: 96.00 Taxes Total: 14.94 Business Purpose: Depositions in Little Rock. S&C Attendees: Brandyn J. Rodgerson	1.00	\$ 110.94	\$ 110.94	
101	Travel - Meals (Other)	4/27/2022	Travel and Expenses : Expense Type: Hotel - Meals Other Hotel Name: AC Hotel by Marriott Location: Little Rock Business Purpose: Depositions in Little Rock. S&C Attendees: Brandyn J. Rodgerson Total Guests: 1	1.00	\$ 6.00	\$ 6.00	
102	Delivery/Courier	4/28/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 776716411434 , InvoiceNum: 774960815	1.00	\$ 92.72	\$ 92.72	
103	Travel - Ride Share/UBER/Lyft	4/28/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock, Arkansas Pickup Time: 5:30pm-6:59pm Pickup Location: 201 W Capitol Ave Little Rock AR Drop off Location: Little Rock Airport (1 Airport Rd) Purpose of Ride: Airport Business Purpose: Depositions in Little Rock. S&C Attendees: Brandyn J. Rodgerson	1.00	\$ 20.54	\$ 20.54	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
104	Travel - Ride Share/UBER/Lyft	4/29/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: New York Pickup Time: 10:00pm-4:59am Pickup Location: LGA Drop off Location: 535 Dean Street (Home) Purpose of Ride: Airport Business Purpose: Depositions in Little Rock. S&C Attendees: Brandyn J. Rodgeron	1.00	\$ 61.42	\$ 61.42	
105	Office Supplies	4/29/2022	Office Supplies : Merchant Name: AUGUSTINE INSTITUTE Product Description: Transgenderism: A Surgeon's Perspective Location: New York Business Purpose: Purchased book to do research for deposition.	1.00	\$ 3.49	\$ 3.49	
106	Library - Document Retrieval	5/1/2022	Library - Document Retrieval/ ovid journal	1.00	\$ 59.28	\$ 59.28	
107	Repro - Copies	5/2/2022	Reproducing documents 05/02/2022 - 21:22	4,042.00	\$ 0.14	\$ 565.88	
108	Repro - Color Copier	5/3/2022	Reproducing color documents 05/03/2022 - 16:14	1,096.00	\$ 0.25	\$ 274.00	
109	Delivery/Courier	5/3/2022	Courier Services FedEx to: GILL RAGON OWEN P A, CHRIS TRAVIS , WayBill: 953635894910 , InvoiceNum: 774959464	1.00	\$ 156.68	\$ 156.68	
110	Delivery/Courier	5/3/2022	Courier Services FedEx to: GILL RAGON OWEN P A, CHRIS TRAVIS , WayBill: 953635894900 , InvoiceNum: 774959464	1.00	\$ 117.55	\$ 117.55	
111	Repro - Copies	5/3/2022	Reproducing documents 05/03/2022 - 16:14	137.00	\$ 0.14	\$ 19.18	
112	Repro - Color Copier	5/3/2022	Reproducing color documents 05/03/2022 - 21:44	26.00	\$ 0.25	\$ 6.50	
113	Repro - Copies	5/3/2022	Reproducing documents 05/03/2022 - 21:44	3.00	\$ 0.14	\$ 0.42	
114	Travel - Airfare	5/4/2022	Travel and expenses RICHARDSON/DANIEL J - 5/4/2022Ticket # - 7756419629DCA/CLT/LIT/CLT/DCAZKUTZU	1.00	\$ 769.10	\$ 769.10	
115	Deposition Transcripts	5/4/2022	Deposition transcript for Dr. Stephanie Ho	1.00	\$ 333.00	\$ 333.00	
116	Travel - Lodging	5/4/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: Marriott Location: Little Rock Hotel Guest Name: Daniel James Richardson Arrival Date: 05/04/2022 Departure Date: 05/06/2022 Room Charge: 264.00 Taxes Total: 38.61 Business Purpose: Hotel stay S&C Attendees: Daniel J. Richardson	1.00	\$ 302.61	\$ 302.61	
117	Travel - Airfare	5/4/2022	Travel and expenses RICHARDSON/DANIEL J - 5/4/2022Ticket # - 7756419629DCA/CLT/LIT/CLT/DCAZKUTZU	1.00	\$ 60.00	\$ 60.00	
118	Travel - Meals (Dinner)	5/4/2022	Travel and Expenses : Expense Type: Hotel - Dinner Hotel Name: Marriott Little Rock Location: Little Rock Business Purpose: Dinner at hotel restaurant after arriving in Little Rock, AR for deposition. S&C Attendees: Daniel J. Richardson Total Guests: 1	1.00	\$ 43.40	\$ 43.40	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
119	Travel - Airline Extras	5/4/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 05/04/2022 Air Extra: Additional Baggage Business Purpose: Checked bag fee from flight to Little Rock, AR in order to participate in deposition in pro bono matter. S&C Attendees: Daniel J. Richardson	1.00	\$ 30.00	\$ 30.00	
120	Travel - Ride Share/UBER/Lyft	5/4/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Arlington, VA Pickup Time: 10:00pm-4:59am Pickup Location: 4406 Upland Drive, Alexandria, VA 22310, US Drop off Location: Terminal B/C, Ronald Reagan Washington National Airport (DCA), Arlington, VA, 22202, US Purpose of Ride: Airport Business Purpose: Uber from home to DCA in order to catch flight to Little Rock, AR to participate in deposition. S&C Attendees: Daniel J. Richardson	1.00	\$ 27.94	\$ 27.94	
121	Travel - Meals (Lunch)	5/4/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Samantha's Tap Room & Wood Grill Location: Little Rock Time of Meal: 9:30am-5:29pm Business Purpose: Lunch at nearby restaurant after arriving in Little Rock, AR for deposition. S&C Attendees: Daniel J. Richardson Total Guests: 1	1.00	\$ 22.15	\$ 22.15	
122	Travel - Meals (Breakfast)	5/4/2022	Travel and Expenses : Expense Type: Breakfast - Out of Town Name of Establishment: Starbucks Location: Washington Time of Meal: 5:00am-5:59am Business Purpose: Breakfast at DCA airport before catching flight to Little Rock, AR for deposition. S&C Attendees: Daniel J. Richardson Total Guests: 1	1.00	\$ 10.18	\$ 10.18	
123	Repro - Copies	5/4/2022	Reproducing documents 05/04/2022 - 17:16	36.00	\$ 0.14	\$ 5.04	
124	Travel - Airfare	5/5/2022	Travel and expenses OSSIP/JONATHAN JOSEP - 5/5/2022Ticket # - 7762746290LGA/ATL/LIT/ATL/LGAZMJJDGR	1.00	\$ 834.32	\$ 834.32	
125	Travel - Airfare	5/5/2022	Travel and expenses HOLLAND/ALEXANDER ST - 5/5/2022Ticket # - 7762746289LGA/ATL/LIT/ATL/LGAZIPMUH	1.00	\$ 793.51	\$ 793.51	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
126	Travel - Lodging	5/5/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: Marriott Location: Little Rock Hotel Guest Name: Daniel James Richardson Arrival Date: 05/04/2022 Departure Date: 05/06/2022 Room Charge: 264.00 Taxes Total: 38.61 Business Purpose: Hotel stay S&C Attendees: Daniel J. Richardson	1.00	\$ 302.61	\$ 302.61	
127	Travel - Lodging	5/5/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: Little Rock Marriot Location: LITTLE ROCK Hotel Guest Name: Jonathan J. Ossip Arrival Date: 05/05/2022 Departure Date: 05/07/2022 Room Charge: 219.00 Taxes Total: 32.03 Business Purpose: Trip to Little Rock Arkansas for depositions. S&C Attendees: Jonathan J. Ossip	1.00	\$ 251.03	\$ 251.03	
128	Travel - Lodging	5/5/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: Marriott Little Rock Location: LITTLE ROCK Hotel Guest Name: Alex Holland Arrival Date: 05/05/2022 Departure Date: 05/07/2022 Room Charge: 219.00 Taxes Total: 32.03 Business Purpose: Hotel stay re deposition in Little Rock. S&C Attendees: Alexander S. Holland	1.00	\$ 251.03	\$ 251.03	
129	Travel - Ride Share/UBER/Lyft	5/5/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: New York Pickup Time: 7:00am-9:29am Pickup Location: 330 Pearl St., New York, NY Drop off Location: LGA Airport Purpose of Ride: Airport Business Purpose: Car to airport re deposition in Little Rock. S&C Attendees: Alexander S. Holland	1.00	\$ 90.63	\$ 90.63	
130	Travel - Airfare	5/5/2022	Travel and expenses HOLLAND/ALEXANDER ST - 5/5/2022Ticket # - 7756419579LGA/ATL/LIT/ATL/LGAKJZAKN	1.00	\$ 60.00	\$ 60.00	
131	Travel - Airfare	5/5/2022	Travel and expenses OSSIP/JONATHAN JOSEP - 5/5/2022Ticket # - 7756419580LGA/ATL/LIT/ATL/LGALWHHIC	1.00	\$ 60.00	\$ 60.00	
132	Travel - Airfare	5/5/2022	Travel and expenses HOLLAND/ALEXANDER ST - 5/5/2022Ticket # - 7756419579LGA/ATL/LIT/ATL/EWRKJZAKN	1.00	\$ 60.00	\$ 60.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
133	Travel - Airfare	5/5/2022	Travel and expenses OSSIP/JONATHAN JOSEP - 5/5/2022Ticket # - 7756419580LGA/ATL/LIT/ATL/EWRLWHHIC	1.00	\$ 60.00	\$ 60.00	
134	Travel - Airfare Booking Fees	5/5/2022	Travel and expenses HOLLAND/ALEXANDER ST - 5/5/2022Ticket # - 7762746289CVG/EWRZIPMUH	1.00	\$ 60.00	\$ 60.00	
135	Travel - Airfare Booking Fees	5/5/2022	Travel and expenses OSSIP/JONATHAN JOSEP - 5/5/2022Ticket # - 7762746290CVG/EWRZMJDR	1.00	\$ 60.00	\$ 60.00	
136	Repro - Color Copier	5/5/2022	Reproducing color documents 05/05/2022 - 17:32	176.00	\$ 0.25	\$ 44.00	
137	Travel - Ride Share/UBER/Lyft	5/5/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock Pickup Time: 9:30am-5:29pm Pickup Location: 425 W Capitol Ave., Little Rock, AR Drop off Location: 3 Statehouse Plaza, Little Rock, AR Purpose of Ride: Meeting Business Purpose: Car to hotel after meeting re deposition in Little Rock. S&C Attendees: Alexander S. Holland	1.00	\$ 20.26	\$ 20.26	
138	Travel - Ride Share/UBER/Lyft	5/5/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock Pickup Time: 9:30am-5:29pm Pickup Location: Little Rock Airport Drop off Location: 3 Statehouse Plaza, Little Rock, AR Purpose of Ride: Other Business Purpose: Car to hotel re deposition in Little Rock. S&C Attendees: Alexander S. Holland	1.00	\$ 18.87	\$ 18.87	
139	Travel - Meals (Lunch)	5/5/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: The Connection Concourse C Food Court Location: Atlanta Time of Meal: 9:30am-5:29pm Business Purpose: Lunch while in Little Rock Arkansas for depositions. (the establishment did not give an itemized receipt) S&C Attendees: Jonathan J. Ossip Total Guests: 1	1.00	\$ 14.03	\$ 14.03	
140	Travel - Meals (Breakfast)	5/5/2022	Travel and Expenses : Expense Type: Breakfast - Out of Town Name of Establishment: Rossi Pizzeria Location: Little Rock Time of Meal: 7:00am-9:29am Business Purpose: Breakfast at airport re deposition in Little Rock. S&C Attendees: Alexander S. Holland Total Guests: 1	1.00	\$ 14.01	\$ 14.01	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
141	Travel - Meals (Lunch)	5/5/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Rossi Pizzeria Market Location: Flushing Time of Meal: 7:00am-9:29am Business Purpose: Breakfast at LaGuardia while travelling to Little Rock Arkansas for depositions. S&C Attendees: Jonathan J. Ossip Total Guests: 1	1.00	\$ 14.01	\$ 14.01	
142	Travel - Meals (Lunch)	5/5/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Maryam's Grill Location: Little Rock Time of Meal: 9:30am-5:29pm Business Purpose: Lunch at nearby restaurant during break in day long deposition for pro bono matter. S&C Attendees: Daniel J. Richardson Total Guests: 1	1.00	\$ 12.75	\$ 12.75	
143	Travel - Meals (Breakfast)	5/5/2022	Travel and Expenses : Expense Type: Hotel - Breakfast Hotel Name: Little Rock Marriott Location: Little Rock Business Purpose: Breakfast at hotel restaurant before flight back to DC after staying in Little Rock, AR for deposition. S&C Attendees: Daniel J. Richardson Total Guests: 1	1.00	\$ 11.74	\$ 11.74	
144	Travel - Meals (Lunch)	5/5/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: The Connection Location: Hartsfield-Jackson, Atlanta Time of Meal: 9:30am-5:29pm Business Purpose: Lunch during stay in Little Rock re deposition. S&C Attendees: Alexander S. Holland Total Guests: 1	1.00	\$ 10.79	\$ 10.79	
145	Travel - Airline Extras	5/5/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 05/05/2022 Air Extra: Onboard Wireless Business Purpose: Wifi usage on plane while travelling to Little Rock Arkansas for depositions. S&C Attendees: Jonathan J. Ossip	1.00	\$ 5.00	\$ 5.00	
146	Repro - Copies	5/5/2022	Reproducing documents 05/05/2022 - 17:32	23.00	\$ 0.14	\$ 3.22	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
147	Travel - Lodging	5/6/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: Little Rock Marriot Location: LITTLE ROCK Hotel Guest Name: Jonathan J. Ossip Arrival Date: 05/05/2022 Departure Date: 05/07/2022 Room Charge: 189.00 Taxes Total: 27.64 Business Purpose: Trip to Little Rock Arkansas for depositions. S&C Attendees: Jonathan J. Ossip	1.00	\$ 216.64	\$ 216.64	
148	Travel - Lodging	5/6/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: Marriott Little Rock Location: LITTLE ROCK Hotel Guest Name: Alex Holland Arrival Date: 05/05/2022 Departure Date: 05/07/2022 Room Charge: 189.00 Taxes Total: 27.64 Business Purpose: Hotel stay re deposition in Little Rock. S&C Attendees: Alexander S. Holland	1.00	\$ 216.64	\$ 216.64	
149	Travel - Meals (Dinner)	5/6/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: Brave New Restaurant Location: Little Rock Time of Meal: 7:00pm-7:59pm Business Purpose: Dinner during stay in Little Rock re deposition. S&C Attendees: Alexander S. Holland Jonathan J. Ossip Total Guests: 2	1.00	\$ 150.00	\$ 150.00	
150	Travel - Meals (Lunch)	5/6/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Maryam Grill Location: Little Rock Time of Meal: 9:30am-5:29pm Business Purpose: Lunch re deposition in Little Rock. S&C Attendees: Alexander S. Holland Jonathan J. Ossip Total Guests: 2	1.00	\$ 47.24	\$ 47.24	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
151	Travel - Ride Share/UBER/Lyft	5/6/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Alexandria, VA Pickup Time: 9:30am-5:29pm Pickup Location: Terminal C, Ronald Reagan Washington National Airport (DCA), Arlington, VA 22202, US Drop off Location: 4406 Upland Drive, Alexandria, VA 22310, US Purpose of Ride: Home Business Purpose: Uber from DCA to home after returning to DC from Little Rock, AR. S&C Attendees: Daniel J. Richardson	1.00	\$ 40.96	\$ 40.96	
152	Travel - Airline Extras	5/6/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 05/06/2022 Air Extra: Additional Baggage Business Purpose: Checked bag fee from flight to Washington, DC after participating in deposition in pro bono matter. S&C Attendees: Daniel J. Richardson	1.00	\$ 30.00	\$ 30.00	
153	Travel - Meals (Breakfast)	5/6/2022	Travel and Expenses : Expense Type: Hotel - Breakfast Hotel Name: Marriott Little Rock Location: LITTLE ROCK Business Purpose: Breakfast during hotel stay re deposition in Little Rock. S&C Attendees: Alexander S. Holland Total Guests: 1	1.00	\$ 25.68	\$ 25.68	
154	Travel - Meals (Breakfast)	5/6/2022	Travel and Expenses : Expense Type: Hotel - Breakfast Hotel Name: Little Rock Marriott Location: Little Rock Business Purpose: Breakfast at hotel restaurant before flight back to DC after staying in Little Rock, AR for deposition. S&C Attendees: Daniel J. Richardson Total Guests: 1	1.00	\$ 20.49	\$ 20.49	
155	Travel - Ride Share/UBER/Lyft	5/6/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock Pickup Time: 7:00am-9:29am Pickup Location: South Louisiana Street & W Markham Street, Little Rock, AR 72201, US Drop off Location: 1 Airport Rd, Little Rock, AR 72202 Purpose of Ride: Airport Business Purpose: Uber from hotel to Little Rock airport in order to catch flight back to DC after taking deposition in Arkansas. S&C Attendees: Daniel J. Richardson	1.00	\$ 17.99	\$ 17.99	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
156	Travel - Meals (Other)	5/6/2022	Travel and Expenses : Expense Type: Meal Other - Out of Town Name of Establishment: Starbucks Location: Cincinnati Time of Meal: 7:00am-9:29am Business Purpose: Coffee during hotel stay re deposition in Little Rock. S&C Attendees: Alexander S. Holland Total Guests: 1	1.00	\$ 6.26	\$ 6.26	
157	Travel - Ride Share/UBER/Lyft	5/7/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock Pickup Time: 9:30am-5:29pm Pickup Location: 3 Statehouse Plaza, Little Rock, AR Drop off Location: Little Rock Airport Purpose of Ride: Airport Business Purpose: Car to airport re deposition in Little Rock. S&C Attendees: Alexander S. Holland	1.00	\$ 29.89	\$ 29.89	
158	Travel - Meals (Breakfast)	5/7/2022	Travel and Expenses : Expense Type: Hotel - Breakfast Hotel Name: Marriott Little Rock Location: LITTLE ROCK Business Purpose: Breakfast during hotel stay re deposition in Little Rock. S&C Attendees: Alexander S. Holland Total Guests: 1	1.00	\$ 27.44	\$ 27.44	
159	Travel - Ride Share/UBER/Lyft	5/7/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock Pickup Time: 9:00pm-9:59pm Pickup Location: 2300 Cottdale Lane, Little Rock, AR Drop off Location: 100 Louisiana St., Little Rock, AR Purpose of Ride: Other Business Purpose: Car to hotel after dinner re deposition in Little Rock. S&C Attendees: Alexander S. Holland	1.00	\$ 17.61	\$ 17.61	
160	Travel - Ride Share/UBER/Lyft	5/7/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock Pickup Time: 7:00pm-7:59pm Pickup Location: 111 W Markham St., Little Rock, AR Drop off Location: 2300 Cottdale Ln, Little Rock, AR Purpose of Ride: Other Business Purpose: Car to restaurant re deposition in Little Rock. S&C Attendees: Alexander S. Holland	1.00	\$ 15.53	\$ 15.53	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
161	Travel - Meals (Lunch)	5/7/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: shake shack Location: Little Rock Time of Meal: 9:30am-5:29pm Business Purpose: Lunch while in airport for return from trip to Little Rock Arkansas for depositions. S&C Attendees: Jonathan J. Ossip Total Guests: 1	1.00	\$ 13.00	\$ 13.00	
162	Travel - Meals (Breakfast)	5/7/2022	Travel and Expenses : Expense Type: Breakfast - Out of Town Name of Establishment: Starbucks Location: Little Rock Time of Meal: 9:30am-5:29pm Business Purpose: Breakfast while in Little Rock Arkansas for depositions. (establishment was not able to give an itemized receipt) S&C Attendees: Jonathan J. Ossip Total Guests: 1	1.00	\$ 12.24	\$ 12.24	
163	Travel - Meals (Lunch)	5/7/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Qdoba Location: Hartsfield-Jackson, Atlanta Time of Meal: 9:30am-5:29pm Business Purpose: Lunch during stay in Little Rock re deposition. S&C Attendees: Alexander S. Holland Total Guests: 1	1.00	\$ 12.00	\$ 12.00	
164	Travel - Airline Extras	5/7/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 05/07/2022 Air Extra: Onboard Wireless Business Purpose: Plane wifi for trip to Little Rock Arkansas for depositions. (return flight) S&C Attendees: Jonathan J. Ossip	1.00	\$ 5.00	\$ 5.00	
165	Travel - Airline Extras	5/8/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 05/08/2022 Air Extra: Onboard Wireless Business Purpose: Wifi on flight re deposition in Little Rock. S&C Attendees: Alexander S. Holland	1.00	\$ 5.00	\$ 5.00	
166	Repro - Copies	5/9/2022	Reproducing documents 05/09/2022 - 13:09	43.00	\$ 0.14	\$ 6.02	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
167	Travel - Lodging	5/10/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: The Lytle Park Hotel Location: CINCINNATI Hotel Guest Name: Jonathan J. Ossip Arrival Date: 05/10/2022 Departure Date: 05/12/2022 Room Charge: 367.00 Taxes Total: 67.17 Business Purpose: Trip to Cincinnati for depositions S&C Attendees: Jonathan J. Ossip	1.00	\$ 434.17	\$ 434.17	
168	Travel - Lodging	5/10/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: The Lytle Park Hotel Location: CINCINNATI Hotel Guest Name: Alexander Holland Arrival Date: 05/10/2022 Departure Date: 05/12/2022 Room Charge: 367.00 Taxes Total: 67.17 Business Purpose: Hotel stay in Cincinnati re deposition. S&C Attendees: Alexander S. Holland	1.00	\$ 434.17	\$ 434.17	
169	Travel - Airfare	5/10/2022	Travel and expenses OSSIP/JONATHAN JOSEP - 5/10/2022Ticket # - 7756419581LGA/CVG/LGAKTRRIX	1.00	\$ 360.45	\$ 360.45	
170	Travel - Airfare	5/10/2022	Travel and expenses HOLLAND/ALEXANDER ST - 5/10/2022Ticket # - 7756419583LGA/CVG/LGAJTCKK	1.00	\$ 360.45	\$ 360.45	
171	Deposition Transcripts	5/10/2022	Deposition transcript for Cathy Campbell	1.00	\$ 245.85	\$ 245.85	
172	Travel - Ride Share/UBER/Lyft	5/10/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Cincinnati Pickup Time: 9:30am-5:29pm Pickup Location: Cincinnati/ Northern Kentucky International Airport Drop off Location: 311 Pike St., Cincinnati, OH Purpose of Ride: Airport Business Purpose: Car to hotel re deposition in Cincinnati. S&C Attendees: Alexander S. Holland	1.00	\$ 65.17	\$ 65.17	
173	Travel - Ride Share/UBER/Lyft	5/10/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: New York Pickup Time: 9:30am-5:29pm Pickup Location: 20 Exchange Pl., New York, NY Drop off Location: LGA Airport Purpose of Ride: Airport Business Purpose: Car to airport re deposition in Cincinnati. S&C Attendees: Alexander S. Holland	1.00	\$ 64.41	\$ 64.41	
174	Travel - Airfare	5/10/2022	Travel and expenses HOLLAND/ALEXANDER ST - 5/10/2022Ticket # - 7756419583LGA/CVG/LGAJTCKK	1.00	\$ 60.00	\$ 60.00	
175	Travel - Airfare	5/10/2022	Travel and expenses OSSIP/JONATHAN JOSEP - 5/10/2022Ticket # - 7756419581LGA/CVG/LGAKTRRIX	1.00	\$ 60.00	\$ 60.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
176	Travel - Meals (Lunch)	5/10/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Cotto Location: New York Time of Meal: 9:30am-5:29pm Business Purpose: Lunch during trip to Cincinnati re deposition. S&C Attendees: Alexander S. Holland Total Guests: 1	1.00	\$ 44.40	\$ 44.40	
177	Travel - Meals (Lunch)	5/10/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Cotto Location: Flushing Time of Meal: 9:30am-5:29pm Business Purpose: Lunch at airport while in Cincinnati for depositions. S&C Attendees: Jonathan J. Ossip Total Guests: 1	1.00	\$ 31.51	\$ 31.51	
178	Travel - Meals (Other)	5/10/2022	Travel and Expenses : Expense Type: Hotel - Meals Other Hotel Name: The Lytle Park Hotel Location: CINCINNATI Business Purpose: Trip to Cincinnati for depositions. S&C Attendees: Jonathan J. Ossip Total Guests: 1	1.00	\$ 22.00	\$ 22.00	
179	Travel - Lodging	5/11/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: The Lytle Park Hotel Location: CINCINNATI Hotel Guest Name: Jonathan J. Ossip Arrival Date: 05/10/2022 Departure Date: 05/12/2022 Room Charge: 367.00 Taxes Total: 67.17 Business Purpose: Trip to Cincinnati for depositions. S&C Attendees: Jonathan J. Ossip	1.00	\$ 434.17	\$ 434.17	
180	Travel - Lodging	5/11/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: The Lytle Park Hotel Location: CINCINNATI Hotel Guest Name: Alexander Holland Arrival Date: 05/10/2022 Departure Date: 05/12/2022 Room Charge: 367.00 Taxes Total: 67.17 Business Purpose: Hotel stay in Cincinnati re deposition. S&C Attendees: Alexander S. Holland	1.00	\$ 434.17	\$ 434.17	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
181	Travel - Meals (Dinner)	5/11/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: Salazar Location: Cincinnati Time of Meal: 9:00pm-9:59pm Business Purpose: Dinner during trip to Cincinnati re deposition. S&C Attendees: Alexander S. Holland Jonathan J. Ossip External Attendees: Armand Antommara Drake Mann Total Guests: 4	1.00	\$ 302.41	\$ 226.81	Reduced by 25% to exclude Dr. Antommara's meal.
182	Travel - Meals (Dinner)	5/11/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: Salazar Location: Cincinnati Time of Meal: 5:30pm-6:59pm Business Purpose: Dinner during trip to Cincinnati re deposition. S&C Attendees: Alexander S. Holland Jonathan J. Ossip External Attendees: Drake Mann Total Guests: 3	1.00	\$ 225.00	\$ 225.00	
183	Travel - Meals (Lunch)	5/11/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Bridges Location: Cincinnati Time of Meal: 9:30am-5:29pm Business Purpose: Lunch during trip to Cincinnati re deposition. S&C Attendees: Alexander S. Holland Jonathan J. Ossip External Attendees: Armand Antommara Drake Mann Total Guests: 4	1.00	\$ 61.57	\$ 46.18	Reduced by 25% to exclude Dr. Antommara's meal.
184	Travel - Ride Share/UBER/Lyft	5/11/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Cincinnati Pickup Time: 5:30pm-6:59pm Pickup Location: 311 Pike St., Cincinnati, OH Drop off Location: 1401 Republic St., Cincinnati, OH Purpose of Ride: Other Business Purpose: Car to dinner re deposition in Cincinnati. S&C Attendees: Alexander S. Holland	1.00	\$ 21.90	\$ 21.90	
185	Deposition Transcripts	5/12/2022	Deposition Transcripts - VERITEXT CORP. - Witness: Clifton Francis Burleigh, Jr.	1.00	\$ 3,469.90	\$ 3,469.90	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
186	Travel - Lodging	5/12/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: Kinley, Cincinnati Downtown A Tribute Po Location: CINCINNATI Hotel Guest Name: Alexander Holland Arrival Date: 05/12/2022 Departure Date: 05/13/2022 Room Charge: 215.00 Taxes Total: 39.35 Business Purpose: Hotel stay in Cincinnati re deposition. S&C Attendees: Alexander S. Holland	1.00	\$ 254.35	\$ 254.35	
187	Travel - Lodging	5/12/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: A Tribute Portfolio Hotel Location: CINCINNATI Hotel Guest Name: Jonathan J. Ossip Arrival Date: 05/12/2022 Departure Date: 05/13/2022 Room Charge: 110.00 Taxes Total: 20.13 Business Purpose: Trip to Cincinnati for depositions. S&C Attendees: Jonathan J. Ossip	1.00	\$ 130.13	\$ 130.13	
188	Travel - Meals (Lunch)	5/12/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Burger Fi Location: Cincinnati Time of Meal: 9:30am-5:29pm Business Purpose: Lunch during trip to Cincinnati re deposition. S&C Attendees: Alexander S. Holland Jonathan J. Ossip External Attendees: Drake Mann Armand Antommara Total Guests: 4	1.00	\$ 58.21	\$ 43.66	Reduced by 25% to exclude Dr. Antommara's meal.
189	Travel - Ride Share/UBER/Lyft	5/12/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Cincinnati Pickup Time: 7:00am-9:29am Pickup Location: 311 Pike St., Cincinnati, OH Drop off Location: 312 Walnut St., Cincinnati, OH Purpose of Ride: Meeting Business Purpose: Car to meeting re deposition in Cincinnati. S&C Attendees: Alexander S. Holland	1.00	\$ 12.35	\$ 12.35	
190	Deposition Transcripts	5/13/2022	Deposition Transcripts - Veritext Corp. - Witness: Clifton Francis Burleigh , Jr	1.00	\$ 1,828.00	\$ 1,828.00	
191	Travel - Airfare	5/13/2022	Travel and expenses OSSIP/JONATHAN JOSEP - 5/13/2022Ticket # - 7762746387CVG/EWRKTRRIX	1.00	\$ 325.82	\$ 325.82	
192	Travel - Airfare	5/13/2022	Travel and expenses HOLLAND/ALEXANDER ST - 5/13/2022Ticket # - 7762746386CVG/EWRJTCIKK	1.00	\$ 325.82	\$ 325.82	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
193	Travel - Taxi/Car Service/Shuttle	5/13/2022	Travel and expenses Travel and Expense Taxi from EWR Newark Airport, Newark, NJ 07114 to 20 Exchange Place, NYC, NY 10005 PickupTime: 15:20 Passenger Name: Alexander Holland Purpose of Ride: Airport Voucher #: 428928 Invoice#: SC9345 Car Company: DIAL CAR INC. 01.004502.001	1.00	\$ 108.99	\$ 108.99	
194	Travel - Meals (Breakfast)	5/13/2022	Travel and Expenses : Expense Type: Breakfast - Out of Town Name of Establishment: Brown Bear Bakery Location: Cincinnati Time of Meal: 7:00am-9:29am Business Purpose: Breakfast during trip to Cincinnati re deposition. S&C Attendees: Alexander S. Holland Jonathan J. Ossip Total Guests: 2	1.00	\$ 39.96	\$ 39.96	
195	Travel - Ride Share/UBER/Lyft	5/13/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Cincinnati Pickup Time: 9:30am-5:29pm Pickup Location: 636 Race St., Cincinnati, OH Drop off Location: Cincinnati/ Northern Kentucky International Airport Purpose of Ride: Airport Business Purpose: Car to airport re deposition in Cincinnati. S&C Attendees: Alexander S. Holland	1.00	\$ 32.77	\$ 32.77	
196	Travel - Meals (Lunch)	5/13/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Smashburger Location: Cincinnati Time of Meal: 9:30am-5:29pm Business Purpose: Lunch during trip to Cincinnati re deposition. S&C Attendees: Alexander S. Holland Jonathan J. Ossip Total Guests: 2	1.00	\$ 19.67	\$ 19.67	
197	Travel - Meals (Breakfast)	5/13/2022	Travel and Expenses : Expense Type: Breakfast - Out of Town Name of Establishment: Khora Location: Cincinnati Time of Meal: 9:30am-5:29pm Business Purpose: Coffee during trip to Cincinnati re deposition. S&C Attendees: Alexander S. Holland Total Guests: 1	1.00	\$ 5.50	\$ 5.50	
199	Deposition Transcripts	5/19/2022	Deposition Transcripts - Veritext - Witness: Roger Hiatt, Jr., MD	1.00	\$ 3,889.00	\$ 3,889.00	
200	Deposition Transcripts	5/20/2022	Deposition Transcripts - Veritext - Witness: Mark D. Regnerus	1.00	\$ 4,383.35	\$ 4,383.35	
201	Deposition Transcripts	5/22/2022	Deposition Transcripts - Veritext - Witness: Patrick W. Lappert, MD	1.00	\$ 5,957.45	\$ 5,957.45	
202	Deposition Transcripts	5/22/2022	Deposition Transcripts - Veritext - Witness: Mark D. Regnerus	1.00	\$ 1,900.50	\$ 1,900.50	
203	Repro - Copies	5/23/2022	Reproducing documents 05/23/2022 - 15:48	2,646.00	\$ 0.14	\$ 370.44	
204	Delivery/Courier	5/23/2022	Courier Services FedEx to: GILL RAGON OWEN, BETH ECHOLS , WayBill: 903637990489 , InvoiceNum: 777125579	1.00	\$ 105.36	\$ 105.36	
205	Deposition Transcripts	5/24/2022	Deposition Transcripts - VERITEXT CORP.- Witness: Patrick W. Lappert, M.D.	1.00	\$ 2,118.00	\$ 2,118.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
206	Deposition Transcripts	5/25/2022	Deposition Transcripts - VERITEXT CORP. - Witness: Amy E. Embry	1.00	\$ 1,072.50	\$ 1,072.50	
207	Repro - Color Copier	5/25/2022	Reproducing color documents 05/25/2022 - 15:29	1,601.00	\$ 0.25	\$ 400.25	
208	Repro - Copies	5/25/2022	Reproducing documents 05/25/2022 - 15:29	631.00	\$ 0.14	\$ 88.34	
209	Deposition Transcripts	5/31/2022	Deposition Transcripts - VERITEXT CORP. - Witness: Dr. Armand Antommara	1.00	\$ 1,148.85	\$ 1,148.85	
210	Deposition Transcripts	5/31/2022	Deposition Transcripts - VERITEXT CORP.- Witness: Janet Cathey - Confidential, M.D.	1.00	\$ 189.30	\$ 189.30	
211	Repro - Copies	5/31/2022	Reproducing documents 05/31/2022 - 12:34	525.00	\$ 0.14	\$ 73.50	
212	Hard Drive Purchase (Soft Cost)	5/31/2022	Hard Drives Purchased for EDLS Billable to Client 7 16GB Thumb Drives	1.00	\$ 67.90	\$ 67.90	
213	Repro - Copies	6/9/2022	Reproducing documents 06/09/2022 - 18:01	40.00	\$ 0.14	\$ 5.60	
214	Repro - Color Copier	6/9/2022	Reproducing color documents 06/09/2022 - 18:01	11.00	\$ 0.25	\$ 2.75	
215	Repro - Color Copier	6/21/2022	Reproducing color documents 06/21/2022 - 10:31	110.00	\$ 0.25	\$ 27.50	
216	Repro - Copies	6/21/2022	Reproducing documents 06/21/2022 - 10:31	66.00	\$ 0.14	\$ 9.24	
217	Deposition Transcripts	6/24/2022	Deposition Transcripts - Rhys Branman , M.D.	1.00	\$ 2,374.10	\$ 2,374.10	
218	Hard Drive Purchase (Soft Cost)	6/30/2022	Hard Drives Purchased for EDLS Billable to Client	1.00	\$ 54.40	\$ 54.40	
219	Repro - Copies	7/18/2022	Reproducing documents 07/18/2022 - 18:21	8,836.00	\$ 0.14	\$ 1,237.04	
220	Repro - Copies	7/18/2022	Reproducing documents 07/18/2022 - 15:17	2,662.00	\$ 0.14	\$ 372.68	
221	Repro - Copies	7/18/2022	Reproducing documents 07/18/2022 - 15:04	1,372.00	\$ 0.14	\$ 192.08	
222	Repro - Binding	7/18/2022	Repro - Binding 07/18/2022 - 20:15	32.00	\$ 3.25	\$ 104.00	
223	Repro - Copies	8/9/2022	Reproducing documents 08/09/2022 - 10:19	1,598.00	\$ 0.14	\$ 223.72	
224	Outside Professional Services	8/9/2022	Professional Services Rendered - Disb B - Use to be Cost Type 238 - Asap Legal LLC - Courtesy Copy delivery with E-Filling	1.00	\$ 45.00	\$ 45.00	
225	Outside Professional Services	8/15/2022	Professional Services Rendered - Disb B - Use to be Cost Type 238 - Asap Legal LLC - E-Filling, Advance Fees, Processing Fees and Transaction Fees	1.00	\$ 57.75	\$ 57.75	
226	Office Supplies	9/16/2022	Office Supplies - STAPLES ADVANTAGE- Sticky Notes	1.00	\$ 110.66	\$ 110.66	
227	Repro - Copies	9/20/2022	Reproducing documents 09/20/2022 - 16:47	376.00	\$ 0.14	\$ 52.64	
228	Repro - Copies	9/27/2022	Reproducing documents 09/27/2022 - 16:06	1,612.00	\$ 0.14	\$ 225.68	
229	Deposition Transcripts	9/28/2022	Deposition Transcripts - VERITEXT CORP. - Witness: Janet Cathey, M.D.	1.00	\$ 170.65	\$ 170.65	
230	Delivery/Courier	9/28/2022	Courier Services FedEx to: INFORMATION NOT SUPPLIED, MICHELE HUTCHISON , WayBill: 903637999946 , InvoiceNum: 790138069	1.00	\$ 81.48	\$ 81.48	
231	Delivery/Courier	9/28/2022	Courier Services FedEx to: INFORMATION NOT SUPPLIED, LESLIE COOPER , WayBill: 903637999957 , InvoiceNum: 790138069	1.00	\$ 33.12	\$ 33.12	
232	Travel - Airfare Booking Fees	9/30/2022	Travel and expenses : Expense Type: Airfare Booking Fees Ticket Number: UA 7792773594 Air Fee Type: Booking Fee Reason for Change: Initial Booking Passenger Name: HALPERN/AVIV Business Purpose: Little Rock, AR Trial re Brandt, et al. v. Rutledge, et al. S&C Attendees: Aviv S. Halpern	1.00	\$ 51.00	\$ 51.00	
233	Delivery/Courier	10/3/2022	Courier Services UPS Package from HACHETYT to MARTI NICHOLSON, AC HOTEL BY MARRIOTT LITTLE, DOWNTOWN, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R037673291	1.00	\$ 97.16	\$ 97.16	
234	Delivery/Courier	10/3/2022	Courier Services UPS Package from HACHETYT to MARTI NICHOLSON, AC HOTEL BY MARRIOTT LITTLE, 210 WEST CAPITOL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0376047905	1.00	\$ 44.79	\$ 44.79	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
235	Delivery/Courier	10/3/2022	Courier Services UPS Package from HACHETYT to MARTI NICHOLSON, AC HOTEL BY MARRIOT LITTLE, 210 WEST CAPITOL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377139920	1.00	\$ 44.40	\$ 44.40	
236	Delivery/Courier	10/3/2022	Courier Services UPS Package from HACHETYT to MARTI NICHOLSON, AC HOTEL BY MARRIOT LITTLE, 210 WEST CAPITOL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0376778116	1.00	\$ 38.67	\$ 38.67	
237	Delivery/Courier	10/3/2022	Courier Services UPS Package from HACHETT to MARTI NICHOLSON, AC HOTEL BY MARRIOT LITTLE, 210 WEST CAPITOL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0376269336	1.00	\$ 37.82	\$ 37.82	
238	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0376255172	1.00	\$ 31.05	\$ 31.05	
239	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378774581	1.00	\$ 31.05	\$ 31.05	
240	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0376252120	1.00	\$ 27.46	\$ 27.46	
241	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377118541	1.00	\$ 26.02	\$ 26.02	
242	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378583153	1.00	\$ 26.02	\$ 26.02	
243	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378693534	1.00	\$ 26.02	\$ 26.02	
244	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377903362	1.00	\$ 22.20	\$ 22.20	
245	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378623163	1.00	\$ 22.20	\$ 22.20	
246	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377258211	1.00	\$ 22.20	\$ 22.20	
247	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377301431	1.00	\$ 22.20	\$ 22.20	
248	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0376816020	1.00	\$ 22.20	\$ 22.20	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
249	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378774956	1.00	\$ 22.20	\$ 22.20	
250	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378990383	1.00	\$ 22.20	\$ 22.20	
251	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378892006	1.00	\$ 22.20	\$ 22.20	
252	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0376941395	1.00	\$ 22.20	\$ 22.20	
253	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0376399053	1.00	\$ 22.20	\$ 22.20	
254	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377382970	1.00	\$ 22.20	\$ 22.20	
255	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377862344	1.00	\$ 22.20	\$ 22.20	
256	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378439078	1.00	\$ 22.20	\$ 22.20	
257	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0376898317	1.00	\$ 22.20	\$ 22.20	
258	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377202486	1.00	\$ 22.20	\$ 22.20	
259	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378069496	1.00	\$ 22.20	\$ 22.20	
260	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378683269	1.00	\$ 22.20	\$ 22.20	
261	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377010442	1.00	\$ 22.20	\$ 22.20	
262	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377296108	1.00	\$ 22.20	\$ 22.20	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
263	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377296108	1.00	\$ 4.80	\$ 4.80	
264	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378990383	1.00	\$ 4.80	\$ 4.80	
265	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378683269	1.00	\$ 4.80	\$ 4.80	
266	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378623163	1.00	\$ 4.80	\$ 4.80	
267	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377202486	1.00	\$ 4.80	\$ 4.80	
268	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377301431	1.00	\$ 4.80	\$ 4.80	
269	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0376941395	1.00	\$ 4.80	\$ 4.80	
270	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378439078	1.00	\$ 4.80	\$ 4.80	
271	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377010442	1.00	\$ 4.80	\$ 4.80	
272	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0376816020	1.00	\$ 4.80	\$ 4.80	
273	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378774956	1.00	\$ 4.80	\$ 4.80	
274	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377382970	1.00	\$ 4.80	\$ 4.80	
275	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377862344	1.00	\$ 4.80	\$ 4.80	
276	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0376399053	1.00	\$ 4.80	\$ 4.80	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
277	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0376898317	1.00	\$ 4.80	\$ 4.80	
278	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378892006	1.00	\$ 4.80	\$ 4.80	
279	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377118541	1.00	\$ 2.45	\$ 2.45	
280	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378693534	1.00	\$ 1.44	\$ 1.44	
281	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0378583153	1.00	\$ 1.44	\$ 1.44	
282	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0376255172	1.00	\$ 0.89	\$ 0.89	
283	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377258211	1.00	\$ 0.77	\$ 0.77	
284	Delivery/Courier	10/3/2022	Courier Services UPS Package from HAWKINS to MARTI NICHOLSON C/O, AC HOTEL MARRIOTT, 201 WEST CAPITAL AVENUE, LITTLE ROCK, AR, 72201, US, Tracking Number: 1ZA8142R0377903362	1.00	\$ 0.77	\$ 0.77	
285	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE - Laser Labels, Steno Pads, notebooks, sticky notes, writing instruments	1.00	\$ 1,044.22	\$ 1,044.22	
286	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE - Biner view 1/2 BK, STD View Binder 1 In Blk 12 Pk, Binder View 1.5 Bk and Heavy Duty View Binder 2In Blk	1.00	\$ 829.08	\$ 829.08	
287	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE - Correction Tape, Paper clips, Binder clips, Folders, Rubber Bands & File Boxes	1.00	\$ 538.29	\$ 538.29	
288	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE- Staplers, Staples, 3-Hole Punches, Mouse Pads and Clipboards	1.00	\$ 316.84	\$ 316.84	
289	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE - Erasers	1.00	\$ 307.73	\$ 307.73	
290	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE- Binder View 3 Bk and Crystal CLR RPT CVR W/Spine	1.00	\$ 264.17	\$ 264.17	
291	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE - STPLS STAN VIEW BNDR 4IN BLK	1.00	\$ 155.99	\$ 155.99	
292	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE - Heavy Duty View Binder 5IN BLK	1.00	\$ 142.03	\$ 142.03	
293	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE- Laser Labels and Writing Pads	1.00	\$ 106.54	\$ 106.54	
294	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE - Staple Removers, 2 -Hole Punch and Bookends	1.00	\$ 79.48	\$ 79.48	
295	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE- Folding Cart	1.00	\$ 52.40	\$ 52.40	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
296	Travel - Airfare Booking Fees	10/4/2022	Travel and expenses : Expense Type: Airfare Booking Fees Ticket Number: UA Air Fee Type: Booking Fee Reason for Change: Initial Booking Passenger Name: OSWELL , LAURA KABLER Business Purpose: Brandt v. Rutledge Trial in Little Rock, AR S&C Attendees: Laura Kabler Oswell	1.00	\$ 51.00	\$ 51.00	
297	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE- Dry Erase Board	1.00	\$ 49.70	\$ 49.70	
298	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE- Sheet Protector 11X8.5 3HP 100	1.00	\$ 21.50	\$ 21.50	
299	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE - Mighty Mite Electric Pencil Sharpener	1.00	\$ 16.78	\$ 16.78	
300	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE- Erasers	1.00	\$ 4.82	\$ 4.82	
301	Office Supplies	10/4/2022	Office Supplies - STAPLES ADVANTAGE - Letter Openers	1.00	\$ 3.24	\$ 3.24	
302	Office Supplies	10/5/2022	Office Supplies - STAPLES ADVANTAGE - Paper for the offsite case	1.00	\$ 1,308.03	\$ 1,308.03	
303	Office Supplies	10/5/2022	Office Supplies - Staples - Writing instruments, tape flags, tape dispensers and tape.	1.00	\$ 555.87	\$ 555.87	
304	Office Supplies	10/5/2022	Office Supplies - Staples - Highlighters	1.00	\$ 15.75	\$ 15.75	
305	Office Supplies	10/6/2022	Office Supplies - Staples - Tape gun dispensers	1.00	\$ 29.15	\$ 29.15	
306	Travel - Meals (Lunch)	10/7/2022	Travel and Expenses AC Hotel By Marriott Little Rock AR - Catering for the duration of the trial 10/07/2022 Lunch	1.00	\$ 15,645.60	\$ 15,645.60	
307	Travel - Lodging	10/7/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Meeting room for the duration of the trial 10/07/2022	1.00	\$ 8,660.00	\$ 8,660.00	
308	Travel - Lodging	10/7/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Meeting room for the duration of the trial 10/07/2022	1.00	\$ 5,034.96	\$ 5,034.96	
309	Travel - Lodging	10/7/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Meeting room for the duration of the trial 10/07/2022	1.00	\$ 5,034.96	\$ 5,034.96	
310	Travel - Lodging	10/7/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Meeting room for the duration of the trial 10/07/2022	1.00	\$ 5,034.96	\$ 5,034.96	
311	Travel - Lodging	10/7/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Meeting room for the duration of the trial 10/07/2022	1.00	\$ 5,034.96	\$ 5,034.96	
312	Travel - Lodging	10/7/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Meeting room for the duration of the trial 10/07/2022	1.00	\$ 5,034.96	\$ 5,034.96	
313	Travel - Airfare	10/7/2022	Travel and expenses WILLIAMS/ANDREW W - 10/7/2022Ticket # - 7793652516JFK/ATL/LITIQVDBY	1.00	\$ 750.35	\$ 750.35	
314	Travel - Airfare	10/7/2022	Travel and expenses NADIFI/KENZA - 10/7/2022Ticket # - 7793652525JFK/ATL/LITKYDDAM	1.00	\$ 342.35	\$ 342.35	
315	Travel - Taxi/Car Service/Shuttle	10/7/2022	Travel and expenses Travel and Expense Taxi from 1377 Lexington Ave, NYC, NY 10128 to JFK Boundary Road, Jamaica, NY 11430 PickupTime: 16:13 Passenger Name: Kenza Nadifi Purpose of Ride: Airport Voucher #: 389477 Invoice#: SC9549 Car Company: GROUP AMERICAR TRANSPORTATION LLC 01.006706.001	1.00	\$ 106.35	\$ 106.35	
316	Travel - Airfare Booking Fees	10/7/2022	Travel and expenses WILLIAMS/ANDREW W - 10/7/2022Ticket # - 7793652516JFK/ATL/LITIQVDBY	1.00	\$ 60.00	\$ 60.00	
317	Travel - Airfare Booking Fees	10/7/2022	Travel and expenses NADIFI/KENZA - 10/7/2022Ticket # - 7793652525JFK/ATL/LITKYDDAM	1.00	\$ 60.00	\$ 60.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
318	Travel - Ride Share/UBER/Lyft	10/7/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock Pickup Time: 9:30am-5:29pm Pickup Location: LIT International Airport Drop off Location: 204 W Capital AC Marriott Hotel Purpose of Ride: Airport Business Purpose: Travel to Arkansas for Trial S&C Attendees: Andrew W. Williams	1.00	\$ 21.30	\$ 21.30	
319	Travel - Meals (Breakfast)	10/7/2022	Travel and Expenses : Expense Type: Breakfast - Out of Town Name of Establishment: Fresh to Order - Concession International Location: Atlanta Time of Meal: 9:30am-5:29pm Business Purpose: Travel to Arkansas for Trial S&C Attendees: Andrew W. Williams Total Guests: 1	1.00	\$ 16.89	\$ 16.89	
320	Travel - Meals (Lunch)	10/8/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Samatha's Tap Room and Grill Location: 322 Main Street, Little Rock Time of Meal: 9:30am-5:29pm Business Purpose: Travel to Arkansas for Trial S&C Attendees: Andrew W. Williams Total Guests: 1	1.00	\$ 12.89	\$ 12.89	
321	Travel - Airfare	10/9/2022	Travel and expenses PEACOCKE/ALEXANDER - 10/9/2022Ticket # - 7788034208JFK/ATL/LIT/ATL/TPAFBYXWF	1.00	\$ 932.18	\$ 932.18	
322	Travel - Airfare	10/9/2022	Travel and expenses LLEWELLYN/CATE MARIE - 10/9/2022Ticket # - 7793652536IAD/ATL/LITAPICFD	1.00	\$ 541.09	\$ 541.09	
323	Travel - Airfare	10/9/2022	Travel and expenses : Expense Type: Airfare Air Routing: SFO-IAH/LIT Air Carrier: UA Air Class Of Service: B Ticket Number: 0167792773594 Class Of Service Reason(Departure): Business - Duration Over Five Hours Date of Travel (Departure): 10/09/2022 Passenger Name: HALPERN/AVIV Business Purpose: Little Rock, AR Trial re Brandt, et al. v. Rutledge, et al. S&C Attendees: Aviv S. Halpern	1.00	\$ 1,008.60	\$ 504.30	Amount Reduced by Half

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
324	Travel - Ride Share/UBER/Lyft	10/9/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: San Francisco Pickup Time: 10:00pm-4:59am Pickup Location: 4235 Reinhardt Dr, Oakland, CA Drop off Location: San Francisco Airport Tram San Francisco, CA Purpose of Ride: Airport Business Purpose: Little Rock, AR Trial re Brandt,, et al. v. Rutledge, et al. Lunch while traveling Dinner while traveling Trial Supplies Return Airfare - Little Rock to SFO via Dallas Ft. Worth Lyft/Uber rides S&C Attendees: Aviv S. Halpern	1.00	\$ 77.64	\$ 77.64	
325	Travel - Airfare Booking Fees	10/9/2022	Travel and expenses LLEWELLYN/CATE MARIE - 10/9/2022Ticket # - 7793652536IAD/ATL/LITAPICFD	1.00	\$ 60.00	\$ 60.00	
326	Travel - Airfare Booking Fees	10/9/2022	Travel and expenses PEACOCKE/ALEXANDER - 10/9/2022Ticket # - 7788034208JFK/ATL/LIT/ATL/TPAFBYXWF	1.00	\$ 60.00	\$ 60.00	
327	Travel - Meals (Dinner)	10/9/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: CANTINA CINCO DE MAYO Location: LITTLE ROCK Time of Meal: 5:30pm-6:59pm Business Purpose: Little Rock, AR Trial re Brandt,, et al. v. Rutledge, et al. Lunch while traveling Dinner while traveling S&C Attendees: Aviv S. Halpern Kenza Nadifi Cate M. Llewellyn Total Guests: 3	1.00	\$ 52.04	\$ 52.04	
328	Travel - Meals (Dinner)	10/9/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: Chipotle Location: Little Rock, Arkansas Time of Meal: 9:00pm-9:59pm Business Purpose: Trial in Little Rock - Arkansas S&C Attendees: Andrew W. Williams Total Guests: 1	1.00	\$ 28.92	\$ 28.92	
329	Travel - Ride Share/UBER/Lyft	10/9/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: LITTLE ROCK Pickup Time: 9:30am-5:29pm Pickup Location: 1 Airport Dr, Little Rock, AR 72201 Drop off Location: 201 W. Capitol Avenue, Little Rock, AR 7201 Purpose of Ride: Airport Business Purpose: Little Rock, AR Trial re Brandt,, et al. v. Rutledge, et al. Lunch while traveling S&C Attendees: Aviv S. Halpern	1.00	\$ 28.20	\$ 28.20	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
330	Travel - Meals (Lunch)	10/9/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Fresh 2 Order Location: Littel rock , AR Time of Meal: 9:30am-5:29pm Business Purpose: Lunch during Trial S&C Attendees: Alexander F.R. Peacocke Total Guests: 1	1.00	\$ 16.15	\$ 16.15	
331	Travel - Meals (Lunch)	10/9/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: FRESHII - HOUSTON AIRPOR Location: HOUSTON Time of Meal: 9:30am-5:29pm Business Purpose: Little Rock, AR Trial re Brandt,, et al. v. Rutledge, et al. Lunch while traveling S&C Attendees: Aviv S. Halpern Total Guests: 1	1.00	\$ 16.00	\$ 16.00	
332	Travel - Meals (Breakfast)	10/9/2022	Travel and Expenses : Expense Type: Breakfast - Out of Town Name of Establishment: KLEIN'S DELI Location: San Francisco Time of Meal: 5:00am-5:59am Business Purpose: Little Rock, AR Trial re Brandt,, et al. v. Rutledge, et al. S&C Attendees: Aviv S. Halpern Total Guests: 1	1.00	\$ 9.78	\$ 9.78	
333	Travel - Airline Extras	10/9/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 10/09/2022 Air Extra: Onboard Wireless Business Purpose: Little Rock, AR Trial re Brandt,, et al. v. Rutledge, et al. S&C Attendees: Aviv S. Halpern	1.00	\$ 8.00	\$ 8.00	
334	Travel - Airfare	10/9/2022	Travel and expenses : Expense Type: Airfare Air Routing: ewr-sju 20a Air Class Of Service: economy Ticket Number: 0061538402568 Class Of Service Reason(Departure): Economy Date of Travel (Departure): 10/09/2022 Passenger Name: PEACOCKE/ALEXANDER Business Purpose: Wifi on Plane during deposition S&C Attendees: Alexander F.R. Peacocke	1.00	\$ 5.00	\$ 5.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
335	Travel - Airfare	10/9/2022	Travel and expenses : Expense Type: Airfare Air Routing: ewr-sju 20a Air Class Of Service: economy Ticket Number: 0061538239169 Class Of Service Reason(Departure): Economy Date of Travel (Departure): 10/09/2022 Passenger Name: PEACOCKE/ALEXANDER Business Purpose: Wife on Plane during deposition S&C Attendees: Alexander F.R. Peacocke	1.00	\$ 5.00	\$ 5.00	
336	Travel - Lodging	10/10/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Andrew Williams 10/07/2022 - 10/10/2022	1.00	\$ 809.02	\$ 809.02	
337	Travel - Airfare	10/10/2022	Travel and expenses WILLIAMS/ANDREW W - 10/10/2022Ticket # - 7793652523LIT/CLT/JFKISZUIO	1.00	\$ 441.40	\$ 441.40	
338	Travel - Lodging	10/10/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Meeting room for the duration of the trial 10/10/2022	1.00	\$ 277.50	\$ 277.50	
339	Travel - Taxi/Car Service/Shuttle	10/10/2022	Travel and expenses Travel and Expense Taxi from JFK Boundary Road, Jamaica, NY 11430 to 199 North Cottage St, VALLEY STREAM, NY 11580 PickupTime: 21:45 Passenger Name: Andrew Williams Purpose of Ride: Airport Voucher #: 389555 Invoice#: SC9549 Car Company: GROUP AMERICAR TRANSPORTATION LLC 01.006706.001	1.00	\$ 174.44	\$ 174.44	
340	Travel - Airfare Booking Fees	10/10/2022	Travel and expenses WILLIAMS/ANDREW W - 10/10/2022Ticket # - 7793652523LIT/CLT/JFKISZUIO	1.00	\$ 60.00	\$ 60.00	
341	Office Supplies	10/10/2022	Office Supplies : Merchant Name: BEST BUY 275 Product Description: USB-A to USB-B cord Location: Littel Rock, Ak Business Purpose: Cord used in Trial	1.00	\$ 16.28	\$ 16.28	
342	Travel - Ride Share/UBER/Lyft	10/10/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock, Arkansas Pickup Time: 9:30am-5:29pm Pickup Location: AC Marriott Hotel Drop off Location: LIT Airport Purpose of Ride: Airport Business Purpose: Trial in Little Rock - Arkansas S&C Attendees: Andrew W. Williams	1.00	\$ 12.99	\$ 12.99	
343	Travel - Airfare	10/11/2022	Travel and expenses BODAPATI/ARUN - 10/11/2022Ticket # - 7788034239EWR/ORD/LITDMTJFX	1.00	\$ 564.52	\$ 564.52	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
344	Travel - Meals (Dinner)	10/11/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: ALLSOPP & CHAPPLE RESTAURANT Location: Little Rock Time of Meal: 8:00pm-8:59pm Business Purpose: Little Rock, AR Trial re Brandt., et al. v. Rutledge, et al. Lunch while traveling Dinner while traveling S&C Attendees: Aviv S. Halpern Alexander F.R. Peacocke Cate M. Llewellyn Kenza Nadifi Total Guests: 4	1.00	\$ 185.83	\$ 185.83	
345	Travel - Airfare Booking Fees	10/11/2022	Travel and expenses BODAPATI/ARUN - 10/11/2022Ticket # - 7788034239EWR/ORD/LITDMTJFX	1.00	\$ 60.00	\$ 60.00	
346	Publications - Hard Copies	10/11/2022	Publications - Hard Copies : Name of Publication: amazon Business Purpose: ordered for Maura Reinbrecht AP RECASS TO 513-900001-03506-01-150-18910	1.00	\$ 16.32	\$ 16.32	
347	Travel - Meals (Breakfast)	10/12/2022	Travel and Expenses AC Hotel By Marriott Little Rock AR - Catering for the duration of the trial 10/10/2022 Breakfast	1.00	\$ 1,332.80	\$ 1,332.80	
348	Travel - Airfare	10/12/2022	Travel and expenses GOLDSMITH/LAUREN M - 10/12/2022Ticket # - 7788034211LGA/ATL/LIT/ATL/LGAGBWPUW	1.00	\$ 591.89	\$ 591.89	
349	Travel - Meals (Dinner)	10/12/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: THREE FOLD DOWNTOWN Location: LITTLE ROCK Time of Meal: 5:30pm-6:59pm Business Purpose: Little Rock, AR Trial re Brandt, et al. v. Rutledge, et al. Team Dinner S&C Attendees: Aviv S. Halpern Lauren M. Goldsmith Alexander F.R. Peacocke Arun Bodapati Cate M. Llewellyn Kenza Nadifi Total Guests: 6	1.00	\$ 157.66	\$ 157.66	
350	Travel - Ride Share/UBER/Lyft	10/12/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: New York Pickup Time: 7:00am-9:29am Pickup Location: 365 Bond Street, BK, NY Drop off Location: LaGuardia Airport Purpose of Ride: Airport Business Purpose: Uber to LaGuardia S&C Attendees: Lauren M. Goldsmith	1.00	\$ 70.59	\$ 70.59	
351	Travel - Airfare Booking Fees	10/12/2022	Travel and expenses GOLDSMITH/LAUREN M - 10/12/2022Ticket # - 7788034211LGA/ATL/LIT/ATL/LGAGBWPUW	1.00	\$ 60.00	\$ 60.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
352	Travel - Airline Extras	10/12/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 10/12/2022 Air Extra: Other Business Purpose: Travel to Little Rock, AR - Baggage Receipt. This reimbursement is for the extra baggage fee for the second bag for the trip to Arkansas for trial. S&C Attendees: Lauren M. Goldsmith	1.00	\$ 30.00	\$ 30.00	
353	Travel - Meals (Lunch)	10/12/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Garbanzo's Mediterranean Grill Location: Atlanta, GA Time of Meal: 9:30am-5:29pm Business Purpose: S&C/ACLU - Attended trial. S&C Attendees: Lauren M. Goldsmith Total Guests: 1	1.00	\$ 14.46	\$ 14.46	
354	Travel - Meals (Other)	10/12/2022	Travel and Expenses : Expense Type: Meal Other - Out of Town Name of Establishment: Starbucks Location: NY Time of Meal: 9:30am-5:29pm Business Purpose: S&C/ACLU - Attended trial. S&C Attendees: Lauren M. Goldsmith Total Guests: 1	1.00	\$ 5.72	\$ 5.72	
355	Travel - Airline Extras	10/12/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 10/12/2022 Air Extra: Onboard Wireless Business Purpose: Wifi usage on the plane for travel to Arkansas for trial. S&C Attendees: Lauren M. Goldsmith	1.00	\$ 4.95	\$ 4.95	
356	Travel - Meals (Dinner)	10/13/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: The Pantry Crest Location: Little Rock, AR Time of Meal: 5:30pm-6:59pm Business Purpose: Brandt team dinner order. S&C Attendees: Lauren M. Goldsmith Arun Bodapati Alexander F.R. Peacocke Aviv S. Halpern Kenza Nadifi Cate M. Llewellyn Total Guests: 6	1.00	\$ 255.10	\$ 255.10	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
357	Travel - Meals (Dinner)	10/14/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: Rock n Roll Sushi Location: Little Rock, AR Time of Meal: 5:30pm-6:59pm Business Purpose: Team Brandt dinner order. S&C Attendees: Lauren M. Goldsmith Alexander F.R. Peacocke Arun Bodapati Aviv S. Halpern Cate M. Llewellyn Kenza Nadifi Total Guests: 6	1.00	\$ 128.57	\$ 128.57	
358	Travel - Meals (Dinner)	10/14/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: Cotijas Location: little Rock, AR Time of Meal: 10:00pm-4:59am Business Purpose: Lunch during Trial. S&C Attendees: Alexander F.R. Peacocke Lauren M. Goldsmith Aviv S. Halpern Kenza Nadifi Arun Bodapati Cate M. Llewellyn Total Guests: 6	1.00	\$ 102.37	\$ 102.37	
359	Office Supplies	10/15/2022	Office Supplies : Merchant Name: WAL-MART SUPERCENTER 1105 Product Description: trial supplies Location: LITTLE ROCK Business Purpose: Little Rock, AR Trial re Brandt,, et al. v. Rutledge, et al. Lunch while traveling Dinner while traveling Trial Supplies We had a trial team of 8 attys & 2 paralegals working out of a hotel in Little Rock, Arkansas living out of suit cases. (That lint roller was for the attys when they had to be in court.). All items on receipt were required for the entire trial team (11 people).	1.00	\$ 400.77	\$ 400.77	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
360	Travel - Meals (Dinner)	10/15/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: CAFE BOSSA NOVA Location: Little Rock Time of Meal: 8:00pm-8:59pm Business Purpose: Little Rock, AR Trial re Brandt., et al. v. Rutledge, et al. Lunch while traveling Dinner while traveling S&C Attendees: Aviv S. Halpern Lauren M. Goldsmith Alexander F.R. Peacocke Arun Bodapati Cate M. Llewellyn Kenza Nadifi Total Guests: 6	1.00	\$ 205.25	\$ 205.25	
361	Travel - Meals (Lunch)	10/15/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Fresh Bowl n Roll Bar Location: Little Rock, AR Time of Meal: 9:30am-5:29pm Business Purpose: This reimbursement is for lunch during trip to Arkansas for trial. S&C Attendees: Lauren M. Goldsmith Total Guests: 1	1.00	\$ 14.91	\$ 14.91	
362	Travel - Airfare	10/16/2022	Travel and expenses LESTER/JONATHAN G - 10/16/2022Ticket # - 7793652521LGA/ATL/LIT/ATL/LGADDMREO	1.00	\$ 727.23	\$ 727.23	
363	Travel - Airfare	10/16/2022	Travel and expenses SMITH/GREGORY - 10/16/2022Ticket # - 7773559185SFO/DFW/LIT/DFW/SFOLKEYBY	1.00	\$ 708.36	\$ 708.36	
364	Travel - Meals (Dinner)	10/16/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: Mr. Chen's Authentic Chinese Cooking Location: Little Rock, AR Time of Meal: 8:00pm-8:59pm Business Purpose: Brandt team dinner order S&C Attendees: Lauren M. Goldsmith Arun Bodapati Alexander F.R. Peacocke Aviv S. Halpern Jonathan G. Lester Gregory L. Smith Cate M. Llewellyn Kenza Nadifi Total Guests: 8	1.00	\$ 221.62	\$ 221.62	
365	Travel - Airfare Booking Fees	10/16/2022	Travel and expenses LESTER/JONATHAN G - 10/16/2022Ticket # - 7793652521LGA/ATL/LIT/ATL/LGADDMREO	1.00	\$ 60.00	\$ 60.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
366	Travel - Airline Extras	10/16/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 10/16/2022 Air Extra: Onboard Wireless Business Purpose: Wifi during first flight going to AR Trial S&C Attendees: Gregory L. Smith	1.00	\$ 15.00	\$ 15.00	
367	Travel - Airline Extras	10/16/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 10/16/2022 Air Extra: Onboard Wireless Business Purpose: Wifi during second flight going to AR Trial S&C Attendees: Gregory L. Smith	1.00	\$ 12.00	\$ 12.00	
368	Travel - Airfare Booking Fees	10/16/2022	Travel and expenses SMITH/GREGORY - 10/16/2022Ticket # - 7773559185REC/LOC/LKE/YBYLKEYBY	1.00	\$ 10.00	\$ 10.00	
369	Travel - Airfare Booking Fees	10/16/2022	Travel and expenses LESTER/JONATHAN G - 10/16/2022Ticket # - 7773559183REC/LOC/EXP/LAMEXPLAM	1.00	\$ 10.00	\$ 10.00	
370	Travel - Meals (Other)	10/16/2022	Travel and Expenses : Expense Type: Meal Other - Out of Town Name of Establishment: Starbucks Location: Little Rock, AR Time of Meal: 9:30am-5:29pm Business Purpose: Coffee at Little Rock Airport (No receipt). S&C Attendees: Jonathan G. Lester Total Guests: 1	1.00	\$ 3.60	\$ 3.60	
371	Travel - Lodging	10/17/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Kenza Nadifi 10/07/2022 - 10/17/2022	1.00	\$ 2,166.50	\$ 2,166.50	
372	Travel - Lodging	10/17/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Alexander Peacocke 10/09/2022 - 10/17/2022	1.00	\$ 1,786.90	\$ 1,786.90	
373	Travel - Lodging	10/17/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Aviv Halpern 10/09/2022 - 10/17/2022	1.00	\$ 1,735.19	\$ 1,735.19	
374	Travel - Lodging	10/17/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Cate Llewellyn 10/09/2022 - 10/17/2022	1.00	\$ 1,733.20	\$ 1,733.20	
375	Travel - Lodging	10/17/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Arun Bodapati10/11/2022 - 10/17/2022	1.00	\$ 1,299.90	\$ 1,299.90	
376	Travel - Lodging	10/17/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Lauren Goldsmith10/12/2022 - 10/17/2022	1.00	\$ 1,083.25	\$ 1,083.25	
377	Travel - Meals (Dinner)	10/17/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: RocknRoll Sushi + Hibachi Location: Little Rock Time of Meal: 7:00pm-7:59pm Business Purpose: Dinner during AR Trial S&C Attendees: Gregory L. Smith Lauren M. Goldsmith Alexander F.R. Peacocke Jonathan G. Lester Kenza Nadifi Cate M. Llewellyn Arun Bodapati Total Guests: 7	1.00	\$ 262.50	\$ 262.50	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
378	Travel - Lodging	10/17/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Jonathan Lester 10/16/2022 - 10/17/2022	1.00	\$ 216.65	\$ 216.65	
379	Travel - Lodging	10/17/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Gregory Smith 10/16/2022 - 10/22/2022	1.00	\$ 216.65	\$ 216.65	
380	Travel - Lodging	10/17/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Gregory Smith 10/16/2022 - 10/17/2022	1.00	\$ 216.65	\$ 216.65	
381	Travel - Sundry/Tips Out of Pocket (Non-Meals)/Other Expenses	10/17/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Valet Parking at Hotel for Alexander Peacocke 10/09/2022 - 10/17/2022	1.00	\$ 200.00	\$ 200.00	
382	Travel - Meals (Other)	10/17/2022	Travel and Expenses AC FRANCHISED C66 Little Rock AR - Snacks at Hotel for Kenza Nadifi 10/07/2022 - 10/17/2022	1.00	\$ 19.62	\$ 19.62	
383	Travel - Meals (Dinner)	10/17/2022	Travel and Expenses AC FRANCHISED C66 Little Rock AR - Meal at the Hotel stay for Aviv Halpern 10/09/2022 - 10/17/2022	1.00	\$ 17.99	\$ 17.99	
384	Travel - Meals (Other)	10/17/2022	Travel and Expenses AC FRANCHISED C66 Little Rock AR - Snacks at the Hotel stay for Cate Llewellyn 10/09/2022 - 10/17/2022	1.00	\$ 17.99	\$ 17.99	
385	Travel - Ride Share/UBER/Lyft	10/17/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock Pickup Time: 7:00pm-7:59pm Pickup Location: 201 W Capitol Ave Little Rock, AR Drop off Location: 2701 Kavanaugh Blvd, Little Rock, AR Purpose of Ride: Other Business Purpose: Little Rock, AR Trial re Brandt,, et al. v. Rutledge, et al. Lunch while traveling Dinner while traveling Trial Supplies Return Airfare - Little Rock to SFO via Dallas Ft. Worth Lyft/Uber rides Trial Team Dinner S&C Attendees: Aviv S. Halpern	1.00	\$ 15.45	\$ 15.45	
386	Travel - Meals (Lunch)	10/18/2022	Travel and Expenses AC Hotel By Marriott Little Rock AR - Catering for the duration of the trial - Lunch 10/18/2022	1.00	\$ 2,065.85	\$ 2,065.85	
387	Travel - Airfare	10/18/2022	Travel and expenses : Expense Type: Airfare Air Routing: SFO-DEN/LIT Air Carrier: UA Air Class Of Service: B Ticket Number: 0167862398438 Class Of Service Reason(Departure): First/Premium - Free Upgrade Date of Travel (Departure): 10/18/2022 Passenger Name: OSWELL/LAURA KABLER Business Purpose: Brandt v. Rutledge Trial in Little Rock, AR S&C Attendees: Laura Kabler Oswell	1.00	\$ 1,073.35	\$ 536.68	Amount Reduced by Half
388	Travel - Airfare	10/18/2022	Travel and expenses MATTHEW/MAXIME D - 10/18/2022Ticket # - 7793652518EWR/ATL/LIT/ATL/JFKVOHXPW	1.00	\$ 521.88	\$ 521.88	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
389	Travel - Meals (Dinner)	10/18/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: Cafe Bossa Nova Location: Little Rock Time of Meal: 5:30pm-6:59pm Business Purpose: Dinner during AR Trial S&C Attendees: Gregory L. Smith Cate M. Llewellyn Kenza Nadifi Jonathan G. Lester Lauren M. Goldsmith Arun Bodapati Aviv S. Halpern Maxime D. Matthew Total Guests: 8	1.00	\$ 395.94	\$ 395.94	
390	Travel - Taxi/Car Service/Shuttle	10/18/2022	Travel and expenses Travel and Expense Taxi from 1208 Pacific St, BROOKLYN, NY 11216 to EWR Newark Airport, Newark, NJ 07114 PickupTime: 03:30 Passenger Name: Maxime Matthew Purpose of Ride: Airport Voucher #: 453603 Invoice#: SC9558 Car Company: DIAL CAR INC. 01.004502.001	1.00	\$ 147.97	\$ 147.97	
391	Publications - Electronic	10/18/2022	Publications - Electronic : Name of Publication: Elsevier Ltd. Business Purpose: Journal for research purposes for the ACLU-Gender-Affirming Medical Care case	1.00	\$ 94.50	\$ 94.50	
392	Travel - Airfare Booking Fees	10/18/2022	Travel and expenses MATTHEW/MAXIME D - 10/18/2022Ticket # - 7793652518EWR/ATL/LIT/ATL/JFKVOHXPW	1.00	\$ 60.00	\$ 60.00	
393	Travel - Airfare Booking Fees	10/18/2022	Travel and expenses MATTHEW/MAXIME D - 10/18/2022Ticket # - 7793652518LIT/ATL/LGAVOHXPW	1.00	\$ 60.00	\$ 60.00	
394	Travel - Airfare Booking Fees	10/18/2022	Travel and expenses : Expense Type: Airfare Booking Fees Ticket Number: XD 0828873280 Air Fee Type: Booking Fee Reason for Change: Initial Booking Passenger Name: OSWELL , LAURA KABLER Business Purpose: Brandt v. Rutledge Trial in Little Rock, A S&C Attendees: Laura Kabler Oswell	1.00	\$ 51.00	\$ 51.00	
395	Travel - Airline Extras	10/18/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 10/18/2022 Air Extra: Additional Baggage Business Purpose: Delta airline baggage charge. S&C Attendees: Maxime D. Matthew	1.00	\$ 30.00	\$ 30.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
396	Travel - Meals (Breakfast)	10/18/2022	Travel and Expenses : Expense Type: Breakfast - Out of Town Name of Establishment: STARBUCKS 800-782-7282 Location: Newark, NJ Time of Meal: 5:00am-5:59am Business Purpose: Starbucks for breakfast while on trip for trial. S&C Attendees: Maxime D. Matthew Total Guests: 1	1.00	\$ 25.00	\$ 25.00	
397	Travel - Meals (Breakfast)	10/18/2022	Travel and Expenses : Expense Type: Breakfast - Out of Town Name of Establishment: STARBUCKS 800-782-7282 Location: Newark, NJ Time of Meal: 5:00am-5:59am Business Purpose: Starbucks for breakfast while on trip for trial. S&C Attendees: Maxime D. Matthew Total Guests: 1	1.00	\$ 10.00	\$ 10.00	
398	Travel - Airfare	10/18/2022	Travel and expenses MATTHEW/MAXIME D - 10/18/2022Ticket # - 7863106613LIT/ATL/EWRVOHXPW	1.00	\$ (180.03)	\$ (180.03)	
399	Travel - Ride Share/UBER/Lyft	10/19/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock Pickup Time: 9:00pm-9:59pm Pickup Location: Little Rock Airport, Little Rock, AR Drop off Location: 201 West Capitol; Ave., Little Rock, AR 72201 Purpose of Ride: Airport Business Purpose: Brandt v. Rutledge Trial in Little Rock, A S&C Attendees: Laura Kabler Oswell	1.00	\$ 51.75	\$ 51.75	
400	Travel - Car Rental	10/19/2022	Travel and expenses : Expense Type: Car Rental Fuel Out of Pocket - Out of Town Business Purpose: Gas for car during trial	1.00	\$ 45.40	\$ 45.40	
401	Travel - Meals (Dinner)	10/20/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: The Root Cafe Location: Little Rock Time of Meal: 9:30am-5:29pm Business Purpose: Dinner during AR Trial S&C Attendees: Gregory L. Smith Lauren M. Goldsmith Alexander F.R. Peacocke Aviv S. Halpern Maxime D. Matthew Jonathan G. Lester Kenza Nadifi Cate M. Llewellyn Arun Bodapati Laura Kabler Oswell Total Guests: 10	1.00	\$ 359.75	\$ 359.75	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
402	Travel - Ride Share/UBER/Lyft	10/20/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock, AR Pickup Time: 8:00pm-8:59pm Pickup Location: InTransitive Drop off Location: AC Hotel Purpose of Ride: Other Business Purpose: Lyft from Client Event to Hotel S&C Attendees: Jonathan G. Lester	1.00	\$ 33.78	\$ 33.78	
403	Travel - Car Rental	10/21/2022	Travel and expenses : Expense Type: Car Rental Agency Invoice - Out of Town Car Rental Date: 10/09/2022 Car Return Date: 10/21/2022 Car Rental Days: 12.00 Vehicle Class: Compact Pickup Location (City): Littel Rock , AR Business Purpose: car during trial	1.00	\$ 1,547.89	\$ 1,547.89	
404	Travel - Airfare	10/21/2022	Travel and expenses : Expense Type: Airfare Air Routing: LIT-DFW/SFO Air Carrier: AA Air Class Of Service: B Ticket Number: 0017865265923 Class Of Service Reason(Departure): First/Premium - Duration Over Five Hours/No Business Class Offered Date of Travel (Departure): 10/21/2022 Passenger Name: SMITH/GREGORY Business Purpose: Brandt v. Rutledge Trial in Little Rock, A S&C Attendees: Laura Kabler Oswell	1.00	\$ 2,180.52	\$ 1,090.26	Amount Reduced by Half
405	Travel - Airfare	10/21/2022	Travel and expenses NADIFI/KENZA - 10/21/2022Ticket # - 7863106617LIT/ATL/EWRVESUNX	1.00	\$ 685.10	\$ 685.10	
406	Travel - Airfare	10/21/2022	Travel and expenses LLEWELLYN/CATE MARIE - 10/21/2022Ticket # - 7863106616LIT/ATL/EWRGXOALT	1.00	\$ 685.10	\$ 685.10	
407	Travel - Airfare	10/21/2022	Travel and expenses : Expense Type: Airfare Air Routing: LIT/DEN/SFO Air Carrier: UA Air Class Of Service: B Ticket Number: 0167865265734 Class Of Service Reason(Departure): Economy Date of Travel (Departure): 10/21/2022 Passenger Name: OSWELL/LAURA KABLER Business Purpose: Brandt v. Rutledge Trial in Little Rock, A S&C Attendees: Laura Kabler Oswell	1.00	\$ 931.80	\$ 465.90	Amount Reduced by Half

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
408	Travel - Airfare	10/21/2022	Travel and expenses : Expense Type: Airfare Air Routing: LIT-DFW/SFO Air Carrier: AA Air Class Of Service: Y Ticket Number: 0017865265930 Class Of Service Reason(Departure): Economy Date of Travel (Departure): 10/21/2022 Passenger Name: HALPERN/AVIV Business Purpose: Little Rock, AR Trial re Brandt,, et al. v. Rutledge, et al. Lunch while traveling Dinner while traveling Trial Supplies Return Airfare - Little Rock to SFO via Dallas Ft. Worth S&C Attendees: Aviv S. Halpern	1.00	\$ 448.53	\$ 448.53	
409	Travel - Airfare	10/21/2022	Travel and expenses LESTER/JONATHAN G - 10/21/2022Ticket # - 7863106615LIT/ATL/EWRDDMREO	1.00	\$ 348.48	\$ 348.48	
410	Travel - Meals (Breakfast)	10/21/2022	Travel and Expenses : Expense Type: Breakfast - Out of Town Name of Establishment: KeiHiro Hibachi and Sushi Location: Little Rock Time of Meal: 7:00am-9:29am Business Purpose: Breakfast during AR Trial S&C Attendees: Gregory L. Smith Cate M. Llewellyn Kenza Nadifi Jonathan G. Lester Maxime D. Matthew Aviv S. Halpern Alexander F.R. Peacocke Lauren M. Goldsmith Arun Bodapati Laura Kabler Oswell Total Guests: 10	1.00	\$ 283.53	\$ 283.53	
411	Travel - Airfare	10/21/2022	Travel and expenses : Expense Type: Airfare Air Routing: LIT-IAH/SFO Air Carrier: UA Air Class Of Service: Y Ticket Number: 0167865265893 Class Of Service Reason(Departure): Economy Date of Travel (Departure): 10/21/2022 Passenger Name: OSWELL/LAURA KABLER Business Purpose: Brandt v. Rutledge Trial in Little Rock, A S&C Attendees: Laura Kabler Oswell	1.00	\$ 226.80	\$ 226.80	
412	Travel - Airfare	10/21/2022	Travel and expenses PEACOCKE/ALEXANDER - 10/21/2022Ticket # - 7863106611LIT/ATL/EWRFBYXWF	1.00	\$ 213.44	\$ 213.44	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
413	Travel - Meals (Other)	10/21/2022	Travel and Expenses : Expense Type: Meal Other - Out of Town Name of Establishment: Chilis Location: Littel Rock, AR Time of Meal: 9:30am-5:29pm Business Purpose: Drink at Airport with Team during trial S&C Attendees: Alexander F.R. Peacocke Lauren M. Goldsmith Aviv S. Halpern Cate M. Llewellyn Arun Bodapati Jonathan G. Lester Maxime D. Matthew Total Guests: 7	1.00	\$ 130.31	\$ 130.31	
414	Travel - Ride Share/UBER/Lyft	10/21/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock Pickup Time: 9:30am-5:29pm Pickup Location: 201 West Capitol Avenue, Little Rock, AR 72201 Drop off Location: Little Rock Airport, Little Rock, AR Purpose of Ride: Airport Business Purpose: Brandt v. Rutledge Trial in Little Rock, A S&C Attendees: Laura Kabler Oswell	1.00	\$ 92.00	\$ 92.00	
415	Travel - Airfare Booking Fees	10/21/2022	Travel and expenses LLEWELLYN/CATE MARIE - 10/21/2022Ticket # - 7863106616LIT/ATL/EWRG XOALT	1.00	\$ 60.00	\$ 60.00	
416	Travel - Airfare Booking Fees	10/21/2022	Travel and expenses NADIFI/KENZA - 10/21/2022Ticket # - 7863106617LIT/ATL/EWRVESUNX	1.00	\$ 60.00	\$ 60.00	
417	Travel - Airfare Booking Fees	10/21/2022	Travel and expenses LESTER/JONATHAN G - 10/21/2022Ticket # - 7863106615LIT/ATL/EWRDDMREO	1.00	\$ 60.00	\$ 60.00	
418	Travel - Airfare Booking Fees	10/21/2022	Travel and expenses PEACOCKE/ALEXANDER - 10/21/2022Ticket # - 7863106611LIT/ATL/EWRFBYXWF	1.00	\$ 60.00	\$ 60.00	
419	Travel - Airfare Booking Fees	10/21/2022	Travel and expenses GOLDSMITH/LAUREN M - 10/21/2022Ticket # - 7863106612LIT/ATL/EWRGBWPUW	1.00	\$ 60.00	\$ 60.00	
420	Travel - Airfare Booking Fees	10/21/2022	Travel and expenses BODAPATI/ARUN - 10/21/2022Ticket # - 7863106614LIT/ATL/EWRDMUICE	1.00	\$ 60.00	\$ 60.00	
421	Travel - Airfare Booking Fees	10/21/2022	Travel and expenses MATTHEW/MAXIME D - 10/21/2022Ticket # - 7863106613LIT/ATL/EWRVOHXPW	1.00	\$ 60.00	\$ 60.00	
422	Travel - Airfare Booking Fees	10/21/2022	Travel and expenses : Expense Type: Airfare Booking Fees Air Carrier: AA Ticket Number: AA 7865265930 Air Fee Type: Booking Fee Reason for Change: Firm Directed Passenger Name: HALPERN / AVIV Business Purpose: Little Rock, AR Trial re Brandt,, et al. v. Rutledge, et al. Lunch while traveling Dinner while traveling Trial Supplies Return Airfare - Little Rock to SFO via Dallas Ft. Worth S&C Attendees: Aviv S. Halpern	1.00	\$ 51.00	\$ 51.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
423	Travel - Airfare Booking Fees	10/21/2022	Travel and expenses : Expense Type: Airfare Booking Fees Ticket Number: XD 0828873294 Air Fee Type: Booking Fee Reason for Change: Initial Booking Passenger Name: SMITH/GREGORY Business Purpose: Brandt v. Rutledge Trial in Little Rock, A S&C Attendees: Laura Kabler Oswell	1.00	\$ 51.00	\$ 51.00	
424	Travel - Airfare Booking Fees	10/21/2022	Travel and expenses : Expense Type: Airfare Booking Fees Ticket Number: 0828735339 Air Fee Type: Booking Fee Reason for Change: Initial Booking Passenger Name: OSWELL , LAURA KABLER Business Purpose: Brandt v. Rutledge Trial in Little Rock, A S&C Attendees: Laura Kabler Oswell	1.00	\$ 51.00	\$ 51.00	
425	Travel - Meals (Dinner)	10/21/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: SSP America Flying Saucer Lounge Location: Dallas-Fort Worth Time of Meal: 8:00pm-8:59pm Business Purpose: Little Rock, AR Trial re Brandt,, et al. v. Rutledge, et al. Lunch while traveling Dinner while traveling Trial Supplies S&C Attendees: Aviv S. Halpern Gregory L. Smith Total Guests: 2	1.00	\$ 48.03	\$ 48.03	
426	Travel - Airfare	10/21/2022	Travel and expenses GOLDSMITH/LAUREN M - 10/21/2022Ticket # - 7863106612LIT/ATL/EWRGBWPUW	1.00	\$ 46.30	\$ 46.30	
427	Travel - Meals (Dinner)	10/21/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: ATL AIRP ATL TODAY D10/DR Location: Atlanta Time of Meal: 10:00pm-4:59am Business Purpose: Purchased waters and snacks for myself, Lauren Goldsmith, and Arun Bodapati. S&C Attendees: Maxime D. Matthew Arun Bodapati Lauren M. Goldsmith Total Guests: 3	1.00	\$ 36.83	\$ 36.83	
428	Travel - Airline Extras	10/21/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 10/21/2022 Air Extra: Additional Baggage Business Purpose: Checked bag fee for changed flight out of Little Rock. Initial flight was canceled due to extenuating circumstances. S&C Attendees: Jonathan G. Lester	1.00	\$ 30.00	\$ 30.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
429	Travel - Airline Extras	10/21/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 10/21/2022 Air Extra: Additional Baggage Business Purpose: S&C/ACLU - Attended trial. S&C Attendees: Lauren M. Goldsmith	1.00	\$ 30.00	\$ 30.00	
430	Travel - Meals (Other)	10/21/2022	Travel and Expenses : Expense Type: Meal Other - Out of Town Name of Establishment: Starbucks Location: NY Time of Meal: 9:30am-5:29pm Business Purpose: S&C/ACLU - Attended trial. S&C Attendees: Lauren M. Goldsmith Total Guests: 1	1.00	\$ 12.39	\$ 12.39	
431	Travel - Meals (Lunch)	10/21/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: STARBUCKS 800-782-7282 Location: Little Rock, Arkansas Time of Meal: 9:30am-5:29pm Business Purpose: Starbucks for lunch with Arun Bodapati while on trip for trial. S&C Attendees: Maxime D. Matthew Arun Bodapati Total Guests: 2	1.00	\$ 10.00	\$ 10.00	
432	Travel - Meals (Other)	10/21/2022	Travel and Expenses : Expense Type: Meal Other - Out of Town Name of Establishment: STARBUCKS 800-782-7282 Location: Little Rock, Arkansas Time of Meal: 9:30am-5:29pm Business Purpose: Starbucks for lunch during trip for trial. S&C Attendees: Maxime D. Matthew Total Guests: 1	1.00	\$ 10.00	\$ 10.00	
433	Travel - Meals (Other)	10/21/2022	Travel and Expenses : Expense Type: Meal Other - Out of Town Name of Establishment: Delta Air Lines Location: Atlanta Time of Meal: 10:00pm-4:59am Business Purpose: Drinks on plane from ATL to Newark (no receipt). S&C Attendees: Jonathan G. Lester Cate M. Llewellyn Total Guests: 2	1.00	\$ 10.00	\$ 10.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
434	Travel - Meals (Other)	10/21/2022	Travel and Expenses : Expense Type: Meal Other - Out of Town Name of Establishment: Delta Air Lines Location: Atlanta Time of Meal: 10:00pm-4:59am Business Purpose: Drinks on plane from ATL to Newark (no receipt). S&C Attendees: Jonathan G. Lester Cate M. Llewellyn Total Guests: 2	1.00	\$ 9.00	\$ 9.00	
435	Travel - Lodging	10/22/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Alexander Peacocke 10/17/2022 - 10/22/2022	1.00	\$ 1,301.20	\$ 1,301.20	
436	Travel - Lodging	10/22/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Arun Bodapati 10/17/2022 - 10/22/2022	1.00	\$ 1,083.25	\$ 1,083.25	
437	Travel - Lodging	10/22/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Jonathan Lester 10/17/2022 - 10/22/2022	1.00	\$ 1,083.25	\$ 1,083.25	
438	Travel - Lodging	10/22/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Gregory Smith 10/16/2022 - 10/22/2022	1.00	\$ 1,083.25	\$ 1,083.25	
439	Travel - Lodging	10/22/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Lauren Goldsmith 10/17/2022 - 10/22/2022	1.00	\$ 1,083.25	\$ 1,083.25	
440	Travel - Airfare	10/22/2022	Travel and expenses BODAPATI/ARUN - 10/22/2022 Ticket # - 7863106591LIT/ATL/EWRDMUICE	1.00	\$ 375.58	\$ 375.58	
441	Travel - Airfare	10/22/2022	Travel and expenses GOLDSMITH/LAUREN M - 10/22/2022 Ticket # - 7863106589LIT/ATL/LGAGBWPUW	1.00	\$ 287.88	\$ 287.88	
442	Travel - Airfare	10/22/2022	Travel and expenses PEACOCKE/ALEXANDER - 10/22/2022 Ticket # - 7863106596LIT/ATL/JFKFBYXWF	1.00	\$ 211.08	\$ 211.08	
443	Travel - Sundry/Tips Out of Pocket (Non-Meals)/Other Expenses	10/22/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Valet Parking at Hotel for Alexander Peacocke 10/17/2022 - 10/22/2022	1.00	\$ 125.00	\$ 125.00	
444	Travel - Airfare Booking Fees	10/22/2022	Travel and expenses WILLIAMS/ANDREW W - 10/22/2022 Ticket # - 7863106599JFK/ATL/LIT/ATL/JFKCOXOPM	1.00	\$ 60.00	\$ 60.00	
445	Travel - Airfare Booking Fees	10/22/2022	Travel and expenses PEACOCKE/ALEXANDER - 10/22/2022 Ticket # - 7863106596LIT/ATL/JFKFBYXWF	1.00	\$ 60.00	\$ 60.00	
446	Travel - Airfare Booking Fees	10/22/2022	Travel and expenses GOLDSMITH/LAUREN M - 10/22/2022 Ticket # - 7863106589LIT/ATL/LGAGBWPUW	1.00	\$ 60.00	\$ 60.00	
447	Travel - Airfare Booking Fees	10/22/2022	Travel and expenses BODAPATI/ARUN - 10/22/2022 Ticket # - 7863106591LIT/ATL/EWRDMUICE	1.00	\$ 60.00	\$ 60.00	
448	Travel - Airfare Booking Fees	10/22/2022	Travel and expenses WILLIAMS/ANDREW W - 10/22/2022 Ticket # - 7863106592JFK/ATL/LIT/ATL/EWRCOXOPM	1.00	\$ 60.00	\$ 60.00	
449	Travel - Airline Extras	10/22/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 10/22/2022 Air Extra: Additional Baggage Business Purpose: Delta airline baggage charge re trial S&C Attendees: Maxime D. Matthew	1.00	\$ 30.00	\$ 30.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
450	Travel - Airline Extras	10/22/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 10/22/2022 Air Extra: Additional Baggage Business Purpose: Checked bag fee for initial flight out of Little Rock. Flight was canceled due to extenuating circumstances. S&C Attendees: Jonathan G. Lester	1.00	\$ 30.00	\$ 30.00	
451	Travel - Airline Extras	10/22/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 10/22/2022 Air Extra: Onboard Wireless Business Purpose: Wifi during third flight during AR Trial S&C Attendees: Gregory L. Smith	1.00	\$ 19.00	\$ 19.00	
452	Travel - Sundry/Tips Out of Pocket (Non-Meals)/Other Expenses	10/22/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Valet at Hotel for Gregory Smith 10/16/2022 - 10/22/2022	1.00	\$ 14.14	\$ 14.14	
453	Travel - Lodging	10/23/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Aviv Halpern 10/17/2022 - 10/23/2022	1.00	\$ 1,299.90	\$ 1,299.90	
454	Travel - Lodging	10/23/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Maxime Matthew 10/18/2022 - 10/23/2022	1.00	\$ 1,083.25	\$ 1,083.25	
455	Travel - Airfare	10/23/2022	Travel and expenses WILLIAMS/ANDREW W - 10/23/2022Ticket # - 7863106631JFK/CLT/LIT/CLT/JFKBDPOMS	1.00	\$ 775.18	\$ 775.18	
456	Travel - Airfare	10/23/2022	Travel and expenses MATTHEW/MAXIME D - 10/23/2022Ticket # - 7863106595LIT/ATL/LGAVOHPW	1.00	\$ 519.97	\$ 519.97	
457	Travel - Ride Share/UBER/Lyft	10/23/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: San Francisco Pickup Time: 10:00pm-4:59am Pickup Location: San Francisco Airport Tram San Francisco, CA Drop off Location: 4216 Reinhardt Dr, Oakland, CA Purpose of Ride: Home Business Purpose: Little Rock, AR Trial re Brandt,, et al. v. Rutledge, et al. Lunch while traveling Dinner while traveling Trial Supplies Return Airfare - Little Rock to SFO via Dallas Ft. Worth Lyft/Uber rides Trial Team Dinner S&C Attendees: Aviv S. Halpern	1.00	\$ 85.76	\$ 85.76	
458	Travel - Airfare Booking Fees	10/23/2022	Travel and expenses WILLIAMS/ANDREW W - 10/23/2022Ticket # - 7863106631JFK/CLT/LIT/CLT/JFKBDPOMS	1.00	\$ 60.00	\$ 60.00	
459	Travel - Airfare Booking Fees	10/23/2022	Travel and expenses RICHARDSON/DANIEL J - 10/23/2022Ticket # - 7793652529PIT/DFW/LITUTDRLE	1.00	\$ 60.00	\$ 60.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
460	Travel - Ride Share/UBER/Lyft	10/23/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock Pickup Time: 9:30am-5:29pm Pickup Location: 1 Airport Rd, Little Rock, AR 72202 Drop off Location: 201 W Capitol Ave, Little Rock, AR 72201 Purpose of Ride: Airport Business Purpose: Trial in Little Rock - Arkansas S&C Attendees: Andrew W. Williams	1.00	\$ 26.92	\$ 26.92	
461	Travel - Sundry/Tips Out of Pocket (Non-Meals)/Other Expenses	10/23/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Valet at Hotel stay for Maxime Matthew 10/18/2022 - 10/23/2022	1.00	\$ 26.12	\$ 26.12	
462	Travel - Meals (Lunch)	10/23/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Brookwood Farms Location: Chorlette Time of Meal: 9:30am-5:29pm Business Purpose: Trial in Little Rock - Arkansas S&C Attendees: Andrew W. Williams Total Guests: 1	1.00	\$ 25.42	\$ 25.42	
463	Travel - Lodging	10/24/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Cate Llewellyn 10/17/2022 - 10/24/2022	1.00	\$ 1,516.55	\$ 1,516.55	
464	Travel - Lodging	10/24/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Kenza Nadifi 10/17/2022 - 10/24/2022	1.00	\$ 1,516.55	\$ 1,516.55	
465	Travel - Lodging	10/24/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Laura Oswell 10/18/2022 - 10/24/2022	1.00	\$ 1,431.29	\$ 1,431.29	
466	Travel - Sundry/Tips Out of Pocket (Non-Meals)/Other Expenses	10/24/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Valet at Hotel stay for Kenza Nadifi 10/17/2022 - 10/24/2022	1.00	\$ 60.96	\$ 60.96	
467	Travel - Sundry/Tips Out of Pocket (Non-Meals)/Other Expenses	10/24/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Valet at the Hotel stay for Cate Llewellyn 10/17/2022 - 10/24/2022	1.00	\$ 38.38	\$ 38.38	
468	Delivery/Courier	10/24/2022	Courier Services FedEx to: C/O SULLIVAN & CROMWELL/ AC LI, MARTI NICHOLSON/ANDREW WILLIAM , WayBill: 903638002316 , InvoiceNum: 792992793	1.00	\$ 27.27	\$ 27.27	
469	Travel - Meals (Lunch)	10/24/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Samatha's Location: Little Rock Time of Meal: 9:30am-5:29pm Business Purpose: Trial in Little Rock - Arkansas S&C Attendees: Andrew W. Williams Total Guests: 1	1.00	\$ 17.59	\$ 17.59	
470	Travel - Lodging	10/25/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Andrew Williams 10/21/2022 - 10/25/2022	1.00	\$ 1,021.58	\$ 1,021.58	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
471	Travel - Meals (Lunch)	10/25/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Great American Bagel Location: Little Rock Time of Meal: 9:30am-5:29pm Business Purpose: Trial in Little Rock - Arkansas S&C Attendees: Andrew W. Williams Total Guests: 1	1.00	\$ 15.79	\$ 15.79	
472	Travel - Ride Share/UBER/Lyft	10/25/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock Pickup Time: 9:30am-5:29pm Pickup Location: 201 W Capitol Ave, Little Rock, AR 72201 Drop off Location: 1 Airport Rd, Little Rock, AR 72202 Purpose of Ride: Airport Business Purpose: Trial in Little Rock - Arkansas S&C Attendees: Andrew W. Williams	1.00	\$ 9.93	\$ 9.93	
473	Delivery/Courier	10/26/2022	Courier Services UPS Package from WILLIAMS to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 100042, US, Tracking Number: 1ZA8142R9076583967	1.00	\$ 24.22	\$ 24.22	
474	Delivery/Courier	10/26/2022	Courier Services UPS Package from WILLIAMS to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 100042, US, Tracking Number: 1ZA8142R9076447757	1.00	\$ 24.22	\$ 24.22	
475	Delivery/Courier	10/26/2022	Courier Services UPS Package from to Little Rock, AR to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 100042, US, Tracking Number: 1ZA8142R9076927149	1.00	\$ 24.22	\$ 24.22	
476	Delivery/Courier	10/26/2022	Courier Services UPS Package from WILLIAMS to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 100042, US, Tracking Number: 1ZA8142R9076111770	1.00	\$ 24.22	\$ 24.22	
477	Delivery/Courier	10/26/2022	Courier Services UPS Package from WILLIAMS to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 100042, US, Tracking Number: 1ZA8142R9077859015	1.00	\$ 24.22	\$ 24.22	
478	Delivery/Courier	10/26/2022	Courier Services UPS Package from WILLIAMS to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 100042, US, Tracking Number: 1ZA8142R907767187	1.00	\$ 24.22	\$ 24.22	
479	Delivery/Courier	10/26/2022	Courier Services UPS Package from WILLIAMS to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 100042, US, Tracking Number: 1ZA8142R9077584820	1.00	\$ 24.22	\$ 24.22	
480	Delivery/Courier	10/26/2022	Courier Services UPS Package from WILLIAMS to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 100042, US, Tracking Number: 1ZA8142R9076846192	1.00	\$ 24.22	\$ 24.22	
481	Delivery/Courier	10/26/2022	Courier Services UPS Package from WILLIAMS to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 100042, US, Tracking Number: 1ZA8142R9076804807	1.00	\$ 24.22	\$ 24.22	
482	Delivery/Courier	10/26/2022	Courier Services UPS Package from WILLIAMS to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 10004, US, Tracking Number: 1ZA8142R9076447757	1.00	\$ 4.06	\$ 4.06	
483	Delivery/Courier	10/26/2022	Courier Services UPS Package from WILLIAMS to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 10004, US, Tracking Number: 1ZA8142R9077859015	1.00	\$ 4.06	\$ 4.06	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
484	Delivery/Courier	10/26/2022	Courier Services UPS Package from WILLIAMS to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 10004, US, Tracking Number: 1ZA8142R9077767187	1.00	\$ 4.06	\$ 4.06	
485	Delivery/Courier	10/26/2022	Courier Services UPS Package from WILLIAMS to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 10004, US, Tracking Number: 1ZA8142R9076804807	1.00	\$ 4.06	\$ 4.06	
486	Outside Reproduction	10/27/2022	Reproducing Documents - XEROX CORPORATION	1.00	\$ 4,022.07	\$ 4,022.07	
487	Outside Reproduction	10/27/2022	Reproducing Documents - XEROX CORPORATION	1.00	\$ 1,348.42	\$ 1,348.42	
488	Delivery/Courier	10/27/2022	Courier Services UPS Package from Little Rock, AR to AVIV HALPERN, SULLIVAN AND CROMWELL LLP, 1870 EMBARCADERO ROAD, PALO ALTO, CA, 94303, US, Tracking Number: 1ZA8142R9078137105	1.00	\$ 29.23	\$ 29.23	
489	Travel - Airfare	10/29/2022	Travel and expenses BODAPATI/ARUN - 10/29/2022Ticket # - 7788034240LIT/ATL/EWRDMUICE	1.00	\$ 174.52	\$ 174.52	
490	Travel - Airfare Booking Fees	10/29/2022	Travel and expenses BODAPATI/ARUN - 10/29/2022Ticket # - 7788034240LIT/ATL/EWRDMUICE	1.00	\$ 60.00	\$ 60.00	
491	Travel - Airfare Booking Fees	10/29/2022	Travel and expenses : Expense Type: Airfare Booking Fees Air Carrier: UA Ticket Number: XD 0841033012 Air Fee Type: Booking Fee Reason for Change: Initial Booking Passenger Name: AVIV HALPERN Business Purpose: 2nd 1/2 of trial beginning 11/28/22 re Brandt, et al. v. Rutledge et al S&C Attendees: Aviv S. Halpern	1.00	\$ 51.00	\$ 51.00	
492	Travel - Airfare Booking Fees	10/30/2022	Travel and expenses RICHARDSON/DANIEL J - 10/30/2022Ticket # - 7793652530LIT/IAH/DCABVUWQZ	1.00	\$ 60.00	\$ 60.00	
493	Travel - Lodging	10/31/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Hotel stay for Andrew Williams 10/17/2022 - 10/21/2022	1.00	\$ 866.60	\$ 866.60	
494	Travel - Airfare Booking Fees	10/31/2022	Travel and expenses WILLIAMS/ANDREW W - 10/31/2022Ticket # - BDP/OMSBDPOMS	1.00	\$ 16.00	\$ 16.00	
495	Outside Professional Services	11/3/2022	Professional Services Rendered - Disb B - Use to be Cost Type 238 - 65 gallon tote	1.00	\$ 175.73	\$ 175.73	
496	Outside Professional Services	11/3/2022	Professional Services Rendered - Disb B - Use to be Cost Type 238 - Delivery charge 1 65 gal	1.00	\$ 175.73	\$ 175.73	
497	Repro - Copies	11/8/2022	Reproducing documents 11/08/2022 - 18:49	586.00	\$ 0.14	\$ 82.04	
498	Travel - Lodging	11/10/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Refund - Sleeping rooms- Little Rock at AC Marriott Little Rock October 2022- Andrew Williams	1.00	\$ (487.80)	\$ (487.80)	
499	Travel - Airfare Booking Fees	11/11/2022	Travel and expenses : Expense Type: Airfare Booking Fees Ticket Number: XD 0841633234 Air Fee Type: Booking Fee Reason for Change: Initial Booking Passenger Name: OSWELL , LAURA KABLER Business Purpose: Little Rock Trial re Brandt, et al. v. Rutledge - (11.27.22 - 12.01.22) S&C Attendees: Laura Kabler Oswell	1.00	\$ 51.00	\$ 51.00	
500	Repro - Copies	11/16/2022	Reproducing documents 11/16/2022 - 20:16	5,817.00	\$ 0.14	\$ 814.38	
501	Repro - Color Copier	11/16/2022	Reproducing color documents 11/16/2022 - 15:53	1,754.00	\$ 0.25	\$ 438.50	
502	Repro - Copies	11/16/2022	Reproducing documents 11/16/2022 - 15:53	610.00	\$ 0.14	\$ 85.40	
503	Repro - Copies	11/16/2022	Reproducing documents 11/16/2022 - 21:30	223.00	\$ 0.14	\$ 31.22	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
504	Repro - Color Copier	11/17/2022	Reproducing color documents 11/17/2022 - 16:18	4,472.00	\$ 0.25	\$ 1,118.00	
505	Repro - Color Copier	11/17/2022	Reproducing color documents 11/17/2022 - 17:08	695.00	\$ 0.25	\$ 173.75	
506	Repro - Color Copier	11/17/2022	Reproducing color documents 11/17/2022 - 14:47	411.00	\$ 0.25	\$ 102.75	
507	Repro - Copies	11/17/2022	Reproducing documents 11/17/2022 - 16:18	357.00	\$ 0.14	\$ 49.98	
508	Repro - Copies	11/17/2022	Reproducing documents 11/17/2022 - 20:01	129.00	\$ 0.14	\$ 18.06	
509	Repro - Copies	11/17/2022	Reproducing documents 11/17/2022 - 17:08	27.00	\$ 0.14	\$ 3.78	
510	Repro - Copies	11/17/2022	Reproducing documents 11/17/2022 - 14:47	3.00	\$ 0.14	\$ 0.42	
511	Repro - Color Copier	11/18/2022	Reproducing color documents 11/18/2022 - 14:53	1,002.00	\$ 0.25	\$ 250.50	
512	Repro - Color Copier	11/18/2022	Reproducing color documents 11/18/2022 - 13:32	568.00	\$ 0.25	\$ 142.00	
513	Delivery/Courier	11/18/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 953635909847 , InvoiceNum: 795955857	1.00	\$ 105.87	\$ 105.87	
514	Delivery/Courier	11/18/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 953635909825 , InvoiceNum: 795955857	1.00	\$ 105.87	\$ 105.87	
515	Delivery/Courier	11/18/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 953635909870 , InvoiceNum: 795955857	1.00	\$ 93.16	\$ 93.16	
516	Delivery/Courier	11/18/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 953635909836 , InvoiceNum: 795955857	1.00	\$ 84.70	\$ 84.70	
517	Repro - Copies	11/18/2022	Reproducing documents 11/18/2022 - 14:53	579.00	\$ 0.14	\$ 81.06	
518	Delivery/Courier	11/18/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 953635909858 , InvoiceNum: 795955857	1.00	\$ 80.46	\$ 80.46	
519	Delivery/Courier	11/18/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 953635909869 , InvoiceNum: 795955857	1.00	\$ 80.46	\$ 80.46	
520	Delivery/Courier	11/18/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 953635909906 , InvoiceNum: 795955857	1.00	\$ 76.23	\$ 76.23	
521	Delivery/Courier	11/18/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 953635909917 , InvoiceNum: 795955857	1.00	\$ 63.56	\$ 63.56	
522	Delivery/Courier	11/18/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 953635909891 , InvoiceNum: 795955857	1.00	\$ 63.52	\$ 63.52	
523	Delivery/Courier	11/18/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 953635909880 , InvoiceNum: 795955857	1.00	\$ 59.29	\$ 59.29	
524	Repro - Copies	11/18/2022	Reproducing documents 11/18/2022 - 13:32	83.00	\$ 0.14	\$ 11.62	
525	Repro - Copies	11/22/2022	Reproducing documents 11/22/2022 - 16:29	2,307.00	\$ 0.14	\$ 322.98	
526	Delivery/Courier	11/22/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 903638004834 , InvoiceNum: 795955857	1.00	\$ 179.46	\$ 179.46	
527	Repro - Color Copier	11/22/2022	Reproducing color documents 11/22/2022 - 16:10	710.00	\$ 0.25	\$ 177.50	
528	Repro - Copies	11/22/2022	Reproducing documents 11/22/2022 - 16:43	696.00	\$ 0.14	\$ 97.44	
529	Delivery/Courier	11/22/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 903638004867 , InvoiceNum: 795955857	1.00	\$ 95.99	\$ 95.99	
530	Delivery/Courier	11/22/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 903638004845 , InvoiceNum: 795955857	1.00	\$ 83.47	\$ 83.47	
531	Delivery/Courier	11/22/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 903638004856 , InvoiceNum: 795955857	1.00	\$ 66.77	\$ 66.77	
532	Delivery/Courier	11/22/2022	Courier Services FedEx to: GILL RAGON OWEN, ATTN BETH ECHOLS , WayBill: 903638004878 , InvoiceNum: 795955857	1.00	\$ 45.94	\$ 45.94	
533	Repro - Binding	11/22/2022	Repro - Binding 11/22/2022 - 16:29	12.00	\$ 3.25	\$ 39.00	
534	Repro - Copies	11/22/2022	Reproducing documents 11/22/2022 - 16:10	89.00	\$ 0.14	\$ 12.46	
535	Travel - Airfare	11/27/2022	Travel and expenses RICHARDSON/DANIEL J - 11/27/2022Ticket # - 7863106703DCA/ORD/LIT/IAH/DCAMSPKKD	1.00	\$ 1,531.16	\$ 1,531.16	
536	Travel - Airfare	11/27/2022	Travel and expenses GOLDSMITH/LAUREN M - 11/27/2022Ticket # - 7863106697LGA/ATL/LIT/ATL/EWRVTMHPQ	1.00	\$ 1,492.31	\$ 1,492.31	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
537	Travel - Airfare	11/27/2022	Travel and expenses BODAPATI/ARUN - 11/27/2022Ticket # - 7863106699LGA/ATL/LIT/ATL/EWRDJCKJX	1.00	\$ 1,492.31	\$ 1,492.31	
538	Travel - Airfare	11/27/2022	Travel and expenses : Expense Type: Airfare Air Routing: SFO/DEN/LIT Air Carrier: UA Air Class Of Service: B Ticket Number: 0167869137497 Class Of Service Reason(Departure): Business - Duration Over Five Hours Date of Travel (Departure): 11/27/2022 Passenger Name: OSWELL/LAURA KABLER Business Purpose: Little Rock Trial re Brandt, et al. v. Rutledge S&C Attendees: Laura Kabler Oswell	1.00	\$ 1,710.59	\$ 855.30	Amount Reduced by Half
539	Travel - Airfare	11/27/2022	Travel and expenses : Expense Type: Airfare Air Routing: SNA-IAH/LIT Air Carrier: UA Air Class Of Service: B Ticket Number: 0167867181590 Class Of Service Reason(Departure): Business - Duration Over Five Hours Date of Travel (Departure): 11/27/2022 Passenger Name: HALPERN/AVIV Business Purpose: 2nd 1/2 of trial beginning 11/28/22 re Brandt, et al. v. Rutledge et al S&C Attendees: Aviv S. Halpern	1.00	\$ 1,428.60	\$ 714.30	Amount Reduced by Half
540	Travel - Meals (Dinner)	11/27/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: On the Border Location: Little Rock, AR Time of Meal: 5:30pm-6:59pm Business Purpose: ACLU Arkansas Trial - Dinner S&C Attendees: Lauren M. Goldsmith Arun Bodapati Aviv S. Halpern Total Guests: 3	1.00	\$ 87.38	\$ 87.38	
541	Travel - Ride Share/UBER/Lyft	11/27/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: New York Pickup Time: 7:00am-9:29am Pickup Location: 365 Bond Street, BK, NY Drop off Location: LaGuardia Airport Purpose of Ride: Airport Business Purpose: Uber - ACLU trial in Arkansas S&C Attendees: Lauren M. Goldsmith	1.00	\$ 75.09	\$ 75.09	
542	Travel - Airfare Booking Fees	11/27/2022	Travel and expenses GOLDSMITH/LAUREN M - 11/27/2022Ticket # - 7863106697LGA/ATL/LIT/ATL/EWRVTMHPQ	1.00	\$ 60.00	\$ 60.00	
543	Travel - Airfare Booking Fees	11/27/2022	Travel and expenses PEACOCKE/ALEXANDER - 11/27/2022Ticket # - 7863106698LGA/ATL/LIT/ATL/EWRVUQCWD	1.00	\$ 60.00	\$ 60.00	
544	Travel - Airfare Booking Fees	11/27/2022	Travel and expenses BODAPATI/ARUN - 11/27/2022Ticket # - 7863106699LGA/ATL/LIT/ATL/EWRDJCKJX	1.00	\$ 60.00	\$ 60.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
545	Travel - Airfare Booking Fees	11/27/2022	Travel and expenses RICHARDSON/DANIEL J - 11/27/2022Ticket # - 7863106703DCA/ORD/LIT/IAH/DCAMSPKDD	1.00	\$ 60.00	\$ 60.00	
546	Travel - Meals (Lunch)	11/27/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Savi Provisions Location: Atlanta, GA Time of Meal: 9:30am-5:29pm Business Purpose: ACLU Trial in Arkansas S&C Attendees: Lauren M. Goldsmith Arun Bodapati Total Guests: 2	1.00	\$ 53.78	\$ 53.78	
547	Travel - Ride Share/UBER/Lyft	11/27/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock, AR Pickup Time: 8:00pm-8:59pm Pickup Location: Target (North Little Rock) Drop off Location: 201 W. Capitol Ave, Little Rock, AR Purpose of Ride: Other Business Purpose: ACLU Arkansas Trial - Groceries from Target S&C Attendees: Lauren M. Goldsmith	1.00	\$ 46.23	\$ 46.23	
548	Travel - Meals (Dinner)	11/27/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: AC Hotel Little Rock Lounge Location: Little Rock, AR Time of Meal: 5:30pm-6:59pm Business Purpose: Meal at hotel restaurant while in Litte Rock, AR working on a pro bono matter. S&C Attendees: Daniel J. Richardson Total Guests: 1	1.00	\$ 36.98	\$ 36.98	
549	Travel - Airline Extras	11/27/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 11/27/2022 Air Extra: Additional Baggage Business Purpose: Checked bag charge for flight heading to Little Rock, AR for a pro bono matter trial. S&C Attendees: Daniel J. Richardson	1.00	\$ 35.00	\$ 35.00	
550	Travel - Ride Share/UBER/Lyft	11/27/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Alexandria, VA Pickup Time: 5:00am-5:59am Pickup Location: 4406 Upland Drive, Alexandria, VA 22310, US Drop off Location: Terminal 2, Ronald Reagan Washington National Airport (DCA), Arlington, VA 22202, US Purpose of Ride: Airport Business Purpose: Uber from home to DCA in order to catch flight to Little Rock, AR for pro bono matter trial. S&C Attendees: Daniel J. Richardson	1.00	\$ 26.93	\$ 26.93	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
551	Travel - Meals (Lunch)	11/27/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: EJ's Eats and Drinks Location: Little Rock Time of Meal: 9:30am-5:29pm Business Purpose: Meal after arriving in Little Rock, AR for pro bono matter trial. S&C Attendees: Daniel J. Richardson Total Guests: 1	1.00	\$ 23.88	\$ 23.88	
552	Travel - Meals (Breakfast)	11/27/2022	Travel and Expenses : Expense Type: Breakfast - Out of Town Name of Establishment: RUBY'S DINETTE Location: SANTA ANA Time of Meal: 6:00am-6:59am Business Purpose: Little Rock Trial - Part II S&C Attendees: Aviv S. Halpern Total Guests: 1	1.00	\$ 16.38	\$ 16.38	
553	Travel - Meals (Breakfast)	11/27/2022	Travel and Expenses : Expense Type: Breakfast - Out of Town Name of Establishment: The Bracket Room & Green Beans Coffee Location: Arlington, VA Time of Meal: 5:00am-5:59am Business Purpose: Breakfast at the airport before arriving in Little Rock, AR for a pro bono matter. S&C Attendees: Daniel J. Richardson Total Guests: 1	1.00	\$ 7.57	\$ 7.57	
554	Travel - Airfare	11/27/2022	Travel and expenses : Expense Type: Airfare Air Routing: Delta 433 Air Carrier: Delta Air Class Of Service: Economy Ticket Number: 0061540241542 Class Of Service Reason(Departure): Economy Date of Travel (Departure): 11/27/2022 Passenger Name: GOLDSMITH/LAUREN Business Purpose: ACLU Trial in Arkansas - Delta wifi flight pass S&C Attendees: Lauren M. Goldsmith	1.00	\$ 5.00	\$ 5.00	
555	Travel - Meals (Dinner)	11/27/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: On the Border Location: Little Rock, AR Time of Meal: 5:30pm-6:59pm Business Purpose: ACLU Arkansas Trial - Dinner (Tip) S&C Attendees: Lauren M. Goldsmith Arun Bodapati Aviv S. Halpern Total Guests: 3	1.00	\$ 5.00	\$ 5.00	
556	Travel - Airfare	11/27/2022	Travel and expenses RICHARDSON/DANIEL J - 11/27/2022Ticket # - 7869386383LIT/IAH/DCAMSPKKD	1.00	\$ (59.46)	\$ (59.46)	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
557	Travel - Meals (Other)	11/28/2022	Travel and Expenses : Expense Type: Meal Other - Out of Town Name of Establishment: Starbucks Location: Little Rock, AR Time of Meal: 5:30pm-6:59pm Business Purpose: ACLU Arkansas Trial - Coffee S&C Attendees: Lauren M. Goldsmith Aviv S. Halpern Arun Bodapati Laura Kabler Oswell Total Guests: 4	1.00	\$ 32.88	\$ 32.88	
558	Travel - Meals (Dinner)	11/29/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: A.W.Lin's Asian Cuisine Location: Little Rock, AR Time of Meal: 5:30pm-6:59pm Business Purpose: ACLU Arkansas Trial - Dinner S&C Attendees: Lauren M. Goldsmith Laura Kabler Oswell Arun Bodapati Aviv S. Halpern Total Guests: 4	1.00	\$ 184.39	\$ 184.39	
559	Travel - Meals (Other)	11/29/2022	Travel and Expenses : Expense Type: Meal Other - Out of Town Name of Establishment: Mugs Cafe Location: Little Rock, AR Time of Meal: 9:30am-5:29pm Business Purpose: ACLU Arkansas Trial - Coffee during trial. S&C Attendees: Lauren M. Goldsmith Daniel J. Richardson Aviv S. Halpern Arun Bodapati Total Guests: 4	1.00	\$ 31.26	\$ 31.26	
560	Travel - Airfare Booking Fees	11/29/2022	Travel and expenses PEACOCKE/ALEXANDER - 11/29/2022Ticket # - 112/722/001VUQCWD	1.00	\$ 16.00	\$ 16.00	
561	Travel - Meals (Dinner)	11/30/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: BJ's Restaurant & Brewhouse Location: Little Rock, AR Time of Meal: 5:30pm-6:59pm Business Purpose: ACLU Arkansas Trial - Dinner S&C Attendees: Lauren M. Goldsmith Laura Kabler Oswell Aviv S. Halpern Arun Bodapati Total Guests: 4	1.00	\$ 123.15	\$ 123.15	
562	Travel - Airfare Booking Fees	11/30/2022	Travel and expenses RICHARDSON/DANIEL J - 11/30/2022Ticket # - 7869386383LIT/IAH/DCAMSPKKD	1.00	\$ 60.00	\$ 60.00	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
563	Travel - Airline Extras	11/30/2022	Travel and expenses : Expense Type: Air Travel Extras Date of Travel: 11/30/2022 Air Extra: Additional Baggage Business Purpose: Checked bag charge for flight heading back to DC after working on a pro bono matter trial. S&C Attendees: Daniel J. Richardson	1.00	\$ 35.00	\$ 35.00	
564	Travel - Meals (Dinner)	11/30/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: Landry's Seafood Location: Houston Time of Meal: 8:00pm-8:59pm Business Purpose: Meal at IAH before flight back to DC after working on a pro bono matter trial. S&C Attendees: Daniel J. Richardson Total Guests: 1	1.00	\$ 32.53	\$ 32.53	
565	Hard Drive Purchase (Soft Cost)	11/30/2022	Hard Drives Purchased for EDLS Billable to Client 1 16GB Thumb Drive	1.00	\$ 9.73	\$ 9.73	
566	Travel - Airfare	12/1/2022	Travel and expenses : Expense Type: Airfare Air Routing: LIT-IAH/SFO Air Carrier: UA Air Class Of Service: Y Ticket Number: 0167869137498 Class Of Service Reason(Departure): First/Premium - Free Upgrade Date of Travel (Departure): 12/01/2022 Passenger Name: OSWELL/LAURA KABLER Business Purpose: Little Rock Trial re Brandt, et al. v. Rutledge - (11.27.22 - 12.01.22) S&C Attendees: Laura Kabler Oswell	1.00	\$ 918.60	\$ 918.60	
567	Travel - Airfare	12/1/2022	Travel and expenses : Expense Type: Airfare Air Routing: LIT/DFW/SFO Air Carrier: AA Air Class Of Service: B Ticket Number: 0017867181591 Class Of Service Reason(Departure): Business - Duration Over Five Hours Date of Travel (Departure): 12/01/2022 Passenger Name: HALPERN/AVIV Business Purpose: 2nd 1/2 of trial beginning 11/28/22 re Brandt, et al. v. Rutledge et al S&C Attendees: Aviv S. Halpern	1.00	\$ 1,717.60	\$ 858.80	Amount Reduced by Half
568	Travel - Airfare	12/1/2022	Travel and expenses WILLIAMS/ANDREW W - 12/1/2022Ticket # - 7869386370JFK/ATL/LIT/ATL/JFKTOPSZS	1.00	\$ 698.56	\$ 698.56	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
569	Travel - Lodging	12/1/2022	Travel and expenses : Expense Type: Hotel - Lodging Hotel Name: WESTIN Location: IRVING Hotel Guest Name: AVIV HALPERN Arrival Date: 12/01/2022 Departure Date: 12/02/2022 Room Charge: 98.00 Taxes Total: 25.00 Business Purpose: Little Rock Trial - Part II S&C Attendees: Aviv S. Halpern	1.00	\$ 123.00	\$ 123.00	
570	Travel - Meals (Lunch)	12/1/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Chili's Post Sec Lit Location: Little Rock, AR Time of Meal: 5:30pm-6:59pm Business Purpose: ACLU Arkansas Trial - Dinner S&C Attendees: Lauren M. Goldsmith Arun Bodapati Aviv S. Halpern Total Guests: 3	1.00	\$ 115.90	\$ 115.90	
571	Travel - Airfare Booking Fees	12/1/2022	Travel and expenses WILLIAMS/ANDREW W - 12/1/2022Ticket # - 7869386370JFK/ATL/LIT/ATL/JFKTOPSZS	1.00	\$ 60.00	\$ 60.00	
572	Travel - Meals (Dinner)	12/1/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: Bawarchi Indian Cuisine Location: Little Rock Time of Meal: 9:30am-5:29pm Business Purpose: Traveled back to Little Rock to close down operations and ship back trial materials and equipment. S&C Attendees: Andrew W. Williams Total Guests: 1	1.00	\$ 45.14	\$ 45.14	
573	Travel - Ride Share/UBER/Lyft	12/1/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock Pickup Time: 9:30am-5:29pm Pickup Location: Bill and Hillary Clinton National Airport - 1 Airport Rd, Little Rock, AR 72202 Drop off Location: AC Hotel Little Rock Downtown 201 West Capitol Avenue, Little Rock, AR 72201 Purpose of Ride: Airport Business Purpose: Traveled back to Little Rock to close down operations and ship back trial materials and equipment. S&C Attendees: Andrew W. Williams	1.00	\$ 33.33	\$ 33.33	
574	Delivery/Courier	12/1/2022	Courier Services FedEx to: AC HOTEL MARRIOTT, ATTN ANDREW WILLIAMS , WayBill: 953635911045 , InvoiceNum: 796597983	1.00	\$ 26.71	\$ 26.71	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
575	Travel - Ride Share/UBER/Lyft	12/1/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Arlington, VA Pickup Time: 10:00pm-4:59am Pickup Location: Terminal 2, Ronald Reagan Washington National Airport, Arlington, VA 22202, US Drop off Location: 4406 Upland Drive, Alexandria, VA 22310, US Purpose of Ride: Home Business Purpose: Uber from DCA to home after returning from Little Rock, AR for pro bono matter trial. S&C Attendees: Daniel I. Richardson	1.00	\$ 24.94	\$ 24.94	
576	Travel - Meals (Dinner)	12/1/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: CHILIS POST SEC LIT Location: LITTLE ROCK Time of Meal: 7:00am-9:29am Business Purpose: Little Rock Trial - Part II S&C Attendees: Aviv S. Halpern Total Guests: 1	1.00	\$ 15.16	\$ 15.16	
577	Travel - Meals (Lunch)	12/1/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Subway Location: Atlanta Time of Meal: 9:30am-5:29pm Business Purpose: Traveled back to Little Rock to close down operations and ship back trial materials and equipment. S&C Attendees: Andrew W. Williams Total Guests: 1	1.00	\$ 12.96	\$ 12.96	
578	Travel - Meals (Dinner)	12/1/2022	Travel and Expenses : Expense Type: Dinner - Out of Town Name of Establishment: The Connection Location: Atlanta, GA Time of Meal: 9:00pm-9:59pm Business Purpose: ACLU Arkansas Trip - Dinner (Food Court) S&C Attendees: Lauren M. Goldsmith Total Guests: 1	1.00	\$ 10.79	\$ 10.79	
579	Travel - Lodging	12/2/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Andrew arrived on 12/01, he took all the office supplies out of the break room and put them into the meeting room	1.00	\$ 273.75	\$ 273.75	
580	Travel - Ride Share/UBER/Lyft	12/2/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: New York Pickup Time: 9:30am-5:29pm Pickup Location: Newark Airport Drop off Location: 365 Bond Street, BK, NY Purpose of Ride: Home Business Purpose: ACLU Arkansas Trial - Car home from Newark airport S&C Attendees: Lauren M. Goldsmith	1.00	\$ 154.63	\$ 154.63	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
581	Travel - Taxi/Car Service/Shuttle	12/2/2022	Travel and expenses Travel and Expense Taxi from JFK Boundary Road, Jamaica, NY 11430 to 86015 VALLEY STREAM, NY PickupTime: 20:20 Passenger Name: ANDREW WILLIAMS Purpose of Ride: Airport Voucher #: 2120218862 Invoice#: SC9616 Car Company: CONCORD LIMOUSINE 1, LLC 01.003643.001	1.00	\$ 138.61	\$ 138.61	
582	Travel - Meals (Lunch)	12/2/2022	Travel and Expenses : Expense Type: Lunch - Out of Town Name of Establishment: Qdoba Hartsfield- Jackson Atlanta International Airport Location: Atlanta Time of Meal: 9:30am-5:29pm Business Purpose: Traveled back to Little Rock to close down operations and ship back trial materials and equipment. S&C Attendees: Andrew W. Williams Total Guests: 1	1.00	\$ 21.94	\$ 21.94	
583	Travel - Ride Share/UBER/Lyft	12/2/2022	Travel and expenses : Expense Type: Ride Share UBER Lyft - Out of Town Location: Little Rock Pickup Time: 9:30am-5:29pm Pickup Location: AC Hotel Little Rock Downtown 201 West Capitol Avenue, Little Rock, AR 72201 Drop off Location: Hartsfield- Jackson Atlanta International Airport Purpose of Ride: Airport Business Purpose: Traveled back to Little Rock to close down operations and ship back trial materials and equipment. S&C Attendees: Andrew W. Williams	1.00	\$ 9.95	\$ 9.95	
584	Delivery/Courier	12/3/2022	Courier Services UPS Package from WILLIAMS to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 100042, US, Tracking Number: 1ZA8142R9078924068	1.00	\$ 24.17	\$ 24.17	
585	Delivery/Courier	12/3/2022	Courier Services UPS Package from WILLIAMS to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 100042, US, Tracking Number: 1ZA8142R9077551856	1.00	\$ 24.17	\$ 24.17	
586	Delivery/Courier	12/3/2022	Courier Services UPS Package from WILLIAMS to RANDOLPH G FONTENELL, SULLIVAN AND CROMWELL LLP, 125 BROAD STREET, NEW YORK, NY, 10004, US, Tracking Number: 1ZA8142R9077551856	1.00	\$ 23.99	\$ 23.99	
587	Travel - Lodging	12/6/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Final Invoice 11/27/2022 - 12/06/2022	1.00	\$ 895.14	\$ 895.14	
588	Travel - Lodging	12/6/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Final Invoice 11/27/2022 - 12/06/2022	1.00	\$ 871.55	\$ 871.55	
589	Travel - Lodging	12/6/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Final Invoice 11/27/2022 - 12/06/2022	1.00	\$ 871.55	\$ 871.55	
590	Travel - Lodging	12/6/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Final Invoice 11/27/2022 - 12/06/2022	1.00	\$ 866.60	\$ 866.60	
591	Travel - Lodging	12/6/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Final Invoice 11/27/2022 - 12/06/2022	1.00	\$ 674.31	\$ 674.31	
592	Travel - Lodging	12/6/2022	Travel and expenses AC FRANCHISED C66 Little Rock AR - Final Invoice 11/27/2022 - 12/06/2022	1.00	\$ 216.65	\$ 216.65	
593	Travel - Meals (Lunch)	12/6/2022	Travel and Expenses AC FRANCHISED C66 Little Rock AR - Final Invoice 11/27/2022 - 12/06/2022	1.00	\$ 48.28	\$ 48.28	

Entry No.	Cost Type	Date	Narrative	Quantity	Rate	Amount	Notes
594	Travel - Meals (Lunch)	12/6/2022	Travel and Expenses AC FRANCHISED C66 Little Rock AR - Final Invoice 11/27/2022 - 12/06/2022	1.00	\$ 32.08	\$ 32.08	
595	Travel - Meals (Lunch)	12/6/2022	Travel and Expenses AC FRANCHISED C66 Little Rock AR - Final Invoice 11/27/2022 - 12/06/2022	1.00	\$ 21.76	\$ 21.76	
596	Travel - Meals (Lunch)	12/6/2022	Travel and Expenses AC FRANCHISED C66 Little Rock AR - Final Invoice 11/27/2022 - 12/06/2022	1.00	\$ 21.10	\$ 21.10	
597	Travel - Airfare Booking Fees	12/11/2022	Travel and expenses WILLIAMS/ANDREW W - 12/11/2022Ticket # - S/ANDREW WFSM/DFW/JFK	1.00	\$ 60.00	\$ 60.00	
598	Outside Professional Services	12/15/2022	Professional Services Rendered - Disb B - Use to be Cost Type 238 - Data-Struction Inc - Shredding charges (3Totes) and removal charge at off-site trial at The Marriot in Little Rock, AR and Arkansas	1.00	\$ 702.90	\$ 702.90	
Total						\$ 192,585.64	

Exhibit D

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____	X	
In re	:	Chapter 11
	:	
Kumtor Gold Company CJSC and Kumtor Operating	:	Case No. 21-11051 (LGB)
Company CJSC, ¹	:	
	:	Jointly Administered
	:	
Debtors.	:	
_____	X	

**ORDER GRANTING INTERIM AND FINAL APPLICATIONS FOR ALLOWANCE OF
INTERIM AND FINAL COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Upon consideration of Interim and Final Applications for Allowance of Final Compensation and Reimbursement of Expenses [D.I. 382, 384, 386] (the “Applications”) for professional services rendered and expenses incurred during the period commencing December 1, 2021 through the date of dismissal of these Chapter 11 Cases (the “Interim Period”) and the period commencing June 1, 2021² through and including the date of dismissal of these Chapter 11 Cases (the “Final Fee Period”); and notice having been given pursuant to Federal Rules of Bankruptcy Procedure 2002(a)(6) and (c)(2); and due consideration having been given to any responses thereto; and sufficient cause having been shown therefor, it is hereby;

ORDERED that the Applications are granted with respect to the Interim Period to the extent set forth in the attached Schedule A and with respect to the Final Fee Period to the extent set forth in the attached Schedule B; and it is further

ORDERED that the Debtors are authorized and directed upon entry of this Order to remit or cause to be remitted payment for (i) the Interim Period to each of the applicants listed

¹ The Debtors’ corporate headquarters is located at 24 Ibraimova Street, 720001, Bishkek, the Kyrgyz Republic.

² In the case of Young Conaway Stargatt & Taylor, LLP, commencing on June 17, 2021.

on Schedule A and (ii) for the Final Fee Period to each of the applicants listed on Schedule B, all fees and expenses allowed herein, less all amounts previously paid on account of such fees and expenses; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: July 29, 2022
New York, New York

/s/ Lisa G. Beckerman
 The Honorable Lisa G. Beckerman
 United States Bankruptcy Judge

Case No.: 21-11051 (LGB)

Case Name: In re Kumtor Gold Company CJSC

CURRENT INTERIM FEE PERIOD

December 1, 2021 through Dismissal of These Chapter 11 Cases

Schedule A

(1) Applicant	(2) Date/Document Number of Application	(3) Interim Fees Requested	(4) Interim Fees as Reduced by Discussions with United States Trustee and/or Ordered by the Court	(5) Interim Fees Allowed (80% of Interim Fees as Reduced)	(6) Interim Expenses Requested	(7) Interim Expenses as Reduced by Discussions with United States Trustee and/or Ordered by the Court	(8) Interim Expenses Allowed
Sullivan & Cromwell LLP	July 6, 2022 / D.I. 386	\$2,026,540.00	\$30,151.00	\$1,597,111.20	\$103,792.54	\$511.00	\$103,281.54
Young Conaway Stargatt & Taylor, LLP	July 6, 2022 / D.I. 382	\$70,000.50	\$0.00	\$56,000.40	\$421.74	\$0.00	\$421.74
Stretto, Inc. (f/k/a Bankruptcy Management Solutions, Inc.)	July 6, 2022 / D.I. 384	\$17,211.84	\$0.00	\$13,769.47	\$0.00	\$0.00	\$0.00

Revised September 2011

DATE ON WHICH ORDER WAS SIGNED:

, 2022

INITIALS: _____ USBJ

Case No.: 21-11051 (LGB)

Case Name: In re Kumtor Gold Company CJSC

FINAL FEE APPLICATION TOTALS

June 1, 2021¹ through Dismissal of These Chapter 11 Cases

Schedule B

(1) Applicant	(2) Total Fees Requested ²	(3) Total Fees Paid ³	(4) Total Expenses Requested ⁴	(5) Total Expenses Paid ⁵
Sullivan & Cromwell LLP	\$6,954,882.02	\$6,924,731.02	\$155,222.22	\$154,711.22
Young Conaway Stargatt & Taylor, LLP	\$503,236.00	\$503,236.00	\$3,700.57	\$3,700.57
Stretto, Inc. (f/k/a Bankruptcy Management Solutions, Inc.)	\$48,279.36	\$48,279.36	\$0.00	\$0.00

Revised September 2011

DATE ON WHICH ORDER WAS SIGNED: _____, 2022

INITIALS: _____ USBJ

¹ In the case of Young Conaway Stargatt & Taylor, LLP, commencing on June 17, 2021.

² Reflects amounts through June 30, 2022 requested in Applications and amounts accrued through dismissal of these Chapter 11 Cases.

³ Reflects reductions as ordered by the Court.

⁴ Reflects amounts through June 30, 2022 requested in Applications and amounts accrued through dismissal of these Chapter 11 Cases.

⁵ Reflects reductions as ordered by the Court.

Hearing Date: July 27, 2022 at 3:00 p.m.
Objection Deadline: July 20, 2022 at 4:00 p.m.

James L. Bromley
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, NY 10004-2498
Telephone: (212) 558-4000
Facsimile: (212) 558-3588

Counsel to the Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____	X	
In re	:	Chapter 11
	:	
Kumtor Gold Company CJSC and Kumtor Operating	:	Case No. 21-11051 (LGB)
Company CJSC, ¹	:	
	:	Jointly Administered
	:	
Debtors.	:	
_____	X	

**NOTICE OF FINAL APPLICATION OF SULLIVAN & CROMWELL LLP
AS COUNSEL TO THE DEBTORS FOR FINAL APPROVAL AND ALLOWANCE
OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES INCURRED FOR THE PERIOD FROM JUNE 1, 2021 THROUGH AND
INCLUDING THE DATE OF DISMISSAL OF THESE CHAPTER 11 CASES**

PLEASE TAKE NOTICE that on the date hereof, Sullivan & Cromwell LLP (“S&C”) filed the *Final Fee Application of Sullivan & Cromwell LLP as Counsel to the Debtors for Final Approval and Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from June 1, 2021 Through and Including the Date of Dismissal of these Chapter 11 Cases* (the “Final Fee Application”) with the United States Bankruptcy Court for the Southern District of New York (the “Court”).

PLEASE TAKE FURTHER NOTICE that a hearing (the “Hearing”) on the Final Fee Application is scheduled to be held virtually via Zoom for Government before the

¹ The Debtors’ corporate headquarters is located at 24 Ibraimova Street, 720001, Bishkek, the Kyrgyz Republic.

Honorable Lisa G. Beckerman, United States Bankruptcy Judge, on **July 27, 2022 at 3:00 p.m.**
(Prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that any responses or objections (the “Objections”) to the Final Fee Application shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules for the United States Bankruptcy Court for the Southern District of New York and shall be filed with the Court in accordance with the customary practices of the Court and General Order M-399. Objections must be filed and received no later than **July 20, 2022 at 4:00 pm (Prevailing Eastern Time)** (the “Objection Deadline”) and must be served on the following parties: (a) counsel to the Debtors, Sullivan & Cromwell LLP, Attn: James L. Bromley (bromleyj@sullcrom.com); (b) co-counsel and conflicts counsel for the Debtors, Young Conaway Stargatt & Taylor, LLP, Attn: Pauline K. Morgan (bankfilings@ycst.com); (c) the Office of the United States Trustee for the Southern District of New York, Attn: Andrea B. Schwartz (andrea.b.schwartz@usdoj.gov); and (d) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002. All Objections that are not resolved by the parties or Court order shall be preserved and presented to the Court at the Hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing and failure to appear may result in relief being granted upon default; *provided* that objecting parties shall attend the Hearing virtually so long as General Order M-399 is in effect or unless otherwise ordered by the Court.

PLEASE TAKE FURTHER NOTICE that the Court, in its discretion, may approve an uncontested Final Fee Application without the need for a hearing. If no Objections are timely filed and served, S&C may, after the Objection Deadline, submit to the Court a

proposed order granting the Final Fee Application, which may be entered with no further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that copies of the Final Fee Application may be obtained from the Court's website, <https://ecf.nysb.uscourts.gov> for a nominal fee or, free of charge, from the website of the Debtors' claims and noticing agent, <https://cases.stretto.com/kumtorgold>.

Dated: July 6, 2022
New York, NY

/s/ James L. Bromley
James L. Bromley
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: bromleyj@sullcrom.com

Counsel to the Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

		X
In re	:	Chapter 11
	:	
Kumtor Gold Company CJSC and Kumtor Operating	:	Case No. 21-11051 (LGB)
Company CJSC, ¹	:	
	:	Jointly Administered
	:	
Debtors.	:	
		X

**SUMMARY COVER SHEET OF FINAL FEE APPLICATION OF
SULLIVAN & CROMWELL LLP AS COUNSEL TO THE DEBTORS
FOR THE PERIOD OF JUNE 1, 2021 THROUGH AND INCLUDING
THE DATE OF DISMISSAL OF THESE CHAPTER 11 CASES²**

NAME OF APPLICANT:	Sullivan & Cromwell LLP
AUTHORIZED TO PROVIDE PROFESSIONAL SERVICES TO:	Kumtor Gold Company CJSC and Kumtor Operating Company CJSC, as debtors in these Chapter 11 Cases
DATE CASE FILED:	May 31, 2021
DATE OF RETENTION:	August 3, 2021, effective as of May 31, 2021
PERIOD FOR WHICH COMPENSATION AND REIMBURSEMENT IS SOUGHT:	June 1, 2021 through and including the date of dismissal of these Chapter 11 Cases
TOTAL COMPENSATION REQUESTED (THROUGH JUNE 30, 2022):	\$6,732,455.02
TOTAL ESTIMATED COMPENSATION FROM JULY 1, 2022 THROUGH DATE OF DISMISSAL OF THESE CHAPTER 11 CASES	\$150,000.00
TOTAL EXPENSE REIMBURSEMENT REQUESTED (THROUGH JUNE 30, 2022):	\$154,873.92
TOTAL ESTIMATED REIMBURSEMENT FROM JULY 1, 2022 THROUGH DATE OF DISMISSAL OF THESE CHAPTER 11 CASES	\$2,500.00

¹ The Debtors' corporate headquarters is located at 24 Ibraimova Street, 720001, Bishkek, the Kyrgyz Republic.

² This Application requests final approval and allowance of compensation for services rendered and reimbursement of expenses incurred from June 1, 2021 through and including the date of dismissal of these Chapter 11 Cases. The Debtors anticipate the dismissal of these Chapter 11 Cases to be in August 2022. This Application includes hours, amounts, time entry detail and expenses from June 1, 2021 through and including June 30, 2022 and an estimate of hours and amounts through the anticipated dismissal of these Chapter 11 Cases.

This is a(n):__interim X final application.

This is the final fee application filed by Sullivan & Cromwell LLP.

SUMMARY OF FEES AND EXPENSES REQUESTED THROUGH JUNE 30, 2022

Date and Docket No.	Period Covered	Fees Requested	Holdback (20%)	Fees Paid to Date	Expenses Requested	Expenses Paid to Date	Interim Fees and Expenses Allowed
08/06/2021 [D.I. 132]	06/01/2021 – 06/30/2021	\$669,991.00	\$133,998.20	\$535,992.80	\$5,400.44	\$5,400.44	\$1,975,682.27
08/30/2021 [D.I. 167]	07/01/2021 – 07/31/2021	\$793,615.00	\$158,723.00	\$634,892.00	\$4,215.32	\$4,215.32	
09/30/2021 [D.I. 209]	08/01/2021 – 08/31/2021	\$1,059,071.00	\$198,392.91	\$793,571.61	\$1,679.68	\$1,610.10	
10/29/2021 [D.I. 241]	09/01/2021 – 09/30/2021	\$1,057,513.50	\$211,502.70	\$846,010.80	\$10,873.03	\$10,873.03	\$2,018,421.02
11/30/2021 [D.I. 263]	10/01/2021 – 10/31/2021	\$515,830.50	\$103,166.10	\$412,664.40	\$3,180.09	\$3,180.09	
12/23/2021 [D.I. 282]	11/01/2021 – 11/30/2021	\$910,339.00	\$179,885.50	\$719,542.00	\$26,182.74	\$26,150.70	
01/28/2022 [D.I. 317]	12/01/2021 – 12/31/2021	\$772,588.00	\$154,517.60	\$618,070.40	\$76,338.10	\$76,338.10	N/A ¹
02/23/2022 [D.I. 331]	01/01/2022 – 01/31/2022	\$464,088.50	\$92,817.70	\$371,270.80	\$23,883.38	\$23,883.38	
03/23/2022 [D.I. 346]	02/01/2022 – 02/28/2022	\$250,206.50	\$50,041.30	\$200,165.20	\$2,518.43	\$2,518.43	
04/26/2022 [D.I. 362]	03/01/2022 – 03/31/2022	\$141,815.00	\$28,363.00	\$113,452.00	\$547.26	\$547.26	N/A
05/10/2022 [D.I. 365]	04/01/2022 – 04/30/2022	\$99,973.00	\$19,994.60	\$0.00	\$102.85	\$0.00	
06/15/2022 [D.I. 378]	05/01/2022 – 05/31/2022	\$32,832.50	\$6,566.50	\$0.00	\$20.00	\$0.00	
- -	06/01/2022 – 06/30/2022	\$42,609.50	\$8,521.90	\$0.00	\$34.22	\$0.00	
TOTAL THROUGH JUNE 30, 2022		\$6,810,473.00	\$1,346,491.01	\$5,245,632.01	\$154,975.54	\$154,716.85	
AGREED ADJUSTMENTS WITH U.S. TRUSTEE		-\$78,017.98			-\$101.62		
CURRENT REQUESTED AMOUNTS		\$6,732,455.02			\$154,873.92		

¹ Sullivan & Cromwell LLP filed a third interim application for interim approval and allowance of compensation for services rendered and reimbursement of expenses incurred for December 1, 2021 through February 28, 2022 [D.I. 350] but with the Court's permission, the hearing on the application was cancelled.

**PROJECTED TOTAL BUDGET THROUGH JUNE 30, 2022
 AND ACTUAL FEES INCURRED**

Estimated Fees through June 30, 2022		Actual Fees through June 30, 2022
Low	High	\$6,732,455.02
\$6,078,000.00	\$12,228,000.00	

PROJECT CODE TOTAL CHART THROUGH JUNE 30, 2022

Project Number	Project Name	Hours	Fee Amount
002	ASSET ANALYSIS AND RECOVERY	-	\$0.00
003	ASSET DISPOSITION	-	\$0.00
004	ASSUMPTION AND REJECTION OF LEASES AND CONTRACTS	-	\$0.00
005	AVOIDANCE ACTION ANALYSIS	-	\$0.00
006	BUSINESS OPERATIONS	160.30	\$182,069.00
007	CASE ADMINISTRATION	180.80	\$230,756.00
008	CLAIMS ADMINISTRATION AND OBJECTIONS	54.60	\$53,235.00
009	CORPORATE GOVERNANCE AND BOARD MATTERS	121.00	\$125,916.00
010	EMPLOYEE BENEFITS AND PENSIONS	4.60	\$6,137.00
011	EMPLOYMENT AND FEE APPLICATIONS (S&C)	477.70	\$403,375.00
012	EMPLOYMENT AND FEE APPLICATIONS (OTHERS)	52.10	\$47,702.50
013	FINANCING AND CASH COLLATERAL	49.60	\$60,403.00
014	OTHER LITIGATION	1,312.10	\$1,402,254.50
015	MEETINGS AND COMMUNICATIONS WITH CREDITORS	28.40	\$29,323.00
016	NON-WORKING TRAVEL	-	\$0.00
017	PLAN AND DISCLOSURE STATEMENT	79.20	\$82,002.50
018	RELIEF FROM STAY AND ADEQUATE PROTECTION	-	\$0.00
019	TAX	-	\$0.00
020	VALUATION	-	\$0.00
021	DISCOVERY	2,842.00	\$3,313,755.00
022	HEARINGS	114.90	\$175,748.50
023	FIRST AND SECOND DAY MOTIONS	421.30	\$426,599.00
024	CLAIMS INVESTIGATION	-	\$0.00
025	LIEN INVESTIGATION	-	\$0.00
026	SCHEDULES, SOFAS AND REPORTING	152.00	\$148,146.50
027	OTHER MOTIONS/APPLICATIONS	100.50	\$110,254.50
028	TIME ENTRY REVIEW	697.90	\$0.00
029	BUDGETING	10.10	\$12,796.00
TOTAL THROUGH JUNE 30, 2022		6,859.10	\$6,810,473.00
AGREED ADJUSTMENTS WITH U.S. TRUSTEE			-\$78,017.98
UPDATED TOTAL THROUGH JUNE 30, 2022			\$6,732,455.02

S&C PROFESSIONALS PERFORMING SERVICES THROUGH JUNE 30, 2022

Timekeeper Name	Title	Practice Group	Bar Admission	Rate	Hours	Amount
Partner 1	Partner	GP	1990	\$1,825.00	447.70	\$817,052.50
Partner 2	Partner	Litigation	2009	\$1,725.00	73.10	\$126,097.50
Partner 3	Partner	Litigation	1986	\$1,825.00	38.50	\$70,262.50
Partner 4	Partner	GP	1987	\$1,825.00	52.00	\$94,900.00
Partner 5	Partner	Litigation	1985	\$1,825.00	1.20	\$2,190.00
Partner 6	Partner	Litigation	2004	\$1,825.00	9.90	\$18,067.50
Partner 7	Partner	Litigation	2006	\$1,800.00	1.00	\$1,800.00
Partner 8	Partner	Litigation	1983	\$1,825.00	0.40	\$730.00
Partner 9	Partner	GP	1992	\$1,825.00	0.30	\$547.50
Partner Total					624.10	\$1,131,647.50
Special Counsel 1	Special Counsel	GP	2009	\$1,630.00	611.80	\$997,234.00
Special Counsel Total					611.80	\$997,234.00
Associate 1	Associate	GP	2020	\$835.00	178.90	\$149,381.50
Associate 1	Associate	GP	2020	\$1,050.00	9.30	\$9,765.00
Associate 2	Associate	Litigation	in process	\$685.00	31.50	\$21,577.50
Associate 3	Associate	Litigation	2019	\$1,155.00	18.90	\$21,829.50
Associate 3	Associate	Litigation	2019	\$1,195.00	0.70	\$836.50
Associate 4	Associate	GP	2016	\$1,225.00	352.30	\$431,567.50
Associate 5	Associate	GP	2019	\$835.00	91.00	\$75,985.00
Associate 5	Associate	GP	2019	\$1,050.00	16.90	\$17,745.00
Associate 6	Associate	Litigation	2018	\$1,155.00	384.60	\$444,213.00
Associate 6	Associate	Litigation	2018	\$1,195.00	295.20	\$352,764.00
Associate 7	Associate	GP	2015	\$835.00	8.90	\$7,431.50
Associate 8	Associate	GP	2015	\$1,225.00	66.40	\$81,340.00
Associate 9	Associate	GP	2021	\$685.00	67.20	\$46,032.00
Associate 9	Associate	GP	2021	\$835.00	24.50	\$20,457.50
Associate 10	Associate	GP	2021	\$685.00	245.20	\$167,962.00
Associate 10	Associate	GP	2021	\$835.00	113.20	\$94,522.00
Associate 11	Associate	Litigation	2012	\$1,225.00	13.50	\$16,537.50
Associate 12	Associate	Litigation	2015	\$1,225.00	267.70	\$327,932.50
Associate 13	Associate	Litigation	2013	\$1,225.00	513.60	\$629,160.00
Associate 14	Associate	Litigation	2017	\$1,155.00	1.00	\$1,155.00
Associate 15	Associate	Litigation	2017	\$1,195.00	95.10	\$113,644.50
Associate 15	Associate	Litigation	2017	\$1,225.00	110.70	\$135,607.50
Associate 16	Associate	Litigation	2019	\$1,050.00	324.90	\$341,145.00
Associate 16	Associate	Litigation	2019	\$1,155.00	759.50	\$877,222.50
Associate 17	Associate	Litigation	2014	\$1,225.00	1.10	\$1,347.50
Trainee Solicitor 1	Trainee Solicitor	GP	2021	\$400.00	2.80	\$1,120.00
Associate Total					3,994.60	\$4,388,281.50
Lawyers Total					5,230.50	\$6,517,163.00

Timekeeper Name	Title	Practice Group	Bar Admission	Rate	Hours	Amount
Summer Associate/Intern 1	Summer Associate/Intern			\$0.00*	67.5	\$0.00
Summer Associate/Intern 2	Summer Associate/Intern			\$0.00*	15.20	\$0.00
Summer Associate/Intern 3	Summer Associate/Intern			\$0.00*	56.00	\$0.00
Summer Associate/Intern 4	Summer Associate/Intern			\$0.00*	2.50	\$0.00
Summer Associate/Intern 5	Summer Associate/Intern			\$0.00*	32.80	\$0.00
Legal Analyst 1	Legal Analyst – Litigation			\$400.00	65.30	\$26,120.00
Legal Analyst 2	Legal Analyst – Discovery			\$400.00	4.70	\$1,880.00
Legal Analyst 3	Legal Analyst – Litigation			\$400.00	2.10	\$840.00
Legal Analyst 4	Legal Analyst – Litigation			\$400.00	0.10	\$40.00
Legal Analyst 5	Legal Analyst – Discovery			\$400.00	0.80	\$320.00
Legal Analyst 6	Legal Analyst – Litigation			\$400.00	53.50	\$21,400.00
Electronic Discovery 1	Electronic Discovery			\$400.00	17.10	\$6,840.00
Electronic Discovery 2	Electronic Discovery			\$400.00	30.10	\$12,040.00
Electronic Discovery 3	Electronic Discovery			\$400.00	5.80	\$2,320.00
Electronic Discovery 4	Electronic Discovery			\$400.00	12.40	\$4,960.00
Electronic Discovery 5	Electronic Discovery			\$400.00	50.20	\$20,080.00
Electronic Discovery 6	Electronic Discovery			\$400.00	0.30	\$120.00
Electronic Discovery 7	Electronic Discovery			\$400.00	16.20	\$6,480.00
Electronic Discovery 8	Electronic Discovery			\$400.00	0.10	\$40.00
Electronic Discovery 9	Electronic Discovery			\$400.00	2.00	\$800.00
Electronic Discovery 10	Electronic Discovery			\$400.00	1.10	\$440.00

Timekeeper Name	Title	Practice Group	Bar Admission	Rate	Hours	Amount
Electronic Discovery 11	Electronic Discovery			\$400.00	1.10	\$440.00
Electronic Discovery 12	Electronic Discovery			\$400.00	1.20	\$480.00
Electronic Discovery 13	Electronic Discovery			\$400.00	6.10	\$2,440.00
Electronic Discovery 14	Electronic Discovery			\$400.00	1.40	\$560.00
Law Clerk 1	Law Clerk			\$400.00	19.70	\$7,880.00
Paralegal 1	Paralegal			\$0.00*	285.50	\$0.00
Paralegal 1	Paralegal			\$375.00	191.80	\$71,925.00
Paralegal 2	Paralegal			\$0.00*	412.40	\$0.00
Paralegal 2	Paralegal			\$375.00	181.70	\$68,137.50
Paralegal 2	Paralegal			\$400.00	69.10	\$27,640.00
Paralegal 3	Paralegal			\$400.00	4.60	\$1,840.00
Paralegal 4	Paralegal			\$400.00	0.60	\$240.00
Paralegal 5	Paralegal			\$375.00	0.80	\$300.00
Paralegal 6	Paralegal			\$400.00	4.80	\$1,920.00
Paralegal 7	Paralegal			\$375.00	0.50	\$187.50
Paralegal 8	Paralegal			\$400.00	0.70	\$280.00
Research Librarian 1	Research Librarian			\$400.00	3.40	\$1,360.00
Research Librarian 2	Research Librarian			\$400.00	1.50	\$600.00
Research Librarian 3	Research Librarian			\$400.00	2.10	\$840.00
Research Librarian 4	Research Librarian			\$400.00	1.90	\$760.00
Research Librarian 5	Research Librarian			\$400.00	1.90	\$760.00
Non Legal Personnel Total:					1,628.60	\$293,310.00
GRAND TOTAL THROUGH JUNE 30, 2022					6,859.10	\$6,810,473.00
AGREED ADJUSTMENTS WITH U.S. TRUSTEE						-\$78,017.98
UPDATED GRAND TOTAL THROUGH JUNE 30, 2022						\$6,732,455.02

* Zero rate appears wherever no fee was charged for work.

SUMMARY OF DISBURSEMENTS THROUGH JUNE 30, 2022

Disbursement Summary	
Description	Amount
Repro - B&W Copies	\$3,944.90
Repro - Color Copies	\$963.50
Repro - Binding	\$11.08
Telephonic Court Appearance	\$591.19
Local Transportation	\$2,859.55
Meals - Overtime	\$1,980.00
Conference Room Dining	\$268.17
Delivery Services	\$1,001.18
Transcripts	\$5,456.45
Filing Fees	\$6,289.00
Vendor Disbursements	\$64,659.67
Deposition Disbursements	\$66,950.85
TOTAL THROUGH JUNE 30, 2022	\$154,975.54
AGREED ADJUSTMENTS WITH U.S. TRUSTEE	-\$101.62
UPDATED TOTAL THROUGH JUNE 30, 2022	\$154,873.92

CUSTOMARY AND COMPARABLE DISCLOSURES

Category	Kumtor Gold Company and Kumtor Operating Company*		Firm**	
	June 2021 through June 2022		Total Firm Bills Allocated to Non-BK General Domestic Timekeepers from January through June 2022	
	Blended Hourly Rate	% of Total Hours	Blended Hourly Rate	% of Total Hours
Partner and Counsels ⁽¹⁾	\$1,723	18%	\$1,837	30%
Associate ⁽²⁾	\$1,099	58%	\$954	63%
Non-Lawyer ⁽³⁾	\$180	24%	\$472	7%
All Timekeepers Average	\$993	100%	\$1,181	100%

⁽¹⁾ Includes Special Counsel, Of Counsel, Senior Counsel

⁽²⁾ Includes Senior Associate (Level 5-8), Practice Area Associates, and Junior Associate (Level 1-4)

⁽³⁾ Includes Summer Associate, Interns, Paralegals, Legal Analyst, Research Analyst, and Electronic Discovery

* Includes No Charge entries on various projects. No Charge entries were included on the fee applications with a \$0 rate.

** Includes non-BK work of BK timekeepers and all work of other domestic timekeepers, excluding litigation matters and all write-offs (bills or collections less than 60% of standard rates).

Exhibit E

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____	X	
In re	:	Chapter 11
	:	
Garrett Motion Inc., <i>et al.</i> , ¹	:	Case No. 20-12212 (MEW)
	:	
Reorganized Debtors.	:	Jointly Administered
	:	
	X	

**ORDER GRANTING INTERIM AND FINAL APPLICATIONS FOR ALLOWANCE OF
INTERIM AND FINAL COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Upon consideration of Interim and Final Applications for Allowance of Final Compensation and Reimbursement of Expenses (the “Applications”) for professional services rendered and expenses incurred during the period commencing April 1, 2021 through April 30, 2021 (the “Third Interim Period”) and the period commencing September 20, 2020 through April 30, 2021 (the “Final Fee Period”); and notice having been given pursuant to Federal Rules of Bankruptcy Procedure 2002(a)(6) and (c)(2); and due consideration having been given to any responses thereto; and sufficient cause having been shown therefor, it is hereby;

ORDERED that the Applications are granted with respect to the Third Interim Period to the extent set forth in the attached Schedule A and with respect to the Final Fee Period to the extent set forth in the attached Schedule B; and it is further

ORDERED that the Debtors are authorized and directed upon entry of this Order to remit or cause to be remitted payment for (i) the Third Interim Period to each of the applicants listed on Schedule A and (ii) for the Final Fee Period to each of the applicants listed on

¹ The last four digits of Garrett Motion Inc.’s tax identification number are 3189. Due to the large number of debtor entities in these Chapter 11 Cases, which are being jointly administered, a complete list of the Reorganized Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <http://www.kccllc.net/garrettmotion>. The Reorganized Debtors’ corporate headquarters is located at La Pièce 16, Rolle, Switzerland.

Schedule B, all fees and expenses allowed herein, less all amounts previously paid on account of such fees and expenses; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York
July 1, 2021

s/Michael E. Wiles
MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE
Southern District of New York

Case No.: 20-12212 (MEW)

Case Name: In re Garrett Motion Inc., et al.

CURRENT INTERIM FEE PERIOD¹

April 1, 2021 through April 30, 2021

Schedule A

(1) Applicant	(2) Date/Document Number of Application	(3) Interim Fees Requested on Application	(4) Fees Allowed	(5) Fees to be Paid for Current Fee Period	(6) Fees to be Paid for Prior Fee Period(s) (if any) (i.e., Holdback Release)	(7) Total Fees to be Paid	(8) Interim Expenses Requested	(9) Expenses to be Paid for Current Fee Period
Sullivan & Cromwell LLP	June 1, 2021 / D.I. 1256	\$2,996,764.50	\$2,996,764.50	\$2,996,764.50	\$0.00	\$2,996,764.50	\$21,727.97	\$21,727.97
Quinn Emanuel Urquhart & Sullivan, LLP	June 1, 2021 / D.I. 1268	\$76,911.50	\$76,911.50	\$76,911.50	\$0.00	\$76,911.50	\$22.64	\$22.64
Anderson Kill PC	June 1, 2021 / D.I. 1271	\$399.00	\$399.00	\$399.00	\$0.00	\$399.00	\$0.00	\$0.00
AlixPartners, LLP	June 1, 2021 / D.I. 1257	\$1,170,998.50	\$1,170,998.50	\$1,170,998.50	\$0.00	\$1,170,998.50	\$0.00	\$0.00
Kurtzman Carson Consultants LLC	June 1, 2021 / D.I. 1259	\$712,286.40	\$712,286.40	\$712,286.40	\$0.00	\$712,286.40	\$0.00	\$0.00
Perella Weinberg Partners LP	June 1, 2021 / D.I. 1260	\$17,225,000.00	\$17,225,000.00	\$17,225,000.00	\$0.00	\$17,225,000.00	\$8,429.00	\$8,429.00
Simpson Thacher & Bartlett LLP	June 1, 2021 / D.I. 1264	\$26,783.00	\$26,783.00	\$26,783.00	\$0.00	\$26,783.00	\$164.50	\$164.50
FTI Consulting, Inc.	June 1, 2021 / D.I. 1265	\$3,440.00	\$3,440.00	\$3,440.00	\$0.00	\$3,440.00	\$0.00	\$0.00
Schulte Roth & Zabel LLP	June 1, 2021 / D.I. 1262	\$16,617.00	\$16,617.00	\$16,617.00	\$0.00	\$16,617.00	\$0.00	\$0.00
PricewaterhouseCoopers LLP ²	June 1, 2021 / D.I. 1258	\$11,989,873.70	\$11,989,873.70	\$11,989,873.70	\$0.00	\$11,989,873.70	\$0.00	\$0.00
Morgan Stanley & Co. LLC ³	June 1, 2021 / D.I. 1261	\$10,000,000.00	\$10,000,000.00	\$10,000,000.00	\$0.00	\$10,000,000.00	N/A	\$0.00

Revised September 2011

DATE ON WHICH ORDER WAS SIGNED: July 1, 2021

INITIALS: **MEW** USBJ

¹ Lester Brickman, KCIC, LLC, Foley & Mansfield and Deloitte did not request compensation or reimbursement of expenses for the Current Interim Fee Period.

² PricewaterhouseCoopers LLP has not previously filed an interim fee application seeking allowance of fees and expenses and amounts listed are for the period commencing September 20, 2020 through April 30, 2021. Amounts listed reflect requested fees before application of available retainers.

³ Morgan Stanley & Co. LLC has not previously filed an interim fee application seeking allowance of fees and expenses and amounts listed are for the period commencing September 20, 2020 through April 30, 2021.

Case No.: 20-12212 (MEW)
Case Name: In re Garrett Motion Inc., et al.

FINAL FEE APPLICATION TOTALS
September 20, 2020 through April 30, 2021

Schedule B

(1) Applicant	(2) Total Fees Requested	(3) Total Fees Paid	(4) Total Expenses Requested	(5) Total Expenses Paid
Sullivan & Cromwell LLP	\$26,237,594.25 ¹	\$25,637,904.51	\$162,997.06 ²	\$163,333.90
Quinn Emanuel Urquhart & Sullivan, LLP	\$10,729,712.50	\$10,714,330.20	\$51,041.91	\$51,041.91
Lester Brickman	\$26,505.00	\$26,505.00	\$0.00	\$0.00
Anderson Kill PC	\$69,224.20	\$68,825.20	\$70.00	\$70.00
KCIC, LLC	\$108,182.50	\$108,182.50	\$262.50	\$262.50
Foley & Mansfield	\$48,000.00	\$48,000.00	\$0.00	\$0.00
AlixPartners, LLP	\$8,124,020.00	\$7,890,604.05	\$2,494.20	\$2,494.20
Kurtzman Carson Consultants LLC	\$841,912.44	\$699,455.16	\$0.00	\$0.00
Deloitte AG	CHF 1,826,051.53 (\$2,051,437.54)	\$2,049,944.64 ³	CHF 0.00	CHF 0.00
Perella Weinberg Partners LP	\$18,642,500.00	\$1,597,500.00	\$308,957.88	\$308,957.88
Simpson Thacher & Bartlett LLP	\$1,401,426.00 ⁴	\$1,279,220.50	\$12,449.38 ⁵	\$8,710.68
FTI Consulting, Inc.	\$661,427.75	\$657,987.75	\$0.00	\$0.00
Schulte Roth & Zabel LLP	\$424,565.00	\$407,948.00	\$210.00	\$210.00
PricewaterhouseCoopers LLP	\$11,989,873.70	\$4,840,218.72	\$0.00	\$0.00
Morgan Stanley & Co. LLC	\$10,000,000.00	\$0.00	N/A	\$0.00

Revised September 2011

DATE ON WHICH ORDER WAS SIGNED: July 1, 2021

INITIALS: **MEW** USBJ

¹ This amount reflects a voluntary reduction of \$96,046.25 pursuant to agreement with the United States Trustee.

² This amount reflects a voluntary reduction of \$336.84 pursuant to agreement with the United States Trustee.

³ Values in USD equivalents. Original invoices in CHF and subject to exchange rate movements.

⁴ This amount includes \$95,422.50 in fees for professional services rendered during the prepetition period.

⁵ This amount includes \$3,574.20 for expenses incurred during the prepetition period.

Hearing Date: June 30, 2021 at 11:00 a.m.
Objection Deadline: June 23, 2021 at 4:00 p.m.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____	X	
In re	:	Chapter 11
	:	
Garrett Motion Inc., <i>et al.</i> , ¹	:	Case No. 20-12212 (MEW)
	:	
Reorganized Debtors.	:	Jointly Administered
	:	
_____	X	

**NOTICE OF FINAL APPLICATION OF SULLIVAN & CROMWELL LLP AS
COUNSEL TO THE DEBTORS FOR FINAL APPROVAL AND
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM
SEPTEMBER 21, 2020 THROUGH AND INCLUDING APRIL 30, 2021**

PLEASE TAKE NOTICE that on the date hereof, Sullivan & Cromwell LLP (“S&C”) filed the *Final Fee Application of Sullivan & Cromwell LLP as Counsel to the Debtors for Final Approval and Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from September 21, 2020 Through and Including April 30, 2021* (the “Final Fee Application”) with the United States Bankruptcy Court for the Southern District of New York (the “Court”).

PLEASE TAKE FURTHER NOTICE that a hearing (the “Hearing”) on the Final Fee Application is scheduled to held telephonically before the Honorable Michael E. Wiles, United States Bankruptcy Judge, on June 30, 2021 at 11:00 a.m. (Prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that any responses or objections (the

¹ The last four digits of Garrett Motion Inc.’s tax identification number are 3189. Due to the large number of debtor entities in these Chapter 11 Cases, which are being jointly administered, a complete list of the Reorganized Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <http://www.kccllc.net/garrettmotion>. The Reorganized Debtors’ corporate headquarters is located at La Pièce 16, Rolle, Switzerland.

“Objections”) to the Final Fee Application shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules for the United States Bankruptcy Court for the Southern District of New York and shall be filed with the Court in accordance with the customary practices of the Court and General Order M-399. Objections must be filed and received no later than June 23, 2021 at 4:00 pm (Prevailing Eastern Time) (the “Objection Deadline”) and must be served on the following parties: (a) counsel to the Debtors, Sullivan & Cromwell LLP, Attn: Alexa J. Kranzley (kranzleya@sullcrom.com); (b) counsel to Honeywell International Inc., Kirkland & Ellis LLP, Attn: Nicole L. Greenblatt, P.C. (nicole.greenblatt@kirkland.com), Mark McKane, P.C. (mmckane@kirkland.com) and Joseph M. Graham (joe.graham@kirkland.com); (c) counsel to Oaktree Capital Management, L.P. and Centerbridge Partners, L.P., as Plan Sponsors, Milbank LLP, Attn: Dennis F. Dunne (ddunne@milbank.com), Andrew M. Leblanc (aleblanc@milbank.com), and Andrew C. Harmeyer (aharmeyer@milbank.com); (d) counsel to the Additional Investors, Jones Day, Attn: Anna Kordas (akordas@jonesday.com), Bruce Bennett (bbennett@jonesday.com), Joshua M. Mester (jmester@jonesday.com) and James O. Johnston (jjohnston@jonesday.com); and (e) the Office of the United States Trustee for the Southern District of New York, Attn: Benjamin Higgins, Esq. (Benjamin.J.Higgins@ust.doj.gov). All Objections that are not resolved by the parties or Court order shall be preserved and presented to the Court at the Hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing and failure to appear may result in relief being granted upon default; *provided* that objecting parties shall attend the Hearing telephonically so long as General Order M-399 is in effect or unless otherwise ordered by the Court.

PLEASE TAKE FURTHER NOTICE that the Court, in its discretion, may

approve an uncontested Final Fee Application without the need for a hearing. If no Objections are timely filed and served, S&C may, after the Objection Deadline, submit to the Court a proposed order granting the Final Fee Application, which may be entered with no further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that copies of the Final Fee Application may be obtained from the Court's website, <https://ecf.nysb.uscourts.gov> for a nominal fee or, free of charge, from the website of the Debtors' claims and noticing agent, <http://www.kcellc.net/garrettmotion>.

Dated: June 1, 2021
New York, New York

/s/ Brian D. Glueckstein
Andrew G. Dietderich
Brian D. Glueckstein
Alexa J. Kranzley
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

Counsel to the Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____	X	
In re	:	Chapter 11
	:	
Garrett Motion Inc., <i>et al.</i> , ¹	:	Case No. 20-12212 (MEW)
	:	
Reorganized Debtors.	:	Jointly Administered
	:	
_____	X	

**SUMMARY COVER SHEET OF FINAL FEE APPLICATION OF SULLIVAN &
CROMWELL LLP AS COUNSEL TO THE DEBTORS FOR THE PERIOD OF
SEPTEMBER 21, 2020 THROUGH AND INCLUDING APRIL 30, 2021**

NAME OF APPLICANT:	Sullivan & Cromwell LLP
AUTHORIZED TO PROVIDE PROFESSIONAL SERVICES TO:	Garrett Motion Inc. and its affiliates, as debtors and debtors-in-possession in these Chapter 11 Cases
DATE CASE FILED:	September 20, 2020
DATE OF RETENTION:	October 26, 2020 <i>nunc pro tunc</i> to September 20, 2020
PERIOD FOR WHICH COMPENSATION AND REIMBURSEMENT IS SOUGHT:	September 21, 2020 through and including April 30, 2021
TOTAL COMPENSATION REQUESTED:	\$26,237,594.25
TOTAL EXPENSE REIMBURSEMENT REQUESTED:	\$162,997.06

This is a(n): ___interim X final application.

This is the final fee application filed by Sullivan & Cromwell LLP.

¹ The last four digits of Garrett Motion Inc.'s tax identification number are 3189. Due to the large number of debtor entities in these Chapter 11 Cases, which are being jointly administered, a complete list of the Reorganized Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Reorganized Debtors' claims and noticing agent at <http://www.kccllc.net/garrettmotion>. The Reorganized Debtors' corporate headquarters is located at La Pièce 16, Rolle, Switzerland.

SUMMARY OF FEES AND EXPENSES REQUESTED FOR FEE PERIOD

Date and Docket No.	Period Covered	Fees Requested	Holdback (20%)	Fees Paid to Date	Expenses Requested	Expenses Paid to Date	Approved Fees and Expenses
11/20/2020 [D.I 437]	09/21/2020 – 10/31/2020	\$6,264,511.50	\$1,252,902.30	\$6,221,206.82	\$93,495.53	\$93,427.82	\$14,067,778.45
12/18/2020 [D.I. 564]	11/1/2020 – 11/30/2020	\$3,754,665.00	\$750,964.80	\$3,728,791.89	\$5,450.79	\$5,300.47	
01/20/2021 [D.I. 747]	12/1/2020 – 12/31/2020	\$4,040,767.50	\$808,153.50	\$4,013,899.04	\$5,271.22	\$5,152.41	
02/19/2021 [D.I. 934]	01/1/2021 – 01/31/2021	\$3,724,366.00	\$744,873.20	\$3,724,366.00	\$3,668.36	\$3,668.36	\$9,314,320.39
03/19/2021 [D.I. 1045]	02/1/2021 – 02/28/2021	\$3,336,940.00	\$667,388.00	\$3,336,940.00	\$28,948.05	\$28,948.05	
04/20/2021 [D.I. 1132]	03/1/2021 – 03/31/2021	\$2,215,626.00	\$443,125.20	\$2,215,626.00	\$4,771.98	\$4,771.98	
05/20/2021 [D.I. 1218]	04/1/2021 – 04/30/2021	\$2,996,764.50	\$599,352.90	\$0.00	\$21,727.97	\$0.00	
TOTAL FOR ALL FEE PERIODS		\$26,333,640.50	\$5,266,759.90	\$23,240,829.75	\$163,333.90	\$141,269.09	
ADJUSTMENTS PER PRIOR DISCUSSIONS WITH U.S. TRUSTEE		-\$96,046.25			-\$336.84		
CURRENT REQUESTED AMOUNTS		\$26,237,594.25			\$162,997.06		

* Fees and expenses requested in the monthly fee statement for April 2021 will not be payable until June 4, 2021.

PROJECTED TOTAL BUDGET FOR FEE PERIOD AND ACTUAL FEES INCURRED

Estimated Fees for Fee Period		Actual Fees For Fee Period
Low	High	\$26,237,594.25
\$22,938,000.00	\$40,206,000.00	

PROJECT CODE TOTAL CHART

Project Number	Project Name	Hours	Fee Amount
010	ASSET ANALYSIS AND RECOVERY	-	\$0.00
011	ASSET DISPOSITION	4,301.30	\$5,451,574.50
012	ASSUMPTION AND REJECTION OF LEASES AND CONTRACTS	138.70	\$185,255.50
013	AVOIDANCE ACTION ANALYSIS	-	\$0.00
014	BUSINESS OPERATIONS	715.80	\$887,911.00
015	CASE ADMINISTRATION	1,237.90	\$1,486,213.00
016	CLAIMS ADMINISTRATION AND OBJECTIONS	315.80	\$344,368.00
017	CORPORATE GOVERNANCE AND BOARD MATTERS	976.30	\$1,309,310.00
018	EMPLOYEE BENEFITS AND PENSIONS	480.00	\$599,447.50
019	EMPLOYMENT AND FEE APPLICATIONS (S&C)	317.60	\$252,910.50
020	EMPLOYMENT AND FEE APPLICATIONS (OTHERS)	431.10	\$426,182.00
021	FINANCING AND CASH COLLATERAL	2,625.70	\$2,889,046.50
022	OTHER LITIGATION	466.20	\$578,785.00
023	MEETINGS AND COMMUNICATIONS WITH CREDITORS	128.90	\$155,702.50
024	NON-WORKING TRAVEL	-	\$0.00
025	PLAN AND DISCLOSURE STATEMENT	5,887.10	\$6,809,185.00
026	RELIEF FROM STAY AND ADEQUATE PROTECTION	-	\$0.00
027	TAX	965.90	\$1,217,284.00
028	VALUATION	12.00	\$20,640.00
029	DISCOVERY	2,328.50	\$2,256,782.50
030	HEARINGS	299.60	\$405,150.00
031	FIRST AND SECOND DAY MOTIONS	429.60	\$399,273.50
032	CLAIMS INVESTIGATION	-	\$0.00
033	LIEN INVESTIGATION	-	\$0.00
034	SCHEDULES, SOFAS AND REPORTING	596.00	\$651,608.00
035	OTHER MOTIONS/APPLICATIONS	5.00	\$5,059.00
036	TIME ENTRY REVIEW	850.80	\$0.00
037	BUDGETING	2.00	\$1,952.50
TOTAL		23,511.80	\$26,333,640.50
ADJUSTMENTS PER DISCUSSION WITH U.S. TRUSTEE			-\$96,046.25
UPDATED TOTAL			\$26,237,594.25

S&C PROFESSIONALS PERFORMING SERVICES DURING THE FEE PERIOD

Timekeeper Name	Title	Practice Group	Bar Admission	Rate	Hours	Amount
Bromley, James L.	Partner	GP	1990	\$1,750.00	2.90	\$5,075.00
Chatterjee, Whitney A.	Partner	GP	2002	\$1,750.00	1.10	\$1,925.00
Clarkin, Catherine M.	Partner	GP	1996	\$1,750.00	0.30	\$525.00
Coleman, Heather L.	Partner	GP/Employee Benefits	2007	\$1,675.00	142.60	\$238,855.00
Creamer Jr., Ronald E.	Partner	Tax	1992	\$1,750.00	0.30	\$525.00
Dietderich, Andrew G.	Partner	GP/Restructuring	1997	\$1,750.00	1,259.50	\$2,204,125.00
Estes, John E.	Partner	GP	1995	\$1,750.00	0.80	\$1,400.00
Gilberg, David J.	Partner	GP	1981	\$1,750.00	24.70	\$43,225.00
Glueckstein, Brian D.	Partner	Litigation	2004	\$1,750.00	1,676.30	\$2,933,525.00
Hariton, David P.	Partner	Tax	1986	\$1,750.00	369.50	\$646,625.00
Hochberg, Jeffrey D.	Partner	Tax	1996	\$1,750.00	0.30	\$525.00
Holley, Steven L.	Partner	Litigation	1984	\$1,750.00	0.90	\$1,575.00
Horsfield-Bradbury, John	Partner	GP	2009	\$1,675.00	0.80	\$1,340.00
Howard, Christopher J.	Partner	GP	1996	\$1,750.00	56.70	\$99,225.00
Jones, Craig	Partner	GP	1996	\$1,750.00	0.40	\$700.00
McKnight, Neal	Partner	GP	1997	\$1,750.00	234.10	\$409,675.00
Miller, Ryne V.	Partner	GP	2007	\$1,675.00	3.40	\$5,695.00
Miller, Scott D.	Partner	GP	1987	\$1,750.00	172.50	\$301,875.00
Mousavi, Nader A.	Partner	GP	1999	\$1,750.00	1.60	\$2,800.00
Pollack, Richard A.	Partner	GP	1989	\$1,750.00	0.30	\$525.00
Rosenberg, Mark F.	Partner	Litigation	1981	\$1,750.00	13.20	\$23,100.00
Rosenthal, Michael	Partner	Litigation	2002	\$1,750.00	8.00	\$14,000.00
Schlein, Robert M.	Partner	GP	1993	\$1,750.00	1.30	\$2,275.00
Simpson, Evan S.	Partner	GP	2011	\$1,550.00	598.50	\$927,675.00
Simpson, Evan S.	Partner	GP	2011	\$1,675.00	467.20	\$782,560.00
Spitzer, David C.	Partner	Tax	1996	\$1,750.00	0.30	\$525.00
Wang, Davis J.	Partner	Tax	2004	\$1,750.00	42.90	\$75,075.00
Wang, S. Eric	Partner	Tax	2002	\$1,750.00	0.30	\$525.00
Wertheim, Frederick	Partner	GP	1988	\$1,750.00	0.30	\$525.00
Wheeler, Isaac J.	Partner	Tax	2010	\$1,675.00	0.30	\$502.50
White, Thomas C.	Partner	Litigation	2008	\$1,675.00	173.90	\$291,282.50
Partner Total					5,255.20	\$9,017,785.00
Solomon, Andrew P.	Of Counsel	Tax	1985	\$1,750.00	0.30	\$525.00
Tulchin, David B.	Of Counsel	Litigation	1974	\$1,750.00	3.30	\$5,775.00
Anselmi, John J.	Special Counsel	GP	2003	\$1,450.00	5.90	\$8,555.00
Berkeley, Nick R.C.	Special Counsel	GP	2003	\$1,375.00	62.10	\$85,387.50
Brander, Saul	Special Counsel	Tax	2003	\$1,350.00	9.20	\$12,420.00
Brennan, Matthew J.	Special Counsel	GP/Environmental	1986	\$1,450.00	6.60	\$9,570.00
Brennan, Matthew J.	Special Counsel	GP/Environmental	1986	\$1,495.00	2.30	\$3,438.50
Hoseinian, Foad	Special Counsel	Litigation	2017	\$1,350.00	89.90	\$121,365.00
Hoseinian, Foad	Special Counsel	Litigation	2017	\$1,450.00	98.40	\$142,680.00
Kranzley, Alexa J.	Special Counsel	GP/Restructuring	2009	\$1,450.00	530.70	\$769,515.00
Kranzley, Alexa J.	Special Counsel	GP/Restructuring	2009	\$1,540.00	836.40	\$1,288,056.00

Timekeeper Name	Title	Practice Group	Bar Admission	Rate	Hours	Amount
Kwok, Joyce Y.	Special Counsel	GP	2013	\$1,350.00	1.20	\$1,620.00
Orchowski, Michael	Special Counsel	Tax	2009	\$1,475.00	1.30	\$1,917.50
Queen, Eric H.	Special Counsel	Litigation	1977	\$1,450.00	3.00	\$4,350.00
Queen, Eric H.	Special Counsel	Litigation	1977	\$1,495.00	11.50	\$17,192.50
Russell, Tracey E.	Special Counsel	GP	2002	\$1,350.00	1.70	\$2,295.00
Russell, Tracey E.	Special Counsel	GP	2002	\$1,450.00	3.20	\$4,640.00
Smith, Bradley P.	Special Counsel	Litigation	1998	\$1,495.00	13.00	\$19,435.00
Thomson, Andrew	Special Counsel	Tax	2004	\$1,540.00	3.20	\$4,928.00
Of Counsel/Special Counsel Total					1,683.20	\$2,503,665.00
DeMarco, Raffaele A.	Practice Area Associate	GP	2003	\$825.00	6.50	\$5,362.50
McClellan, Clea M.	Practice Area Associate	Litigation	2004	\$635.00	8.50	\$5,397.50
Akeseh, Solomon A.	Associate	GP	in process	\$675.00	125.70	\$84,847.50
Akrong, Kevin A.	Associate	GP	in process	\$650.00	7.20	\$4,680.00
Badgley, Tyler S.	Associate	Litigation	2017	\$1,100.00	10.80	\$11,880.00
Badgley, Tyler S.	Associate	Litigation	2017	\$1,140.00	60.80	\$69,312.00
Baker, Nicholas R.	Associate	Litigation	2019	\$795.00	22.40	\$17,808.00
Basse, Michael A.	Associate	GP	2020	\$650.00	25.10	\$16,315.00
Basse, Michael A.	Associate	GP	2020	\$795.00	224.40	\$178,398.00
Beller, Benjamin S.	Associate	GP	2014	\$1,185.00	1,198.10	\$1,419,748.50
Bogdan, Matt	Associate	Litigation	2019	\$795.00	0.80	\$636.00
Calder Jr., Joseph M.	Associate	Litigation	2020	\$650.00	8.40	\$5,460.00
Calder Jr., Joseph M.	Associate	Litigation	2020	\$795.00	241.40	\$191,913.00
Cheema, Zainab A.	Associate	GP	in process	\$675.00	11.40	\$7,695.00
Cheema, Zainab A.	Associate	GP	in process	\$820.00	44.20	\$36,244.00
Cheema, Zainab A.	Associate	GP	in process	\$820.00	33.90	\$27,798.00
Costakos, Paige N.	Associate	GP	2019	\$995.00	308.60	\$307,057.00
Costello, Dermot P.	Associate	GP	2020	\$675.00	290.50	\$196,087.50
Darby, Samuel G.	Associate	Litigation	2018	\$1,100.00	205.90	\$226,490.00
Erickson, Anna R.	Associate	Tax	2019	\$995.00	0.70	\$696.50
Feldman, Zachary W.	Associate	Tax	2020	\$795.00	7.40	\$5,883.00
Goldman, Jessica H.	Associate	Litigation	2020	\$795.00	103.60	\$82,362.00
Grayman, Samantha O.	Associate	GP	in process	\$675.00	133.10	\$89,842.50
Greene, Miles H.	Associate	Litigation	2021	\$650.00	31.30	\$20,345.00
Guido, Emma J.	Associate	GP	2017	\$995.00	3.60	\$3,582.00
Guido, Emma J.	Associate	GP	2017	\$1,100.00	356.00	\$391,600.00
Hauch, Elisa T.	Associate	Litigation	2016	\$1,160.00	8.70	\$10,092.00
Hill, Tyler W.	Associate	GP	2017	\$1,165.00	453.40	\$528,211.00
Hopkin, Wesley N.	Associate	GP	2018	\$795.00	66.10	\$52,549.50
Hopkin, Wesley N.	Associate	GP	2018	\$995.00	862.80	\$858,486.00
Hopkinson, Charlotte M.	Associate	GP	2020	\$650.00	15.70	\$10,205.00
Hopkinson, Charlotte M.	Associate	GP	2020	\$795.00	276.80	\$220,056.00
Jensen, Christian P.	Associate	GP	2016	\$1,160.00	0.30	\$348.00
Khajooei, Kian T.	Associate	GP	2021	\$650.00	2.70	\$1,755.00
Kim, Ayoung	Associate	GP	2021	\$650.00	36.10	\$23,465.00
Kim, HyunKyu	Associate	Tax	in process	\$650.00	164.10	\$106,665.00
King, Bradley S.	Associate	GP	2015	\$1,160.00	34.60	\$40,136.00

Timekeeper Name	Title	Practice Group	Bar Admission	Rate	Hours	Amount
King, Bradley S.	Associate	GP	2015	\$1,185.00	144.60	\$171,351.00
Kostelak, Rebekah A.	Associate	GP	2019	\$795.00	43.20	\$34,344.00
Kostelak, Rebekah A.	Associate	GP	2019	\$995.00	248.10	\$246,859.50
Kwok, Joyce Y.	Associate	GP	2013	\$1,185.00	23.00	\$27,255.00
Lacayo, Maria J.	Associate	GP	2018	\$1,020.00	10.40	\$10,608.00
Lacayo, Maria J.	Associate	GP	2018	\$1,125.00	484.80	\$545,400.00
Lee, Joyce Y.	Associate	GP	2021	\$650.00	1.50	\$975.00
Levine, Aaron M.	Associate	GP	2018	\$995.00	8.60	\$8,557.00
Levine, Aaron M.	Associate	GP	2018	\$1,100.00	3.50	\$3,850.00
Levy, Eran	Associate	Tax	2017	\$795.00	26.20	\$20,829.00
Levy, Eran	Associate	Tax	2017	\$995.00	132.00	\$131,340.00
Lloyd, Jameson S.	Associate	Tax	2014	\$1,185.00	167.40	\$198,369.00
McIver, Thomas R.	Associate	Litigation	2018	\$995.00	17.90	\$17,810.50
McIver, Thomas R.	Associate	Litigation	2018	\$1,100.00	117.70	\$129,470.00
Menillo, Nicholas F.	Associate	Litigation	2013	\$1,185.00	62.50	\$74,062.50
Merron, Eric R.	Associate	Litigation	2015	\$1,140.00	81.60	\$93,024.00
Merron, Eric R.	Associate	Litigation	2015	\$1,160.00	413.10	\$479,196.00
Middleditch, Hattie R.	Associate	Litigation	2014	\$1,125.00	1.50	\$1,687.50
Mishkin, Sarah H.	Associate	GP	2019	\$820.00	7.00	\$5,740.00
Mishkin, Sarah H.	Associate	GP	2019	\$1,020.00	40.60	\$41,412.00
Morrice, R. Courtland	Associate	GP	2017	\$1,100.00	41.60	\$45,760.00
Morrice, R. Courtland	Associate	GP	2017	\$1,140.00	380.10	\$433,314.00
Nascimento dos Reis, Thiago	Associate	GP	2017	\$650.00	8.70	\$5,655.00
Nascimento dos Reis, Thiago	Associate	GP	2017	\$795.00	12.00	\$9,540.00
Newman, Brandon A.	Associate	GP	2019	\$795.00	8.40	\$6,678.00
Newman, Brandon A.	Associate	GP	2019	\$995.00	62.30	\$61,988.50
Omer, Corey	Associate	Litigation	2013	\$1,185.00	13.40	\$15,879.00
Opris, Gabriel	Associate	GP	2019	\$675.00	1.50	\$1,012.50
Orr, Justin R.	Associate	GP	2014	\$1,160.00	16.20	\$18,792.00
Orr, Justin R.	Associate	GP	2014	\$1,185.00	157.10	\$186,163.50
Petiford, Julie G.	Associate	Litigation	2018	\$995.00	43.00	\$42,785.00
Petiford, Julie G.	Associate	Litigation	2018	\$1,100.00	812.30	\$893,530.00
Rabinowitz, Rebecca M.	Associate	GP	2021	\$650.00	3.60	\$2,340.00
Rhein, Jonathan M.	Associate	Tax	2014	\$1,160.00	1.60	\$1,856.00
Rhein, Jonathan M.	Associate	Tax	2014	\$1,185.00	7.00	\$8,295.00
Rosenthal, David M.	Associate	GP	2019	\$795.00	37.70	\$29,971.50
Rosenthal, David M.	Associate	GP	2019	\$995.00	434.20	\$432,029.00
Ruscitto, Sean	Associate	GP	2015	\$1,185.00	10.40	\$12,324.00
Salter, David	Associate	Litigation	2017	\$1,140.00	83.70	\$95,418.00
Schapiro, Bella	Associate	Tax	in process	\$795.00	61.80	\$49,131.00
Scully, Lauren S.	Associate	Litigation	in process	\$650.00	82.70	\$53,755.00
Simpson, James G.	Associate	GP	2017	\$1,165.00	1,238.00	\$1,442,270.00
Stevens, Joshua I.	Associate	Tax	2018	\$1,020.00	1.50	\$1,530.00
Taye, Louell T.T.	Associate	GP	2020	\$650.00	67.90	\$44,135.00
Taye, Louell T.T.	Associate	GP	2020	\$795.00	0.10	\$79.50

Timekeeper Name	Title	Practice Group	Bar Admission	Rate	Hours	Amount
Thompson, Andrew A.	Associate	Litigation	2021	\$995.00	20.30	\$20,198.50
Toprani, Akash M.	Associate	Litigation	2013	\$1,185.00	86.10	\$102,028.50
Tran, Tue M.	Associate	GP	in process	\$650.00	608.00	\$395,200.00
Treiber, Alexander	Associate	Litigation	2017	\$1,140.00	108.20	\$123,348.00
Verlinden, Karen A.J.	Associate	Litigation	in process	\$650.00	24.50	\$15,925.00
Verlinden, Karen A.J.	Associate	Litigation	in process	\$795.00	88.90	\$70,675.50
Verma, Nitish	Associate	GP	in process	\$1,020.00	245.00	\$249,900.00
Wasser, Jason A.	Associate	GP	2017	\$1,140.00	5.70	\$6,498.00
Weinberg Crocco, Fabio	Associate	GP	2011	\$995.00	5.50	\$5,472.50
Weinberg Crocco, Fabio	Associate	GP	2011	\$1,100.00	49.40	\$54,340.00
Weiss, Noam R.	Associate	GP	2014	\$1,185.00	788.50	\$934,372.50
Wilson, Timothy C.	Associate	GP	2019	\$795.00	0.50	\$397.50
Wong, Albert	Associate	GP	2020	\$650.00	21.80	\$14,170.00
Wong, Albert	Associate	GP	2020	\$795.00	170.50	\$135,547.50
Young, Elizabeth V.	Associate	Litigation	2017	\$1,140.00	120.20	\$137,028.00
Yu, Meng	Associate	GP	2021	\$650.00	242.30	\$157,495.00
Yu, Rachel	Associate	GP	2014	\$1,185.00	0.50	\$592.50
Borsuk, Anna	Trainee Solicitor	GP	in process	\$535.00	97.10	\$51,948.50
McGinn, Amy N.	Trainee Solicitor	GP	in process	\$535.00	0.70	\$374.50
Morreale, Luca E.	Trainee Solicitor	GP	in process	\$535.00	211.80	\$113,313.00
Associate Total					13,909.10	\$13,984,605.50
Lawyers Total					20,847.50	\$25,506,055.50
Bowden, Karen E.	Paralegal			\$495.00	24.60	\$12,177.00
Chen, Sophia	Paralegal			\$0.00*	384.80	\$0.00
Chen, Sophia	Paralegal			\$350.00	357.00	\$124,950.00
Chiu, Jeffrey H.	Paralegal			\$495.00	2.50	\$1,237.50
Dahlberg, Kethan T.	Paralegal			\$495.00	54.30	\$26,878.50
Ea, Choun F.	Paralegal			\$495.00	15.00	\$7,425.00
Fierres, Maria C.	Paralegal			\$405.00	2.60	\$1,053.00
Guo, Wei	Paralegal			\$495.00	3.80	\$1,881.00
Hetherington, Sara V.	Paralegal			\$405.00	2.00	\$810.00
Khan, Paul R.	Paralegal			\$495.00	6.30	\$3,118.50
Kim, Scott J.	Paralegal			\$495.00	9.90	\$4,900.50
Lowden, Grace A.	Paralegal			\$350.00	22.10	\$7,735.00
Malz, Rebecca A.	Paralegal			\$0.00*	466.00	\$0.00
Malz, Rebecca A.	Paralegal			\$495.00	446.50	\$221,017.50
Nguyen, Bach-Yen T.	Paralegal			\$495.00	52.00	\$25,740.00
Poeltl, Natalie A.	Paralegal			\$405.00	8.50	\$3,442.50
Winston, Conor J. S.	Paralegal			\$405.00	9.00	\$3,645.00
Jayasekara-Evans, Anuththara L.	Legal Analyst - Litigation			\$495.00	7.80	\$3,861.00
Jordan, Frank A.	Legal Analyst - Litigation			\$495.00	12.40	\$6,138.00
Mao, Charles	Legal Analyst - Litigation			\$495.00	7.00	\$3,465.00
Maratheftis, Georgia	Legal Analyst - Litigation			\$495.00	17.70	\$8,761.50

Timekeeper Name	Title	Practice Group	Bar Admission	Rate	Hours	Amount
Preston, Robert F.	Legal Analyst - Litigation			\$495.00	14.20	\$7,029.00
Seguritan, Patrick	Legal Analyst - Litigation			\$495.00	8.30	\$4,108.50
Skaggs, Travis A.	Legal Analyst - Litigation			\$495.00	7.10	\$3,514.50
Sokhna, Ibrahima	Legal Analyst - Litigation			\$495.00	11.30	\$5,593.50
Lee, Christian C.	Legal Analyst - Discovery			\$520.00	9.20	\$4,784.00
Romero, Evangelina C.	Legal Analyst - Discovery			\$520.00	1.10	\$572.00
Whalen, Sean S.	Paralegal Clerk			\$200.00	3.50	\$700.00
Cabrera, Ismael	Electronic Discovery			\$485.00	26.80	\$12,998.00
Chen, Ken	Electronic Discovery			\$415.00	100.40	\$41,666.00
Davis, Makeia K.	Electronic Discovery			\$490.00	6.00	\$2,940.00
Hossein, Saud M.	Electronic Discovery			\$485.00	37.60	\$18,236.00
Kordic, Alma	Electronic Discovery			\$485.00	68.90	\$33,416.50
Lampariello, Alla P.	Electronic Discovery			\$490.00	14.30	\$7,007.00
Long, Jacky Q.	Electronic Discovery			\$490.00	4.60	\$2,254.00
Lopez, Nathaniel S.	Electronic Discovery			\$490.00	0.20	\$98.00
Masurka, Evan R.	Electronic Discovery			\$490.00	1.20	\$588.00
Mian, Ahmed A.	Electronic Discovery			\$490.00	29.10	\$14,259.00
Newman, Eric M.	Electronic Discovery			\$485.00	141.30	\$68,530.50
Ozols, Leslie M.	Electronic Discovery			\$490.00	58.60	\$28,714.00
Phan, Jimmy T.	Electronic Discovery			\$490.00	163.90	\$80,311.00
Sheikh, Faisal M.	Electronic Discovery			\$630.00	0.20	\$126.00
Yim, Eileen Y. L.	Electronic Discovery			\$490.00	6.70	\$3,283.00
Betin, Darya A.	Research Librarian			\$490.00	6.20	\$3,038.00
Bowersox, Christine E.	Research Librarian			\$490.00	5.40	\$2,646.00
Council, Kimberly N.	Research Librarian			\$490.00	7.90	\$3,871.00
Gorman, Teresa A.	Research Librarian			\$490.00	2.10	\$1,029.00
Haslam, Chase M.	Research Librarian			\$490.00	0.30	\$147.00
Khwaja, Tariq	Research Librarian			\$490.00	2.20	\$1,078.00
Noller, Denise J.	Research Librarian			\$490.00	2.80	\$1,372.00
Ramburrin, Robi	Research Librarian			\$490.00	1.00	\$490.00
Seeger, Evelyn H.	Research Librarian			\$490.00	5.50	\$2,695.00
Tully, John K.	Research Librarian			\$490.00	4.60	\$2,254.00
Non Legal Personnel Total:					2,664.30	\$827,585.00
GRAND TOTAL					23,511.80	\$26,333,640.50
ADJUSTMENTS PER DISCUSSION WITH U.S. TRUSTEE						-\$96,046.25
UPDATED GRAND TOTAL						\$26,237,594.25

* Zero rate appears wherever no fee was charged for work.

SUMMARY OF DISBURSEMENTS

Disbursement Summary	
Description	Amount
Repro - B&W Copies	\$1,251.50
Repro - Color Copies	\$668.00
Repro - Binding	\$16.25
Telephonic Court Appearance	\$7,000.00
Tele-video Conference	\$1,304.62
Local Transportation	\$2,118.72
Meals - Overtime	\$1,023.33
Delivery Services	\$1,518.63
Transcripts	\$56,137.70
Filing Fees	\$65,837.84
Process Servicer	\$145.07
CT Corp/CSC	\$26,312.24
TOTAL	\$163,333.90
ADJUSTMENTS PER DISCUSSION WITH U.S. TRUSTEE	-\$336.84
UPDATED TOTAL	\$162,997.06

CUSTOMARY AND COMPARABLE DISCLOSURES

Category	Garrett Motion Inc.*		Firm**	
	September 2020 through April 2021		Total Firm Bills Allocated to Non-BK General Domestic Timekeepers from January 2020 through April 2021	
	Blended Hourly Rate	% of Total Hours	Blended Hourly Rate	% of Total Hours
Partner	\$1,716	22%	\$1,820	23%
Counsel and Senior Associate ⁽¹⁾	\$1,240	32%	\$1,200	26%
Junior Associate ⁽²⁾	\$890	35%	\$826	43%
Non-Lawyer ⁽³⁾	\$311	11%	\$451	8%
All Timekeepers Average	\$1,120	100%	\$1,116	100%

⁽¹⁾ Includes Special Counsel, Of Counsel, Senior Counsel, Senior Associate (Level 5-8) and Practice Area Associates

⁽²⁾ Includes Junior Associate (Level 1-4)

⁽³⁾ Includes Summer Associate, Paralegals, Legal Analyst, Research Analyst, and Electronic Discovery

* Includes No Charge entries on various projects. No Charge entries were included on the fee applications with a \$0 rate.

** Includes non-BK work of BK timekeepers and all work of other domestic timekeepers, excluding litigation matters and all write-offs (bills or collections less than 60% of standard rates).

Exhibit F

**UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK**

_____	x	
In re	:	Chapter 11
	:	
LSC COMMUNICATIONS, INC., <i>et al.</i> , ¹	:	Case No. 20-10950 (SHL)
	:	
Debtors.	:	Jointly Administered
	:	
	:	
	x	

**OMNIBUS ORDER GRANTING THE APPLICATIONS OF THE PROFESSIONALS FOR
 FINAL APPROVAL AND ALLOWANCE OF COMPENSATION FOR SERVICES
 RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD
 FROM APRIL 13, 2020 THROUGH AND INCLUDING MARCH 10, 2021**

Upon the final applications (the “Applications”)² of Sullivan & Cromwell LLP, AlixPartners, LLP and Evercore Group L.L.C. for entry of an order (i) granting approval and allowance of compensation for professional services rendered to LSC Communications, Inc. and certain of its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), from April 13, 2020 through and including March 10, 2021 (the “Fee Period”), in the amounts indicated on Schedule A and (ii) authorizing reimbursement of actual and necessary expenses incurred during the Fee Period in the amounts indicated on Schedule A; and this Court having jurisdiction to consider the Applications pursuant to 28 U.S.C. §§ 157 and 1334; and venue of these Chapter 11 Cases and the Applications in this district is proper pursuant to 28 U.S.C. §§

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are as follows: LSC Communications, Inc. (9580); Courier Communications LLC (2268); Courier Kendallville, Inc. (4679); Courier New Media, Inc. (1312); Dover Publications, Inc. (0853); LSC Communications Logistics, LLC (9496); LSC Communications MM LLC (5577); LSC Communications US, LLC (4157); LSC International Holdings, Inc. (4995); National Publishing Company (8213); Publishers Press, LLC (7265); Continuum Management Company, LLC (2627); Clark Distribution Systems, Inc. (5778); Clark Holdings Inc. (9172); Clark Worldwide Transportation, Inc. (5773); The Clark Group, Inc. (6223); Courier Companies, Inc. (7588); Courier Publishing, Inc. (3681); F.T.C. Transport, Inc. (8699); LibreDigital, Inc. (7160); LSC Communications Printing Company (7012); and Research & Education Association, Inc. (3922). The Debtors’ corporate address is LSC Communications, Inc. c/o Prime Clerk LLC, P.O. Box 329003, Brooklyn, NY 11232.

² All capitalized terms used and not defined herein shall have the meanings ascribed to them in the Applications.

1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Applications and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and any objections (if any) to the Applications having been withdrawn or overruled on the merits; and a hearing having been held to consider the relief requested in the Applications on April 22, 2021 and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief sought in the Applications is in the best interests of the Debtors, their estates, their creditors and all other parties-in-interest; and that the legal and factual bases set forth in the Applications establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Applications are granted with respect to the Fee Period to the extent set forth on Schedule A and Schedule B.
2. Compensation to the Professionals for professional services rendered during the Fee Period is approved and allowed on a final basis in the respective amounts indicated on Schedule A and Schedule B.
3. Reimbursement to the Professionals for expenses incurred during the Fee Period is approved and allowed on a final basis in the respective amounts indicated on Schedule A and Schedule B.

4. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order.

5. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Applications or the implementation of this Order.

Dated: April 30, 2021
New York, New York

/s/ **Sean H. Lane**
The Honorable Sean H. Lane
United States Bankruptcy Judge

Schedule A

Current Interim Period

December 1, 2020 through March 10, 2021

Case No.: 20-10950 (SHL)

Case Name: In re LSC Communications, Inc., *et al.*

(1) Applicant	(2) Date/ Document Number of Application	(3) Interim Fees Requested on Application	(4) Interim Fees Allowed	(5) Fees to be Paid for Current Fee Period	(6) Fees to be Paid for Prior Fee Period(s) (if any) (i.e., Holdback Release)	(7) Total Fees to be Paid	(8) Interim Expenses Requested on Application	(9) Interim Expenses Allowed	(10) Expenses to be Paid for Current Fee Period
Sullivan & Cromwell LLP	April 5, 2021 / Doc 1327	\$1,531,769.00	\$1,518,781.00 ¹	\$363,741.80	\$0	\$363,741.80	\$2,953.77	\$2,953.77	\$432.80
AlixPartners, LLC	April 5, 2021 / Doc 1326	\$1,322,223.50	\$1,319,569.30 ²	\$261,790.50	\$0	\$261,790.50	\$0	\$0	\$0
EverCore Group L.L.C.	April 5, 2021 / Doc 1325	\$7,750,000.00	\$7,750,000.00	\$3,750,000.00	\$0	\$3,750,000.00	\$4,441.00	\$4,441.00	\$4,441.00

¹ Reflects agreement with the U.S. Trustee to reduce final fees payable by \$12,988.00.

² Reflects agreement with the U.S. Trustee to reduce final fees payable by \$2,654.20.

Schedule B

Final Fee Application Totals

Case No.: 20-10950 (SHL)

Case Name: In re LSC Communications, Inc., *et al.*

(1) Applicant	(2) Total Fees Requested	(3) Total Fees Paid	(4) Total Expenses Requested	(5) Total Expenses Paid
Sullivan & Cromwell LLP	\$13,371,053.75	\$13,358,065.75 ³	\$55,856.75	\$55,856.75
AlixPartners, LLC	\$9,974,886.10	\$9,972,231.90 ⁴	\$86.52	\$86.52
EverCore Group L.L.C.	\$9,775,000.00	\$9,775,000.00	\$38,281.04	\$38,281.04

³ Reflects agreement with the U.S. Trustee to reduce final fees payable by \$12,988.00.

⁴ Reflects agreement with the U.S. Trustee to reduce final fees payable by \$2,654.20.

**UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK**

_____	x	
In re	:	Chapter 11
	:	
LSC COMMUNICATIONS, INC., <i>et al.</i> , ¹	:	Case No. 20-10950 (SHL)
	:	
Debtors.	:	Jointly Administered
	:	
_____	x	

**SUMMARY COVER SHEET OF FINAL FEE APPLICATION OF
 SULLIVAN & CROMWELL LLP AS COUNSEL TO THE DEBTORS
 AND DEBTORS-IN-POSSESSION FOR THE PERIOD OF
 APRIL 13, 2020 THROUGH AND INCLUDING MARCH 10, 2021**

NAME OF APPLICANT:	Sullivan & Cromwell LLP
AUTHORIZED TO PROVIDE PROFESSIONAL SERVICES TO:	LSC Communications, Inc. and certain of its affiliates, as debtors and debtors-in-possession in these Chapter 11 Cases
DATE CASE FILED:	April 13, 2020
DATE OF RETENTION:	May 12, 2020 nunc pro tunc to April 13, 2020
PERIOD FOR WHICH COMPENSATION AND REIMBURSEMENT IS SOUGHT:	April 13, 2020 through and including March 10, 2021
TOTAL COMPENSATION REQUESTED:	\$13,371,053.75
TOTAL EXPENSE REIMBURSEMENT REQUESTED:	\$55,856.75

This is a(n): interim X final application.

This is the final fee application filed by Sullivan & Cromwell LLP.

¹ The Debtors in these Chapter 11 Cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: LSC Communications, Inc. (9580); Courier Communications LLC (2268); Courier Kendallville, Inc. (4679); Courier New Media, Inc. (1312); Dover Publications, Inc. (0853); LSC Communications Logistics, LLC (9496); LSC Communications MM LLC (5577); LSC Communications US, LLC (4157); LSC International Holdings, Inc. (4995); National Publishing Company (8213); Publishers Press, LLC (7265); Continuum Management Company, LLC (2627); Clark Distribution Systems, Inc. (5778); Clark Holdings Inc. (9172); Clark Worldwide Transportation, Inc. (5773); The Clark Group, Inc. (6223); Courier Companies, Inc. (7588); Courier Publishing, Inc. (3681); F.T.C. Transport, Inc. (8699); LibreDigital, Inc. (7160); LSC Communications Printing Company (7012); and Research & Education Association, Inc. (3922). The Debtors' address is LSC Communications, Inc. c/o Prime Clerk LLC, P.O. Box 329003, Brooklyn, NY 11232.

SUMMARY OF FEES AND EXPENSES REQUESTED FOR FEE PERIOD

Date and Docket No.	Period Covered	Fees Requested	Holdback (20%)	Fees paid to Date	Expenses Requested	Expenses Paid to Date	Approved Fees and Expenses
5/29/2020 D.I. 297	4/13/2020 – 4/30/2020	\$1,212,900.00	\$242,580.00	\$1,212,900.00	\$843.13	\$843.13	\$5,877,691.64
6/30/2020 D.I. 447	5/1/2020 – 5/31/2020	\$1,903,563.50	\$380,712.70	\$1,903,563.50	\$39,411.69	\$39,411.69	
7/30/2020 D.I. 555	6/1/2020 – 6/30/2020	\$1,340,331.00	\$268,066.20	\$1,340,331.00	\$1,425.80	\$1,425.80	
8/28/2020 D.I. 702	7/1/2020 – 7/31/2020	\$1,376,557.50	\$275,311.50	\$1,376,557.50	\$2,659.02	\$2,659.02	
9/30/2020 D.I. 855	8/1/2020 – 8/31/2020	\$1,697,414.50	\$339,482.90	\$1,697,414.50	\$4,457.87	\$4,457.87	\$6,014,496.09
10/30/2020 D.I. 930	9/1/2020 – 9/30/2020	\$2,291,235.50	\$458,247.10	\$2,291,235.50	\$2,729.82	\$2,729.82	
11/30/2020 D.I. 999	10/1/2020 – 10/31/2020	\$822,779.50	\$164,555.90	\$822,779.50	\$778.14	\$778.14	
12/24/2020 D.I. 1065	11/1/2020 – 11/30/2020	\$1,216,022.00	\$243,204.40	\$1,194,503.25	\$1,048.40	\$597.51	
1/28/2021 D.I. 1176	12/1/2020 – 12/31/2020	\$659,890.50	\$131,978.10	\$527,912.40	\$562.68	\$562.68	
2/24/2021 D.I. 1247	1/1/2021 – 1/31/2021	\$335,712.00	\$67,142.40	\$268,569.60	\$805.19	\$805.19	
3/23/2021 D.I. 1307	2/1/2021 – 2/28/2021	\$448,196.50	\$89,639.30	\$0.00*	\$1,153.10	\$0.00*	
	3/1/2020 – 3/10/2021	\$87,970.00	\$17,594.00	\$0.00	\$432.80	\$0.00	
TOTAL FOR ALL FEE PERIODS		\$13,392,572.50	\$2,678,514.50	\$12,635,766.75	\$56,307.64	\$54,270.85	
ADJUSTMENTS PER PRIOR DISCUSSIONS WITH U.S. TRUSTEE		-\$21,518.75			-\$450.89		
CURRENT REQUESTED AMOUNTS		\$13,371,053.75			\$55,856.75		

* Fees and expenses requested in the monthly fee statement for February 2021 will not be payable until April 7, 2021.

PROJECTED TOTAL BUDGET FOR FEE PERIOD AND ACTUAL FEES INCURRED

Estimated Fees for Fee Period		Actual Fees For Fee Period
Low	High	\$13,371,053.75
\$11,382,000.00	\$20,172,000.00	

PROJECT CODE TOTAL CHART

Project Number	Project Name	Hours	Fee Amount
011	ASSET ANALYSIS AND RECOVERY	8.40	\$11,955.00
012	ASSET DISPOSITION	5,703.60	\$6,319,374.50
013	ASSUMPTION AND REJECTION OF LEASES AND CONTRACTS	386.00	\$410,450.00
014	AVOIDANCE ACTION ANALYSIS	3.40	\$5,340.00
015	BUSINESS OPERATIONS	406.10	\$493,913.50
016	CASE ADMINISTRATION	631.00	\$671,855.00
017	CLAIMS ADMINISTRATION AND OBJECTIONS	70.30	\$72,456.00
018	CORPORATE GOVERNANCE AND BOARD MATTERS	83.00	\$123,723.50
019	EMPLOYEE BENEFITS AND PENSIONS	986.10	\$1,098,149.00
020	EMPLOYMENT AND FEE APPLICATIONS (S&C)	239.70	\$205,159.00
021	EMPLOYMENT AND FEE APPLICATIONS (OTHERS)	102.50	\$105,970.00
022	FINANCING AND CASH COLLATERAL	715.40	\$717,350.00
023	OTHER LITIGATION	476.30	\$555,651.00
024	MEETINGS AND COMMUNICATIONS WITH CREDITORS	326.70	\$342,391.50
025	NON-WORKING TRAVEL	-	\$0.00
026	PLAN AND DISCLOSURE STATEMENT	1,028.30	\$995,331.00
027	RELIEF FROM STAY AND ADEQUATE PROTECTION	120.50	\$145,343.50
028	TAX	146.00	\$219,162.50
029	VALUATION	-	\$0.00
030	DISCOVERY	195.20	\$105,045.50
031	HEARINGS	138.20	\$181,830.50
032	FIRST AND SECOND DAY MOTIONS	370.30	\$355,838.50
033	CLAIMS INVESTIGATION	3.80	\$6,650.00
034	LIEN INVESTIGATION	-	\$0.00
035	SCHEDULES, SOFAS AND REPORTING	154.70	\$176,943.50
036	OTHER MOTIONS/APPLICATIONS	71.60	\$66,848.50
037	TIME ENTRY REVIEW	696.50	\$0.00
038	BUDGETING	4.40	\$5,841.00
	TOTAL:	13,068.00	\$13,392,572.50
	ADJUSTMENTS PER DISCUSSION WITH U.S. TRUSTEE:		-\$21,518.75
	UPDATED TOTAL:		\$13,371,053.75

S&C PROFESSIONALS PERFORMING SERVICES DURING THE FEE PERIOD

Timekeeper Name	Title	Practice Group	Bar Admission	Rate	Hours	Amount
Ansari, Mehdi	Partner	GP	2009	\$1,675.00	12.40	\$20,770.00
Bourtin, Nicolas	Partner	Litigation	1997	\$1,750.00	0.20	\$350.00
Bromley, James L.	Partner	GP	1990	\$1,750.00	0.50	\$875.00
Buckholz, Robert E.	Partner	GP	1980	\$1,750.00	0.60	\$1,050.00
Cohen, Audra D.	Partner	GP	1993	\$1,750.00	609.60	\$1,066,800.00
Coleman, Heather L.	Partner	GP/Employee Benefits	2007	\$1,675.00	19.50	\$32,662.50
Creamer Jr., Ronald E.	Partner	Tax	1992	\$1,750.00	2.40	\$4,200.00
Dietderich, Andrew G.	Partner	GP/Restructuring	1997	\$1,750.00	184.00	\$322,000.00
Downes, Robert W.	Partner	GP	1992	\$1,750.00	24.20	\$42,350.00
Eitel, Mitchell S.	Partner	GP	1988	\$1,750.00	1.00	\$1,750.00
Glueckstein, Brian D.	Partner	Litigation	2004	\$1,750.00	942.20	\$1,648,850.00
Hariton, David P.	Partner	Tax	1986	\$1,750.00	117.20	\$205,100.00
Holley, Steven L.	Partner	Litigation	1984	\$1,750.00	22.00	\$38,500.00
O'Shea, Aisling	Partner	Litigation	2004	\$1,675.00	12.40	\$20,770.00
Rodriguez, Juan	Partner	Litigation	1990	\$1,750.00	2.50	\$4,375.00
Schlein, Robert M.	Partner	GP	1993	\$1,750.00	43.70	\$76,475.00
Simmons, Rebecca J.	Partner	GP	1992	\$1,750.00	0.50	\$875.00
Partner Total					1,995.40	\$3,488,590.00
Solomon, Andrew P.	Of Counsel	Tax	1985	\$1,750.00	0.30	\$525.00
Brennan, Matthew J.	Special Counsel	GP/Environmental	1986	\$1,450.00	22.40	\$32,480.00
Brennan, Matthew J.	Special Counsel	GP/Environmental	1986	\$1,495.00	0.70	\$1,046.50
Clarke, Stephen H.	Special Counsel	Litigation	2011	\$1,350.00	276.90	\$373,815.00
Coccaro, Rebecca S.	Special Counsel	GP	2000	\$1,495.00	84.00	\$125,580.00
Coccaro, Rebecca S.	Special Counsel	GP	2000	\$1,540.00	2.80	\$4,312.00
Kent, Benjamin S.D.	Special Counsel	GP	2010	\$1,495.00	7.40	\$11,063.00
Kranzley, Alexa J.	Special Counsel	GP/Restructuring	2009	\$1,450.00	39.90	\$57,855.00
Kranzley, Alexa J.	Special Counsel	GP/Restructuring	2009	\$1,540.00	4.00	\$6,160.00
Orchowski, Michael	Special Counsel	Tax	2009	\$1,375.00	3.50	\$4,812.50
Queen, Eric H.	Special Counsel	Litigation	1977	\$1,450.00	14.20	\$20,590.00
Russell, Tracey E.	Special Counsel	GP	2002	\$1,350.00	2.00	\$2,700.00
Smith, Bradley P.	Special Counsel	Litigation	1998	\$1,450.00	13.80	\$20,010.00
Of Counsel/Special Counsel Total					471.90	\$660,949.00
Carrier, Rita M.	Practice Area Associate	GP	1984	\$1,130.00	0.80	\$904.00
DeMarco, Raffaele A.	Practice Area Associate	GP	2003	\$825.00	37.60	\$31,020.00
McClellan, Clea M.	Practice Area Associate	Litigation	2004	\$635.00	15.30	\$9,715.50
Baker, Robert J.	Associate	GP	2017	\$1,100.00	108.00	\$118,800.00
Baker, Robert J.	Associate	GP	2017	\$1,140.00	1.70	\$1,938.00
Beard, Hannah L.	Associate	GP	2020	\$795.00	81.80	\$65,031.00
Belgiovine, Matthew J.	Associate	GP	2016	\$1,140.00	14.20	\$16,188.00
Belgiovine, Matthew J.	Associate	GP	2016	\$1,160.00	5.60	\$6,496.00
Cho, Audrey Y.	Associate	GP	2020	\$650.00	80.90	\$52,585.00
Cho, Audrey Y.	Associate	GP	2020	\$795.00	2.40	\$1,908.00
Costakos, Paige N.	Associate	GP	2019	\$795.00	418.20	\$332,469.00

Timekeeper Name	Title	Practice Group	Bar Admission	Rate	Hours	Amount
Costakos, Paige N.	Associate	GP	2019	\$995.00	11.90	\$11,840.50
Deddens, Emily K.	Associate	GP	2016	\$1,140.00	15.90	\$18,126.00
Deddens, Emily K.	Associate	GP	2016	\$1,160.00	14.90	\$17,284.00
Ellis, Angela N.	Associate	Litigation	2013	\$1,185.00	78.90	\$93,496.50
Fishbien, Nir	Associate	Tax	2018	\$795.00	6.60	\$5,247.00
Flynn, John-Francis S.	Associate	Litigation	2019	\$795.00	311.60	\$247,722.00
Flynn, John-Francis S.	Associate	Litigation	2019	\$995.00	80.30	\$79,898.50
Friedman, Mitchell N.	Associate	GP	2019	\$795.00	990.30	\$787,288.50
Friedman, Mitchell N.	Associate	GP	2019	\$995.00	61.20	\$60,894.00
Goldsmith, Lauren M.	Associate	Litigation	2013	\$1,140.00	197.20	\$224,808.00
Goldsmith, Lauren M.	Associate	Litigation	2013	\$1,160.00	109.10	\$126,556.00
Gross, Alexander N.	Associate	Litigation	2017	\$1,100.00	4.90	\$5,390.00
Guido, Emma J.	Associate	GP	2017	\$1,100.00	0.70	\$770.00
Hofman, Jonathan H.	Associate	GP	2020	\$650.00	187.90	\$122,135.00
Hofman, Jonathan H.	Associate	GP	2020	\$795.00	34.20	\$27,189.00
Hopkin, Wesley N.	Associate	GP	2018	\$795.00	3.90	\$3,100.50
Hynes, Samantha F.	Associate	Litigation	2014	\$1,185.00	34.10	\$40,408.50
Jensen, Christian P.	Associate	GP	2016	\$1,140.00	1,400.60	\$1,596,684.00
Jensen, Christian P.	Associate	GP	2016	\$1,160.00	852.60	\$989,016.00
Jo, M. John	Associate	Tax	2018	\$995.00	0.20	\$199.00
Jolly, Ryan M.	Associate	GP	2020	\$650.00	356.20	\$231,530.00
Jolly, Ryan M.	Associate	GP	2020	\$795.00	418.10	\$332,389.50
Lee, Jennifer L.	Associate	GP	2013	\$1,185.00	6.80	\$8,058.00
Levine, Aaron M.	Associate	GP	2018	\$995.00	0.40	\$398.00
Lum-Tai, Natalie A.	Associate	GP	2016	\$1,140.00	479.20	\$546,288.00
Lum-Tai, Natalie A.	Associate	GP	2016	\$1,160.00	33.80	\$39,208.00
Mahal, Kirandeep K.	Associate	Litigation	2019	\$995.00	130.00	\$129,350.00
Marton, Suzanne J.	Associate	Litigation	2018	\$820.00	0.80	\$656.00
Mungovan, Steven M.	Associate	GP	2012	\$1,185.00	0.20	\$237.00
Orr, Justin R.	Associate	GP	2014	\$1,160.00	107.70	\$124,932.00
Orr, Justin R.	Associate	GP	2014	\$1,185.00	11.60	\$13,746.00
Petiford, Julie G.	Associate	Litigation	2018	\$995.00	5.80	\$5,771.00
Podboj, Agustin E.	Associate	GP	2018	\$995.00	0.10	\$99.50
Pompliano, Elizabeth S.	Associate	GP	2017	\$995.00	229.40	\$228,253.00
Pompliano, Elizabeth S.	Associate	GP	2017	\$1,100.00	351.00	\$386,100.00
Poppe, Corbin M.	Associate	GP	in process	\$650.00	5.30	\$3,445.00
Pulling, Keith E.	Associate	GP	in process	\$650.00	145.50	\$94,575.00
Pulling, Keith E.	Associate	GP	in process	\$795.00	76.10	\$60,499.50
Rhein, Jonathan M.	Associate	Tax	2014	\$1,160.00	35.00	\$40,600.00
Rhein, Jonathan M.	Associate	Tax	2014	\$1,185.00	10.40	\$12,324.00
Rosenberg, Matthew J.	Associate	GP	2016	\$1,100.00	10.00	\$11,000.00
Schulweis, Danielle B.	Associate	GP	2017	\$1,100.00	40.00	\$44,000.00
Schulweis, Danielle B.	Associate	GP	2017	\$1,140.00	13.80	\$15,732.00
Taye, Louell T.T.	Associate	GP	2020	\$650.00	72.50	\$47,125.00
Taye, Louell T.T.	Associate	GP	2020	\$795.00	6.20	\$4,929.00
Thornton, Jay D.	Associate	GP	2018	\$1,100.00	2.30	\$2,530.00

Timekeeper Name	Title	Practice Group	Bar Admission	Rate	Hours	Amount
Tirrell, Kerry A.	Associate	Litigation	2013	\$1,185.00	95.20	\$112,812.00
Weiss, Noam R.	Associate	GP	2014	\$1,185.00	34.50	\$40,882.50
Wilson, Timothy C.	Associate	GP	2019	\$650.00	310.00	\$201,500.00
Wilson, Timothy C.	Associate	GP	2019	\$795.00	28.50	\$22,657.50
Wu, Mimi	Associate	GP	2016	\$1,140.00	661.70	\$754,338.00
Wu, Mimi	Associate	GP	2016	\$1,160.00	150.00	\$174,000.00
Zhu, Angela	Associate	GP		\$650.00	207.10	\$134,615.00
Lestelin, Jasmin E. J.	Trainee Solicitor	GP		\$535.00	11.80	\$6,313.00
Associate Total					9,210.50	\$8,926,001.00
Lawyers Total					11,677.80	\$13,075,540.00
Buckingham, William J.	Legal Assistant			\$495.00	2.10	\$1,039.50
Bush, Victoria F.	Legal Assistant			\$405.00	0.70	\$283.50
Chen, Sophia	Legal Assistant			\$0.00*	93.40	\$0.00
Chen, Sophia	Legal Assistant			\$350.00	58.30	\$20,405.00
Chiu, Jeffrey H.	Legal Assistant			\$495.00	18.40	\$9,108.00
Dahlberg, Kethan T.	Legal Assistant			\$405.00	1.60	\$648.00
Dahlberg, Kethan T.	Legal Assistant			\$495.00	0.50	\$247.50
Ea, Choun F.	Legal Assistant			\$495.00	11.50	\$5,692.50
Eigen, Jeffrey G.	Legal Assistant			\$495.00	6.00	\$2,970.00
Figurelli-Reid, Price A.	Legal Assistant			\$405.00	4.10	\$1,660.50
Figurelli-Reid, Price A.	Legal Assistant			\$495.00	0.30	\$148.50
Fisher, Isaiah A.	Legal Assistant			\$0.00*	36.20	\$0.00
Fisher, Isaiah A.	Legal Assistant			\$405.00	3.10	\$1,255.50
Guo, Wei	Legal Assistant			\$495.00	7.00	\$3,465.00
Hetherington, Sara V.	Legal Assistant			\$350.00	0.40	\$140.00
Hetherington, Sara V.	Legal Assistant			\$405.00	8.10	\$3,280.50
Khan, Paul R.	Legal Assistant			\$495.00	11.70	\$5,791.50
Kim, Scott J.	Legal Assistant			\$495.00	4.60	\$2,277.00
King, Christopher S.	Legal Assistant			\$0.00*	61.70	\$0.00
King, Christopher S.	Legal Assistant			\$405.00	8.40	\$3,402.00
Longacre, Caroline G.	Legal Assistant			\$0.00*	121.50	\$0.00
Longacre, Caroline G.	Legal Assistant			\$350.00	11.60	\$4,060.00
Longacre, Caroline G.	Legal Assistant			\$405.00	11.70	\$4,738.50
Malz, Rebecca A.	Legal Assistant			\$0.00*	383.70	\$0.00
Malz, Rebecca A.	Legal Assistant			\$405.00	94.50	\$38,272.50
Malz, Rebecca A.	Legal Assistant			\$495.00	116.20	\$57,519.00
Nguyen, Bach-Yen T.	Legal Assistant			\$495.00	22.30	\$11,038.50
Pastrana, Emily	Legal Assistant			\$495.00	1.80	\$891.00
Viloria, Nestor A.	Legal Assistant			\$495.00	12.30	\$6,088.50
Winston, Conor J. S.	Legal Assistant			\$405.00	18.20	\$7,371.00
Jordan, Frank A.	Legal Analyst - Litigation			\$495.00	25.00	\$12,375.00
Seguritan, Patrick	Legal Analyst - Litigation			\$495.00	32.80	\$16,236.00
McMahon, Mary R.	Legal Analyst - Discovery			\$520.00	3.10	\$1,612.00
Cabrera, Ismael	Electronic Discovery			\$485.00	3.90	\$1,891.50

Timekeeper Name	Title	Practice Group	Bar Admission	Rate	Hours	Amount
Chen, Ken	Electronic Discovery			\$415.00	18.00	\$7,470.00
Davis, Makeia K.	Electronic Discovery			\$490.00	41.30	\$20,237.00
Fanning, Carrie R.	Electronic Discovery			\$485.00	65.70	\$31,864.50
Hossein, Saud M.	Electronic Discovery			\$485.00	1.10	\$533.50
Long, Jacky Q.	Electronic Discovery			\$490.00	30.40	\$14,896.00
Lopez, Nathaniel S.	Electronic Discovery			\$490.00	1.20	\$588.00
Mian, Ahmed A.	Electronic Discovery			\$490.00	0.60	\$294.00
Peresiper, Roman	Electronic Discovery			\$485.00	15.30	\$7,420.50
Schaffel, Brad	Electronic Discovery			\$630.00	0.50	\$315.00
Betin, Darya A.	Research Librarian			\$490.00	0.70	\$343.00
Bowersox, Christine E.	Research Librarian			\$490.00	0.60	\$294.00
Council, Kimberly N.	Research Librarian			\$490.00	1.80	\$882.00
Gorman, Teresa A.	Research Librarian			\$490.00	0.80	\$392.00
Khwaja, Tariq	Research Librarian			\$490.00	2.70	\$1,323.00
Noller, Denise J.	Research Librarian			\$490.00	2.00	\$980.00
Seeger, Evelyn H.	Research Librarian			\$490.00	3.60	\$1,764.00
Timmons, Penny H.	Research Librarian			\$490.00	0.30	\$147.00
Tinkler, Sarah N.	Research Librarian			\$490.00	5.40	\$2,646.00
Tully, John K.	Research Librarian			\$490.00	1.50	\$735.00
Non Legal Personnel Total:					1,390.20	\$317,032.50
GRAND TOTAL:					13,068.00	\$13,392,572.50
Adjustments per discussions with U.S. Trustee:						-\$21,518.75
UPDATED GRAND TOTAL:						\$13,371,053.75

* Zero rate appears wherever no fee was charged for work.

CUSTOMARY AND COMPARABLE DISCLOSURES

Category	LSC Communications*		Firm**	
	April 2020 through March 2021		Total Firm Bills Allocated to Non-BK General Domestic Timekeepers from January 2019 through February 2021	
	Blended Hourly Rate	% of Total Hours	Blended Hourly Rate	% of Total Hours
Partner	\$1,748	15%	\$1,767	23%
Counsel and Senior Associate ⁽¹⁾	\$1,167	39%	\$1,168	25%
Junior Associate ⁽²⁾	\$797	35%	\$807	45%
Non-Lawyer ⁽³⁾	\$228	11%	\$424	7%
All Timekeepers Average	\$1,025	100%	\$1,085	100%

⁽¹⁾ Includes Special Counsel, Of Counsel, Senior Counsel, Senior Associate (Level 5-8) and Practice Area Associates

⁽²⁾ Includes Junior Associate (Level 1-4)

⁽³⁾ Includes Summer Associate, Legal Assistant, Legal Analyst, Research Analyst, and Electronic Discovery

* Includes No Charge entries on various projects. No Charge entries were included on the fee applications with a \$0 rate.

** Includes non-BK work of BK timekeepers and all work of other domestic timekeepers, excluding litigation matters and all write-offs (bills or collections less than 60% of standard rates).

SUMMARY OF DISBURSEMENTS

Disbursement Summary	
Description	Amount
Repro - B&W Copies	\$1,355.00
Repro - Color Copies	\$1,350.25
Tele-conference	\$3,799.59
Telephonic Hearing	\$5,460.00
Local Transportation	\$681.72
Filing Fees	\$38,999.42
Delivery Services/Messengers	\$602.88
Trial/Hearing Transcripts	\$2,912.15
CT Corp/CSC	\$116.49
Meals - Overtime	\$583.24
Deposition Transcripts	\$446.90
Total:	\$56,307.64
Adjustments per discussions with U.S. Trustee:	-\$450.89
UPDATED TOTAL:	\$55,856.75

Exhibit G

Dated: July 8, 2019

The following is ORDERED:



A handwritten signature in black ink that reads "Janice D. Loyd".

Janice D. Loyd
U.S. Bankruptcy Judge

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

_____	X	
In re	:	Chapter 11
	:	
WHITE STAR PETROLEUM HOLDINGS, LLC,	:	Case No. 19-12521-JDL
<i>et al.</i> , ¹	:	
	:	Jointly Administered
	:	
Debtors.	:	
_____	X	

**ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT
OF SULLIVAN & CROMWELL LLP AS COUNSEL TO THE DEBTORS
AND DEBTORS-IN-POSSESSION *NUNC PRO TUNC* TO THE PETITION DATE**

¹ The Debtors in these chapter 11 cases, and the last four digits of their U.S. taxpayer identification numbers are: White Star Petroleum Holdings, LLC (0575) ("WSTR Holdings"), White Star Petroleum, LLC (0977) ("WSTR"), White Star Petroleum II, LLC (4347) ("WSTR II"), White Star Petroleum Operating, LLC (5387) ("WSTR Operating") and WSP Finance Corporation (9152) ("WSP Finance" and together with WSTR Holdings, WSTR, WSTR II and WSTR Operating, the "Debtors"). The Debtors' corporate headquarters is located at 301 N.W. 63rd Street, Suite 600, Oklahoma City, OK 73116.

Upon the application (the “Application”)² of White Star Petroleum Holdings, LLC and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) for entry of an order (the “Order”) pursuant to section 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rule 2014(a) and Local Bankruptcy Rule 2014-1 authorizing the Debtors to retain and employ Sullivan & Cromwell LLP (“S&C”) as their counsel *nunc pro tunc* to the Petition Date; this Court having jurisdiction to consider the Application pursuant to 28 U.S.C. §§ 157 and 1334 and rule 81.4(a) of the Local Civil Rules of the United States District Court for the Western District of Oklahoma; and venue of these chapter 11 cases and the Application in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that the Application was filed on June 21, 2019 and served on or before June 21, 2019 and that the response deadline to the Application expired on July 3, 2019; and objections (if any) to the Application having been withdrawn, resolved or overruled on the merits; and this Court having found that proper and adequate notice of the Application and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Bankruptcy Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and a hearing having been held to consider the relief requested in the Application and upon the record of the hearing and all proceedings had before this Court; and upon the consideration of and based on the representations made in the First Day Declaration, the Declaration of Jeffrey J. Zanotti in in support of the Application attached as Exhibit B thereto and the Declaration of Andrew G. Dietderich in support of the Application attached as Exhibit C thereto; and this Court being satisfied based on the representations made in the Application and the Dietderich Declaration

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

that S&C does not hold or represent any interest adverse to the Debtors' estates, with respect to the matters upon which S&C is to be employed, that S&C is a disinterested person as that term is defined under section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, and that S&C's employment is necessary and is in the best interests of the Debtors and their estates; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED as set forth herein.
2. In accordance with sections 327(a) and 328(a) of the Bankruptcy Code, the Debtors, as debtors and debtors-in-possession, are hereby authorized to retain and employ S&C as their counsel on the terms set forth in the Application and the Dietderich Declaration, effective *nunc pro tunc* to the Petition Date.
3. S&C shall use its best efforts to avoid any duplication of services provided by any of the Debtors' other retained professionals in these chapter 11 cases.
4. S&C shall apply for compensation for professional services rendered and reimbursement of reasonable and necessary expenses incurred pursuant to this Order, in accordance with sections 330 and 331 of the Bankruptcy Code, applicable provisions of the Bankruptcy Rules and Local Bankruptcy Rules, any case specific fee protocols approved by this Court and all other applicable guidelines, procedures and orders of this Court.
5. S&C shall not charge a markup to the Debtors with respect to fees billed by any contract attorneys hired by S&C to provide services to the Debtors and shall ensure that any such contract attorneys are subject to conflicts checks and disclosures in accordance with the requirements of the Bankruptcy Code and Bankruptcy Rules. For the avoidance of doubt, S&C

shall neither share fees with existing or future contract attorneys who provide services to the Debtors nor enter into fee sharing arrangements with such contract attorneys.

6. Notwithstanding anything to the contrary in the Application, S&C will not seek reimbursement of expenses for office supplies.

7. Prior to the implementation of any increases in the hourly rates set forth in the Application and the Dietderich Declaration, S&C shall file a supplemental declaration with this Court and provide ten (10) business days' notice to the Debtors, the U.S. Trustee and any statutory committee appointed in these chapter 11 cases, which declaration shall explain the basis for the requested rate increases in accordance with section 330(a)(3)(F) of the Bankruptcy Code and state whether the Debtors have consented to such rate increases. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in section 330 of the Bankruptcy Code, and this Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

8. S&C shall apply any remaining amounts of its prepetition retainer as a credit toward postpetition fees and expenses after such postpetition fees and expenses are approved pursuant to the first order of this Court awarding fees and expenses to S&C.

9. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

10. To the extent that this Order is inconsistent with the Application, the terms of this Order shall govern.

11. This Court shall retain jurisdiction to hear and determine all matters arising from the implemental of this Order.

12. Findings of fact are based upon representations of counsel. Local Rule

9013-1.L.1.

IT IS SO ORDERED.

###

Approved for Entry:

/s/ John D. Dale
John D. Dale, OBA No. 19787
GABLEGOTWALS
1100 ONEOK Plaza
100 West 5th Street
Tulsa, Oklahoma 74103-4217
Telephone: (918) 595-4800
Fax: (918) 595-4990
Email: jdale@gablelaw.com

-and-

/s/ Craig M. Regens
Craig M. Regens, OBA No. 22894
GABLEGOTWALS
One Leadership Square
211 North Robinson
Oklahoma City, Oklahoma 73102
Telephone: (405) 568-3313
Facsimile: (405) 235-2875
cregens@gablelaw.com

-and-

Andrew G. Dietderich, NY Bar 2850584
Brian D. Glueckstein, NY Bar 4227005
Alexa J. Kranzley, NY Bar 4707386
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
dietdericha@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

Proposed Co-Counsel to White Star

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

	X	
In re	:	Chapter 11
	:	
WHITE STAR PETROLEUM HOLDINGS, LLC, <i>et al.</i> , ¹	:	Case No. 19-12521-JDL
	:	
Debtors.	:	Jointly Administered
	:	
	X	

**DEBTORS’ APPLICATION FOR AN ORDER AUTHORIZING
THE RETENTION AND EMPLOYMENT OF SULLIVAN & CROMWELL LLP
AS COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION
NUNC PRO TUNC TO THE PETITION DATE
AND NOTICE OF OPPORTUNITY FOR HEARING**

White Star Petroleum Holdings, LLC and certain of its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) hereby submit this application (this “Application”) for entry of an order, substantially in the form attached hereto as Exhibit A (the “Proposed Order”), pursuant to sections 327(a) and 328(a) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and rule 2014-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Western District of Oklahoma (the “Local Bankruptcy Rules”), authorizing the retention and employment of Sullivan & Cromwell LLP (“S&C”) as counsel to the Debtors *nunc pro tunc* to the Petition Date (as defined below). In support of this Application, the Debtors rely upon the *Declaration of Jeffrey J. Zanoliti in*

¹ The Debtors in these chapter 11 cases, and the last four digits of their U.S. taxpayer identification numbers are: White Star Petroleum Holdings, LLC (0575) (“WSTR Holdings”), White Star Petroleum, LLC (0977) (“WSTR”), White Star Petroleum II, LLC (4347) (“WSTR II”), White Star Petroleum Operating, LLC (5387) (“WSTR Operating”) and WSP Finance Corporation (9152) (“WSP Finance” and together with WSTR Holdings, WSTR, WSTR II and WSTR Operating, the “Debtors”). The Debtors’ corporate headquarters is located at 301 N.W. 63rd Street, Suite 600, Oklahoma City, OK 73116.

Support of Debtors' Chapter 11 Petitions and First Day Pleadings [Doc. 2] (the "Zanotti First Day Declaration") and the *Declaration of Edgar W. Mosley II, Managing Director at Alvarez & Marsal North America, LLC in Support of Debtors' Chapter 11 Petitions and First Day Pleadings* [Doc. 3] (the "Mosley First Day Declaration" and together with the Zanotti First Day Declaration, the "First Day Declarations"), each filed on May 28, 2019 (the "Petition Date"), the Declaration of Jeffrey J. Zanotti attached hereto as Exhibit B (the "Zanotti Declaration") and the Declaration of Andrew G. Dietderich attached hereto as Exhibit C (the "Dietderich Declaration"), each of which is incorporated herein by reference, and respectfully state as follows:

Background

1. The Debtors engage in the acquisition, development, exploration and production of oil, natural gas, and natural gas liquids located in the Mid-Continent region in the United States.
2. The Debtors are headquartered in Oklahoma City, Oklahoma and employed 169 people as of the Petition Date. As of December 2018, the Debtors owned approximately 315,000 net leasehold acres, primarily in Creek, Dewey, Garfield, Lincoln, Logan, Noble, and Payne counties of Oklahoma. Approximately 80% of the total acreage was held by production. As of December 31, 2018, the Debtors had an interest in a total of 883 gross productive wells (475 net) of which 590 were operated (451 net). The Debtors are not currently drilling any new wells.
3. On the Petition Date, each of the Debtors filed with the United States Bankruptcy Court for the District of Delaware a voluntary petition for relief under the Bankruptcy Code. These chapter 11 cases were transferred to the United States Bankruptcy Court for the Western District of Oklahoma on June 20, 2019. Each Debtor continues to operate

its business and manage its properties as a debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The Debtors' cases are being jointly administered pursuant to Bankruptcy Rule 1015.

4. On June 10, 2019, the Office of the United States Trustee for the District of Delaware appointed an Official Committee of Unsecured Creditors (the "Committee") pursuant to section 1102 of the Bankruptcy Code [Doc. 60].

5. Additional factual background relating to the Debtors' businesses and the commencement of these chapter 11 cases is set forth in detail in the First Day Declarations.

Facts Specific to Relief Requested

I. S&C's Qualifications

1. By this Application, the Debtors seek the authority to employ and retain S&C as their attorneys in connection with the prosecution of their chapter 11 cases to perform legal services as set forth herein.

2. S&C has represented the Debtors since April 2016 in connection with general corporate matters, including asset acquisitions and financing matters, and, since April 2019, in connection with the potential disposition of their business, the incurrence of debtor-in-possession financing and the preparation, commencement and prosecution of these chapter 11 cases. During the course of this representation, S&C has become familiar with the Debtors' business, financial affairs and capital structure. As a result, S&C has the necessary background information to deal effectively with many of the potential legal issues and problems that may arise in these chapter 11 cases. Accordingly, the Debtors have not interviewed any similar law firms as potential counsel in connection with these chapter 11 cases.

3. These cases are likely to be complex and will require counsel with a national reputation and with extensive experience and specialized expertise in, among other

areas, bankruptcy law, secured finance, corporate law and litigation. S&C is a full service law firm with a national and international presence. S&C has experience and expertise in most substantive areas of legal practice and its regular clients include leading public companies in a variety of industries, smaller and privately held businesses, major international corporations and individuals.

4. For the foregoing reasons, the Debtors believe that S&C is well qualified to represent them as debtors-in-possession in these chapter 11 cases, and that the retention of S&C is necessary and in the best interests of the Debtors and their estates and stakeholders.

II. Services to Be Provided

5. S&C will work closely with such other professionals as may be retained by the Debtors, including co-counsel in Oklahoma City, Oklahoma, taking appropriate steps to reduce costs by assigning tasks to co-counsel as appropriate and to avoid duplication of effort. Specifically, the Debtors have requested that S&C render services including, but not limited to, the following:

- a. advising the Debtors with respect to their powers and duties as debtors and debtors-in-possession, including the legal and administrative requirements of operating in chapter 11;
- b. advising the Debtors with respect to the potential sale of their business and negotiating and preparing on the Debtors' behalf all agreements related thereto;
- c. attending meetings and negotiating with representatives of creditors and other parties-in-interest;
- d. assisting with the preservation of the Debtors' estates, including the prosecution of actions commenced under the Bankruptcy Code or otherwise on their behalf, and objections to claims filed against the estates;
- e. preparing and prosecuting on behalf of the Debtors all motions, applications, answers, orders, reports and papers necessary for the administration of the estates;

- f. negotiating and preparing on the Debtors' behalf chapter 11 plan(s), disclosure statement(s) and all related agreements and/or documents;
- g. advising the Debtors with respect to certain corporate, financing, tax and employee benefit matters as requested by the Debtors and without duplication of other professionals' services;
- h. appearing before the Court, and any appellate courts, and protecting the interests of the Debtors' estates before such courts and
- i. performing all other legal services in connection with these chapter 11 cases as requested by the Debtors and without duplication of other professionals' services.

III. Professional Compensation

6. The professional services of S&C are necessary to enable the Debtors to faithfully and competently execute their duties as debtors-in-possession. S&C has advised the Debtors that it intends to apply to the Court for allowance of compensation for professional services rendered and reimbursement of charges, costs and expenses incurred in these chapter 11 cases in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules and any applicable guidelines and orders of the Court.

7. As set forth in the Dietderich Declaration, S&C does not ordinarily determine its fees solely on the basis of hourly rates. Instead, S&C ordinarily bases the fee for its services on all the factors prescribed by rule 1.5(a) of the New York Rules of Professional Conduct, including the firm's contribution to the relevant matter, the responsibility assumed, the results achieved, the difficulty and complexity of the matter, the amount involved, the experience of, and demands on, the lawyers involved and the fees customarily charged for such matters. S&C's compensation arrangements are designed to fairly compensate S&C for its services according to these principles.

8. Notwithstanding the foregoing, S&C has agreed with the Debtors that, consistent with the above and subject to the Court's approval, it will charge the Debtors for its

legal services on an hourly basis in connection with these cases. S&C's billing rates have been determined with reference to the rates charged by other leading law firms for similar work during chapter 11 cases and will range from \$1,275 to \$1,560 per hour for partners and special counsel, \$595 to \$1,040 per hour for associates and \$335 to \$480 per hour for legal assistants. These rates for the more senior timekeepers in each class represent a discount from the rates currently used by S&C when preparing estimates of fees under its normal billing procedures for non-bankruptcy engagements.

9. During the 90-day period prior to the Petition Date, the Debtors paid S&C the following amounts:

Amount Received	Received Date
\$5,205	March 5, 2019
\$8,712.50	April 15, 2019
\$263,809.39	April 29, 2019
\$392,558.26	May 22, 2019
\$770,000	May 24, 2019

On April 29, 2019, the Debtors funded a retainer for S&C to hold as security for payment of its fees and expenses in the amount of \$2,000,000. As of the Petition Date, S&C hold as security for payment of its fees and expenses a retainer in the amount of \$1,086,947.88.

10. Pursuant to Bankruptcy Rule 2016(b), S&C has neither shared nor agreed to share any compensation it has received or may receive with another party or person, other than with partners, counsel, associates and contract attorneys associated with S&C or any compensation another person or party has received or may receive.

11. The Debtors have agreed to pay S&C for the legal services rendered or to be rendered by their attorneys and other personnel in connection with these chapter 11 cases on the Debtors' behalf. The Debtors have also agreed to reimburse S&C for its actual and necessary expenses incurred in connection with these chapter 11 cases. The Debtors will review

prospective budgets and staffing plans to be submitted by S&C on a monthly basis during these chapter 11 cases, and will have a full opportunity to review all of S&C's fees and expenses as set forth in the monthly and interim fee applications to be submitted by S&C to the Court.

IV. Disinterestedness

12. To the best of the Debtors' knowledge, and as detailed in the Dietderich Declaration, (i) S&C is a "disinterested person" within the meaning of section 101(14) of the Bankruptcy Code, (ii) S&C does not represent any person or entity having an interest adverse to the Debtors in connection with these chapter 11 cases, (iii) S&C does not hold or represent an interest adverse to the Debtors' estates with respect to matters on which S&C is employed and (iv) S&C has no connection to the Debtors, their creditors or any other party-in-interest except as disclosed herein and in the Dietderich Declaration.

13. S&C will promptly review its files against any updated Interested Parties List (as defined in the Dietderich Declaration) received from the Debtors from time to time during the pendency of these chapter 11 cases pursuant to the procedures described in the Dietderich Declaration. To the extent any new relevant facts or relationships are discovered or arise in the course of such review, S&C will promptly make additional disclosure to the Court as required by Bankruptcy Rule 2014(a).

Jurisdiction

14. The Court has jurisdiction to consider this Application pursuant to 28 U.S.C. §§ 157 and 1334 and rule 81.4(a) of the Local Civil Rules of the United States District Court for the Western District of Oklahoma. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue for purposes of considering this Application is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief requested herein

are sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local Bankruptcy Rule 2014-1.

Relief Requested

15. By this Application, the Debtors request entry of the Proposed Order authorizing the Debtors to retain and employ S&C as their counsel in connection with these chapter 11 cases effective *nunc pro tunc* to the Petition Date.

Basis for Relief

16. The Debtors seek to retain S&C as their attorneys pursuant to section 327(a) of the Bankruptcy Code, which provides that a debtor, subject to Court approval:

[M]ay employ one or more attorneys, accountants, appraisers, auctioneers, or other professional persons, that do not hold or represent an interest adverse to the estate, and that are disinterested persons, to represent or assist the [debtor] in carrying out the [debtor]'s duties under this title.

11 U.S.C. § 327(a).

17. Bankruptcy Rule 2014(a) requires that an application for retention include:

[S]pecific facts showing the necessity for the employment, the name of the [firm] to be employed, the reasons for the selection, the professional services to be rendered, any proposed arrangement for compensation, and, to the best of the applicant's knowledge, all of the [firm's] connections with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee.

Fed. R. Bankr. P. 2014(a).

18. Based on the facts and for the reasons stated herein and in the Zanoliti Declaration and the Dietderich Declaration, the retention of S&C as counsel to the Debtors pursuant to this Application is reasonable, necessary, appropriate and satisfies the requirements of sections 327 and 328 of the Bankruptcy Code and Bankruptcy Rule 2014(a). The Debtors

respectfully submit that the relief requested in this Application will enable the Debtors to administer their estates during these chapter 11 cases, is in the best interests of the Debtors and their estates and stakeholders and should be approved by the Court.

19. Additionally, the Debtors’ retention of S&C *nunc pro tunc* to the Petition Date is appropriate. S&C has been representing the Debtors in connection with the potential disposition of their business, the incurrence of debtor-in-possession financing and the preparation, commencement and prosecution of these chapter 11 cases since April 2019 and on other corporate matters since April 2016. The Debtors believe that no party-in-interest will be prejudiced by the granting of the employment *nunc pro tunc* to the Petition Date, as provided in this Application, because S&C has provided and continues to provide valuable services to the Debtors’ estates. According to the Tenth Circuit, *nunc pro tunc* employment is appropriate in “extraordinary circumstances.” *In re Land*, 943 F.2d 1265, 1268 (10th Cir. 1991). Here, the extraordinary circumstances envisioned by the Tenth Circuit and the Debtors’ retention of S&C *nunc pro tunc* to the Petition Date should be authorized.

20. The Debtors commenced these chapter 11 proceedings in the United States Bankruptcy Court for the District of Delaware (the “Delaware Court”) on May 28, 2019. Simultaneous to the commencement of these chapter 11 proceedings, the Debtors filed various motions and applications seeking emergency interim first day relief. Prior to the Petition Date, an involuntary petition against Debtor WSTR was filed in this Court. On May 28, 2019, this Court entered its Notice of Status Conference [Doc. 4] (the “Notice”) in Case No. 19-12145-JDL. The Notice provided among other things, that, aside from emergency interim first day relief “deemed critical” by the Delaware Court, “no further matters are to proceed until this Court

makes the determination as to proper venue of the Oklahoma and Delaware cases.” (Notice at 5.)

21. Following the status conference conducted pursuant to the Notice, this Court entered its Scheduling Order and Order on Stay of Proceedings [Doc. 24] (the “Stay Order”) in Case No. 19-12145-JDL. The Stay Order provided that “this Court’s enjoining and staying any further proceedings in the Bankruptcy Court in Delaware entered on May 28, 2019, as part of its *Order Setting Status Conference*, shall remain in full force and effect” subject to limited exceptions, which do not include the filing of this Application. Accordingly, this Application could not have been filed sooner and an order authorizing the Debtors to retain S&C *nunc pro tunc* to the Petition Date is necessary and appropriate under Tenth Circuit precedent.

Notice

22. Notice of this Application has been provided to: (a) the United States Trustee for the Western District of Oklahoma (the “U.S. Trustee”); (b) the United States Attorney’s Office for the Western District of Oklahoma; (c) the Internal Revenue Service; (d) counsel to the agent of the Debtors’ prepetition first lien lenders; (e) counsel to the Debtors’ prepetition second lien lender; (f) counsel to the DIP agent; (g) counsel to the Committee; (h) the parties identified on the Debtors’ consolidated list of 30 largest unsecured creditors; (i) any other party that has requested notice pursuant to Bankruptcy Rule 2002; and (j) any party that has appeared in the involuntary proceeding pending against White Star Petroleum, LLC. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be provided.

No Prior Request

23. No prior application for the relief sought herein has been made to this or any other court.

Conclusion

WHEREFORE, for the reasons set forth herein, the Debtors respectfully request that the Court (a) enter the Proposed Order and (b) grant such other and further relief as is just and proper.

NOTICE OF OPPORTUNITY FOR HEARING

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THIS DOCUMENT CAREFULLY AND CONSULT YOUR ATTORNEY ABOUT YOUR RIGHTS AND THE EFFECT OF THIS DOCUMENT. IF YOU DO NOT WANT THE COURT TO GRANT THIS REQUESTED RELIEF, OR YOU WISH TO HAVE YOUR VIEWS CONSIDERED, YOU MUST FILE A WRITTEN RESPONSE OR OBJECTION TO THE REQUESTED RELIEF WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF OKLAHOMA, 215 DEAN A. MCGEE AVENUE, OKLAHOMA CITY, OK 73102 NO LATER THAN 12:00 P.M. CENTRAL DAYLIGHT TIME ON JULY 3, 2019. YOU SHOULD ALSO SERVE A FILE-STAMPED COPY OF YOUR RESPONSE OR OBJECTION TO THE UNDERSIGNED MOVANT/MOVANT'S ATTORNEY AND FILE A CERTIFICATE OF SERVICE WITH THE COURT. IF NO RESPONSE OR OBJECTION IS TIMELY FILED, THE COURT MAY GRANT THE REQUESTED RELIEF WITHOUT A HEARING OR FURTHER NOTICE.

THE JULY 3, 2019 AT 12:00 P.M. CENTRAL DAYLIGHT TIME DEADLINE INCLUDES THE THREE (3) DAYS ALLOWED FOR MAILING PROVIDED FOR IN BANKRUPTCY RULE 9006(F).

Dated: June 21, 2019
Oklahoma City, Oklahoma

/s/ John D. Dale
John D. Dale, OBA No. 19787
GABLEGOTWALS
1100 ONEOK Plaza
100 West 5th Street
Tulsa, Oklahoma 74103-4217
Telephone: (918) 595-4800
Fax: (918) 595-4990
Email: jdale@gablelaw.com

-and-

/s/ Craig M. Regens

Craig M. Regens, OBA No. 22894
GABLEGOTWALS
One Leadership Square
211 North Robinson
Oklahoma City, Oklahoma 73102
Telephone: (405) 568-3313
Facsimile: (405) 235-2875
cregens@gablelaw.com

-and-

Andrew G. Dietderich, NY Bar 2850584
Brian D. Glueckstein, NY Bar 4227005
Alexa J. Kranzley, NY Bar 4707386
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
dietdericha@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

Proposed Co-Counsel to White Star

EXHIBIT B

Zanotti Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

	X	
In re	:	Chapter 11
	:	
WHITE STAR PETROLEUM HOLDINGS, LLC, <i>et al.</i> , ¹	:	Case No. 19-12521-JDL
	:	
Debtors.	:	Jointly Administered
	:	
	X	

**DECLARATION OF JEFFREY J. ZANOTTI IN SUPPORT OF DEBTORS’
APPLICATION FOR AN ORDER AUTHORIZING THE RETENTION
AND EMPLOYMENT OF SULLIVAN & CROMWELL LLP AS
COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION
NUNC PRO TUNC TO THE PETITION DATE**

I, Jeffrey J. Zanotti, under penalty of perjury, declare as follows:

1. I am the Senior Vice President, General Counsel and Secretary of Debtor White Star Petroleum, LLC.

2. I submit this declaration (this “Declaration”) in support of the *Debtors’ Application for an Order Authorizing the Retention and Employment of Sullivan & Cromwell LLP (“S&C”) as Counsel to the Debtors and Debtors-in-Possession Nunc Pro Tunc to the Petition Date* (the “Application”).² I have reviewed and am familiar with the contents of the Application and the Declaration of Andrew G. Dietderich in support of the Application and attached thereto as Exhibit C (the “Dietderich Declaration”). Except as otherwise indicated, the

¹ The Debtors in these chapter 11 cases, and the last four digits of their U.S. taxpayer identification numbers are: White Star Petroleum Holdings, LLC (0575) (“WSTR Holdings”), White Star Petroleum, LLC (0977) (“WSTR”), White Star Petroleum II, LLC (4347) (“WSTR II”), White Star Petroleum Operating, LLC (5387) (“WSTR Operating”) and WSP Finance Corporation (9152) (“WSP Finance” and together with WSTR Holdings, WSTR, WSTR II and WSTR Operating, the “Debtors”). The Debtors’ corporate headquarters is located at 301 N.W. 63rd Street, Suite 600, Oklahoma City, OK 73116.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

facts set forth herein are based upon my personal knowledge, my review of relevant documents, information provided to me by employees working under my supervision or my opinion based upon experience with the operation of the Debtors and their industry as a whole.

Debtors' Selection of Counsel

3. The Debtors recognize that a comprehensive review process is necessary when selecting and managing chapter 11 counsel to ensure that bankruptcy professionals are subject to the same client-driven market forces, scrutiny and accountability as professionals in non-bankruptcy engagements. The Debtors' decision to retain S&C as their counsel beginning in April 2016 in connection with general corporate matters, including asset acquisitions and financing matters, and, since April 2019, in connection with the preparation, commencement and prosecution of these chapter 11 cases, was based on S&C's recognized experience and knowledge regarding corporate reorganizations under chapter 11 of the Bankruptcy Code, as well as the extensive expertise of S&C's transactional, tax and litigation practice in complex matters relating to all aspects of corporate restructuring.

4. As a result of S&C's representation of the Debtors since April 2016 in connection with general corporate matters, including asset acquisitions and financing matters, and, since April 2019, in connection with the potential disposition of the Debtors' business, the incurrence of debtor-in-possession financing and the preparation, commencement and prosecution of these chapter 11 cases, S&C is familiar with the Debtors' business, financial affairs and capital structure and has the necessary background information to deal effectively with many of the potential legal issues and problems that may arise in these chapter 11 cases. Accordingly, the Debtors have not interviewed any similar law firms as potential counsel in

connection with these chapter 11 cases. I believe that S&C is both well qualified and uniquely able to represent the Debtors in these chapter 11 cases in an efficient and effective manner.

5. These cases are likely to be complex and will require counsel with a national reputation and with extensive experience and specialized expertise in, among other areas, bankruptcy law, secured finance, corporate law and litigation. S&C is a full service law firm with a national and international presence. S&C has experience and expertise in most substantive areas of legal practice and its regular clients include leading public companies in a variety of industries, smaller and privately held businesses, major international corporations and individuals.

Rate Structure

6. In my capacity as General Counsel and Secretary, I am responsible for supervising outside counsel retained by the Debtors in the ordinary course of business. The Debtors have reviewed, and have discussed with S&C, the proposed rates for S&C's legal services in connection with these chapter 11 cases. S&C has informed the Debtors that S&C does not ordinarily determine its fees solely on the basis of hourly rates. For the purposes of its engagement by the Debtors, however, S&C has agreed that it will charge for services performed during these chapter 11 cases on the basis of the hourly rates described in the Application and the Dietderich Declaration.

7. I understand from S&C that these hourly rates are the same or less than the hourly rates used by S&C when preparing estimates of fees under its normal billing practices. In particular, I understand that the rates have been determined with reference to the rates charged by other leading law firms for similar work during chapter 11 cases and for the more senior

timekeepers for each class of personnel represent a discount from the rates used by S&C when preparing estimates of fees under its normal billing practices for non-bankruptcy engagements.

Cost Supervision

8. The Debtors also propose to engage GabelGotwals, in Oklahoma City, Oklahoma, as co-counsel. The use of co-counsel with appropriate expertise and rates substantially lower than S&C will allow the Debtors to utilize S&C's expertise on those matters where it is appropriate while controlling legal expenses by assigning specific other matters to GableGotwals. The Debtors intend to determine the tasks assigned to GableGotwals from time to time in a manner that avoids duplication.

9. The Debtors have approved S&C's budget and staffing plan for the period from the Petition Date to June 30, 2019, recognizing that in the course of these chapter 11 cases, there may be unforeseen fees and expenses that will need to be addressed by the Debtors and S&C. The Debtors further recognize that it is their responsibility to monitor closely the billing practices of their counsel and other retained professionals to ensure that the fees and expenses paid by the estate remain consistent with the Debtors' expectations and are appropriate under the circumstances of these chapter 11 cases.

10. The Debtors will review and make appropriate adjustments to the prospective budgets and staffing plans to be submitted by S&C on a monthly basis during these chapter 11 cases, and will review S&C's fees and expenses as set forth in the monthly and interim fee applications to be submitted by S&C to the Court in order to ensure that such fees and expenses are reasonable and appropriate under the circumstances. While every chapter 11 case is unique, I believe this review will enable the Debtors to effectively supervise legal fees

and expenses incurred in these chapter 11 cases, including budgeting and staffing of legal personnel with regard to specific matters in these cases.

11. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States, that the foregoing statements are true and correct.

Dated: June 21, 2019

Respectfully submitted,

/s/ Jeffrey J. Zanolli
Jeffrey J. Zanolli
Senior Vice President, General Counsel and
Secretary

EXHIBIT C

Dietderich Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

	X	
In re	:	Chapter 11
	:	
WHITE STAR PETROLEUM HOLDINGS, LLC, <i>et al.</i> , ¹	:	Case No. 19-12521-JDL
	:	
Debtors.	:	Jointly Administered
	:	
	X	

**DECLARATION OF ANDREW G. DIETDERICH IN SUPPORT OF DEBTORS’
APPLICATION FOR AN ORDER AUTHORIZING THE RETENTION
AND EMPLOYMENT OF SULLIVAN & CROMWELL LLP
AS COUNSEL TO THE DEBTORS AND
DEBTORS-IN-POSSESSION NUNC PRO TUNC TO THE PETITION DATE**

I, Andrew G. Dietderich, under penalty of perjury, declare as follows:

1. I am admitted to practice law in the State of New York and the Southern District of New York. I am a partner of the law firm of Sullivan & Cromwell LLP (“S&C” or the “Firm”), which maintains an office at 125 Broad Street, New York, NY 10004-2498. I submit this declaration (this “Declaration”) in support of the *Debtors’ Application for an Order Authorizing the Retention and Employment of Sullivan & Cromwell LLP as Counsel to the Debtors and Debtors-in-Possession Nunc Pro Tunc to the Petition Date* (the “Application”).²

Unless otherwise stated in this declaration, I have personal knowledge of the facts set forth herein.

¹ The Debtors in these chapter 11 cases, and the last four digits of their U.S. taxpayer identification numbers are: White Star Petroleum Holdings, LLC (0575) (“WSTR Holdings”), White Star Petroleum, LLC (0977) (“WSTR”), White Star Petroleum II, LLC (4347) (“WSTR II”), White Star Petroleum Operating, LLC (5387) (“WSTR Operating”) and WSP Finance Corporation (9152) (“WSP Finance” and together with WSTR Holdings, WSTR, WSTR II and WSTR Operating, the “Debtors”). The Debtors’ corporate headquarters is located at 301 N.W. 63rd Street, Suite 600, Oklahoma City, OK 73116.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application

Services to be Provided

2. I have been advised by the Debtors that they wish to employ and retain S&C as their attorneys to assist them in these chapter 11 cases. The Debtors have requested that S&C render services including, but not limited to, the following:

- a. advising the Debtors with respect to their powers and duties as debtors and debtors-in-possession, including the legal and administrative requirements of operating in chapter 11;
- b. advising the Debtors with respect to the potential sale of their business and negotiating and preparing on the Debtors' behalf all agreements related thereto;
- c. attending meetings and negotiating with representatives of creditors and other parties-in-interest;
- d. assisting with the preservation of the Debtors' estates, including the prosecution of actions commenced under the Bankruptcy Code or otherwise on their behalf, and objections to claims filed against the estates;
- e. preparing and prosecuting on behalf of the Debtors all motions, applications, answers, orders, reports and papers necessary for the administration of the estates;
- f. negotiating and preparing on the Debtors' behalf chapter 11 plan(s), disclosure statement(s) and all related agreements and/or documents;
- g. advising the Debtors with respect to certain corporate, financing, tax and employee benefit matters as requested by the Debtors and without duplication of other professionals' services;
- h. appearing before the Court, and any appellate courts, and protecting the interests of the Debtors' estates before such courts; and
- i. performing all other legal services in connection with these chapter 11 cases as requested by the Debtors and without duplication of other professionals' services.

Professional Compensation During these Chapter 11 Cases

3. S&C does not ordinarily determine its fees solely on the basis of hourly rates. Instead, S&C ordinarily bases the fee for its services on all the factors prescribed by rule 1.5(a) of the New York Rules of Professional Conduct, including the firm's contribution to the

relevant matter, the responsibility assumed, the results achieved, the difficulty and complexity of the matter, the amount involved, the experience of, and demands on, the lawyers involved and the fees customarily charged for such matters.

4. Notwithstanding the foregoing, S&C has agreed with the Debtors that, subject to the Court's approval, it will charge the Debtors for its legal services on an hourly basis in connection with these cases. S&C's billing rates will range from \$1,275 to \$1,560 per hour for partners and special counsel, \$595 to \$1,040 per hour for associates and \$335 to \$480 per hour for legal assistants. These rates for the more senior timekeepers in each class represent a discount from the rates currently used by S&C when preparing estimates of fees under its normal billing procedures for non-bankruptcy engagements.

5. During the 90-day period prior to the Petition Date, the Debtors paid S&C the following amounts:

Amount Received	Received Date
\$5,205	March 5, 2019
\$8,712.50	April 15, 2019
\$263,809.39	April 29, 2019
\$392,558.26	May 22, 2019
\$770,000	May 24, 2019

On April 29, 2019, the Debtors funded a retainer for S&C to hold as security for payment of its fees and expenses in the amount of \$2,000,000. As of the Petition Date, S&C hold as security for payment of its fees and expenses a retainer in the amount of \$1,086,947.88.

6. Pursuant to Bankruptcy Rule 2016(b), S&C has neither shared nor agreed to share any compensation it has received or may receive with another party or person, other than with partners, counsel, associates and contract attorneys associated with S&C or any compensation another person or party has received or may receive.

7. S&C has advised the Debtors that it intends to apply to the Court for allowance of compensation for professional services rendered and reimbursement of charges and costs and expenses incurred in these chapter 11 cases in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules and applicable guidelines and orders of the Court. S&C also intends to make a reasonable effort to comply with any requests from the U.S. Trustee for information or additional disclosures as set forth in the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Large Chapter 11 Cases Effective as of November 1, 2013, in connection with this Application and the interim and final fee applications to be filed by S&C in these chapter 11 cases.

Procedures to Identify Conflicts; Disinterestedness

8. In order to confirm that S&C did not have a prior representation that precluded its representation of the Debtors, and to identify S&C's connections with the Debtors and their affiliates,³ creditors or any other party-in-interest, the Court, the U.S. Trustee or any person employed by the U.S. Trustee, the following procedures have been performed under my supervision, consistent with S&C's customary procedures with respect to potential conflicts:

- a. The list of prepetition interested parties attached hereto as Schedule 1 (the "Interested Parties List") was provided to S&C by the Debtors for purposes of preparing the disclosure required by Bankruptcy Rule 2014 in connection with the Application. S&C has not independently verified the accuracy or completeness of the Interested Parties List.
- b. With respect to the Debtors, S&C's Conflicts Information Management Department, under the supervision of S&C lawyers involved in representing the Debtors, have substantially completed a search of (i) a master client database maintained by S&C for the purposes of clearing conflicts, which includes the names of current and former clients (the "Client Database") and (ii) a master database of persons and entities with

³ As used in this declaration with respect to the Debtors, the term "affiliates" means those entities indicated as "Affiliated Parties" on Schedule 1.

respect to which partners of S&C have made an inquiry at the time of a potential new engagement, which database we use to identify certain types of business conflicts, among other things. The Client Database was searched with respect to all client matters since January 1, 2016 and the other database was searched with respect to all inquiries in the past three years. The results of these searches were reviewed by S&C lawyers and any information determined to be appropriate for disclosure pursuant to Bankruptcy Rule 2014 is disclosed herein.

- c. S&C's Conflicts Information Management Department, under the supervision of S&C attorneys involved in representing the Debtors, have substantially completed a check of the other persons and entities listed on the Interested Parties List as well as the ultimate parent of all listed entities against the Client Database and prepared a list of those persons and entities on the Interested Parties List that are identified in the Client Database as either current clients or clients represented by S&C at any time after January 1, 2016. The list of current and former clients was then reviewed by S&C lawyers, and, after eliminating certain errors and redundancies,⁴ a list of entities S&C currently represents ("Current Clients") was included on Schedule 2 and a list of clients that are not Current Clients but that S&C has represented since January 1, 2016 ("Former Clients") was included on Schedule 3.

9. Based solely on the conflicts procedures conducted to date and described herein, (i) S&C is not aware of any conflict between its representation of the Debtors and its representations of its Current Clients or Former Clients that would cause S&C not to be a "disinterested person," (ii) S&C does not represent any person or entity having an interest adverse to the Debtors in connection with these chapter 11 cases and (iii) S&C does not hold or represent an interest adverse to the Debtors' estates with respect to matters on which S&C is employed. To the extent any new relevant facts or relationships are discovered or arise, S&C will promptly make additional disclosure to the Court as required by Bankruptcy Rule 2014(a).

10. Based solely on the conflicts procedures conducted to date and described herein, to the best of my knowledge, S&C does not have any connection with the Debtors, their

⁴ Schedule 2 includes parties-in-interest that are either Current Clients or whose ultimate parents are current clients. Parties-in-interest that are Former Clients and whose ultimate parents are Current Clients are listed on Schedule 2 and are omitted from Schedule 3.

creditors or any other parties-in-interest, their respective attorneys and accountants, the U.S. Trustee or any person employed by the U.S. Trustee or any Bankruptcy Judge currently serving on the United States Bankruptcy Court for the District of Delaware or on the United States Bankruptcy Court for the Western District of Oklahoma, except as disclosed or otherwise described herein.

11. I am able to address only those positions or relationships that appear on the Interested Parties List. It is possible that, undisclosed to the Debtors, S&C clients hold, or acquire in the future, loans, bonds or other claims against the Debtors. In addition, notwithstanding the foregoing, the entities set forth on the Interested Parties List, and the status of any such entity, may have changed or could change during the pendency of these chapter 11 cases without S&C's knowledge. S&C will promptly review its files against any updated Interested Parties List received from the Debtors from time to time during the pendency of these chapter 11 cases pursuant to the procedures described in this Declaration. To the extent any new relevant facts or relationships are discovered or arise in the course of such review, S&C will promptly make additional disclosure to the Court as required by Bankruptcy Rule 2014(a).

12. S&C does not currently employ or intend to employ contract attorneys in these chapter 11 cases. To the extent S&C employs contract attorneys, S&C will ensure that any such contract attorneys are subject to conflicts checks and disclosures in accordance with the requirements of the Bankruptcy Code and Bankruptcy Rules, and will make additional disclosure to the Court as required by Bankruptcy Rule 2014(a). S&C will not charge a markup to the Debtors with respect to fees billed by any such contract attorney.

13. Approval of the proposed engagement of S&C is not prohibited by Bankruptcy Rule 5002. I am not related, and to the best of my knowledge, no attorney at the

Firm is related, to the United States Bankruptcy Judge assigned to these chapter 11 cases, or to the U.S. Trustee.

14. No promises have been received by S&C or by any partner, of counsel, special counsel or associate thereof as to compensation in connection with these cases other than in accordance with the provisions of the Bankruptcy Code. No agreement or understanding in any form or guise exists between S&C and any other person or entity for a division of compensation for services rendered in or in connection with these cases, and no division of compensation prohibited by section 504 of the Bankruptcy Code will be made.

Specific Disclosures

15. Generally, it is S&C's policy to disclose clients in the capacity that they first appear in a conflicts search. For example, if a client has already been disclosed in this Declaration in one capacity (*e.g.*, as a bank), and the client appears in a subsequent conflicts search in a different capacity (*e.g.*, as a bondholder), S&C will not disclose the same client again in supplemental declarations, unless the circumstances are such in the latter capacity that additional disclosure is required.

B. Relationships with Creditors and Parties-in-Interest

16. S&C currently represents American Energy Partners, LP ("AELP") and/or certain of their respective affiliates in matters unrelated to these chapter 11 cases. Debtor WSTR was originally formed in October 2013 by AELP and in February 2014, investment funds affiliated with and managed by The Energy & Minerals Group LP ("EMG") and other private equity investors made equity commitments to Debtor WSTR through Debtor WSTR Holdings. S&C has not represented and will not represent any of these clients in matters related to these chapter 11 cases.

17. Furthermore, S&C also currently represents EMG, the primary owner and equity sponsor of the Debtors, in matters unrelated to these chapter 11 cases. S&C has not represented and will not represent EMG in matters related to these chapter 11 cases.

18. As disclosed in Schedule 2 and Schedule 3 attached hereto, S&C has represented, and may continue to represent, various lenders and other parties-in-interest of the Debtors (and affiliates of such parties) in matters unrelated to these chapter 11 cases. While representing the Debtors, S&C will not represent any party-in-interest disclosed in Schedule 2 or Schedule 3 in connection with the these chapter 11 cases.

C. Relationships with Other Professionals

19. As part of its practice, S&C appears in cases, proceedings and transactions involving many different attorneys, accountants, financial consultants and investment banks, including other professionals representing the Debtors. In certain instances, professionals representing the Debtors may be clients of, or opposing counsel to, S&C in matters unrelated to these chapter 11 cases. In addition, S&C may have represented, and may continue to represent, clients that are adverse to clients of the Debtors' professionals in various matters unrelated to these chapter 11 cases.

20. From time to time, S&C has referred work to other professionals that the Debtors propose to retain in these chapter 11 cases. Likewise, certain such professionals have referred work to S&C.

D. Historical S&C Attorney and Employee Investments

21. One S&C partner has an investment in The Energy & Minerals Group Fund III, LP, a fund managed by EMG. This investment constitutes less than .03% of such fund. The same S&C partner also had investments in vehicles managed by EMG and AELP that

invested indirectly in WSTR Holdings, but these investments are of no value and all such investments have been written off.

Affirmative Statement of Disinterestedness

22. Based solely on the conflicts procedures conducted to date and described herein, to the best of my knowledge and insofar as I have been able to ascertain, (i) S&C is a “disinterested person” within the meaning of section 101(14) of the Bankruptcy Code, (ii) S&C does not represent any person or entity having an interest adverse to the Debtors in connection with these chapter 11 cases, (iii) S&C does not hold or represent an interest adverse to the Debtors’ estates with respect to matters on which S&C is employed and (iv) S&C has no connection to the Debtors, their creditors or any other party-in-interest except as disclosed herein.

Statement Pursuant to U.S. Trustee Guidelines

23. Pursuant to paragraph D, section 1 of the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Large Chapter 11 Cases Effective as of November 1, 2013, S&C responds to the questions set forth therein as follows:

Question: Did you agree to any variations from, or alternatives to, your standard or customary billing arrangements for this engagement?

Response: Yes. As discussed herein, S&C does not ordinarily determine its fees solely on the basis of hourly rates. For the purposes of its engagement by the Debtors, S&C has agreed that it will charge for services performed during these chapter 11 cases, and will apply to the Court for approval of such charges, on the basis of the hourly rates described in this Declaration. The hourly rates set forth herein are the same or less than the hourly rates used by S&C when preparing estimates of fees under its normal billing practices. In particular, the rates for the more senior timekeepers for each class of personnel represent a discount from the rates used by S&C

when preparing estimates of fees under its normal billing practices for non-bankruptcy engagements.

Question: Do any of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case?

Response: No.

Question: If you represented the client in the 12 months prepetition, disclose your billing rates and material financial terms for the prepetition engagement, including any adjustments during the 12 months prepetition. If your billing rates and material financial terms have changed postpetition, explain the difference and the reasons for the difference.

Response: Prior to the Petition Date, in connection with general corporate matters, S&C performed services for the Debtors at hourly billing rates consistent with S&C's practice for nonbankruptcy engagements, which are higher than the S&C rates proposed to be charged during these chapter 11 cases. The S&C rates proposed to be charged during these chapter 11 cases have been adjusted by imposing a cap on the hourly rate for each class of personnel, as described above. Prior to the Petition Date, in connection with the preparation and commencement of these chapter 11 cases, S&C performed services for the Debtors at the same hourly rates as the rates proposed to be charged during these chapter 11 cases.

Question: Has your client approved your prospective budget and staffing plan, and, if so, for what budget period?

Response: The Debtors have approved S&C's budget and staffing plan for the period from the Petition Date to June 30, 2019. If necessary, S&C expects to submit for approval by the Debtors prospective budgets and staffing plans for the duration of these chapter 11 cases.

24. I am authorized to submit this Declaration on behalf of S&C, and if called upon to testify, I would testify competently to the facts set forth herein.

25. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 21, 2019

/s/ Andrew G. Dietderich

Andrew G. Dietderich
Sullivan & Cromwell LLP

Exhibit H



FILED
ALAMEDA COUNTY

MAY 01 2020

CLERK OF THE SUPERIOR COURT
By: [Signature] DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF ALAMEDA

STEPHANIE STIAVETTI, et al,

Plaintiffs,

v.

PAMELA AHLIN, et al,

Defendants.

No. RG15-779731

ORDER GRANTING IN PART MOTION
FOR ATTORNEYS' FEES.

Date: 5/1/20

Time: 10:00 A.M.

Dept.: 21

The motion of Plaintiff Stephanie Stiavetti et al ("Plaintiffs") for an award of attorneys' fees came on for hearing on 5/1/20, in Department 21 of this Court, the Honorable Winifred Y. Smith presiding. The court issued a tentative decision and the parties did not contest the tentative decision. IT IS ORDERED: The motion of Plaintiffs for an award of attorneys' fees is GRANTED IN PART. The court orders the California Department of State Hospitals ("DSH") and the California Department of Developmental Services ("DDS") (collectively "the State") to pay counsel for Plaintiffs attorneys' fees in the total amount of \$2,683,252.50.

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FACTS

On 7/29/15, Plaintiffs filed this action asserting that the DSH and DDS are violating the constitutional rights of defendants who have been found incompetent to stand trial ("IST defendants") by subjecting them to long waits after they are declared incompetent and before they are admitted to state hospitals. Plaintiffs asserted four causes of action (1) due process violations under the California Constitution, (2) violation of the California constitutional right to a speedy trial, (3) due process violations under the United States Constitution, and (4) a taxpayer claim under CCP 526a based on the prior three claims.

On 10/1/15, the State filed a demurrer and motion to strike portions of the petition. The court overruled the demurrer and granted in part the motion to strike. (Orders of 4/26/16)

On 10/16/15, the State filed a motion to stay all discovery. The court denied the motion (Order of 11/18/15.) On 5/6/16, the State filed its answer.

On 3/1/17, the State filed a motion for judgment on the pleadings. The court denied the motion. (Order of 8/11/17)

Both Plaintiffs and the State sought and produced substantial discovery. The parties dispute whether the discovery sought was reasonable or was unnecessary and overbroad. (LaGoy Dec., para 5-14; Clayton Dec., para 10-33.) Plaintiffs filed motions to compel discovery. The court dropped one motion as moot because it appeared that the parties had substantially resolved their dispute. (Order of 8/11/17.) The court denied one motion. (Order of 11/3/17) The court denied another motion. (Order of 11/17/17.) The State filed one motion to compel discovery. The court denied the motion. (Order of 11/3/17)

Plaintiffs took 15 depositions. The State took 5 depositions.

1 On 1/25/18, Plaintiffs filed their brief on the merits. The Order of 11/1/18 continued the
2 hearing and requested supplemental briefing on several issues. The Order of 2/4/19 again
3 continued the hearing and requested supplemental briefing on different issues.

4 On 3/22/19, the court issued an order granting the petition in substantial part. On
5 4/19/19, the court entered judgment.

6 The State has filed an appeal. (*Stiavetti v. Ahlin*, First Appellate District, Division 2,
7 A157553.) This order concerns fees related to the trial court proceedings through 10/7/19.
8 (Oswell Dec., para 26.)
9

10
11 ENTITLEMENT TO FEES UNDER C.C.P. 1021.5.

12 C.C.P. 1021.5 is a general fee shifting statute designed to facilitate actions resulting in the
13 enforcement of important rights that affect the public interest and confer a benefit on the public
14 or a large class of persons. The court considers several interrelated factors and weighs the factors
15 on a sliding scale such that a strong showing on one factor can compensate for a weak showing
16 on another factor. (*Los Angeles Police Protective League v. City of Los Angeles* (1986) 188
17 Cal.App.3d 1, 10.)
18

19 The State does not dispute entitlement to fees. The court reviews the factors in the
20 interests of thoroughness.

21 Plaintiffs are the prevailing party in this case for purposes of an award of fees under
22 C.C.P. 1021.5. The judgment entered 4/19/19 states that the petition was granted.
23

24 Plaintiffs enforced “important rights” affecting the public interest. The court realistically
25 and pragmatically evaluates the importance of the rights at issue. (*Bui v. Nguyen* (2014) 230
26

1 Cal.App.4th 1357, 1366.) The rights of IST defendants are “important rights” affecting the
2 public interest.

3 Plaintiffs’ action conferred a significant benefit on the general public. The court
4 examines the significance of the benefit. (*Baxter v. Salutary Sportsclubs, Inc.* (2004) 122
5 Cal.App.4th 941, 945.) The judgment determined (1) “Constitutional due process requires that
6 DSH must commence substantive services to restore an IST defendant to competency within 28
7 days of the transfer of responsibility for an IST defendant to DSH” and (2) “Constitutional due
8 process requires that DDS commence substantive services to restore an IST defendant to
9 competency within 28 days of the transfer of responsibility for an IST defendant to DDS.” The
10 determination of these Constitutional minimums was significant and the action conferred benefits
11 on the public.
12

13 Plaintiffs’ private action was necessary. The “necessity” of private enforcement looks to
14 the adequacy of public enforcement. (*In re Conservatorship of Whitley* (2010) 50 Cal.4th 1206,
15 1214-1215.) (See also *Woodland Hills Residents Assn., Inc. v. City Council* (1979) 23 Cal.3d
16 917, 941.) Plaintiffs made pre-litigation efforts to resolve the issues but Plaintiffs and the State
17 were not able to resolve the dispute. (Risher Dec., para 2-6; LaGoy Dec., para 6-7.)
18

19 The State argues that although Plaintiffs were the prevailing party in the case, they were
20 not the prevailing party on all of the motions or on all of the claims and that the court should
21 decrease the fees accordingly. The court addresses those arguments in the context of the amount
22 of fees.
23

24 ///

25 ///

1 AMOUNT OF FEES – LODESTAR/MULTIPLIER ANALYSIS.

2 The court determines the amount of a reasonable fee under the lodestar/multiplier
3 analysis. "The challenge to the trial courts is to make an award that provides fair compensation
4 to the attorneys involved in the litigation at hand and encourages litigation of claims that in the
5 public interest merit litigation, without encouraging the unnecessary litigation of claims of little
6 public value." (*Weeks v. Baker & McKenzie* (1998) 63 Cal. App. 4th 1128, 1172 (applying Gov't
7 Code 12965(b).) "The fees should be adequate to attract competent counsel, but they should not
8 be so large that it is a windfall for attorneys." (*Heritage Pacific Financial, LLC v. Monroy*
9 (2013) 215 Cal.App.4th 972, 1006 [fees under federal Fair Debt Collection Practices Act].)

11 The court first determines reasonable hours worked. The court considers the
12 reasonableness of the hours worked in light of the complexity of the legal issues, the scope of
13 discovery, the reasonableness of counsel in seeking or resisting discovery, duplication of effort,
14 the number of motions, and other variables. (*569 East County Boulevard LLC v. Backcountry*
15 *Against the Dump* (2016) 6 Cal.App.5th 426, 440-441.)

17 The court then determines the reasonable hourly rate for the attorney for the work in this
18 case. "The reasonable hourly rate is that prevailing in the community for similar work." (*Syers*
19 *Properties III, Inc. v. Rankin* (2014) 226 Cal.App.4th 691, 702; *Heritage Pacific Financial, LLC*
20 *v. Monroy* (2013) 215 Cal.App.4th 972, 1004.) The court considers the market, the rates for
21 similar work, the general experience of the attorney, and the specific experience of the attorney.

22 Where there has been a "lengthy delay" between when fees were incurred and when fees
23 are paid, the court can account for the delay by either using current rates or by increasing the
24 contemporaneous rates with an interest rate. (*Robles v. Employment Development Dept.* (2019)
25 38 Cal.App.5th 191, 205 [*Robles III*].) The court finds that the use of contemporaneous rates is
26

1 more appropriate in this case than using current rates. The contemporaneous rates reflect the
2 value of an attorneys' time as of when she performed the services and the interest rate accounts
3 for the delay in payment. In contrast, the use of current rates implicitly takes into account the
4 attorney's acquisition of experience and expertise after the work was performed. An attorney
5 might have been a novice when the work was performed but have acquired practical experience
6 and substantive expertise that supports a higher current rate when the fee request is made years
7 later. Alternatively, an attorney might have developed substance abuse problems and become a
8 less than stellar attorney with difficulty finding any paying clients a few years later.¹

10 The use of current rates for prior work is particularly problematic for attorneys who were
11 new to the bar or new to a practice area when they performed the work. An attorney's reasonable
12 rate based on her general skills can increase by 50-100% in the first five years of practice, then
13 increase by 25-50% in the next five years of practice, but after that the attorney has usually
14 reached her level of expertise and her reasonable rate will tend to remain stable or increase with
15 inflation for the duration of her career. (Pearl Declaration, pages 6-22.) Similarly, an attorney's
16 rate based on specific subject matter expertise may increase sharply in the early years as she
17 develops her expertise, but will not increase at the same rate when she is maintaining her
18 expertise. Many of the attorneys who staffed this case were both new to the profession and new
19 to the specific subject matter when they worked on this case. Therefore, it is particularly
20 problematic to award fees for work performed years ago in this case based on the hourly rates
21
22
23

24 ¹ Attorney Sallomi is no longer a member of the California Bar and therefore has a
25 current billing rate of \$0. Attorney Roll is currently clerking for a federal judge in Hawaii and
26 attorney Loevinsohn is currently clerking for a federal judge in New York, so they have no
current billing rates. Plaintiffs can, however, recover fees for the work that those attorneys
performed at their reasonable rates when the work was performed.

1 that the attorneys currently charge in different subject areas that are now in their fields of
2 expertise.

3 This case was commenced on 7/29/15 and judgment was entered on 4/19/19. The case
4 took almost four years to judgment, which is a long time but does not qualify as a “lengthy
5 delay.” The ACLUF-NC states its contemporaneous billing rates and then makes adjustments to
6 account for inflation. (Risher Dec., para 31 [ACLUF-NC methodology for adjusting rates over
7 time].) The court accepts the ACLUF-NC’s methodology.

8
9 Sullivan & Cromwell seeks fees at current rates that account for experience acquired after
10 the work was performed. The court will determine Sullivan & Cromwell’s contemporaneous
11 reasonable rates but will apply a 12% interest adjustment to approximately 40% of the Sullivan
12 & Cromwell lodestar because counsel provided significant work in 2015 [last half], 2016, and
13 2017[first half]. The court uses 12% as the combined interest rate because Government Code
14 965.5 states the interest rate is “the weekly average one year constant maturity United States
15 Treasury yield ... plus 2 percent.” The court takes judicial notice that during the relevant period
16 from 7/2015 to the present, the weekly average one year constant maturity United States Treasury
17 yield varied from 0.5 to 2.5%. A 12% interest adjustment for work performed between 3-5 years
18 ago is also generally consistent with the 3.1% annual increase in the price of legal services.
19 (Sobel Dec., para 20; Risher Dec., para 29-30.)

20
21 The court then considers a multiplier based on: (1) the novelty and difficulty of the legal
22 issues involved, (2) the skill of counsel, (3) the time commitment and preclusion of other
23 employment, (4) the contingent nature of the fee award, and (5) the benefit conferred. (*Ketchum*
24 *v. Moses* (2001) 24 Cal. 4th 1122, 1131-1132.) The court may apply a negative multiplier to a
25
26

1 fee request that appears unreasonably inflated. (*Chavez v. City of Los Angeles* (2010) 47 Cal.4th
2 970, 990-991; *Thayer v. Wells Fargo Bank, N.A.* (2001) 92 Cal.App.4th 819, 840

3 The court does not use an award of fees to punish a party for defending itself in litigation.
4 “[A]n enhancement ... may not properly be imposed merely for the purpose of punishing” the
5 party paying fees. (*Ketchum v. Moses* (2001) 24 Cal. 4th 1122, 1142.) (See also *Ketchum*, 24
6 Cal.4th at 1139.) If a defendant undertakes a tenacious defense, then that will be reflected in the
7 hours worked. (*Peak-Las Positas Partners v. Bollag* (2009) 172 Cal.App.4th 101, 114
8 [tenacious litigation].)

9
10 Plaintiffs assert that counsel reasonably spent 7,486.4 hours on this case. (Moving at 13
11 and 14.) Sullivan & Cromwell exercised billing judgment and is not seeking compensation for
12 2,481.25 hours. (Oswell, para 27.) At their asserted billing rates of \$325-\$1,000/hr, Plaintiffs
13 asset a lodestar of \$5,419,960.30. Plaintiffs seek a multiplier of 1.2-1.3. (Moving at 14.) A
14 lodestar of \$5,419,960.30 and a multiplier of 1.25 would result in a fee award of \$6,437,450.
15

16 The court considers the fee request both by viewing the case in the aggregate and by
17 looking at the details. The forest and the trees as it were.
18

19 AGGREGATE ANALYSIS

20 The court’s aggregate estimate of the reasonable time spent on the case and the
21 reasonable hourly rates for the work in this case is based on the court’s experience in overseeing
22 complex cases generally and in managing this case specifically. The case was filed on 7/29/15,
23 determined to be complex on 12/21/15, and assigned to the undersigned judge on 12/22/15. The
24 court is very familiar with the case.
25
26

Regarding the use of an aggregate estimate, *PLCM Group v. Drexler* (2000) 22 Cal.4th 1084, 1096 and 1098, states:

The value of legal services performed in a case is a matter in which the trial court has its own expertise. ... The trial court may make its own determination of the value of the services contrary to, or without the necessity for, expert testimony. ... *We do not want "a [trial] court, in setting an attorney's fee, [to] become enmeshed in a meticulous analysis of every detailed facet of the professional representation.* It ... is not our intention that the inquiry into the adequacy of the fee assume massive proportions, perhaps dwarfing the case in chief.

(Italics added.) (See also *Syers Properties III, Inc. v. Rankin* (2014) 226 Cal.App.4th 691, 700 [“Most importantly, the trial judge presided over the entire matter and was well able to evaluate whether the time expended by counsel in this case, given its complexity and other factors, was reasonable.”].) The court’s consideration of the case in the aggregate is similar to the court’s review of time records organized by category. (*City of Oakland v. McCullough* (1996) 46 Cal.App.4th 1, 9.)

The court finds the aggregate approach to be useful because it does not draw the court into questions of whether attorney A was duplicating attorney B’s work or the other way around. The distribution of work among many attorneys can lead to the duplication of effort. (Risher Dec. Exh E [Lye Dec at para 33-34 (distinguishing between staffing at ACLUF-NC and staffing at commercial law firms)].) At any given stage in the case, counsel for plaintiffs could presumably rely on research conducted earlier in case. (Risher Dec. Exh E [Lye Dec at para 19].)

The court can decrease the amount of hours reasonably expended based on whether a case was overstaffed and whether hours were reasonably expended. (*Morris v. Hyundai Motor America* (2019) 41 Cal.App.5th 24, 38.) The court does not, however, need to identify which research by what attorney was duplicative as each attorney separately came up to speed in the

1 case. (*Cavalry SPV I, LLC v. Watkins* (2019) 36 Cal.App.5th 1070, 1101 [“Cavalry complains
2 that the trial court did not point out specific instances of duplicated effort or over litigation in its
3 order, but the court was not required to do so”]; *Rey v. Madera Unified School Dist.* (2012) 203
4 Cal.App.4th 1223, 1240, 1244 [the burden “to discern any precise billing entry that was
5 duplicative of another ... does not rest on the trial court”].)

6
7 Plaintiffs cite to two cases that arguably suggest that a trial court cannot rely on its own
8 familiarity with a case and cannot consider the reasonableness of the time spent in the aggregate.
9 (Reply at 4:21-5:2.) *Lunada Biomedical v. Nunez* (2014) 230 Cal.App.4th 459, 488, states “In
10 challenging attorney fees as excessive because too many hours of work are claimed, it is the
11 burden of the challenging party to point to the specific items challenged, with a sufficient
12 argument and citations to the evidence. General arguments that fees claimed are excessive,
13 duplicative, or unrelated do not suffice.” (See also *Premier Medical Management Systems, Inc.*
14 *v. California Ins. Guarantee Assn.* (2008) 163 Cal.App.4th 550, 564.) The statements in *Lunada*
15 and *Pemier Medical* concern the standard of review on appeal, where “principles of appellate
16 review required appellants to affirmatively demonstrate error to overcome the presumptions in
17 favor of the trial court's ruling.” (*Premier Medical*, 163 Cal.App.4th at 564.) Neither case limited
18 the ability of a trial judge to rely on her familiarity with a case. Neither case required a trial court
19 opinion to have a detailed accounting of each specific time entry challenged. Both cases
20 affirmed the trial court.

21
22 The court finds that an aggregate of 5,000 hours would be reasonable. Plaintiffs actively
23 prosecuted the claims and the State actively contested the claims. The focus of the case was the
24 legal issue of defining the Constitutionally permissible length of time that that an IST defendant
25 can be held after an IST order and before the State provides substantial services designed to
26

1 restore competency. That Constitutional due process issue did, however, arise in the context of
2 specific facts. The parties reasonably conducted significant discovery that was appropriate to the
3 seriousness of the Constitutional issues presented, the number of IST defendants affected, and the
4 burden on the State of complying with the standard that Plaintiffs hoped to establish. (CCP
5 2019.030(a)(2).)

6
7 The court finds that an aggregate of 5,000 hours would be reasonable based on the court's
8 estimate of 200 hours preparing the case, 400 hours on miscellaneous legal research on the
9 Constitutional issues, 200 hours opposing the demurrer and motion to strike, 200 hours opposing
10 the MJOP, 1000 hours on written discovery, 800 hours on the 20 depositions (40 hours each),
11 400 hours total on the discovery motions, 800 hours on briefing the merits, 800 hours on
12 miscellaneous conferences and case management, and 200 hours on the cost and fee motions.
13 The estimate is based on the court's experience in overseeing complex cases generally and in
14 managing this case specifically.

15
16 The court finds that a blended billing rate of \$455 would be reasonable. This reflects that
17 20% of time was spent was by attorneys with substantial general experience or specific expertise
18 in the specific field (Oswell, Murtagh, Risher) at a rate of \$700/hr, 50% of the time was spent by
19 attorneys with 2-5 years of experience and some case-specific expertise at a rate of \$450/hr, and
20 30% of the time was spent by attorneys of 0-1 years of experience at a rate of \$300/hour. (569
21 *East County Boulevard LLC v. Backcountry Against the Dump* (2016) 6 Cal.App.5th 426, 436-
22 438 [approving trial judge setting blended rate of \$275 for all counsel].)

23
24 A blended rate is appropriate for purposes of the aggregate analysis because what is
25 relevant is the time reasonably spent and an appropriate ratio of experienced attorneys to junior
26 attorneys in staffing the case. There should be an inverse ratio between experience (and thus

1 billing rate) and time required to perform a task. (*Ursic v. Bethlehem Mines* (3d Cir. 1983) 719
 2 F.2d 670, 677; *Boston & Me. Corp. v. Moore* (1st Cir. 1985) 776 F.2d 2, 9; *Blizzard v. Astrue*
 3 (SDNY 2007) 496 F.Supp.2d 320, 323.) Therefore, the substitution of one experienced attorney
 4 for two junior attorneys (or the other way around) has no material effect on the aggregate
 5 reasonable fees.

6 The aggregate approach suggests a lodestar of 5,000 hours at \$455/hr for a total of
 7 \$2,275,000.
 8

9 10 ANALYSIS OF TIME CLAIMED - GENERALLY

11 Plaintiffs submitted time records. The court has reviewed the time records. The State
 12 challenges the time claimed in several categories.

13 Time spent on claims where plaintiff did not prevail. The State argues that a party who is
 14 only partially successful is not entitled to compensation for fees expended on unsuccessful
 15 claims. (*Chavez v. City of Los Angeles* (2010) 47 Cal.4th 970, 989–990.) (Oppo at 9.) A
 16 reduction from the lodestar is appropriate “only when a plaintiff has achieved limited success or
 17 has failed with respect to distinct and unrelated claims.” (*Hogar Dulce Hogar v. Community*
 18 *Development Com. of City of Escondido* (2007) 157 Cal.App.4th 1358, 1269.) The court will not
 19 reduce the hours by the time spent on claims where plaintiff did not prevail. The claims were
 20 closely related, if not inextricably intertwined.
 21

22 Time spent on Public Records Act Requests. Counsel for plaintiffs made Public Records
 23 Act (“PRA”) requests before filing this case as part of their pre-litigation investigation.

24 “Frivolous litigation is frequently avoided by a careful lawyer’s investigation of a client’s claims
 25 before filing suit.” (*Jorgensen v. Taco Bell Corp.* (1996) 50 Cal.App.4th 1398, 1403.) (See also
 26

1 *Tichinin v. City of Morgan Hill* (2009) 177 Cal.App.4th 1049, 1068-1069.) Counsel can recover
2 fees for pre-litigation activity that was “useful and necessary to the public interest litigation.”

3 (*Best v. California Apprenticeship Council* (1987) 193 Cal.App.3d 1448, 1459-1462)

4 The State argues that a party who prevails in a case and is seeking fees under CCP 1021.5
5 cannot recover fees for work on a Public Records Act (“PRA”) request because the CPRA has its
6 own fee shifting provision. (Govt Code 6259(d).) (Oppo at 9-10.) The court will not reduce the
7 hours by the time spent on PRA efforts. A party prosecuting a claim may recover fees for work
8 “useful and necessary to the public interest litigation.” It is immaterial that if public agencies had
9 responded to PRA requests improperly, and if Plaintiffs had filed a separate PRA lawsuit, and if
10 Plaintiffs had prevailed in that PRA lawsuit, then Plaintiffs then would have had an independent
11 claim for fees under Govt Code 6259(d).
12

13 Time spent on motions to compel discovery. The State argues that Plaintiffs should not be
14 awarded any fees for the discovery motions they lost. (Oppo at 10-11.) The court will not
15 reduce the time spent on the discovery motions because Plaintiffs lost the motions. The discovery
16 motions were not frivolous. “There is no requirement that each motion or opposition be
17 successful to be reasonable. ... Litigation often involves a succession of attacks upon an
18 opponent’s case; indeed the final ground of resolution may only become clear after a series of
19 unsuccessful attacks. Compensation is ordinarily warranted even for unsuccessful forays.” (*City*
20 *of Los Angeles v. Metropolitan Water Dist. of Southern California* (2019) 42 Cal.App.5th 290,
21 307.)
22

23 The court does, however, find that the time spent on the discovery motions was
24 unreasonable. Discovery motions are relatively routine in civil litigation. The court would
25 decrease the hours spent on discovery motions by 233 (from 633 to 400).
26

1 Time spent on secretarial and paralegal work. The State argues that the billing records
2 include 311 hours of secretarial and paralegal work. (Oppo at 12-13; Berona Dec.) The court
3 has reviewed the billing records and finds numerous instances where counsel billed for work that
4 can reasonably be described as secretarial and paralegal work. The court appreciates that it is
5 often faster and simpler and ultimately less expensive for an attorney to do a task herself than to
6 spend the time instructing a paralegal on how to do a task and then later checking the work. That
7 noted, the billing records reflect a significant amount of non-attorney level work. The court
8 would decrease the hours by 200.²

10 Time spent on travel. The State argues that Plaintiffs stated they would not bill for travel
11 time but the records include 52 hours of travel time. The court presumes that the travel time was
12 included in error. The court would decrease the hours by 52.³

13 Time spent on training. The State refers generally to time spent training, but does not
14 identify any anecdotes or state the number of allegedly improper hours. The training issue is
15 inextricably intertwined with the staffing of the case. The case was staffed with many attorneys
16 and many of those attorneys had little general litigation experience and/or no expertise in the
17 California criminal procedure or constitutional issues when they started work on the case. The
18

20 ² The court thinks that eliminating hours spent on non-attorney work is a better approach
21 than adjusting the reasonable rate for all time worked. (*Morris v. Hyundai Motor America* (2019)
22 41 Cal.App.5th 24, 41.)

23 ³ Petitioners informed the court that they would not contest the tentative decision, but did
24 point out in the communication that their papers state that they did not seek travel time only for
25 the Sullivan & Cromwell attorneys. (Moving at 11:26-27; Oswald Dec., para 27.) The 52 hours
26 of travel was for ACLU attorneys. With the exception of this footnote, the court does not change
the tentative decision. Petitioners did not contest the tentative decision, so the tentative becomes
the order of the court. (CRC 3.1308(a); Local Rule 3.30(d).) In addition, the court determines
the lodestar based on its consideration of both the reasonable aggregate fees and its review of the
time records. Counting the 52 travel hours would not have changed to court's finding that the
reasonable lodestar is \$2,500,000.

1 allocation of the work would have required each attorney to individually get up to speed on the
2 case. Even recognizing that counsel exercised billing judgment and decreased the number of
3 hours sought, the court would further decrease the hours by 1000.

4 Time spent on vague entries. The State refers generally to vague entries and identifies a
5 few anecdotes but does not state the number of allegedly improper hours. The court would not
6 decrease the hours based on vague entries.

7 Time spent on internal communications. The State argues that there were excessive
8 internal communications. Counsel for Plaintiffs did not record all their internal communications
9 (Risher Dec., para 19) and/or edited their billing records to delete a significant amount of their
10 internal communications (Oswell Dec., para 27.) The criticism nevertheless has some merit.
11 Lin's billing records shows 57 entries for "Attended weekly team call," each of which took 0.1-
12 0.6 hours. Guneratne joined the case at the tail end, spent approximately 8 hours on the
13 supplemental briefing, and spent the balance of 5 hours on team calls. The State asserts that even
14 after the exercise of billing judgment there were still 1,266 hours billed to internal
15 teleconferences, meetings, and emails. (Oppo at 13:24; Berona Dec.) The court appreciates that
16 coordination and discussion among counsel through meetings or email permits efficient and
17 effective work and can improve the quality of factual and legal analysis. That noted, Plaintiffs
18 chose to staff the case with 17 attorneys in both ACLUF-NC (attorneys in San Francisco and Los
19 Angeles) and Sullivan & Cromwell (attorneys in Palo Alto, San Francisco, and New York): The
20 court will not shift the burden of the resulting communication challenges to the State. The court
21 would decrease the hours by 200.

22 Time spent on overstaffed preparation for and attendance at depositions. The State argues
23 that the court should reduce hours due to overstaffing. (*Chavez v. Netflix, Inc.* (2008) 162
24
25
26

1 Cal.App.4th 43, 64.) The State identifies anecdotes where Plaintiffs' counsel had several
2 attorneys prepare for and/or attend a deposition. The court would decrease the hours by 200.

3 Based on the specific issues identified by the State, the court would reduce Plaintiffs'
4 hours by at least 1505 hours. This would reduce the asserted hours from 7,841 to 6,336.

5 6 REVIEW OF HOURLY RATES – GENERALLY 7

8 The court determines the reasonable hourly rate for each attorney. (Attorney Fee Awards
9 (2019), Richard Pearl, section 9.92.) “The reasonable hourly rate is that prevailing in the
10 community for similar work.” (*Syers Properties III, Inc. v. Rankin* (2014) 226 Cal.App.4th 691,
11 702.) “In making its calculation, the court should also consider the experience, skill, and
12 reputation of the attorney requesting fees. ... The court may rely on its own knowledge and
13 familiarity with the legal market in setting a reasonable hourly rate.” (*Heritage Pacific*
14 *Financial, LLC v. Monroy* (2013) 215 Cal.App.4th 972, 1009.)
15

16 The “community” is the San Francisco Bay Area. Neither Plaintiffs nor the State argue
17 that the prevailing rates in other geographic communities should apply. (Reply at 7:23-28.)
18 Assuming it were an issue, there is no indication that the rates vary significantly among San
19 Francisco, Los Angeles, Palo Alto, and New York. (Oswell Dec., para 28; Sobel Dec., para 20,
20 22.)
21

22 “The reasonable hourly rate [for that attorney] for similar work” is based on several
23 factors: the rates in the relevant market for similar work, the general experience of the attorney,
24 and the specific expertise of the attorney with similar work.
25
26

1 The relevant market for “similar work” requires the court to implicitly or explicitly define
2 the relevant market. “Generally, the courts will look to equally difficult or complex types of
3 litigation to determine which market rates to apply.” (*Syers Properties III, Inc. v. Rankin* (2014)
4 226 Cal.App.4th 691, 700.) The court’s determination of the relevant market is fact specific. In
5 determining what is “similar work” or “comparable legal services,” a court could, for example,
6 differentiate between insurance defense litigation and general civil litigation. (*Syers*, 226
7 Cal.App.4th at 702.)

9 The relevant market in this case is an intersection of California criminal procedure and
10 Constitutional law. The relevant market is not complex commercial litigation and government
11 investigations. The court presumes that the market rates for skilled and experienced counsel with
12 substantive knowledge in the field are comparable for the fields of California criminal defense,
13 Constitutional law, commercial litigation, and government investigations. The definition of the
14 relevant market is important primarily because it focuses attention on whether the attorneys had
15 experience or substantive expertise in the relevant market when they performed the work in this
16 case.

18 The general experience of an attorney regarding litigation is her or his experience with
19 factual investigation, legal research and analysis, drafting and responding to discovery, taking
20 depositions, drafting briefs, arguing motions, preparing for trial, and presenting evidence and
21 argument at trial. (*Russell v. Foglio* (2008) 160 Cal.App.4th 653, 661-662 [court considered that
22 lawyer “brought to the case far more extensive trial experience than an average junior associate at
23 a law firm”].)

25 An attorney’s years since law school or after passing the bar is a reasonable and accepted
26 proxy for general experience. (Attorney Fee Awards (2019), Richard Pearl, section 9.107

1 ["Many courts find years of experience to be a significant factor in determining market rates"].)
 2 Years of experience is, however, only a proxy for actual relevant experience. An attorney with
 3 20 years of transactional or regulatory experience in complex real estate transactions or SEC
 4 compliance is not equivalent to an attorney with 20 years of litigation experience prosecuting or
 5 defending personal injury or employment cases through trial. Each has expertise in their
 6 respective fields. The court does not blindly rely on years as an attorney as a proxy for general
 7 experience in civil litigation.
 8

9 The specific expertise of the attorney with similar work is her or his experience and
 10 knowledge in the relevant market for "similar work." Counsel's special expertise in a field can
 11 justify a higher hourly rate for work in that field. (*Building a Better Redondo, Inc. v. City of*
 12 *Redondo Beach* (2012) 203 Cal.App.4th 852, 871 [trial court approved rate of \$850/hour based
 13 on "counsel's special expertise" as "a leading expert in the field of environmental, land use and
 14 administrative law"].) (See generally Attorney Fee Awards (2019), Richard Pearl, section
 15 9.107.) Similarly, counsel's lack of experience or expertise in a field can justify a lower hourly
 16 rate for work in a field. All complex legal work is not similar to all other complex legal work.
 17 Federal antitrust law and California trade secret law can both be complex, but expertise in one
 18 field does not make an attorney an expert in the other. An expert in C++ code is not an expert
 19 when she is assisting on a project that uses Python or SQL. The State notes that an expert
 20 neurosurgeon is not an expert urologist. (Oppo at 17:19-22.)
 21

22 *569 East County Boulevard LLC v. Backcountry Against the Dump* (2016) 6 Cal.App.5th
 23 426, 438-439, is instructive. In *569 East County*, an attorney with a "stellar resume" asserted a
 24 rate of \$750/hour and the trial court awarded a blended rate of \$275/hour. The Court of Appeal
 25 stated that the attorney with the stellar resume "had neither defended nor prosecuted an anti-
 26

1 SLAPP action before this case and, although he has great expertise and skill in other areas of law,
2 his relative inexperience in matters of this nature could properly be “included in the hourly rate
3 used to calculate the lodestar.” (6 Cal.App.5th at 438-439, fn 14.)

4 *Common Cause v. Jones* (C.D. Cal., 2002) 235 F.Supp.2d 1076, 1081, is a useful
5 contrast. In *Common Cause*, “the largest and most prestigious law firms in Los Angeles”
6 asserted rates of \$500/hour in litigation against the State of California concerning voting
7 equipment. The federal trial court found that counsel’s regular commercial rates were reasonable
8 because “the legal issues were complex, multivariate and often novel, including constitutional
9 and statutory challenges to an intricate election scheme, and, later, the practicability of a rapid
10 overhaul of the state’s electoral machinery.” The court reasoned “it was reasonable for Plaintiffs
11 to seek out the most competent and talented attorneys available, and for those attorneys to take
12 central roles in litigating this case.” Mr. Risher appears to be one of “the most competent and
13 talented attorneys available” for this particular case given his directly relevant prior experience in
14 California criminal procedure and Constitutional issues. Many of the other attorneys, however,
15 had little to no experience, much less expertise, in California criminal procedure and
16 Constitutional issues. If any given attorney did not have expertise when the work was performed,
17 then the court will not award fees at a rate that reflects expertise.

18 The acquisition of specific expertise takes research and experience. A lawyer can spend
19 100 hours researching a topic, but that does not make her an expert. A district attorney or public
20 defender who has been on the job for three months (500 hours) would still be considered a new
21 attorney. A district attorney or public defender who has been on the job for six months (1000
22 hours) would hopefully have gained practical experience and developed familiarity with criminal
23 procedure and law, but she would not be considered an expert. For purposes of the State Bar’s
24
25
26

1 certified specialty program, an attorney cannot be a certified specialist until she has practiced law
2 continuously for at least five years, spending at least 25 percent of the time given to occupational
3 endeavors practicing in the specialty area. (State Bar Rule 3.115.) Reduced to hours, and
4 assuming 1600 billable hours of work per year, that suggests that an attorney must have 2,000
5 billable hours in a field before she can meet the minimum requirement to be a certified specialist
6 in that field. Assuming 2,000 hours per year, the certified specialist requirements suggest that an
7 attorney must have 2,500 hours in a field to be a certified specialist in that field. There is no
8 indication that any of the Sullivan & Cromwell attorneys brought to this case any relevant subject
9 matter expertise.

11 Plaintiffs argue that an attorney's reasonable rate can be based on her or his experience in
12 "equally difficult or complex types of litigation" and the rates are not limited to rates "charged or
13 awarded in cases involving the same subject matter." (Reply at 8:1-7, citing Attorney Fee
14 Awards (2019), Richard Pearl, sections 9:106 and 9:109.) Plaintiffs are correct that "similar
15 work" in the relevant market does not mean "identical work" in the same subject area. (*Syers*,
16 226 Cal.App.4th at 702-703.) The court does, however, have the discretion, if not the obligation,
17 to determine an attorney's reasonable market rate for the work in a case based on the attorney's
18 general experience and the attorney's specific expertise, if any, with similar work. (Attorney Fee
19 Awards (2019), Richard Pearl, section 9.92.)

21 Plaintiffs' argument regarding the reasonableness of the rates is implicitly based on the
22 presumption that an attorney's reasonable rate in this case is the rate the attorney could have
23 charged if she were working on a different case that was within her area of expertise. (Reply at
24 8:23-28.) That is not the law and it does not reflect how markets work. An attorney cannot
25 charge \$700/hour in a case simply because she is foregoing the opportunity to charge \$700/hour
26

1 elsewhere. The court determines the reasonable hourly rate of an attorney in a case based on
2 what relevant experience and expertise the attorney brings to that case and not on whatever else
3 the attorney might have done with her time.

4 The court finds that the asserted hourly rates of the ACLU are reasonable for the work
5 performed in this case. The State accepts the ACLU's rates as reasonable. The State refers to
6 "the more reasonable hourly rates for experienced civil rights litigators utilized by the ACLU."
7 (Oppo at 5:14-15.) (See also Oppo at 17:9-15.) (Compare Moving at p 13 [table] with Oppo at
8 Exh A [table].) The Court independently finds the ACLU's rates to be reasonable. The court has
9 considered the declaration of Richard Pearl collecting information and the declaration of Carol
10 A. Sobel. The court has relied on its own experience reviewing fee applications in complex
11 cases. (*PLCM Group v. Drexler* (2000) 22 Cal.4th 1084, 1096; *Syers Properties III, Inc. v.*
12 *Rankin* (2014) 226 Cal.App.4th 691, 698- 700.)

13
14 The court finds that the asserted hourly rates of the Sullivan & Cromwell attorneys are
15 unreasonable for the work performed in this case. The court emphasizes "for the work
16 performed in this case." The Sullivan & Cromwell attorneys may be well worth their current
17 asserted hourly rates when they work in their specialties of complex commercial litigation and
18 government investigations. (Oswell Dec., para 10; Goldsmith Dec., para 3; Muscatello Dec.,
19 para 4; Lazarow Dec., para 3.)⁴ The determination of the reasonable hourly rates for the work
20 performed in this case does not diminish the importance of pro bono commitments by law firms
21
22
23
24

25 ⁴ Sullivan & Cromwell's clients regularly pay for legal services relating to complex
26 commercial litigation and government investigations at rates that are higher than those asserted in
this case. (Oswell Dec., para 21.) Those are, however, different markets and the lawyers
presumably have expertise in those markets.

and individual lawyers. The court's focus is on whether a fee paying client would have reasonably paid for the work performed in this case at the asserted rates.

The court has considered the survey evidence in determining the reasonable rate of an attorney who is 0-5 years out of law school and/or passing the bar. The Pearl Declaration includes the following:

Firm / Case	Year	Years Experience	\$/hr	Source
Shaw v. AMN	2019	2	380	Pearl p 9
Shaw v. AMN	2019	3	400	Pearl p 9
DFEH v. Law School	2018	1	290	Pearl p 9
DFEH v. Law School	2018	5	425	Pearl p 9
Goldstein Borgen	2018	3	405	Pearl p 9
Goldstein Borgen	2018	5	450	Pearl p 9
L/O Robert Rubin	2018	5	615	Pearl p 9
Cornell v. CCSF	2018	6	425	Pearl p 10
Gibbs Law Grp	2018	1-9	275-525	Pearl p11
Leiff Cabraser	2018	2-6	370-455	Pearl p11
Finklestein Thompson	2018	4	300	Pearl p 11
Max Sound v. Google	2017	5	336-575	Pearl p 12
May v. San Mateo	2017	5	425	Pearl p 12
Ridgeway v. Wal-Mart	2017	1	300	Pearl p 14
Ridgeway v. Wal-Mart	2017	3	355	Pearl p 14
Ridgeway v. Wal-Mart	2017	4	330	Pearl p 14
Ridgeway v. Wal-Mart	2017	6	425	Pearl p 14
Law Fdn Silicon Valley	2017	3, 4	325	Pearl p 15
Fish & Richardson	2017	1, 2	330	Pearl p 15
Fish & Richardson	2017	3	363	Pearl p 15
Cotter v. Lyft	2017	3	325	Pearl p 16
Armstrong v. Brown	2017	6	440	Pearl p 16
Nat'l Fed Blind v. Uber	2016	3	355	Pearl p 18
Carnes v. Atria	2016	2	265	Pearl p 19
Carnes v. Atria	2016	4	450	Pearl p 19
Schneider Wallace	2014	1	350	Pearl, p7

This data in the Pearl Declaration supports a finding that during the relevant time period and in complex cases with competent counsel an attorney with one year of experience had a

1 billing rate of \$275-350, an attorney with two years of experience had a billing rate of \$265-370,
2 an attorney with three years of experience had a billing rate of \$325-405, an attorney with four
3 years of experience had a billing rate of \$300-450, and an attorney with five or six years of
4 experience had a billing rate of \$425-615.

5 Many of the Sullivan & Cromwell attorneys with current rates of \$700/hr started work
6 on this case only a few days, months, or years after passing the bar and had no experience with or
7 expertise in the relevant subject matter. The court is not persuaded that an attorney who has just
8 passed the bar, no matter how smart or well educated they might be, has a reasonable market rate
9 of \$700/hour in a field in which they have no prior experience.
10

11
12 REASONABLE HOURLY RATES FOR WORK ON THIS CASE – ACLUF-NC
13

14 The court has reviewed the declarations that detail the work provided by the attorneys at
15 ACLUF-NC. The court has concerns with some of the time spent, but finds the asserted rates to
16 be reasonable.

17 Peter Eliasberg (15.67 hrs at \$850/hr) passed the California Bar in 6/1997.⁵ Eliasberg
18 was with the ACLUF-NC from 1998-2020, giving him familiarity with Constitutional issues.
19 Eliasberg worked on the case from 2/19/15 through 9/25/19. Eliasberg provided occasional
20 consultation on the case but was not actively involved in prosecution of the case. (Eliasberg Dec
21 and billing records) The court finds that the reasonable market rate for Eliasberg's work in this
22 case is \$850/hr.
23
24

25 ⁵ The court takes judicial notice of the attorney information on the California State Bar
26 website for each attorney. For attorney Barillari the court has considered the New York Bar
website. (Evid. Code 452(h); *In re White* (2004) 121 Cal.App.4th 1453, 1469 fn 14.)

1 Michael Risher (510 hrs at \$755/hr) passed the California Bar in 12/1997. Risher was an
2 Alameda County Public Defender from 1998-2005, giving him familiarity with California Penal
3 Code and criminal procedure issues, and was with the ACLUF-NC from 2006-2018, giving him
4 familiarity with Constitutional issues. Risher worked on the case from inception to conclusion,
5 providing both institutional memory and increasing expertise in the field. (Risher Dec. para 7-
6 19 and Exh C and D.) The court finds that the reasonable market rate for Risher's work in this
7 case is \$755/hr.
8

9 Linda Lye (9.4 hrs at \$725/hr) passed the California Bar in 12/2001. Lye was with the
10 ACLUF-NC from 2010-2018. Lye was the lead ACLUF-NC attorney from July-October 2015
11 when Risher was on leave. (Risher Dec. 20-24, Exh E [Lye Dec].) Lye worked on the case from
12 7/27/15 through 10/26/15. (Risher Dec. Exh F [Lye billing records].) The court finds that the
13 reasonable market rate for Lye's work in this case is \$725/hr.
14

15 Kathleen Guneratne (13 hrs at \$650/hr) passed the California Bar in 10/2007. Guneratne
16 was an Alameda County Public Defender from 2007-2018, giving her familiarity with California
17 criminal procedure, and was with the ACLUF-NC starting September 2018. Guneratne worked
18 on the case from 11/7/18 through 10/3/19, providing some assistance with the supplemental
19 briefing on the merits. (Guneratne Dec. and billing records) The court finds that the reasonable
20 market rate for Guneratne's work in this case is \$650/hr.
21

22 Micaela Davis (341 hrs at \$490/hr) passed the California Bar in 3/2012. Davis was with
23 ACLUF-NC from 2012-2019. Davis worked on the case from 2/6/15 through 12/7/18,
24 providing both institutional memory and increasing expertise in the field. (Davis Dec. and
25 billing records) The court finds that the reasonable market rate for Davis's work in this case is
26 \$490/hr.

Megan Sallomi (17.4 hrs at \$325) passed the California Bar in 12/2014 and became inactive on 1/22/20. Sallomi was with the ACLUF-NC from 2015- 2016. Sallomi worked on the case for a six week period from 1/13/15 through 2/25/15. (Risher Dec., para 25-27 and Exh G.) The court finds that the reasonable market rate for Sallomi's work in this case is \$325/hr.

Katherine Lin (157 hrs at \$325/hr) passed the California Bar in 12/2014. Lin was with the ACLUF-NC from 2016- 2018. Lin worked on the case from 10/11/16 through 4/19/18. Lin worked primarily on discovery issues. Lin's billing records show 57 entries for "Attended weekly team call," each of which took 0.1-0.6 hours, with the mean call appearing to be about 0.3 hours. (Lin Dec. and billing records) The court finds that the reasonable market rate for Lin's work in this case is \$325/hr.

REASONABLE HOURS WORKED ON THIS CASE – ACLUF-NC

Consistent with the general finding that there was overwork in the case generally, the court decreases the ACLUF-NC hours by approximately 10% per person.

SUMMARY OF ACLUF-NC LODESTAR

Attorney	CA Bar	When work performed	Reasonable rate	Asserted hours	Reasonable hours	Lodestar
Peter Eliasberg	1997	2015-2020	\$850	16	14	11,900
Michael Risher	1997	2015-2020	\$755	510	460	347,300
Linda Lye	2001	2015	\$725	9	8	5,800
Kathleen Guneratne	2007	2018-2019	\$650	13	11	7,150
Michela Davis	2012	2015-2018	\$490	341	310	151,900
Megan Sallomi	2014	2015	\$325	17	15	4,875
Katherine Lin	2014	2016-2018	\$325	157	140	45,500
TOTAL				1063	958	574,425

1
2 REASONABLE HOURLY RATES FOR WORK ON THIS CASE – SULLIVAN &
3 CROMWELL
4

5 The court has reviewed the declarations that detail the work provided by the attorneys at
6 Sullivan & Cromwell. The court finds most of the asserted rates to be unreasonable for the work
7 performed in this case.

8 Laura Kabler Oswell (314 hrs at \$1000/hr) passed the California Bar on 12/2005. Oswell
9 has significant experience in complex commercial litigation. There is no indication she had
10 experience with California criminal procedure before her work on this case. Oswell worked on
11 the case from 3/3/15 through 9/13/19. Oswell has been the senior attorney at Sullivan &
12 Cromwell responsible for high-level oversight and staffing of the case throughout the five years
13 of this case. (Oswell Dec., para 10.) Oswell attended Stiavetti's deposition. Oswell's billing
14 records indicate that she stayed involved in the case through occasional conferences or phone
15 calls generally lasting 0.25-1.0 hours was not otherwise actively involved in discovery, legal
16 research or writing memoranda. Oswell's billing records shows 19 entries for "Attended weekly
17 team call," at which she presumably provided guidance to the newer attorneys. (Oswell Dec.,
18 Exh K [billing records].) The court finds that the reasonable market rate for Oswell's work in
19 this case is \$700/hr.
20
21

22 Christopher Morley (463 hrs at \$750/hr) passed the California Bar on 12/2011. Morley,
23 with four years of experience, appears to have been the senior attorney responsible for managing
24 the case at Sullivan & Cromwell from the beginning of the case in 2015 until he left Sullivan &
25 Cromwell in 2016. (Oswell, para 11-12.) There is no indication he had experience with
26

1 California criminal procedure before his work on this case. Morley worked on the case from
2 3/3/15 through 5/10/16. (Oswell Dec., para 12, Exh B [billing records].) The court finds that the
3 reasonable market rate for Morley's work in this case is \$425/hr.

4 Michael Murtagh (486 hrs at \$865/hr) passed the California Bar on 12/2010. Murtagh,
5 with six years of experience, started work on the case when Morley departed in 2016 and worked
6 on it through the end of the case. (Oswell, para 11.) Murtagh had relevant prior experience in
7 *Franco-Gonzalez v. Holder*. There is no indication he had experience with California criminal
8 procedure before his work on this case. (Murtagh Dec., para 2-4; Oswell Dec, para 11.) Murtagh
9 worked on the case from 5/18/16 through 10/4/19. (Oswell Dec., Exh A [billing records].)
10 Mutagh was consistently involved in the case and presumably developed case-specific expertise
11 during this time period. The court finds that the reasonable market rate for Murtagh's work in
12 this case is \$700/hr.
13

14 Lauren Goldsmith (239 hrs at \$750/hr) passed the California Bar in 12/2013. There is no
15 indication she had experience with California criminal procedure before her work on this case.
16 (Goldsmith Dec., para 2-3.) Goldsmith had three years of commercial litigation experience when
17 she started work on this case and she worked on the case for the eight months from 6/27/16 to
18 2/23/17. (Oswell Dec., Exh D.) Goldsmith did not stay on the case long enough to develop
19 case-specific expertise. The court finds the reasonable rate for Goldsmith's work in this case to
20 be \$300/hr.
21

22 Duncan Simpson LaGoy (1,462 hrs at \$750/hr) passed the California Bar in 12/2014.
23 There is no indication he had experience with California criminal procedure before he worked on
24 this case. (Simpson LaGoy Dec., para 2.) Simpson LaGoy started work on the case three months
25 after he passed the California Bar and worked on the case from 3/5/15 to 10/10/19. (Oswell
26

1 Dec., Exh C.) Simpson LaGoy was consistently involved in the case and presumably developed
2 case-specific expertise during this time period. The court finds his reasonable rate for his work
3 on this case was \$300/hr when he started to work on the case in 2015, that it increased with his
4 experience to \$550/hr in 2019, and that his average reasonable rate over the course of the case
5 was \$425/hr.

6
7 David Barillari (295 hrs at \$700/hr) graduated law school in 2015 and passed the New
8 York Bar on 6/22/2016, but never passed the California Bar. There is no indication he had
9 experience with California criminal procedure before he worked on this case. Barillari started
10 work on the case a few months after graduating from law school and *before* he had passed the
11 Bar exam of any state. Barillari worked on the case from 10/5/15 to 7/14/16.⁶ (Oswell Dec.,
12 Exh D.) Barillari never passed the California Bar. The court has not been able to locate any
13 order granting Barillari admission in this case pro hac vice.

14
15 “No one may recover compensation for services as an attorney at law in California unless
16 that person was a member of the State Bar at the time those services were performed.” (*Golba v.*
17 *Dick's Sporting Goods, Inc.* (2015) 238 Cal.App.4th 1251, 1261.) Plaintiffs cannot recover
18 attorneys’ fees for the work performed by Barillari because he was not a California attorney when
19 he performed the work.

20 Natalie Muscatello (431 hrs at \$700/hr) passed the California Bar in 12/2015. There is no
21 indication she had experience with California criminal procedure before she worked on this case.
22 (Muscatello Dec., para 2, 4) Muscatello started work on the case two years after she passed the
23

24
25 ⁶ The Barillari time records show an asserted lodestar of \$206,675. The requested
26 multiplier is 1.2-1.3, so the effect of the including Barillari in the fee application is
approximately \$260,000.

1 bar when she had two years of commercial litigation experience and worked on the case from
2 1/24/17 to 9/17/19. (Oswell Dec., Exh H.) The court finds her reasonable rate for his work on
3 this case when he started to work on the case was \$300/hr, that it increased to \$550/hr with
4 experience, and that her average reasonable rate over the course of the case was \$425/hr.

5 Shane Palmer (1133 hrs at \$700/hr) passed the California Bar in 12/2015. There is no
6 indication he had experience with California criminal procedure before he worked on this case.
7 (Oswell Dec., para 16.) Palmer started work on the case seven months after he passed the Bar
8 and worked on the case from 7/7/16 to 9/30/19. (Oswell Dec., Exh F.) The court finds his
9 reasonable rate for his work on this case when he started to work on the case was \$300/hr, that it
10 increased to \$550/hr cwith his experience, and that his average reasonable rate over the course of
11 the case was \$425/hr.
12

13 Daniel Loevinsohn (734 hrs at \$650/hr) passed the California Bar in 12/2016. There is no
14 indication he had experience with California criminal procedure before he worked on this case.
15 (Oswell Dec., para 17.) Loevinsohn started work on the case for three months *before* he passed
16 the Bar and worked on the case from 9/15/16 to 2/17/19.⁷ (Oswell Dec., Exh G.) The court finds
17 his reasonable rate for his work on this case when he started to work on the case was \$300/hr,
18 that it increased to \$550/hr with his experience, and that his average reasonable rate over the
19 course of the case was \$425/hr.
20

21 Plaintiffs cannot recover compensation for Loevinsohn's services as an attorney for the
22 time he spent on the case before he passed the State Bar. (*Golba*, 238 Cal.App.4th at 1261.) The
23

24
25 ⁷ The Loevinsohn time records show that he worked 121.75 hours on this case from
26 9/15/16 through 12/23/16, which at his asserted hourly rate of \$650/hour results in a lodestar for
that time period of \$79,137.5. The requested multiplier is 1.2-1.3, so the effect of the including
Loevinson's time before he passed the Bar is approximately \$100,000.

1 court cannot grant Loevinsohn retroactive admission to the State Bar of California based on his
2 subsequent admission to the State Bar. Only the California Supreme Court can grant admission
3 to the State Bar, and the Supreme Court can do so only when an applicant has met certain
4 prerequisites. (Bus & Prof 6060 et seq; *In re Garcia* (2014) 58 Cal.4th 440, 451-452.) This trial
5 court can grant admission pro hac vice, but that requires prior admission to the bar of another
6 state. (CRC 9.40.) There is no evidence that Loevinsohn was admitted to the bar of another state
7 at the time he performed the work in this case. (Oswell Dec., para 17.) The court would not
8 grant admission retroactively nunc pro tunc even if it could do so. “The function of a nunc pro
9 tunc order is ... not to make an order now for then, but to enter now for then an order previously
10 made.” (*Golba*, 238 Cal.App.4th at 1265-1266.) The fact is that Loevinsohn was not a member
11 of the California Bar, or any bar, before 12/2016.

12
13 Paul Lazarow (474 hrs at \$650/hr) passed the California Bar in 12/2016. There is no
14 indication he had experience with California criminal procedure before he worked on this case.
15 (Lazarow Dec., para 2-3.) Lazaow started work on the case worked on the case five months after
16 he passed the Bar and worked on the case from 5/30/17 to 10/4/19. (Oswell Dec., Exh I) The
17 court finds his reasonable rate for his work on this case when he started to work on the case was
18 \$300/hr, that it increased to \$550/hr with his experience, and that his average reasonable rate
19 over the course of the case was \$425/hr.

20
21 Alicia Roll (746 hrs at \$450/hr) passed the California Bar in 5/2018. There is no
22 indication she had experience with California criminal procedure before she worked on this case.
23 (Oswell Dec., para 20.) Roll started work on the case eight months *before* she passed the Bar and
24

1 worked on the case from 9/15/17 to 6/21/19.⁸ (Oswell Dec., Exh J.) The court finds her
2 reasonable rate for her work on this case at the time she performed the work to be \$300/hr.
3 Plaintiffs cannot recover compensation for Roll's services as an attorney for the time she spent
4 on the case before she passed the State Bar.

6
7 REASONABLE HOURS WORKED ON THIS CASE – SULLIVAN & CROMWELL

8 The court deletes the hours that attorneys Barillari, Loevinson, and Roll worked when
9 they were not admitted to the California State Bar. Plaintiffs cannot recover attorneys' fees for
10 work performed when they were not attorneys. (*Golba*, 238 Cal.App.4th at 1261.) Plaintiffs did
11 not seek compensation for their time at paralegal or pre-bar attorney rates.

13 Consistent with the general finding that Sullivan & Cromwell staffed the case with
14 lawyers who had no prior experience in California criminal procedure and many who had only
15 recently passed the Bar, the court decreases the Sullivan & Cromwell hours by approximately
16 10% per person for the senior attorneys (Oswell, Mutagh) and by 25% for the more junior
17 attorneys (everyone else). This is not a reflection on the effort of the individuals. This is a
18 reflection of the inexperience of the individuals in the matters at issue in this case and resulting
19 inefficiency in their use of time when they performed the work in this case. (*Morris v. Hyundai*
20 *Motor America* (2019) 41 Cal.App.5th 24, 38-40.)

25 ⁸ The Roll time records show that she worked 609 hours on this case from 9/15/17
26 through 4/30/18, which at her asserted hourly rate of \$450/hour results in a lodestar for that time
period of \$274,050. The requested multiplier is 1.2-1.3, so the effect of the including Roll's time
before she passed the Bar is approximately \$342,500.

SUMMARY OF LODESTAR – SULLIVAN & CROMWELL

Attorney	CA Bar	When work performed	Reasonable rate	Asserted hours	Reasonable hours	Lodestar
Laura Oswell	2005	2015-2020	\$700	314	283	197820
Michael Murtagh	2010	2016-2020	\$700	486	437	306180
Christopher Morley	2011	2015-2016	\$425	463	370	157420
Lauren Goldsmith	2013	2016-2017	\$300	239	191	57360
Duncan Simpson LaGoy	2015	2015-2019	\$425	1462	1170	497080
David Barillari	N/A	2015-2016	\$0	295 (0)	0	0
Natalie Muscatello	2015	2017-2019	\$425	431	345	146540
Shane Palmer	2015	2016-2019	\$425	1132	906	384880
Daniel Loevinsohn	2016	2016-2019	\$425	734 (612)	490	208080
Paul Lazarow	2016	2017-2019	\$425	474	379	161160
Alicia Roll	2018	2017-2019	\$300	746 (137)	110	32880
TOTAL				6776	4681	2149400

LODESTAR SUMMARY

The court considers the lodestar based on both the aggregate method of \$2,275,000 and the review of billing records of \$2,723,825 (574,425 [ACLUF-NC] + 2,149,400 [S&C]). The aggregate approach reflects this court's evaluation of the complexity of this case as the court has watched counsel litigate the matter. The review of the billing records educates the court on the work that was reasonably done but was not visible in the courtroom. The court finds that the appropriate lodestar is \$2,500,000.

1 In reviewing the evidence in support of the lodestar, the court considered the credibility
2 of the evidence and argument on this motion for fees. Plaintiffs sought to recover fees at
3 \$700/hour for time spent for two attorneys (Loevinsohn (\$100,000) and Roll (\$342,500) for time
4 they spent *before* they passed the California Bar. Plaintiffs sought to recover fees at \$700/hour
5 for time spent for one attorney (Barillari (\$260,000)) who *never* passed the California Bar and
6 was *never* admitted pro hac vice. Plaintiffs also asserted that attorneys who were only a few
7 months or years out of law school and who had no experience or expertise in the relevant field
8 when they did the work had reasonable market rates of \$450-700 for their work.

10 The court has, as a result, viewed the evidence and argument of Plaintiffs with some
11 skepticism and has given the State the benefit of the doubt when evaluating the evidence. “An
12 attorney's chief asset in submitting a fee request is his or her credibility.” (*Christian Research*
13 *Institute v. Alnor* (2008) 165 Cal.App.4th 1315, 1323.) “The trial court, with declarations and
14 supporting affidavits, [is] able to assess credibility and resolve any conflicts in the evidence.”
15 (*Christian*, 165 Cal.App.4th at 1323.) (See also *569 East County Boulevard LLC v. Backcountry*
16 *Against the Dump* (2016) 6 Cal.App.5th 426, 441, fn 18.)

19 INTEREST-ADJUSTED LODESTAR

20 The appropriate lodestar is \$2,500,000, and the court divides it into three parts for
21 purposes of accounting for inflation and interest.

22 Approximately 23% of the \$2,500,000 in reasonable fees are attributable to the ACLU.
23 The court will not adjust the ACLUF-NC lodestar for interest. The ACLUF-NC provided its
24 contemporaneous billing rates and then made adjustments to account for inflation. (Risher Dec.,
25

1 para 31 [ACLUF-NC methodology for adjusting rates over time].) The total interest adjusted
2 ACLUF-NC lodestar is \$574,425.

3 Approximately 35% of the \$2,500,000 in reasonable fees are attributable to the Sullivan
4 & Cromwell concerned work early in the case. The court will increase this portion of the
5 lodestar (\$875,000) by 12% to account for interest. (Govt Code 965.5; Sobel Dec para 20;
6 Risher Dec, para 29-30.) The total interest adjusted Sullivan & Cromwell lodestar for early work
7 on the case is \$980,000.
8

9 Approximately 42% of the \$2,500,000 in reasonable fees are attributable to the Sullivan
10 & Cromwell work later in the case. The court will not increase this portion of the lodestar
11 (\$1,050,000) to account for interest because there is no significant delay between performance of
12 the work and the order on fees. The total interest adjusted Sullivan & Cromwell lodestar for later
13 work on the case is \$1,050,000.
14

15 The total interest adjusted lodestar is \$2,604,425.

16 17 MULITIPLIER

18 The court next determines whether to apply a multiplier based on its consideration of five
19 factors: (1) the novelty and difficulty of the legal issues involved, (2) the skill of counsel, (3) the
20 time commitment and preclusion of other employment, (4) the contingent nature of the fee
21 award, and (5) the benefit conferred. (*Ketchum v. Moses* (2001) 24 Cal. 4th 1122, 1131-1132.)
22 The court can also award a negative multiplier for a fee request that appears unreasonably
23 inflated. (*Chavez v. City of Los Angeles* (2010) 47 Cal.4th 970, 990-991.)
24
25
26

1 The novelty and difficulty of the issues is often already reflected in the reasonable hourly
2 rate for the type of work and the time spent by counsel. (*Northwest Energetic Services, LLC v.*
3 *California Franchise Tax Bd.* (2008) 159 Cal.App.4th 841, 880.)

4 The skill of counsel is usually already reflected in the hourly rates of counsel. The Court
5 is aware of the danger of “double counting.” (*Ketchum v. Moses* (2001) 24 Cal. 4th 1122, 1138-
6 1139.)

7
8 The time commitment and preclusion of other employment can be viewed from two
9 angles. The time commitment is a material factor if it was so significant that it disrupted
10 counsel’s practice and the concentration of counsel’s efforts on a single contingent case was itself
11 a significant business risk. The time commitment is not a material factor to the extent it is
12 simply a restatement of the hours billed. The time commitment was no so significant it disrupted
13 the regular operations of ACLUF-NC or Sullivan & Cromwell.

14
15 Counsel is entitled to a multiplier if they assume the risk of non-payment and undertake a
16 case on a contingent basis. (*Ketchum v. Moses* (2001) 24 Cal. 4th 1122, 1132-1133; *Horsford v.*
17 *Board of Trustees of California State University* (2005) 132 Cal.App.4th 359, 394–395.)

18 Counsel undertook this case on a contingent basis. (Oswell Dec., para 3.) There was
19 contingent risk when plaintiffs filed the case. The facts regarding delay in substantive treatment
20 of IST defendants were known when the case was filed. Plaintiffs did pre-litigation investigation
21 through the PRA and otherwise and presumably knew to a high degree of certainty that there
22 were substantial delays between when a court issued an IST order and the State started providing
23 substantial services to restore the IST defendant to competency. (Petition, para 4, 5, 46, 47.)

24
25 The contingent risk was in the legal issues. On 3/13/15, the Court of Appeal issued
26 *People v. Brewer* (2015) 235 Cal.App.4th 122, which addressed some of the issues in this case.

1 On 4/2/15, a federal district court issued *Trueblood v. Washington State Dept. of Social and*
2 *Health Services* (W.D. Wash., 2015) 101 F.Supp.3d 1010, which addressed directly whether
3 undue delay in the transfer of IST defendants to state hospitals was denial of constitutional due
4 process. On 7/29/15, plaintiffs filed this case. On 2/11/16, the Court of Appeal issued *In re*
5 *Loveton* (2016) 244 Cal.App.4th 1025, which addressed several of the issues in this case, but in
6 the context of a single State Hospital. On 4/7/16, a federal district court issued *Disability Law*
7 *Center v. Utah* (D. Utah 2016) 180 F.Supp.3d 998, which addressed the IST due process issue at
8 the pleadings stage.
9

10 There were legal issues regarding whether the individual right to file a habeas petition
11 made a statewide injunction or writ inappropriate, whether *Loveton* established a statewide
12 standard, whether the Legislature through knowing inaction adopted the *Loveton* standard,
13 whether California would follow *Trueblood* and the similar federal cases, and whether, assuming
14 a violation, the court could identify a Constitutional standard without encroaching on the
15 legislative and executive branches of state government. Although there was legal uncertainty,
16 there was also substantial legal support in the form of *Trueblood*.
17

18 The court awards a multiplier of 1.3 for contingent risk. The court is guided by *Bernardi*
19 *v. County of Monterey* (2008) 167 Cal.App.4th 1379, 1399, where the Court of Appeal affirmed
20 the use of a multiplier of 1.25 “in recognition of [petitioner’s] contingency fee arrangement with
21 her counsel, the extended delay before counsel could receive compensation, and the presence of
22 unique issues.” The court stated. “We therefore conclude that the court acted entirely within its
23 discretion in adjusting the attorney fee award in this case by applying a multiplier of 1.25 to the
24 lodestar amount.” *Bernardi* is consistent with *Pennsylvania v. Delaware Valley Citizens’*
25
26

1 *Council for Clean Air* (1987) 483 U.S. 711, 730 which held under federal law a multiplier for
2 contingent risk should generally be limited to one third of the lodestar.

3 The court does not adjust the multiplier because a government entity will be paying the
4 fees. The law is uncertain regarding the relevance of a government entity be paying the fees.

5 The California Supreme Court stated in *Serrano v. Priest* (1977) 20 Cal.3d 25, 49, that a trial
6 court should consider “that an award against the state would ultimately fall upon the taxpayers.”

7 Courts continue to cite *Serrano* for that proposition. (*Glaviano v. Sacramento City Unified*
8 *School Dist.* (2018) 22 Cal.App.5th 744, 751; *Rey v. Madera Unified School Dist.* (2012) 203
9 Cal.App.4th 1223, 1240.)

10
11 More recently, California Supreme Court stated in *In re Conservatorship of Whitley*
12 (2010) 50 Cal.4th 1206, 1217, 1210, that the purpose of fee shifting is to compensate litigants
13 and attorneys who step forward to engage in public interest litigation when there are insufficient
14 financial incentives to justify the litigation in economic terms. In *Horsford v. Board Of Trustees*
15 *Of California State University* (2005) 132 Cal.App.4th 359, 400-401, the court stated, “the trial
16 court's reliance on the public-entity status of the defendant to completely deny an enhancement
17 multiplier in this case was an abuse of discretion.” In *Rogel v. Lynwood Redevelopment Agency*
18 (2011) 194 Cal.App.4th 1319, 1332, the court stated, “Allowing properly documented attorneys'
19 fees to be cut simply because a losing party is a governmental entity would defeat the purpose of
20 the private attorney general doctrine.” The court follows the more recent policy statement in
21 *Whitley* and finds the reasoning of *Horsford* and *Rogel* compelling. (*Auto Equity Sales v.*
22 *Superior Court* (1962) 57 Cal.2d 450, 456 [“the court exercising inferior jurisdiction can and
23 must make a choice between the conflicting decisions”].)
24
25
26

1 The court does not adjust the multiplier based on the identity of plaintiffs' counsel or how
2 they will use any award of fees. The ACLUF-NC is a non-profit organization. (Risher Dec.,
3 para 9.) Sullivan & Cromwell has committed to donate all attorneys' fees recovered in this case
4 to the ACLUF-NC and to the Sullivan & Cromwell Foundation. (Oswell Dec., para 4.) The
5 court does not consider that the fees will be used to further purposes consistent with IRS
6 approval of 501(c)(3) status for the same reasons that the court does not consider that fees will be
7 paid by the government and thus the taxpayers. "The controlling factor ... is the fair market
8 value of the legal work which was performed" without regard to the identity of the prevailing or
9 the non-prevailing party. (*Rogel v. Lynwood Redevelopment Agency* (2011) 194 Cal.App.4th
10 1319, 1332.)

12 The application of the positive multiplier of 1.3 to the interest adjusted lodestar of
13 \$2,604,425 results in multiplier-adjusted fees of \$3,385,752.50.

15 The court applies a negative multiplier for making an unreasonable fee request. (*Chavez*
16 *v. City of Los Angeles* (2010) 47 Cal.4th 970, 990-991.) The lodestar/multiplier analysis above
17 was designed to reflect the market rate. A negative multiplier for an unreasonable fee request is
18 intended to result in a below market rate to discourage unreasonable fee requests. "If ... the
19 Court were required to award a reasonable fee when an outrageously unreasonable one has been
20 asked for, claimants would be encouraged to make unreasonable demands, knowing that the only
21 unfavorable consequence of such misconduct would be reduction of their fee to what they should
22 have asked in the first place. To discourage such greed, a severer reaction is needful." (*Christian*
23 *Research Institute v. Alnor* (2008) 165 Cal.App.4th 1315, 1329.) "[T]he court must clearly
24 explain its case-specific reasons for the percentage reduction." (*Morris v. Hyundai Motor*
25 *America* (2019) 41 Cal.App.5th 24, 38.)

1 The court applies a negative multiplier primarily because the fee request sought attorneys'
2 fees for time spent by non-attorneys. The court will apply a negative multiplier of approximately
3 0.7925, which will decrease the fee award by \$702,500, which is the mirror image of the
4 \$702,500 in multiplier adjusted attorneys' fees that plaintiffs unreasonably sought for work by
5 persons who were not attorneys when they performed the work. Plaintiffs' request for these fees
6 does not reflect a discretionary decision where reasonable people can disagree on the
7 reasonableness of time spent or rates charged. Plaintiffs sought \$702,500 in multiplier adjusted
8 fees that they could not recover as a matter of law. \$702,500 is a significant amount of money.
9 It is not a rounding error. The California median household income for 2014-2018 was \$71,228.
10 (<https://www.census.gov/quickfacts/CA>)
11

12 The court expresses the decrease in fees as a negative multiplier of 0.7925 because that is
13 the legal framework for decreasing fees to discourage unreasonable fee requests. The court's
14 reasoning is, and the equities are, however, based on Plaintiff's request for \$702,500 in attorneys'
15 fees based on work by persons who were not attorneys. (*Morris v. Hyundai Motor America*
16 (2019) 41 Cal.App.5th 24, 40 [affirming trial court decision to cut six attorneys' hours entirely
17 because "The court could properly have made an across-the-board reduction of 30 percent to
18 accomplish the same purpose"].)
19

20 The court applies the negative multiplier secondarily because Plaintiff's fee request
21 sought unjustifiably high rates for novice attorneys. The State argues that "S&C is seeking rates
22 that are reflective of the attorneys' level of experience in 2019 as opposed to when the case was
23 actually litigated." (Oppo at 19:1-2.) The State argues that it would be "unreasonable and
24 manifestly unfair" to use the current rates of the Sullivan and Cromwell attorneys. (Oppo at
25 19:8-9.)
26

1 Plaintiffs could not have reasonably asserted that attorneys who started working on this
2 case days or months after passing the bar and worked on the case for four years had billing rates
3 of \$700/hour *throughout* that time period. The data in the Pearl declaration shows that during the
4 relevant time period an attorney with one year of experience had a billing rate of \$275-350, an
5 attorney with two years of experience had a billing rate of \$265-370, an attorney with three years
6 of experience had a billing rate of \$325-405. This court has been sitting in the complex litigation
7 department through the duration of this case and in that time has reviewed many fee applications
8 in many complex cases. Attorneys with 0-3 years of experience and no subject matter expertise
9 do not have reasonable rates close to \$700/hr.

11 Plaintiffs could make the argument that the request for \$700/hour *throughout* that time
12 period was reasonable because a court can account for a lengthy delay by using current rates.
13 (*Robles III*, 38 Cal.App.5th at 205.) The complication, noted by plaintiff's expert Richard Pearl
14 in his book is that "counsel's rates will generally increase because of increased *experience and*
15 *inflation.*" (Attorney Fee Awards (2019), Richard Pearl, section 9.111.) The use of current
16 hourly rates is an appropriate proxy for an award of *interest* for the delay in payment. The use of
17 current hourly rates is not, however, appropriate when the increased rate is due to *experience and*
18 *expertise* acquired after the work was performed.

20 The distinction leaps out on the facts of this case. The Sullivan & Cromwell attorneys
21 who started work as soon as, or months after, they passed the bar (Simpson-LaGoy, Palmer,
22 Loeninsohn, Lazarow) probably had contemporaneous hourly rates of \$350-425 when they
23 started work on the case. The value of the time when the work was performed was \$350-
24 425/hour and the current value of that time as adjusted for four years of compounded
25 interest/inflation at 3% per year would be \$394-478/hour. Plaintiffs nevertheless seek to recover
26

1 for work provided years ago when the lawyers were novices at the current billing rates of
2 \$700/hour. The difference of \$200-300/hour between the interest adjusted 2015 or 2016 rates
3 and current rates is the experience and expertise the attorneys acquired after they performed the
4 work. In contrast, Oswell had probably reached a billing rate plateau when she started work on
5 the case in 2015, so the difference in her hourly rate from 2015 to 2019 was much more likely to
6 have been due to interest/inflation than to increases in experience and expertise.
7

8 Plaintiff's request to use the current rates and defense of those rates in the reply brief
9 sought a result that would have been "unreasonable and manifestly unfair." Although the use of
10 current rates is not prohibited by law, it was unreasonable on the facts of this case, and was
11 particularly so after the State highlighted the issue in its opposition brief. The court will not
12 apply an additional negative multiplier for the unreasonable use of current rates. It is an alternate
13 basis for the negative multiplier.
14

15 The application of the negative multiplier of approximately 0.7925 (\$702,500) to the
16 multiplier adjusted lodestar of 3,385,752.50 results in fees of \$2,683,252.50.

17 CONCLUSION

18 The court ORDERS that the motion of Plaintiffs for an award of attorneys' fees under
19 C.C.P. 1021.5 is GRANTED in the total amount of \$2,683,252.50.
20

21 Dated: May 1, 2020


Winifred Y. Smith
Judge of the Superior Court

Exhibit I

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	x	
In re	:	Chapter 11
	:	
ASCENT RESOURCES MARCELLUS HOLDINGS, LLC, <i>et al.</i> , ¹	:	Case No. 18-10265 (LSS)
	:	
	:	Jointly Administered
	:	
Debtors.	:	Doc. Nos. 140, 141, 142, 143, 144, 147, 148 and 156
	x	

OMNIBUS ORDER APPROVING FIRST AND FINAL FEE APPLICATIONS

Upon consideration of the first and final fee applications (collectively, the “**Fee Applications**”) of the professionals (collectively, the “**Professionals**”) employed by the debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases, a list of which is attached hereto as Exhibit A, for allowance of compensation and reimbursement of expenses on an final basis; and it appearing to this Court that all of the requirements of sections 327, 328, 330, 331, and 503(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532, as well as Rule 2016 of the Federal Rules of Bankruptcy Procedure and the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware, have been satisfied; and it further appearing that the expenses incurred were reasonable and necessary; and that the notices of the Applications were appropriate; and after due deliberation and sufficient good cause appearing therefor, it is hereby ORDERED that:

1. The Fee Applications are hereby APPROVED in the amounts set forth on Exhibit A.

¹ The Debtors in these chapter 11 cases and, the last four digits of their U.S. taxpayer identification numbers are: Ascent Resources Marcellus Holdings, LLC (3495), Ascent Resources - Marcellus, LLC (0354) and Ascent Resources Marcellus Minerals, LLC (5418). The Debtors’ corporate headquarters and mailing address is located at 3501 NW 63rd Street, Suite 600, Oklahoma City, Oklahoma 73116.

2. The Professionals are granted allowance of compensation in the amounts set forth on Exhibit A.

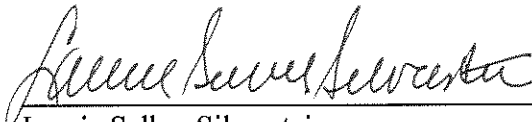
3. The Professionals are allowed the reimbursement of reasonable and necessary expenses in the amounts set forth on Exhibit A.

4. The Debtors are authorized and directed to remit payment to the Professionals in the amounts set forth on Exhibit A, less all amounts previously paid on account of such fees and expenses.

5. This Order shall be deemed a separate order for each of the Professionals and the appeal of any order with respect to any of the Professionals shall have no effect on the authorized fees and expenses of any of the other Professionals.

6. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

Dated: May 8, 2018
Wilmington, Delaware



Laurie Selber Silverstein
United States Bankruptcy Judge

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	X	
In re	:	Chapter 11
	:	
ASCENT RESOURCES MARCELLUS HOLDINGS,	:	Case No. (18-10265) (LSS)
LLC, <i>et al.</i> , ¹	:	
	:	Jointly Administered
	:	
Debtors.	:	Hearing Date: May 9, 2018 at 10:00 a.m. ET
	X	Objection Deadline: April 30, 2018 at 4:00 p.m. ET

**SUMMARY OF FIRST AND FINAL FEE APPLICATION OF SULLIVAN & CROMWELL
LLP AS COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION**

NAME OF APPLICANT:	Sullivan & Cromwell LLP
AUTHORIZED TO PROVIDE PROFESSIONAL SERVICES TO:	The above-captioned debtors and debtors-in-possession
DATE CASE FILED:	February 6, 2018
DATE OF RETENTION:	March 22, 2018, <i>nunc pro tunc</i> to February 6, 2018
PERIOD FOR WHICH COMPENSATION AND REIMBURSEMENT IS SOUGHT:	February 6, 2018 through and including March 30, 2018
TOTAL COMPENSATION REQUESTED:	\$924,938.00
TOTAL EXPENSE REIMBURSEMENT REQUESTED:	\$4,708.87

This is a(n): ___interim X final application.

This is the final fee application filed by Sullivan & Cromwell LLP.

¹ The Debtors in these chapter 11 cases and, the last four digits of their U.S. taxpayer identification numbers are: Ascent Resources Marcellus Holdings, LLC (3495) (“ARM Holdings”), Ascent Resources - Marcellus, LLC (0354) (“ARM”) and Ascent Resources Marcellus Minerals, LLC (5418) (“ARM Minerals” and together with ARM Holdings and ARM, the “Debtors”). The Debtors’ corporate headquarters and mailing address is located at 3501 NW 63rd Street, Oklahoma City, Oklahoma 73116.

SUMMARY OF FEES AND EXPENSES REQUESTED FOR FEE PERIOD

Period Covered	Fees Requested	Fees paid to Date	Expenses Requested	Expenses Paid to Date	Approved Fees and Expenses
2/7/2018 - 3/30/2018	\$924,938.00	\$0.00	\$4,708.87	\$0.00	N/A

PROJECTED TOTAL BUDGET FOR FEE PERIOD AND ACTUAL FEES INCURRED

Estimated Fees for Fee Period		Actual Fees For Fee Period
Low	High	\$924,938.00
\$440,000.00	\$1,079,100.00	

PROJECT CODE TOTAL CHART

Project Number	Project Name	Hours	Fee Amount
00002	ASSET ANALYSIS AND RECOVERY	0.00	\$0.00
00003	ASSET DISPOSITION	0.00	\$0.00
00004	ASSUMPTION AND REJECTION OF LEASES AND CONTRACTS	0.00	\$0.00
00005	AVOIDANCE ACTION ANALYSIS	0.00	\$0.00
00006	BUSINESS OPERATIONS	10.20	\$10,320.00
00007	CASE ADMINISTRATION	3.00	\$1,742.00
00008	CLAIMS ADMINISTRATION AND OBJECTIONS	0.00	\$0.00
00009	CORPORATE GOVERNANCE AND BOARD MATTERS	0.00	\$0.00
00010	EMPLOYEE BENEFITS AND PENSIONS	0.00	\$0.00
00011	EMPLOYMENT AND FEE APPLICATIONS (S&C)	45.90	\$38,652.50
00012	EMPLOYMENT AND FEE APPLICATIONS (OTHERS)	19.20	\$14,190.00
00013	FINANCING AND CASH COLLATERAL	0.00	\$0.00
00014	OTHER LITIGATION	0.00	\$0.00
00015	MEETINGS AND COMMUNICATIONS WITH CREDITORS	3.40	\$2,957.00
00016	NON-WORKING TRAVEL	21.10	\$11,734.00
00017	PLAN AND DISCLOSURE STATEMENT	820.80	\$746,629.00
00018	RELIEF FROM STAY AND ADEQUATE PROTECTION	0.00	\$0.00
00019	TAX	7.00	\$7,317.50
00020	VALUATION	0.00	\$0.00
00021	DISCOVERY	0.00	\$0.00
00022	HEARINGS	16.90	\$19,088.50
00023	FIRST AND SECOND DAY MOTIONS	50.60	\$45,147.50
00024	CLAIMS INVESTIGATION	0.00	\$0.00
00025	LIEN INVESTIGATION	0.00	\$0.00
00026	SCHEDULES, SOFAS AND REPORTING	14.40	\$13,925.00
00027	OTHER MOTIONS / APPLICATIONS	0.00	\$0.00
00028	TIME ENTRY REVIEW	32.70	\$11,820.00
00029	BUDGETING	1.90	\$1,415.00
TOTAL		1,047.10	\$924,938.00

S&C PROFESSIONALS PERFORMING SERVICES DURING THE FEE PERIOD

Timekeeper Name	Title	Practice Group	Year Admitted	Rate		Hours	Amount
Ansari, Mehdi	Partner	GP/IP	2009	\$1,150.00		1.10	\$1,265.00
Dietderich, Andrew G.	Partner	GP/Restructuring	1997	\$1,435.00		14.80	\$21,238.00
Dietderich, Andrew G.	Partner	GP/Restructuring	1997	\$718.00	*	3.00	\$2,154.00
Estes, John E.	Partner	GP/Finance	1995	\$1,435.00		11.70	\$16,789.50
Glueckstein, Brian D.	Partner	Litigation	2004	\$1,435.00		9.40	\$13,489.00
Hariton, David P.	Partner	Tax	1986	\$1,435.00		2.50	\$3,587.50
Risoleo, Robert S.	Partner	GP	1985	\$1,435.00		0.70	\$1,004.50
Partner Total						43.20	\$59,527.50
Anselmi, John J.	Special Counsel	GP/Finance	2003	\$1,100.00		63.30	\$69,630.00
Anselmi, John J.	Special Counsel	GP/Finance	2003	\$550.00	*	6.90	\$3,795.00
Brander, Saul	Special Counsel	Tax	2003	\$1,100.00		1.00	\$1,100.00
Brennan, Matthew J.	Special Counsel	GP/Environmental	1986	\$1,225.00		0.80	\$980.00
Kranzley, Alexa J.	Special Counsel	GP/Restructuring	2009	\$1,100.00		244.60	\$269,060.00
Kranzley, Alexa J.	Special Counsel	GP/Restructuring	2009	\$550.00	*	8.20	\$4,510.00
Special Counsel Total						324.80	\$349,075.00
Bander, Jeannette E.	Associate	GP/Benefits	2012	\$990.00		0.70	\$693.00
Chandler, Lindsey L.	Associate	GP	2017	\$700.00		52.60	\$36,820.00
Green, Joshua A.	Associate	GP/Benefits	2014	\$970.00		1.00	\$970.00
Grein, John J.	Associate	GP	2016	\$850.00		167.30	\$142,205.00
Grein, John J.	Associate	GP	2016	\$425.00	*	3.00	\$1,275.00
Ha, Alice YN	Associate	GP	2015	\$950.00		126.60	\$120,270.00
Hogan, Michael P.	Associate	Tax	2017	\$700.00		2.30	\$1,610.00
Miller, Elizabeth A.	Associate	GP	2017	\$700.00		123.40	\$86,380.00
Motten, Andrew B.	Associate	Tax	2016	\$850.00		0.60	\$510.00
Orr, Justin R.	Associate	GP	2014	\$950.00		0.90	\$855.00
Silver, Justin P.	Associate	GP/IP	2015	\$950.00		0.10	\$95.00
Steinberger, Joshua Z.	Associate	GP/IP	2013	\$970.00		2.00	\$1,940.00
Weiss, Noam R.	Associate	GP/Finance	2014	\$970.00		80.20	\$77,794.00
Yamashita, Kelly H.	Associate	GP/Benefits	2016	\$850.00		0.90	\$765.00
Yu, Rachel	Associate	GP/Finance	2014	\$950.00		1.40	\$1,330.00
Zylberberg, David	Associate	GP	2011	\$990.00		3.30	\$3,267.00
Associate Total						566.30	\$476,779.00
Lawyers Total						933.60	\$884,377.00
Booth, Oliver B.	Legal Assistant			\$350.00		107.90	\$37,765.00
Coulibaly, Rockia	Legal Assistant			\$350.00		3.80	\$1,330.00
Kim, Scott J.	Legal Assistant			\$410.00		0.40	\$164.00
Tinkler, Sarah N.	Research Librarian			\$425.00		0.70	\$297.50
Non Legal Personnel Total						112.80	\$39,556.50
GRAND TOTAL						1,047.10	\$924,938.00

CUSTOMARY AND COMPARABLE DISCLOSURES

Category	Ascent Resources Marcellus Holdings *		Firm **	
	February 7, 2018 through March 30, 2018		Total Firm Bills Allocated to Non-Bankruptcy General Domestic Timekeepers from January 2017 through December 2017	
	Blended Hourly Rate	% of Total Hours	Blended Hourly Rate	% of Total Hours
Partner	\$1,378	4%	\$1,580	23%
Senior Associate and Counsel ⁽¹⁾	\$1,053	39%	\$1,030	22%
Junior Associate	\$818	46%	\$724	49%
Non-Lawyer ⁽²⁾	\$351	11%	\$354	6%
All Timekeepers Average	\$883	100%	\$967	100%

⁽¹⁾ Includes Special Counsel, Of Counsel, Senior Counsel, Practice Area Associate and Senior Associate

⁽²⁾ Includes Legal Assistant, Legal Analyst, Research Analyst, and Electronic Discovery

* Includes No Charge entries on various projects. No Charge entries were included on the fee applications with a \$0 rate.

** Includes non-bankruptcy work of bankruptcy timekeepers and all work of other domestic timekeepers, excluding litigation matters and all write-offs (bills or collections less than 50% of standard rates).

SUMMARY OF DISBURSEMENTS

Disbursement Summary	
Description	Amount
Local Transportation	\$337.04
Travel and expenses	\$2,748.64
Meals - Overtime	\$840.00
Repro - BW Copies	\$319.70
Hearing Transcripts	\$123.25
CT Corp/CSC	\$318.12
Telephone conferencing charges	\$22.12
TOTAL	\$4,708.87

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	X	
In re	:	Chapter 11
	:	
ASCENT RESOURCES MARCELLUS HOLDINGS, LLC, <i>et al.</i> , ¹	:	Case No. (18-10265) (LSS)
	:	
Debtors.	:	Jointly Administered
	:	
	:	Hearing Date: May 9, 2018 at 10:00 a.m. ET
	X	Objection Deadline: April 30, 2018 at 4:00 p.m. ET

**FIRST AND FINAL APPLICATION OF SULLIVAN & CROMWELL LLP
AS COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION FOR
APPROVAL AND ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD
FROM FEBRUARY 6, 2018 THROUGH AND INCLUDING MARCH 30, 2018**

Sullivan & Cromwell LLP (“S&C”), counsel for Ascent Resources Marcellus Holdings, LLC and certain of its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), hereby submits this final application (this “Application”) pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”) for: (a) final approval and allowance of compensation for professional services rendered from the Petition Date, February 6, 2018 through and including the Effective Date, March 30, 2018 (the “Fee Period”) and (b) reimbursement of actual and necessary expenses incurred during the Fee Period. In support of this Application, S&C respectfully states as follows:

¹ The Debtors in these chapter 11 cases and, the last four digits of their U.S. taxpayer identification numbers are: Ascent Resources Marcellus Holdings, LLC (3495) (“ARM Holdings”), Ascent Resources - Marcellus, LLC (0354) (“ARM”) and Ascent Resources Marcellus Minerals, LLC (5418) (“ARM Minerals” and together with ARM Holdings and ARM, the “Debtors”). The Debtors’ corporate headquarters and mailing address is located at 3501 NW 63rd Street, Oklahoma City, Oklahoma 73116.

Background

1. On February 28, 2018, the Debtors filed the *Application for an Order Authorizing the Retention and Employment of Sullivan & Cromwell LLP as Counsel to the Debtors and Debtors-in-Possession Nunc Pro Tunc to the Petition Date* [D.I. 62] (the “Retention Application”). On March 22, 2018, the Court entered an order granting the Retention Application and authorizing the retention and employment of S&C as counsel to the Debtors *nunc pro tunc* to February 6, 2018 (the “Petition Date”) [D.I. 118].

2. On the Petition Date, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Joint Prepackaged Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* [D.I. 12] (as modified, amended or supplemented from time to time, the “Plan”) and the *Disclosure Statement for Debtors’ Joint Prepackaged Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* [D.I. 13] (as modified, amended or supplemented from time to time, the “Disclosure Statement”). On March 23, 2018, the Court entered an order approving the Disclosure Statement and confirming the Plan (the “Confirmation Order”) [D.I. 122].

3. The Plan became effective in accordance with its terms on March 30, 2018 (the “Effective Date”) [D.I. 135]. On the Effective Date, the Debtors emerged from these chapter 11 cases as the reorganized Debtors.

Jurisdiction and Venue

4. The Court has jurisdiction to consider this Application pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in the Court pursuant to 28 U.S.C.

§§ 1408 and 1409. The statutory predicates for the relief requested herein are sections 330, 331 and 105(a) of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rules 2016-2 and 9013-1(f). Pursuant to Local Rule 9013-1(f), the Debtors consent to the entry of a final order or judgment by the Court in connection with this Application to the extent it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Summary of Professional Compensation and Reimbursement of Expenses Requested

5. This Application has been prepared in accordance with in accordance with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and the United States Trustee's requests for information and additional disclosures as set forth in the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013 (the "UST Guidelines" and, together with the Local Rules, the "Guidelines").

6. Pursuant to this Application, S&C seeks approval and allowance of:

(a) compensation for professional services rendered by S&C, as counsel to the Debtors during the Fee Period, of \$924,938.00 and (b) reimbursement of actual and necessary expenses incurred by S&C during the Fee Period of \$4,708.87.

7. S&C's compensation for this Fee Period is requested in accordance with the agreed-upon rates described in the Retention Application.² There has been no increase in the

² S&C does not ordinarily determine its fees solely on the basis of hourly rates. Instead, S&C ordinarily bases the fee for its services on all the factors prescribed by Rule 1.5(a) of the New York Rules of Professional Conduct, including the firm's contribution to the relevant matter, the responsibility assumed, the results achieved, the difficulty and complexity of the matter, the amount involved, the experience of, and demands on, the lawyers involved and the fees customarily charged for such matters. Notwithstanding the foregoing, as set forth in its Retention Application, S&C has agreed to charge for services performed during these chapter 11 cases on the basis of hourly rates. The hourly rates reflected in this Application are the same or less than the rates generally used by S&C when preparing estimates of fees under its normal billing practices.

rates charged for any S&C professional from the date of S&C's retention through the end of the Fee Period.

8. S&C's fees have not varied based on the geographic location of any S&C professional or for any other reason, other than a reduction in the hourly rates for all professionals for time spent during non-working travel in accordance with the Guidelines.

9. During the Fee Period, S&C professionals and paraprofessionals spent an aggregate of 1,047.10 hours performing services for the Debtors in connection with these chapter 11 cases, at a blended hourly rate for professionals of \$883.33. S&C voluntarily reduced its fees incurred during the Fee Period by over \$11,730.00 by agreeing to charge 50 percent for time spent on non-working travel, as further discussed below.

10. S&C's fees for the services rendered in these chapter 11 cases during the Fee Period are reasonable and are commensurate with the complexity of the applicable matters and the level of expertise required to best serve the Debtors in connection therewith. S&C believes that its fees are comparable to the fees charged by other highly skilled practitioners experienced in non-bankruptcy cases.

11. In accordance with the UST Guidelines, S&C prepared a projected budget (the "Budget") and staffing plan (the "Staffing Plan") for the anticipated duration of these chapter 11 cases, for approval by the Debtors. The Budget approved by the Debtors estimated total fees of between \$440,000.00 and \$1,079,100.00. S&C's actual total fees incurred were \$924,938.00, within the estimated Budget. While S&C's total fees were within the Budget in the aggregate, S&C's fees in three project codes exceeded the estimated amounts: Employment and Fee Applications (S&C); Plan and Disclosure Statement and Schedules, SOFAs and Reporting. With respect to Employment and Fee Applications (S&C), the total fees exceeded the budgeted

fees as a result of questions and comments from the United States Trustee regarding S&C's Retention Application and the need to file a supplemental declaration. With respect to Plan and Disclosure Statement, the total fees exceeded the budgeted fees as a result of the significant amount of time needed to draft, negotiate and finalize all of the corporate and post-emergence documentation necessary to implement the Plan. Additional agreements and documents were also requested by counsel to the first and second lien lenders to implement the restructuring, and all matters related to the implementation of the Plan, including the new take-back debt and all corporate governance matters, were charged to the Plan and Disclosure Statement project code. With respect to the Schedules, SOFAs and Reporting, S&C professionals assisted the Debtors with inquiries regarding the preparation of the initial debtor interview with the United States Trustee and inquiries related to the preparation of the monthly operating report.

12. The Staffing Plan approximated the number of S&C professionals and paraprofessionals who is anticipated to work on these chapter 11 cases, as shown in Exhibit F hereto. While the actual number of professionals and paraprofessionals that provided services exceeded the number projected in the Staffing Plan, the number of attorneys and paraprofessionals billing substantial time remained within the Staffing Plan.

13. This Application requests compensation for work performed by 17 S&C lawyers who billed 15 or fewer hours during the Fee Period. These lawyers provided advice in specific areas of expertise such as finance, tax, benefits and environmental matters. The limited services provided by these professionals in connection with specific matters enabled S&C's core team to more effectively and efficiently advise the Debtors.

14. All services for which S&C hereby requests compensation were performed for or on behalf of the Debtors. No payment has been made or promised to S&C from

any source for services rendered or to be rendered for the Debtors in connection with these chapter 11 cases. There is no agreement or understanding between S&C and any person (other than the partners of S&C) for the sharing of compensation received or to be received for services rendered in these chapter 11 cases.

15. In accordance with the Guidelines, the following Exhibits are annexed to this Application:

Exhibit A: Certification of Andrew G. Dietderich — certification of Andrew G. Dietderich regarding compliance of this Application with the Local Rules.

Exhibit B: S&C Professionals Performing Services During the Fee Period — summary chart of information on the S&C professionals and paraprofessionals performing services during this Fee Period, including the hourly billing rates for such services and the aggregate hours and fees billed by each professional and paraprofessional.

Exhibit C: Project Code Total Chart — summary chart indicating aggregate fees incurred and time billed by S&C personnel for each project category during the Fee Period.

Exhibit D: Summary of Disbursements — summary chart detailing expenses for which reimbursement is sought, itemized and organized by category.

Exhibit E: Budget and Staffing Plan — S&C's Budget and Staffing Plan for the Fee Period, as approved by the Debtors.

Exhibit F: Budget and Staffing Plan Comparison — comparison of hours and fees budgeted for each project category against the actual hours and fees for which S&C seeks compensation; and comparison of S&C's approved Staffing Plan with actual S&C staffing.

Exhibit G: Time Entries and Narrative Description — S&C's time entry records and descriptions of activities by project code, billed by tenths of an hour.

Exhibit H: Monthly Expense Records — S&C's disbursement records from the Fee Period.

Summary of Professional Services Rendered

16. In accordance with the Guidelines, S&C has organized its time records according to an internal system of project codes in order to facilitate review of this Application.

The work performed by S&C personnel with respect to each of these project codes is summarized below. Given the scope of the work performed, these summaries do not include all tasks performed or advice given by S&C personnel during the Fee Period, but generally describe the most significant matters included under each project code.

A. Asset Analysis and Recovery – Project Code 00002

Total Fees: \$0.00
Total Hours: -

17. No time was charged to this category.

B. Asset Disposition – Project Code 00003

Total Fees: \$0.00
Total Hours: -

18. No time was charged to this category.

C. Assumption and Rejection of Leases and Contracts – Project Code 00004

Total Fees: \$0.00
Total Hours: -

19. No time was charged to this category.

D. Avoidance Action Analysis – Project Code 00005

Total Fees: \$0.00
Total Hours: -

20. No time was charged to this category.

E. Business Operations – Project Code 00006

Total Fees: \$10,320.00
Total Hours: 10.20

21. This category includes time spent advising on the Debtors' business operations post-petition.

F. Case Administration – Project Code 00007

Total Fees: \$1,742.00
Total Hours: 3.00

22. This category includes all matters related to the internal administration of the Debtors' cases, including monitoring the case docket and tracking key dates.

G. Claims Administration and Objections – Project Code 00008

Total Fees: \$0.00
Total Hours: -

23. No time was charged to this category.

H. Corporate Governance and Board Matters – Project Code 00009

Total Fees: \$0.00
Total Hours: -

24. No time was charged to this category.

I. Employee Benefits and Pensions – Project Code 00010

Total Fees: \$0.00
Total Hours: -

25. No time was charged to this category.

J. Employment and Fee Applications (S&C) – Project Code 00011

Total Fees: \$38,652.50
Total Hours: 45.90

26. During the Fee Period, S&C prepared the Retention Application and this Application. With respect to the Retention Application, the S&C drafted and discussed it with the Debtors. Additionally, S&C responded to questions, prepared a supplemental declaration and revised the proposed form of order at the request of the United States Trustee. With respect to this Application, S&C drafted this Application, prepared and reviewed the required

information and charts and reviewed all requested fees and disbursements to ensure that such fees and disbursements are consistent with the Guidelines.

K. Employment and Fee Application (Others) – Project Code 00012

Total Fees: \$14,190.00
Total Hours: 19.20

27. The Debtors retained PJT Partners LP as their investment banker, Prime Clerk LLC as their administrative advisor and D.R. Payne & Associates, Inc. as their Financial Consultant. S&C, on behalf of the Debtors, prepared and drafted the Debtors' applications to retain these parties, and reviewed related materials. Additionally, S&C also facilitated discussions with the United States Trustee with each of these professionals regarding their retention applications and proposed forms of order.

L. Financing and Cash Collateral – Project Code 00013

Total Fees: \$0.00
Total Hours: -

28. No time was charged to this category.

M. Other Litigation – Project Code 00014

Total Fees: \$0.00
Total Hours: -

29. No time was charged to this category.

N. Meetings and Communications with Creditors – Project Code 00015

Total Fees: \$2,957.00
Total Hours: 3.40

30. This category includes time spent by S&C professionals responding to inquiries from the Debtors' creditors and other parties-in-interest regarding these chapter 11 cases.

O. Non-Working Travel – Project Code 00016

Total Fees: \$11,734.00
 Total Hours: 7.00

31. This category includes non-working travel time spent by S&C professionals. In accordance with the Guidelines, the fees presented for payment in this category have been voluntarily reduced by 50 percent, for a total reduction of \$11,734.00.

P. Plan and Disclosure Statement – Project Code 00017

Total Fees: \$746,629.00
 Total Hours: 820.80

32. S&C professionals spent a substantial amount of time with respect to plan confirmation and emergence related activities. On the Petition Date, the Debtors filed the *Debtors' Joint Prepackaged Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* [D.I. 12] and the *Disclosure Statement for Debtors' Joint Prepackaged Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* [D.I. 13].

33. S&C professionals subsequently prepared, reviewed, analyzed and negotiated two plan supplements and two amended plan supplements. The plan supplement included, among others, forms of the reorganized Debtors' corporate documents, the new take-back debt credit agreement and the new management services agreement. S&C professionals engaged in extensive negotiations with counsel to the lenders regarding each of these documents.

34. With respect to the plan and proposed confirmation order, the United States Trustee had extensive questions and comments. S&C professionals engaged in comprehensive discussions with the United States Trustee and counsel to the lenders regarding these and were ultimately able to consensually resolve all issues. The Debtors filed the *Debtors' Amended Joint Prepackaged Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* on March 13, 2018 [D.I. 76] and filed the proposed confirmation order on March 19 [D.I. 98].

Both of these reflected these consensual resolutions. Additionally, S&C also prepared the *Memorandum of Law in Support of Findings of Fact, Conclusions of Law and Order (I) Approving the Debtors' Solicitation and Disclosure Statement and (II) Confirming the Debtors' Amended Joint Prepackaged Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* [D.I. 99].

35. Finally, S&C professionals also prepared for and appeared at the confirmation hearing on March 22, 2018. After confirmation of the plan and approval of the disclosure statement, S&C professionals assisted the Debtors with implementing the confirmed plan and successfully emerging from these chapter 11 cases.

Q. Relief From Stay and Adequate Protection – Project Code 00018

Total Fees: \$0.00
Total Hours: -

36. No time was charged to this category.

R. Tax – Project Code 00019

Total Fees: \$7,317.50
Total Hours: 7.00

37. During the Fee Period, S&C professionals assisted the Debtors in understanding tax issues involved in these chapter 11 cases. S&C professionals assisted in reviewing and responding to tax questions related to the chapter 11 plan, disclosure statement as well as the emergence documentation, including the new take-back credit agreement.

S. Valuation – Project Code 00020

Total Fees: \$0.00
Total Hours: -

38. No time was charged to this category.

T. Discovery – Project Code 00021

Total Fees: \$0.00
Total Hours: -

39. No time was charged to this category.

U. Hearings – Project Code 00022

Total Fees: \$19,088.50
Total Hours: 16.90

40. This category includes time spent by S&C personnel attending and participating in the February 8, 2018 first day hearing and the March 23, 2018 confirmation hearing.

V. First and Second Day Motions – Project Code 00023

Total Fees: \$45,147.50
Total Hours: 50.60

41. This category includes time spent by S&C professionals negotiating and finalizing the first and second day motions and proposed forms of order considered by the Court following the commencement of these chapter 11 cases. The first day motions included: a motion for joint administration; a motion authorizing the Debtors to pay certain prepetition taxes and assessments; a motion prohibiting utilities from discontinuing services; a motion authorizing the Debtors to honor gas and oil interests; a motion to file a consolidated list of creditors and a request for extension of time to file schedules and statements of financial affairs; a motion to authorize the use of cash collateral and grant adequate protection; a motion to continue the use of the Debtors' centralized cash management system and a solicitation procedures motion. After commencement of these chapter 11 cases, S&C professionals negotiated the proposed forms of first day orders the United States Trustee. S&C professionals prepared, appeared and presented each of these before the Court at the February 8, 2018 first day hearing, where they were granted.

42. After the first day hearing, S&C professionals negotiated and prepared proposed forms of second day orders. S&C professionals engaged in discussions the United States Trustee with respect to these proposed forms of order. The agreed proposed forms of the second day orders were all filed under certification of counsel and entered prior to the confirmation hearing.

W. Claims Investigations – Project Code 00024

Total Fees: \$0.00
Total Hours: -

43. No time was charged to this category.

X. Lien Investigation – Project Code 00025

Total Fees: \$0.00
Total Hours: -

44. No time was charged to this category.

Y. Schedules, Sofas and Reporting – Project Code 00026

Total Fees: \$13,925.00
Total Hours: 14.40

45. S&C professionals assisted the Debtors with preparing for and attending the initial debtor interview with the United States Trustee and assisted the Debtors with monthly reporting requirements and budget requirements pursuant to the cash collateral orders.

Z. Other Motions/Applications – Project Code 00027

Total Fees: \$0.00
Total Hours: -

46. No time was charged to this category.

AA. Time Entry Review – Project Code 00028

Total Fees: \$11,820.00
Total Hours: 32.70

47. This category includes time spent reviewing the time entries to ensure accuracy, clarity and consistency.

BB. Budgeting – Project Code 00029

Total Fees: \$1,415.00
Total Hours: 1.90

48. This category includes time spent preparing the Budget and Staffing Plan.

Reasonable and Necessary Services Rendered by S&C

49. The foregoing professional services provided by S&C to the Debtors were in the best interests of the Debtors and its constituent unsecured creditors, and were reasonable, necessary and appropriate under the circumstances of these chapter 11 cases. The compensation requested for the foregoing services is commensurate with the complexity, importance and nature of the issues and tasks involved. These professional services were performed expediently and in an efficient manner. In particular, S&C allocated work among junior and senior professionals and paraprofessionals in a manner designed to avoid unnecessary duplication of services and promote cost-effectiveness, including through consultation with internal practice area experts and specialists when necessary in connection with discrete questions arising in the course of S&C's work.

50. S&C is widely recognized for its experience and knowledge relating to complex business matters and reorganizations under chapter 11 of the Bankruptcy Code. S&C has an established reputation for its expertise in handling large corporate transactions, including dispositions and other transactions involving businesses similar to those operated by the Debtors.

The S&C practice groups that provided services to the Debtors—employee benefits and tax, among others—enjoy a global reputation for their expertise.

51. During the Fee Period, the professional services performed by S&C on behalf of the Debtors required an aggregate expenditure of 1,047.10 recorded hours by S&C personnel. Of the aggregate time expended, 368.00 recorded hours were expended by partners, counsel and special counsel; 566.30 recorded hours were expended by associates and 112.80 recorded hours were expended by S&C paraprofessionals.

52. S&C billed the Debtors for time expended by professionals at hourly rates ranging from \$350.00 to \$1,435.00. Allowance of compensation in the amount requested would result in a blended hourly billing rate for professionals of approximately \$883.33 (based on 1,047.10 recorded hours at S&C's agreed hourly rates). The hourly rates charged by S&C in these chapter 11 cases are equivalent to or less than the rates used by S&C when preparing estimates of fees for similar non-bankruptcy matters.

Actual and Necessary Disbursements by S&C

53. As set forth in Exhibit D, S&C seeks reimbursement for \$4,708.87 in expenses incurred in the course of its professional services during the Fee Period. All expenses for which reimbursement is requested pursuant to this Application have been incurred in compliance with the Guidelines.

54. Reimbursable expenses (whether for services performed by S&C personnel or by a third-party vendor) include appropriate local and long distance transportation costs, overtime meals and teleconference charges. Pursuant to S&C's disbursement policies, out-of-pocket expenses are passed through at actual (or, when actual out-of-pocket expenses are

uncertain, estimated actual) costs. Certain items, such as overtime meals, may be charged at amounts below cost in accordance with limits imposed by the Guidelines.

55. S&C seeks no reimbursement of copying charges, other than charges for in-house copies made by its reproduction department (typically large copying jobs). In accordance with the Guidelines, S&C has limited its reimbursement request for black and white copying charges to \$0.10 per page, and for color copies to \$0.25 per page. S&C seeks no reimbursement of any charges incurred for computerized research or long-distance telephone or fax charges, other than telephone fees for telephone and video conference services.

56. S&C respectfully submits that its actual expenses incurred in providing professional services to the Debtors during the Fee Period were necessary, reasonable and justified under the circumstances of these chapter 11 cases.

The Requested Compensation and Expense Reimbursement Should Be Allowed

57. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 1103 of the Bankruptcy Code “reasonable compensation for actual, necessary services rendered . . . and . . . reimbursement for actual, necessary expenses.” 11 U.S.C. § 330(a)(1)(A), (B). Section 331 of the Bankruptcy Code allows professionals to apply for such compensation and expense reimbursement on an interim basis not more than once every 120 days after the order for relief in a bankruptcy case, or more often as permitted by the court. 11 U.S.C. § 331.

58. Section 330 of the Bankruptcy Code also sets forth the criteria for determining the amount of reasonable compensation to be awarded to such a professional:

[T]he court shall consider the nature, the extent, and the value of such [professional’s] services, taking into account all relevant factors, including --

(A) the time spent on such services;

- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

59. S&C respectfully submits that the services for which it seeks compensation and the expenditures for which it seeks reimbursement pursuant to this Application were necessary for and beneficial to the Debtors. S&C worked diligently to anticipate or respond to the Debtors' needs during the Fee Period, particularly with respect to the Debtors' monitoring and consideration of developments relating to the chapter 11 plan. S&C further submits that the services provided to the Debtors by its professionals and paraprofessionals were performed economically, effectively and efficiently, and have been in the best interests of the Debtors. The services provided by S&C were consistently performed in a timely manner commensurate with the complexity, importance and nature of the issues involved. Accordingly, S&C respectfully submits that the compensation requested herein is reasonable in light of the nature, extent and value of such services.

Prior Relief

60. No prior application for the relief requested herein has been made to this or any other Court.

Notice

61. Notice of this Motion has been provided to the following parties, or, in lieu thereof, their counsel: (i) United States Trustee; (ii) Davis Polk & Wardwell LLP, as counsel to Cortland Capital Market Services LLC as administrator and collateral agent under the Debtors' former First Lien Credit Facility; (iii) counsel to Cortland Capital Market Services LLC as administrator and collateral agent under the Debtors' former Second Lien Credit Facility, (iv) the parties identified on the Debtors' consolidated list of thirty largest unsecured creditors and (v) all parties requesting notice pursuant to Bankruptcy Rule 2002. S&C submits that, in light of the nature of the relief requested, no other or further notice need be provided.

WHEREFORE, S&C respectfully requests that the Court enter an order:

(a) awarding S&C the sum of \$924,938.00 as compensation for services rendered and \$4,708.87 for reimbursement for actual and necessary expenses S&C incurred and (b) granting such other and further relief as the Court deems appropriate.

Dated: Wilmington, Delaware
April 10, 2018

SULLIVAN & CROMWELL LLP

/s/ Andrew G. Dietderich

Andrew G. Dietderich

Brian D. Glueckstein

Alexa J. Kranzley

125 Broad Street

New York, New York 10004

Telephone: (212) 558-4000

Facsimile: (212) 558-3588

Co-Counsel to the Reorganized Debtors

Exhibit J

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: ENERGY FUTURE HOLDINGS CORP., <i>et al.</i>, Debtors.¹	)))))))	Chapter 11 Case No. 14-10979 (CSS) (Jointly Administered) Re: D.I. 13018, 12985, 13012, 12983, 12998, 12986, 13007, 13355, 12996, 13002, 13008, 13009, 13024, 13013, 13020, 13023, 13004, 13010, 13140, 13005, 13017, and 13016

**OMNIBUS ORDER AWARDING FINAL REQUESTS
FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND FOR REIMBURSEMENT OF EXPENSES**

This matter coming before the Court on the final fee applications (together D.I. 13018, 12985, 13012, 12983, 12998, 12986, 13007, 13355, 12996, 13002, 13008, 13009, 13024, 13013, 13020, 13023, 13004, 13010, 13140, 13005, 13017, and 13016, the “**Applications**”) of those professionals listed on **Exhibit A** attached hereto (together, the “**Applicants**”), pursuant to sections 330(a) and 331 of the Bankruptcy Code, 11 U.S.C. §§ 101-1532, Rule 2016 of the Federal Rules of Bankruptcy Procedure and Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, for the final allowance of certain fees, including all holdbacks, and expenses incurred by the Applicants for the specific period of time set forth in each of the Applications (the “**Compensation Period**”), filed in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [D.I. 2066] (the “**Interim Compensation Order**”) and the *Stipulation and Order Appointing a Fee Committee* [Docket No. 1896] (the “**Fee Committee Order**”);² and the Court having

¹ The last four digits of Energy Future Holdings Corp.’s tax identification number are 8810. The location of the debtors’ service address is 1601 Bryan Street, Dallas, Texas 75201. Due to the large number of debtors in these chapter 11 cases, which are being jointly administered on a final basis, a complete list of the debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the debtors’ claims and noticing agent at <http://www.efhcaseinfo.com>.

² Superseded by *Order Amending Stipulation and Order Appointing Fee Committee and Granting Related Relief*

reviewed the Applications with respect to the Applicants and/or the omnibus report filed by the Fee Committee (as such term is defined in the Fee Committee Order) with respect to each of the Applications (see D.I. ____); and the Court finding that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) notice of the Applications and the hearing thereon was adequate under the circumstances; and (c) all parties with notice of the Applications have been afforded the opportunity to be heard on the Applications, and all objections having been overruled; now therefore

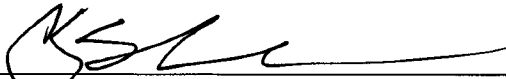
IT IS HEREBY ORDERED THAT:

1. The Applications are GRANTED on a final basis, to the extent set forth on the attached **Exhibit A**.

2. Each of the Applicants is allowed (a) final compensation for services rendered during the Compensation Period and (b) final reimbursement for actual and necessary expenses incurred during the Compensation Period, each in the respective amounts set forth on the attached **Exhibit A**, including any and all holdbacks.

3. To the extent not already paid pursuant to the Interim Compensation Order, the EFH Plan Administrator Board is hereby authorized and directed to pay each of the Applicants 100% of the fees and 100% of the expenses listed on **Exhibit A** hereto under the columns "Final Fees Approved" and "Final Expenses Approved," respectively, for services rendered and expenses incurred during the Compensation Period.

Dated: November 6, 2018
Wilmington, Delaware



THE HONORABLE CHRISTOPHER S. SONTCHI
UNITED STATES BANKRUPTCY JUDGE

19733778.1

Exhibit A

EXHIBIT A

Applicant	Detail Exhibit Number	Compensation Period	Fees Requested	Committee's Fee Adjustments	Expenses Requested	Committee's Expense Adjustments	FINAL Fees Approved	FINAL Expenses Approved
1 Bielli & Klauder [D.I. 13018]	D1	10/01/2015 - 03/09/2018	\$257,887.50	\$3,155.60	\$2,042.60	\$34.80	\$254,731.90	\$2,007.80
2 Jenner & Block [D.I. 12985]	D2	05/08/2015 - 03/09/2018	\$1,817,193.50	\$0.00	\$28,671.30	\$0.00	\$1,824,313.00	\$28,671.30
3 AlixPartners LLP [D.I. 13012]	D3	11/20/2014 - 03/09/2018	\$3,155,346.65	+	\$388,448.66	\$752.20	\$3,155,593.84	\$387,696.46
4 Cravath Swaine & Moore LLP [D.I. 12983]	D4	11/16/2014 - 03/09/2018	\$5,655,576.92	\$2,364.00	\$53,853.42	\$0.00	\$5,653,213.12	\$53,853.42
5 Guggenheim Securities LLC [D.I. 12998]	D5	11/12/2014 - 03/09/2018	\$13,740,456.99	\$0.00	\$412,390.46	\$0.00	\$13,740,456.99	\$412,390.46
6 Montgomery McCracken W&R LLP [D.I. 12986]	D6	11/05/2014 - 03/09/2018	\$5,612,419.49	\$674.99	\$227,384.01	\$0.00	\$5,611,744.50	\$227,384.01
7 Stevens & Lee PC [D.I. 13007 and 13355]	D7	11/26/2014 - 03/09/2018	\$526,545.50	\$7,139.10	\$4,706.72	+	\$519,406.40	\$4,716.85
8 Goldin Associates LLC [D.I. 12996]	D8	12/11/2014 - 03/09/2018	\$4,450,000.00	\$225,000.00	\$45,842.30	\$0.03	\$4,225,000.00	\$45,842.33
9 Sullivan & Cromwell LLP [D.I. 13002]	D9	11/5/2014 - 03/09/2018	\$23,663,509.29	\$10,833.58	\$805,851.62	\$0.00	\$23,652,675.71	\$805,851.62
10 KPMG [D.I. 13008]	D10	12/01/2017 - 03/09/2018	\$578,243.70	\$1,821.60	\$7,972.44	\$0.00	\$576,422.10	\$7,972.44
11 SOLIC Capital Advisors [D.I. 13009]	D11	12/18/2014 - 03/09/2018	\$6,243,730.58	\$6,949.99	\$123,690.62	\$0.00	\$6,236,780.59	\$123,690.62
12 Thompson & Knight [D.I. 13024]	D12	04/29/2014 - 03/09/2018	\$3,120,193.87	+	\$20,834.50	FN2	\$3,240,765.87	\$20,844.70
13 Greenberg Traurig [D.I. 13013]	D13	11/02/2015 - 07/31/2017	\$676,614.50	\$297.50	\$7,060.39	\$0.30	\$676,317.00	\$7,060.09
14 Enoch Kever [TCEH] [D.I. 13020]	D14	03/15/2015 - 03/09/2018	\$2,307,195.48	\$29,330.98	\$77,136.71	\$0.00	\$2,277,864.50	\$76,984.65
15 Enoch Kever [EFH/EFH] [D.I. 13023]	D14	03/01/2015 - 03/09/2018	\$1,285,905.00	\$29,330.98	\$7,695.34	\$0.00	\$1,256,574.02	\$7,695.34
16 Alvarez & Marsal North America, LLC [D.I. 13004]	D15	04/29/2014 - 03/09/2018	\$29,108,072.37	\$4,693.99	\$1,183,348.76	\$0.00	\$29,103,378.38	\$1,183,348.76
17 Deloitte & Touche LLP [D.I. 13010]	D16	04/29/2014 - 03/09/2018	\$23,269,745.50	\$4,199.00	\$0.00	\$0.00	\$23,265,546.50	\$0.00
18 Evercore [D.I. 13140]	D17	04/29/2014 - 03/09/2018	\$47,500,000.00	\$0.00	\$1,016,922.83	+	\$47,500,000.00	\$1,019,254.43
19 Filsinger Energy Partners [D.I. 13005]	D18	04/29/2014 - 03/09/2018	\$28,112,537.75	\$0.00	\$1,237,717.42	\$0.00	\$28,112,537.75	\$1,237,717.42
20 EPIQ [D.I. 13017]	D19	04/29/2014 - 03/09/2018	\$1,262,596.35	\$5,980.23	\$2,308,718.29	\$0.00	\$1,256,616.12	\$2,308,718.29
21 Richards, Layton & Finger [D.I. 13016]	D20	04/29/2014 - 03/09/2018	\$7,230,701.50	\$81,297.20	\$646,533.83	\$58,253.94	\$7,149,409.30	\$588,279.89

FN1 - Allowed interim fees from seventh - twelfth interim fee periods not included in final fee request.

FN2 - Allowed interim expenses from seventh - twelfth interim fee periods not included in final fee request.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
ENERGY FUTURE HOLDINGS CORP., <i>et al.</i> , ¹	)	Case No. 14-10979 (CSS)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	Hearing Date: TBD
	)	Objection Deadline: May 14, 2018 at 4:00 p.m.

SUMMARY OF FINAL FEE APPLICATION OF SULLIVAN & CROMWELL LLP AS COUNSEL TO THE EFH COMMITTEE

NAME OF APPLICANT:	Sullivan & Cromwell LLP
AUTHORIZED TO PROVIDE PROFESSIONAL SERVICES TO:	Official Committee of Unsecured Creditors of Energy Future Holdings Corporation, Energy Future Intermediate Holding Company LLC, EFIH Finance Inc. and EECI, Inc.
DATE CASE FILED:	April 29, 2014
DATE OF RETENTION:	January 13, 2015, <i>nunc pro tunc</i> to November 5, 2014
PERIOD FOR WHICH COMPENSATION AND REIMBURSEMENT IS SOUGHT:	November 5, 2014 through and including the Effective Date
TOTAL COMPENSATION REQUESTED:	\$23,663,509.29
TOTAL EXPENSE REIMBURSEMENT REQUESTED:	\$805,851.62 ²

This is a(n): interim X final application.

This is the final fee application filed by Sullivan & Cromwell LLP.

¹ The last four digits of Energy Future Holdings Corp.'s taxpayer identification number are 8810. The location of the debtors' service address is 1601 Bryan Street, Dallas, Texas 75201. Due to the large number of debtors in these chapter 11 cases, for which joint administration has been granted, a complete list of the debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the debtors' claims and noticing agent at <http://www.efhcaseinfo.com>.

² The total compensation and total expense reimbursement requested reflect all adjustments previously agreed to with the Fee Committee.

SUMMARY OF FEES AND EXPENSES

Date and Docket No.	Period Covered	Fees Requested	Holdback (20%)	Fees paid to Date	Expenses Requested	Expenses Paid to Date	Approved Fees and Expenses
1/23/2015 [D.I. 3358]	11/05/2014 - 11/30/2014	\$1,633,519.00	\$326,703.80	\$1,580,640.08	\$12,273.34	\$11,831.27	\$2,697,155.36
2/5/2015 [D.I. 3455]	12/01/2014 - 12/31/2014	\$1,137,878.40	\$227,575.68	\$1,101,043.94	\$3,948.00	\$3,640.07	
2/26/2015 [D.I. 3691]	01/01/2015 - 01/31/2015	\$1,139,002.50	\$227,800.50	\$1,099,767.97	\$4,630.14	\$4,630.14	\$4,924,079.31
3/24/2015 [D.I. 3959]	02/01/2015 - 02/28/2015	\$1,289,130.10	\$257,826.02	\$1,244,724.22	\$5,133.05	\$5,133.05	
4/21/2015 [D.I. 4241]	03/01/2015 - 03/31/2015	\$1,280,362.50	\$256,072.50	\$1,236,258.63	\$3,900.84	\$3,900.84	
5/21/2015 [D.I. 4560]	04/01/2015 - 04/30/2015	\$1,360,411.80	\$272,082.36	\$1,313,550.52	\$16,113.94	\$16,113.94	
6/22/2015 [D.I. 4820]	05/01/2015 - 05/31/2015	\$997,875.50	\$199,575.10	\$991,901.96	\$4,548.67	\$4,530.06	\$4,493,854.17
7/21/2015 [D.I. 5054]	06/01/2015 - 06/30/2015	\$1,087,893.50	\$217,578.70	\$1,081,381.09	\$4,265.83	\$4,245.54	
8/21/2015 [D.I. 5615]	07/01/2015 - 07/31/2015	\$704,331.50	\$140,866.30	\$700,115.19	\$6,814.33	\$6,801.19	
9/21/2015 [D.I. 6127]	08/01/2015 - 08/31/2015	\$1,699,912.00	\$339,982.40	\$1,689,735.89	\$15,174.95	\$15,143.25	
10/21/2015 [D.I. 6557]	09/01/2015 - 09/30/2015	\$2,512,274.10	\$502,454.82	\$2,434,831.81	\$451,883.06	\$451,883.06	\$9,607,132.82
11/23/2015 [D.I. 7108]	10/01/2015 - 10/31/2015	\$4,073,755.90	\$814,751.18	\$3,965,033.37	\$87,674.34	\$87,674.34	
12/21/2015 [D.I. 5615]	11/01/2015 - 11/30/2015	\$2,471,103.00	\$494,220.60	\$2,405,449.06	\$41,847.14	\$41,847.14	
1/21/2016 [D.I. 7710]	12/01/2015 - 12/31/2015	\$113,575.50	\$22,715.10	\$107,662.42	\$112,751.62	\$112,751.62	
2/22/2016 [D.I. 7906]	01/01/2016 - 01/31/2016	\$37,850.50	\$7,570.10	\$37,520.18	\$3,881.73	\$3,881.73	\$164,056.05

Date and Docket No.	Period Covered	Fees Requested	Holdback (20%)	Fees paid to Date	Expenses Requested	Expenses Paid to Date	Approved Fees and Expenses
3/21/2016 [D.I. 8027]	02/01/2016 - 02/29/2016	\$47,410.50	\$9,482.10	\$47,034.39	\$107.07	\$107.07	
4/21/2016 [D.I. 8249]	03/01/2016 - 03/31/2016	\$37,517.00	\$7,503.40	\$37,216.10	\$498.77	\$498.77	
5/23/2016 [D.I. 8509]	04/01/2016 - 04/30/2016	\$37,092.00	\$7,418.40	\$36,790.44	\$1,007.38	\$1,007.38	
6/21/2016 [D.I. 8790]	05/01/2016 - 05/31/2016	\$171,966.50	\$34,393.30	\$165,900.48	\$400.58	\$400.58	\$756,630.28
7/22/2016 [D.I. 8983]	06/01/2016 - 06/30/2016	\$187,428.00	\$37,485.60	\$180,816.59	\$1,194.33	\$1,194.33	
8/22/2016 [D.I. 9365]	07/01/2016 - 07/31/2016	\$170,544.50	\$34,108.90	\$164,528.64	\$5,356.57	\$5,356.57	
9/21/2016 [D.I. 9619]	08/01/2016 - 08/31/2016	\$243,025.00	\$48,605.00	\$234,452.44	\$3,980.65	\$3,980.65	
10/21/2016 [D.I. 9906]	09/01/2016 - 09/30/2016	\$134,569.00	\$26,913.80	\$133,617.40	\$5,972.79	\$5,702.01	\$405,803.26
11/21/2016 [D.I. 10233]	10/01/2016 - 10/31/2016	\$108,020.80	\$21,604.16	\$107,256.94	\$2,247.61	\$2,145.71	
12/21/2016 [D.I. 10425]	11/01/2016 - 11/30/2016	\$79,835.60	\$15,967.12	\$79,271.05	\$2,250.62	\$2,148.59	
1/23/2017 [D.I. 10695]	12/01/2016 - 12/31/2016	\$73,632.50	\$14,726.50	\$73,111.81	\$2,670.84	\$2,549.75	
2/21/2017 [D.I. 10874]	01/01/2017 - 01/31/2017	\$64,889.50	\$12,977.90	\$64,676.96	\$1,728.56	\$1,728.56	\$276,109.62
3/21/2017 [D.I. 11032]	02/01/2017 - 02/28/2017	\$94,513.00	\$18,902.60	\$94,203.43	\$2,718.43	\$2,718.43	
4/25/2017 [D.I. 11188]	03/01/2017 - 03/31/2017	\$27,745.50	\$5,549.10	\$27,654.62	\$2,100.47	\$2,100.47	

Date and Docket No.	Period Covered	Fees Requested	Holdback (20%)	Fees paid to Date	Expenses Requested	Expenses Paid to Date	Approved Fees and Expenses
5/22/2017 [D.I. 11271]	04/01/2017 - 04/30/2017	\$82,205.80	\$16,441.16	\$81,936.54	\$1,090.61	\$1,090.61	
6/21/2017 [D.I. 11377]	05/01/2017 - 05/31/2017	\$52,060.00	\$10,412.00	\$41,846.06	\$696.25	\$696.25	\$469,103.85
7/21/2017 [D.I. 11530]	06/01/2017 - 06/30/2017	\$40,224.00	\$8,044.80	\$32,332.23	\$817.40	\$817.40	
8/21/2017 [D.I. 11789]	07/01/2017 - 07/31/2017	\$119,095.70	\$23,819.14	\$95,729.66	\$969.81	\$969.81	
9/21/2017 [D.I. 11926]	08/01/2017 - 08/31/2017	\$250,439.50	\$50,087.90	\$201,304.39	\$6,558.17	\$6,558.17	
10/23/2017 [D.I. 12108]	09/01/2017 - 09/30/2017	\$176,586.70	\$35,317.34	\$141,269.36	\$3,416.08	\$3,416.08	N/A
11/21/2017 [D.I. 12267]	10/01/2017 - 10/31/2017	\$154,482.50	\$30,896.50	\$123,586.00	\$4,381.96	\$4,381.96	
12/22/2017 [D.I. 12392]	11/01/2017 - 11/30/2017	\$78,552.50	\$15,710.50	\$62,842.00	\$716.76	\$716.76	
1/22/2018 [D.I. 12505]	12/01/2017 - 12/31/2017	\$39,791.00	\$7,958.20	\$31,832.80	\$941.15	\$941.15	
2/21/2018 [D.I. 12679]	01/01/2018 - 01/31/2018	\$131,017.50	\$26,203.50	\$0.00	\$1,041.70	\$0.00	N/A
3/21/2018 [D.I. 12841]	02/01/2018 - 02/28/2018	\$74,487.00	\$14,897.40	\$0.00	\$1,248.89	\$0.00	
4/16/2018 [D.I. 12957]	03/01/2018 - 03/9/2018	\$8,300.50	\$1,660.10	\$0.00	\$471.95	\$0.00	
TOTAL REQUESTED AND PAID AMOUNTS		\$24,224,307.90	\$4,844,861.58	\$23,248,826.66	\$829,426.38	\$825,234.30	\$23,793,924.72
ADJUSTMENTS PER PRIOR DISCUSSIONS WITH FEE COMMITTEE		-\$560,798.61			-\$23,574.76		
CURRENT REQUESTED AMOUNTS		\$23,663,509.29			\$805,851.62		

PROJECTED TOTAL BUDGET FOR FEE PERIOD AND ACTUAL FEES INCURRED

Estimated Fees for Fee Period		Actual Fees For Fee Period
Low	High	\$23,663,509.29
\$27,062,025.00	\$43,574,250.00	

PROJECT CODE TOTAL CHART

Project Number	Project Name	Hours	Fee Amount
00002	ASSET ANALYSIS AND RECOVERY	37.20	\$27,177.50
00003	ASSET DISPOSITION	1,848.20	\$1,618,626.00
00004	ASSUMPTION AND REJECTION OF LEASES AND CONTRACTS	5.10	\$4,177.00
00005	AVOIDANCE ACTION ANALYSIS	0.00	\$0.00
00006	BUSINESS OPERATIONS	22.80	\$15,599.50
00007	CASE ADMINISTRATION	1,374.40	\$844,255.50
00008	CLAIMS ADMINISTRATION AND OBJECTIONS	775.20	\$821,800.00
00009	CORPORATE GOVERNANCE AND BOARD MATTERS	2.90	\$2,624.50
00010	EMPLOYEE BENEFITS AND PENSIONS	270.40	\$195,446.00
00011	EMPLOYMENT AND FEE APPLICATIONS (S&C)	1,383.10	\$801,757.00
00012	EMPLOYMENT AND FEE APPLICATIONS (OTHERS)	518.90	\$384,993.50
00013	FINANCING, CASH COLLATERAL, MAKE WHOLE	645.80	\$487,287.50
00014	OTHER LITIGATION	614.30	\$520,530.50
00015	MEETINGS AND COMMUNICATIONS WITH CREDITORS	1,329.40	\$1,313,457.00
00016	NON-WORKING TRAVEL	291.20	\$134,073.40
00017	PLAN AND DISCLOSURE STATEMENT	16,189.40	\$12,144,006.50
00018	RELIEF FROM STAY AND ADEQUATE PROTECTION	4.10	\$3,104.50
00019	TAX	2,098.10	\$1,828,798.00
00020	VALUATION	0.00	\$0.00
00021	DISCOVERY	318.70	\$181,039.50
00022	HEARINGS	1,238.10	\$1,113,744.00
00023	FIRST AND SECOND DAY MOTIONS	0.00	\$0.00
00024	CLAIMS INVESTIGATION	355.80	\$239,811.00
00025	LIEN INVESTIGATION	142.10	\$86,847.50
00026	INTERCOMPANY CLAIMS	1,341.70	\$938,805.00
00027	OTHER MOTIONS / APPLICATIONS	635.70	\$474,068.00
00028	SCHEDULES AND STATEMENTS	0.00	\$0.00
00029	TIME ENTRY REVIEW	1,146.80	\$14,653.00
00031	BUDGETING (CASE)	37.30	\$27,626.00
Total		32,626.70	\$24,224,307.90
Adjustments per discussions with Fee Committee			-\$560,798.61
UPDATED TOTAL			\$23,663,509.29

S&C PROFESSIONALS PERFORMING SERVICES DURING THE FEE PERIOD

Timekeeper Name	Title	Practice Group	Year Admitted	Rate		Hours	Amount
Clayton, Jay	Partner	GP	1994	\$ 1,295.00		1.60	\$2,072.00
Coleman, Heather L.	Partner	GP/Employee Benefits	2007	\$ 865.00	*	5.00	\$4,325.00
Coleman, Heather L.	Partner	GP/Employee Benefits	2007	\$ 1,160.00		5.00	\$5,800.00
Creamer Jr., Ronald E.	Partner	Tax	1992	\$ 1,295.00		2.30	\$2,978.50
Dietderich, Andrew G.	Partner	GP/Restructuring	1997	\$ 0.00	*	5.10	\$0.00
Dietderich, Andrew G.	Partner	GP/Restructuring	1997	\$ 570.00	*	48.20	\$27,474.00
Dietderich, Andrew G.	Partner	GP/Restructuring	1997	\$ 1,140.00		1,885.20	\$2,149,128.00
Downes, Robert W.	Partner	GP	1992	\$ 1,295.00		0.50	\$647.50
Giuffra Jr., Robert J.	Partner	Litigation	1989	\$ 1,140.00		11.00	\$12,540.00
Glueckstein, Brian D.	Partner	Litigation	2004	\$ 0.00	*	0.80	\$0.00
Glueckstein, Brian D.	Partner	Litigation	2004	\$ 570.00	*	52.20	\$29,754.00
Glueckstein, Brian D.	Partner	Litigation	2004	\$ 1,140.00		3,752.30	\$4,277,622.00
Hardiman, John L.	Partner	Litigation	1983	\$ 570.00	*	6.60	\$3,762.00
Hardiman, John L.	Partner	Litigation	1983	\$ 1,140.00		282.50	\$322,050.00
Hariton, David P.	Partner	Tax	1986	\$ 648.00	*	4.50	\$2,916.00
Hariton, David P.	Partner	Tax	1986	\$ 1,295.00		934.80	\$1,210,566.00
Holley, Steven L.	Partner	Litigation	1984	\$ 570.00	*	3.00	\$1,710.00
Holley, Steven L.	Partner	Litigation	1984	\$ 1,140.00		52.70	\$60,078.00
Jacobson, Eli D.	Partner	Tax	1981	\$ 1,295.00		195.90	\$253,690.50
Korb, Donald L.	Partner	Tax	1973	\$ 1,295.00		0.80	\$1,036.00
Korry, Alexandra D.	Partner	GP/M&A	1988	\$ 648.00	*	0.20	\$129.60
Korry, Alexandra D.	Partner	GP/M&A	1988	\$ 1,295.00		376.20	\$487,179.00
Kotran, Stephen M.	Partner	GP	1993	\$ 1,295.00		5.00	\$6,475.00
Mason, Andrew S.	Partner	Tax	1982	\$ 1,295.00		6.60	\$8,547.00
McIntosh, Brent J.	Partner	Litigation	2001	\$ 1,140.00		8.30	\$9,462.00
Neuhaus, Joseph E.	Partner	GP	1986	\$ 1,140.00		0.50	\$570.00
Rosenberg, Mark F.	Partner	Litigation	1981	\$ 570.00	*	1.00	\$570.00
Rosenberg, Mark F.	Partner	Litigation	1981	\$ 1,140.00		316.60	\$360,924.00
Shane, Penny	Partner	Litigation	1989	\$ 1,140.00		130.60	\$148,884.00
Simmons, Rebecca J.	Partner	GP	1992	\$ 1,295.00		0.30	\$388.50
Solomon, Andrew P.	Partner	Tax	1985	\$ 1,295.00		1.50	\$1,942.50
Spitzer, David C.	Partner	Tax	1996	\$ 1,295.00		0.10	\$129.50
Torkin, Michael H.	Partner	GP/Restructuring	1999	\$ 570.00	*	2.70	\$1,539.00
Torkin, Michael H.	Partner	GP/Restructuring	1999	\$ 1,140.00		132.90	\$151,506.00
Trevino, Marc	Partner	GP/Employee Benefits	1995	\$ 1,295.00		41.60	\$53,872.00
Wang, Davis J.	Partner	Tax	2004	\$ 1,295.00		0.40	\$518.00
Partner Total						8,274.50	\$9,600,785.60
Jerome, John J.	Of Counsel	GP/Restructuring	1962	\$ 1,140.00		150.00	\$171,000.00
Korb, Donald L.	Of Counsel	Tax	1973	\$ 1,295.00		0.40	\$518.00
Of Counsel Total						150.40	\$171,518.00
Altman, Daniel Z.	Special Counsel	Tax	1999	\$ 498.00	*	5.00	\$2,490.00
Altman, Daniel Z.	Special Counsel	Tax	1999	\$ 995.00		527.00	\$524,365.00

Timekeeper Name	Title	Practice Group	Year Admitted	Rate		Hours	Amount
Barancik, Tia S.	Special Counsel	GP/Regulatory	1987	\$ 1,140.00		138.90	\$158,346.00
Brander, Saul	Special Counsel	Tax	2003	\$ 865.00		1.00	\$865.00
Brebner, Adam R.	Special Counsel	Litigation	2000	\$ 498.00	*	6.90	\$3,436.20
Brebner, Adam R.	Special Counsel	Litigation	2000	\$ 995.00		418.50	\$416,407.50
Brennan, Matthew J.	Special Counsel	GP/Environmental	1986	\$ 525.00	*	0.60	\$315.00
Brennan, Matthew J.	Special Counsel	GP/Environmental	1986	\$ 1,050.00		112.40	\$118,020.00
Coccaro, Rebecca S.	Special Counsel	GP	2000	\$ 995.00		0.70	\$696.50
Fiorini, Judith R.	Special Counsel	Restructuring	1998	\$ 0.00	*	6.40	\$0.00
Fiorini, Judith R.	Special Counsel	Restructuring	1998	\$ 995.00		138.40	\$137,708.00
Kranzley, Alexa J.	Special Counsel	GP/Restructuring	2009	\$ 0.00	*	3.00	\$0.00
Kranzley, Alexa J.	Special Counsel	GP/Restructuring	2009	\$ 433.00	*	16.30	\$7,057.90
Kranzley, Alexa J.	Special Counsel	GP/Restructuring	2009	\$ 865.00		174.40	\$150,856.00
Kranzley, Alexa J.	Special Counsel	GP/Restructuring	2009	\$ 995.00		45.00	\$44,775.00
Special Counsel Total						1,594.50	\$1,565,338.10
Aksu, Veronica J.	Associate	GP	2015	\$ 460.00		125.70	\$57,822.00
Aksu, Veronica J.	Associate	GP	2015	\$ 605.00	*	199.60	\$120,758.00
Apostolopoulos, Alexander P.	Associate	Tax	2012	\$ 830.00		0.60	\$498.00
Bander, Jeannette E.	Associate	GP	2012	\$ 830.00		16.70	\$13,861.00
Bander, Jeannette E.	Associate	GP	2012	\$ 855.00		3.30	\$2,821.50
Bander, Jeannette E.	Associate	GP	2012	\$ 865.00		3.60	\$3,114.00
Biller, Daniel L.	Associate	GP/Restructuring	2013	\$ 725.00		112.90	\$81,852.50
Blaut, Ari B.	Associate	GP/Finance	2008	\$ 865.00		13.10	\$11,331.50
Bradley, Adrienne R. W.	Associate	GP/Restructuring	2013	\$ 725.00		179.90	\$130,427.50
Coleman, Heather L.	Associate	GP/Employee Benefits	2007	\$ 865.00		109.80	\$94,977.00
Coyle, Victoria A.	Associate	Litigation	2009	\$ 433.00	*	5.80	\$2,511.40
Coyle, Victoria A.	Associate	Litigation	2009	\$ 865.00		64.40	\$55,706.00
Danberg, J. Conlon	Associate	GP	2016	\$ 460.00		199.10	\$91,586.00
Ekono, Zeh S.	Associate	Litigation	2011	\$ 855.00		51.30	\$43,861.50
Foushee, M. Hampton	Associate	GP/Restructuring	2015	\$ 0.00	*	1.90	\$0.00
Foushee, M. Hampton	Associate	GP/Restructuring	2015	\$ 460.00		675.80	\$310,868.00
Foushee, M. Hampton	Associate	GP/Restructuring	2015	\$ 605.00		217.80	\$131,769.00
Gadwood, James R.	Associate	Tax	2009	\$ 865.00		3.00	\$2,595.00

Timekeeper Name	Title	Practice Group	Year Admitted	Rate		Hours	Amount
Geiger, Mark S.	Associate	Litigation	2013	\$ 725.00		5.40	\$3,915.00
Goldin, David L.	Associate	GP/M&A	2013	\$ 725.00		406.00	\$294,350.00
Goldin, David L.	Associate	GP/M&A	2013	\$ 830.00		223.50	\$185,505.00
Graybill, Joshua D.	Associate	Tax	in process	\$ 460.00		10.50	\$4,830.00
Guido, Emma J.	Associate	GP	2017	\$ 460.00		56.00	\$25,760.00
Ha, Alice YN	Associate	GP	2015	\$ 0.00	*	3.10	\$0.00
Ha, Alice YN	Associate	GP	2015	\$ 460.00		565.80	\$260,268.00
Ha, Alice YN	Associate	GP	2015	\$ 605.00		152.60	\$92,323.00
Heuer, Max S.	Associate	Litigation	2012	\$ 830.00		101.00	\$83,830.00
Hong, Slki	Associate	Tax	2016	\$ 460.00		36.10	\$16,606.00
Ip, Veronica W.	Associate	Litigation	2011	\$ 428.00	*	1.50	\$642.00
Ip, Veronica W.	Associate	Litigation	2011	\$ 433.00	*	12.90	\$5,585.70
Ip, Veronica W.	Associate	Litigation	2011	\$ 855.00		910.40	\$778,392.00
Ip, Veronica W.	Associate	Litigation	2011	\$ 865.00		671.10	\$580,501.50
Jakus, David J.	Associate	GP	2014	\$ 605.00		75.00	\$45,375.00
Janove, Raphael	Associate	Litigation	2014	\$ 460.00		29.90	\$13,754.00
Jensen, Christian P.	Associate	GP	2016	\$ 460.00		372.10	\$171,166.00
Jensen, Christian P.	Associate	GP	2016	\$ 605.00		152.10	\$92,020.50
Jensen, Christian P.	Associate	GP	2016	\$ 725.00		25.20	\$18,270.00
Jo, M. John	Associate	Tax	in process	\$ 460.00		1.80	\$828.00
Josephs, Adam M.	Associate	GP/Employee Benefits	2014	\$ 460.00		51.60	\$23,736.00
Keranen, Kristin L.	Associate	Litigation	2008	\$ 865.00		67.90	\$58,733.50
Khanna, Harry S.	Associate	GP/M&A	2015	\$ 460.00		172.30	\$79,258.00
Kitai, Sarah A.	Associate	GP	2016	\$ 460.00		250.30	\$115,138.00
Kranzley, Alexa J.	Associate	GP/Restructuring	2009	\$ 0.00	*	30.80	\$0.00
Kranzley, Alexa J.	Associate	GP/Restructuring	2009	\$ 433.00	*	49.70	\$21,520.10
Kranzley, Alexa J.	Associate	GP/Restructuring	2009	\$ 865.00		2,454.40	\$2,123,056.00
Lee, Alexander S.	Associate	Litigation	2016	\$ 460.00		379.40	\$174,524.00
Liolos, John J.	Associate	Litigation	2013	\$ 363.00	*	12.10	\$4,392.30
Liolos, John J.	Associate	Litigation	2013	\$ 605.00		129.50	\$78,347.50
Liolos, John J.	Associate	Litigation	2013	\$ 725.00		450.60	\$326,685.00
Littleton, Judson O.	Associate	Litigation	2008	\$ 433.00	*	16.50	\$7,144.50
Littleton, Judson O.	Associate	Litigation	2008	\$ 865.00		269.80	\$233,377.00
Lloyd, Jameson S.	Associate	Tax	2014	\$ 605.00		0.30	\$181.50
Loeser, Daniel R.	Associate	GP	2014	\$ 605.00		174.20	\$105,391.00
Lorme, Daniel R.	Associate	GP	2015	\$ 0.00	*	0.20	\$0.00
Lorme, Daniel R.	Associate	GP	2015	\$ 460.00		255.40	\$117,484.00
Lorme, Daniel R.	Associate	GP	2015	\$ 605.00		59.80	\$36,179.00
Lu, Michelle H.	Associate	Tax	2014	\$ 460.00		8.60	\$3,956.00
Lum-Tai, Natalie A.	Associate	GP	2016	\$ 605.00		12.90	\$7,804.50
Ma, Chiansan	Associate	GP/Restructuring	2012	\$ 0.00	*	7.60	\$0.00
Ma, Chiansan	Associate	GP/Restructuring	2012	\$ 415.00	*	4.50	\$1,867.50
Ma, Chiansan	Associate	GP/Restructuring	2012	\$ 830.00		1,143.80	\$949,354.00
Ma, Chiansan	Associate	GP/Restructuring	2012	\$ 855.00		410.50	\$350,977.50
Markey, Timothy A.	Associate	Litigation	2016	\$ 605.00		29.40	\$17,787.00

Timekeeper Name	Title	Practice Group	Year Admitted	Rate		Hours	Amount
Martel, Jean-Christophe	Associate	Litigation	2014	\$ 725.00		138.50	\$100,412.50
Menillo, Nicholas F.	Associate	Litigation	2013	\$ 415.00	*	7.30	\$3,029.50
Menillo, Nicholas F.	Associate	Litigation	2013	\$ 830.00		480.20	\$398,566.00
Menillo, Nicholas F.	Associate	Litigation	2013	\$ 855.00		71.00	\$60,705.00
Metz, Alexander J.F.	Associate	GP	2015	\$ 0.00	*	1.90	\$0.00
Metz, Alexander J.F.	Associate	GP	2015	\$ 460.00		66.70	\$30,682.00
Mortensen, Todd A.	Associate	GP/Restructuring	2013	\$ 0.00	*	0.50	\$0.00
Mortensen, Todd A.	Associate	GP/Restructuring	2013	\$ 725.00		92.40	\$66,990.00
Moulins, Charles E.	Associate	Litigation	2013	\$ 725.00		9.90	\$7,177.50
O'Neill, T. Max	Associate	Tax	2013	\$ 830.00		0.20	\$166.00
Orchowski, Michael	Associate	Tax	2009	\$ 865.00		0.20	\$173.00
Parnes, Lee C.	Associate	GP	2016	\$ 460.00		152.50	\$70,150.00
Rhein, Jonathan M.	Associate	Tax	2014	\$ 0.00	*	4.00	\$0.00
Rhein, Jonathan M.	Associate	Tax	2014	\$ 230.00	*	2.80	\$644.00
Rhein, Jonathan M.	Associate	Tax	2014	\$ 303.00	*	2.10	\$636.30
Rhein, Jonathan M.	Associate	Tax	2014	\$ 460.00		222.70	\$102,442.00
Rhein, Jonathan M.	Associate	Tax	2014	\$ 605.00		96.90	\$58,624.50
Sam, Erick J.	Associate	Tax	2016	\$ 220.00	*	20.10	\$4,422.00
Sam, Erick J.	Associate	Tax	2016	\$ 460.00		12.70	\$5,842.00
Sam, Erick J.	Associate	Tax	2016	\$ 605.00		0.10	\$60.50
Schneiderman, Mark U.	Associate	GP/Restructuring	2006	\$ 433.00	*	0.30	\$129.90
Schneiderman, Mark U.	Associate	GP/Restructuring	2006	\$ 865.00		74.70	\$64,615.50
Silver, Justin P.	Associate	GP	2015	\$ 460.00		2.80	\$1,288.00
Taylor, Daniel	Associate	GP	2014	\$ 605.00		134.00	\$81,070.00
Toy, Amanda K.	Associate	GP	2016	\$ 460.00		16.90	\$7,774.00
Ward, Andrew H.	Associate	Litigation	2015	\$ 605.00		0.40	\$242.00
Weiss, Noam R.	Associate	GP	2014	\$ 0.00	*	1.00	\$0.00
Weiss, Noam R.	Associate	GP	2014	\$ 303.00	*	1.50	\$454.50
Weiss, Noam R.	Associate	GP	2014	\$ 605.00		1,005.70	\$608,448.50
Weiss, Noam R.	Associate	GP	2014	\$ 725.00		198.80	\$144,130.00
White, Amaris R.	Associate	GP	2013	\$ 725.00		139.60	\$101,210.00
Xu, Vic	Associate	GP	2016	\$ 460.00		356.20	\$163,852.00
Zhang, Xin Florence	Associate	GP	2014	\$ 460.00		313.00	\$143,980.00
Zhou, Rae	Associate	GP	2015	\$ 0.00	*	0.50	\$0.00
Zhou, Rae	Associate	GP	2015	\$ 460.00		39.70	\$18,262.00
Zichawo, William N.	Associate	GP	2016	\$ 460.00		180.60	\$83,076.00
Zylberberg, David R.	Associate	GP/Restructuring	2011	\$ 0.00	*	0.10	\$0.00
Zylberberg, David R.	Associate	GP/Restructuring	2011	\$ 855.00		699.90	\$598,414.50
Zylberberg, David R.	Associate	GP/Restructuring	2011	\$ 865.00		219.20	\$189,608.00
Associate Total						17,006.00	\$11,784,453.20
Lawyers Total						27,025.40	\$23,122,094.90
Agha, Mavara	Summer Associate			\$ 0.00	*	88.60	\$0.00
Billmire, Alice B.	Summer Associate			\$ 0.00	*	3.50	\$0.00
Brown, A. Christopher	Summer Associate			\$ 0.00	*	106.70	\$0.00

Timekeeper Name	Title	Practice Group	Year Admitted	Rate		Hours	Amount
Chung, Grace H.	Summer Associate			\$ 0.00	*	14.40	\$0.00
Costakos, Paige N.	Summer Associate			\$ 0.00	*	15.30	\$0.00
Graybill, Joshua D.	Summer Associate			\$ 0.00	*	88.90	\$0.00
Grein, John J.	Summer Associate			\$ 0.00	*	27.30	\$0.00
Houchens, Jesse P.	Summer Associate			\$ 0.00	*	16.70	\$0.00
Kim, Terence H.	Summer Associate			\$ 0.00	*	115.40	\$0.00
Maass, Evan P.	Summer Associate			\$ 0.00	*	2.00	\$0.00
Macfarlane, Bonnie C.	Summer Associate			\$ 0.00	*	15.60	\$0.00
Mittal, Rakesh A.	Summer Associate			\$ 0.00	*	63.20	\$0.00
Rizkalla, Aaron M.	Summer Associate			\$ 0.00	*	16.70	\$0.00
Ross, Ethan David	Summer Associate			\$ 0.00	*	56.10	\$0.00
Salter, David	Summer Associate			\$ 0.00	*	5.70	\$0.00
Sullivan, William Peyton	Summer Associate			\$ 0.00	*	166.40	\$0.00
Tata, Vivek V.	Summer Associate			\$ 0.00	*	41.10	\$0.00
Thompson, Tasha N.	Summer Associate			\$ 0.00	*	5.50	\$0.00
Wasser, Jason A.	Summer Associate			\$ 0.00	*	44.60	\$0.00
Watanabe, Kisho	Summer Associate			\$ 0.00	*	5.90	\$0.00
Young, Elizabeth V.	Summer Associate			\$ 0.00	*	18.00	\$0.00
Hobby, Lauren Morghan	Intern			\$ 0.00	*	5.20	\$0.00
Booth, Oliver B.	Legal Assistant			\$ 0.00	*	129.30	\$0.00
Booth, Oliver B.	Legal Assistant			\$ 225.00		42.30	\$9,517.50
Booth, Oliver B.	Legal Assistant			\$ 275.00		107.90	\$29,672.50
Booth, Oliver B.	Legal Assistant			\$ 315.00		25.00	\$7,875.00
Chiu, Jeffrey H.	Legal Assistant			\$ 355.00		1.50	\$532.50

Timekeeper Name	Title	Practice Group	Year Admitted	Rate		Hours	Amount
Coulibaly, Rockia	Legal Assistant			\$ 0.00	*	119.70	\$0.00
Coulibaly, Rockia	Legal Assistant			\$ 225.00		13.60	\$3,060.00
Coulibaly, Rockia	Legal Assistant			\$ 275.00		41.00	\$11,275.00
Coulibaly, Rockia	Legal Assistant			\$ 315.00		11.10	\$3,496.50
Drinkwater, Emily C. C.	Legal Assistant			\$ 0.00	*	396.60	\$0.00
Drinkwater, Emily C. C.	Legal Assistant			\$ 275.00	*	386.00	\$106,150.00
Drinkwater, Emily C. C.	Legal Assistant			\$ 315.00	*	159.10	\$50,116.50
Ea, Choun F.	Legal Assistant			\$ 355.00		0.50	\$177.50
Eigen, Jeffrey G.	Legal Assistant			\$ 315.00		1.00	\$315.00
Marryshow, Danielle J.	Legal Assistant			\$ 158.00	*	2.30	\$363.40
Marryshow, Danielle J.	Legal Assistant			\$ 275.00		93.00	\$25,575.00
Marryshow, Danielle J.	Legal Assistant			\$ 315.00		165.40	\$52,101.00
Minio, Zara E.	Legal Assistant			\$ 0.00	*	402.50	\$0.00
Minio, Zara E.	Legal Assistant			\$ 355.00		307.80	\$109,269.00
Son, Grace M.	Legal Assistant			\$ 138.00	*	3.70	\$510.60
Son, Grace M.	Legal Assistant			\$ 225.00		77.20	\$17,370.00
Son, Grace M.	Legal Assistant			\$ 275.00		161.90	\$44,522.50
Son, Grace M.	Legal Assistant			\$ 315.00		1.60	\$504.00
Watson, Thomas C.	Legal Assistant			\$ 0.00	*	122.30	\$0.00
Watson, Thomas C.	Legal Assistant			\$ 275.00		250.10	\$68,777.50
Watson, Thomas C.	Legal Assistant			\$ 315.00		127.30	\$40,099.50
Yang, April C.	Legal Assistant			\$ 158.00	*	12.50	\$1,975.00
Yang, April C.	Legal Assistant			\$ 275.00		99.30	\$27,307.50
Yang, April C.	Legal Assistant			\$ 315.00		151.60	\$47,754.00

Timekeeper Name	Title	Practice Group	Year Admitted	Rate		Hours	Amount
Robinson, Kenneth W.	Legal Analyst - Corporate			\$ 355.00		38.90	\$13,809.50
Bender, Jennifer B.	Legal Analyst - Litigation			\$ 0.00	*	1.50	\$0.00
Bender, Jennifer B.	Legal Analyst - Litigation			\$ 355.00		91.10	\$32,340.50
Cieniawa, Aaron B.	Legal Analyst - Litigation			\$ 355.00		199.20	\$70,716.00
Gilday, Joseph F.	Legal Analyst - Litigation			\$ 355.00		459.60	\$163,158.00
Caprio-Lopez, Melissa	Legal Assistant Clerk			\$ 145.00		3.50	\$507.50
Desir, Sadel J.	Legal Assistant Clerk			\$ 145.00		7.00	\$1,015.00
Whalen, Sean S.	Legal Assistant Clerk			\$ 145.00		3.90	\$565.50
Adams, Kristofer S.	Electronic Discovery			\$ 355.00		3.00	\$1,065.00
Balsdon, Nicholas J.	Electronic Discovery			\$ 315.00		4.00	\$1,260.00
Chen, Ken	Electronic Discovery			\$ 315.00		2.20	\$693.00
Fanning, Carrie R.	Electronic Discovery			\$ 355.00		0.20	\$71.00
Grullon, Ralph	Electronic Discovery			\$ 355.00		2.00	\$710.00
Harris, Angelique R.	Electronic Discovery			\$ 355.00		0.80	\$284.00
Langston, Nicole E.	Electronic Discovery			\$ 355.00		71.90	\$25,524.50
Lopez, Nathaniel S.	Electronic Discovery			\$ 355.00		0.50	\$177.50
Mian, Ahmed A.	Electronic Discovery			\$ 355.00		0.40	\$142.00
Perez, Hazel V.	Electronic Discovery			\$ 355.00		14.90	\$5,289.50
Smith, Clay	Electronic Discovery			\$ 315.00		0.30	\$94.50
Yim, Eileen Y. L.	Electronic Discovery			\$ 355.00		10.70	\$3,798.50

Timekeeper Name	Title	Practice Group	Year Admitted	Rate		Hours	Amount
Nakamura, Ken	Tech Services			\$ 178.00	*	3.50	\$623.00
Nakamura, Ken	Tech Services			\$ 355.00		126.90	\$45,049.50
Williams, Andrew W.	Tech Services			\$ 178.00	*	5.00	\$890.00
Williams, Andrew W.	Tech Services			\$ 355.00		90.00	\$31,950.00
Betin, Darya A.	Research Librarian			\$ 355.00		15.80	\$5,609.00
Council, Kimberly N.	Research Librarian			\$ 355.00		22.80	\$8,094.00
Gorman, Teresa A.	Research Librarian			\$ 355.00		11.10	\$3,940.50
Khwaja, Tariq	Research Librarian			\$ 355.00		6.90	\$2,449.50
Nolan, Brian J.	Research Librarian			\$ 355.00		3.30	\$1,171.50
Noller, Denise J.	Research Librarian			\$ 355.00		3.00	\$1,065.00
Normile, Michael R.	Research Librarian			\$ 355.00		2.30	\$816.50
Pearson, Michael D.	Research Librarian			\$ 355.00		3.80	\$1,349.00
Petit, Gregoire M.	Research Librarian			\$ 355.00		1.80	\$639.00
Seeger, Evelyn H.	Research Librarian			\$ 355.00		10.70	\$3,798.50
Stephen, Cherryl J.	Research Librarian			\$ 355.00		1.00	\$355.00
Timmons, Penny H.	Research Librarian			\$ 355.00		0.70	\$248.50
Tully, John K.	Research Librarian			\$ 355.00		26.20	\$9,301.00
Voizard, Marshall R.	Research Librarian			\$ 355.00		15.00	\$5,325.00
Non Legal Personnel Total						5,601.30	\$1,102,213.00
Total						32,626.70	\$24,224,307.90
Adjustments per discussions with Fee Committee							-\$560,798.61
UPDATED TOTAL							\$23,663,509.29

* Half-rates appear where fees were charged for non-working travel and a zero rate appears wherever no fee was charged for work.

Exhibit K

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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10

11 JOSE ANTONIO FRANCO-
12 GONZALEZ, et al.,

13 *Plaintiffs-Petitioners,*

14 v.

15 ERIC H. HOLDER, Jr., Attorney
General, et al.,

16 *Defendants-Respondents.*
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Case No.: CV 10-2211 DMG (DTBx)

**ORDER APPROVING PARTIES'
SETTLEMENT AGREEMENT
RESOLVING PLAINTIFFS'
MOTION FOR ATTORNEYS'
FEES AND COSTS [827, 864]**

1 WHEREAS, the Parties provided proper notice to the Class [Doc. # 860];

2 WHEREAS, the Court has already approved the notice provided to the Class
3 as satisfying the requirements of Federal Rule of Civil Procedure 23(e)(1) and due
4 process [Doc. ## 856, 860];

5 WHEREAS, the notice provided to the Class stated that Plaintiffs would
6 seek attorneys' fees and costs up to \$15,000,000, and no Class Member has
7 objected;

8 WHEREAS, Plaintiffs did not seek the full \$15,000,000 in fees and costs of
9 which they gave notice to the Class, and instead filed a Motion for Attorneys' Fees
10 and Costs ("Fee Motion") seeking \$11,632,425.73 in attorneys' fees and
11 \$81,701.73 in costs (as corrected) [Doc. ## 827, 843];

12 WHEREAS, Defendants were granted, by order of this Court, over two
13 months to analyze and respond to Plaintiffs' Fee Motion and indicated that they
14 would engage an expert to assist them in analyzing and responding to Plaintiffs'
15 Fee Motion [Doc. ## 822 at 14-16, 825];

16 WHEREAS, the Parties engaged in non-collusive, arms'-length negotiations
17 to resolve Plaintiffs' Fee Motion, and have now reached a settlement ("Fee
18 Settlement Agreement");

19 WHEREAS, the Fee Settlement Agreement, attached hereto as Exhibit A, is
20 the entire agreement between the Government and Plaintiffs regarding attorneys'
21 fees and costs;

22 WHEREAS, the Fee Settlement Agreement requires Defendants to pay
23 Plaintiffs \$9,500,000.00 in full satisfaction of all attorneys' fees and costs that
24 Plaintiffs have sought or could seek in this matter as of September 29, 2015;

25 WHEREAS, Plaintiffs' Fee Motion provides ample support for an award of
26 at least \$9,500,000;

27 WHEREAS, there is no evidence of collusion between the Parties regarding
28 fees, or of Plaintiffs putting their interests in obtaining fees ahead of the interests of

1 the Class [Doc. # 854 at 15-16];

2 The Court hereby awards Plaintiffs \$9,500,000 in attorneys' fees and costs,
3 subject to the terms set forth in the Fee Settlement Agreement. The Fee Settlement
4 Agreement is a compromise reached by the Parties as a result of arms'-length
5 negotiations, including negotiations after Defendants had the opportunity to review
6 Plaintiffs' entire Fee Motion, which contained voluminous time records and
7 supporting materials. The Fee Settlement Agreement does not prejudice the Class
8 and was not the result of collusion between the Parties. The Class has received
9 notice of Plaintiffs' Fee Motion that complied with the requirements of Federal
10 Rule of Civil Procedure 23(e)(1), and no Class Member has objected to the Fee
11 Motion. The Court therefore finds the award to be fair, adequate, and reasonable.

12 The Parties are hereby ordered to implement the terms of the Fee Settlement
13 Agreement. The Court retains jurisdiction for the purpose of enforcing compliance
14 with the terms of the Fee Settlement Agreement.

15 IT IS SO ORDERED.

16
17 DATED: October 8, 2015


DOLLY M. GEE
UNITED STATES DISTRICT JUDGE

Exhibit A

SETTLEMENT AGREEMENT

Franco-Gonzalez, et al. v. Lynch, et.al.

Case No. CV 10-2211-DMG (DTBx)

This Settlement Agreement is entered into by all Plaintiffs and all Defendants in this class action lawsuit (collectively, “the Parties”). Plaintiffs are individuals who are, or were during the relevant period, in the custody of U.S. Immigration and Customs Enforcement (“ICE”) in Arizona, California, or Washington, who have serious mental disorders, and who lack or lacked counsel in their immigration proceedings. Defendants are Loretta Lynch, United States Attorney General, Juan Osuna, Director of the Executive Office for Immigration Review (“EOIR”), Jeh Johnson, Secretary of Homeland Security, Sarah Saldaña, Director of U.S. Immigration and Customs Enforcement (“ICE”), and David Jennings, Field Office Director for the Los Angeles District of ICE.

RECITALS

Intention of the Parties. The Parties desire to settle and resolve 1) Plaintiffs’ claim for \$81,701.73 in costs; 2) Plaintiffs’ claim for \$11,632,425.73 in attorneys’ fees, *see* Dkt. 843-2; 843-4; and 3) any attorneys’ fees accrued between July 1, 2015 and September 29, 2015. Plaintiffs’ claims for costs and fees accrued prior to July 1, 2015 are contained in Plaintiffs’ Motion for Attorneys’ Fees and Costs, Dkt. 827, as corrected in Dkt. 843. Plaintiffs have not yet sought fees for work done between July 1, 2015 and September 29, 2015, but they would do so but for this Agreement. The parties enter into this Settlement Agreement to avoid the time and expense of further litigation as to costs and fees. The Parties acknowledge that this Settlement Agreement (1) disposes of all claims and issues regarding the claims for costs and Fees that the Plaintiffs raise or could raise against Defendants in Plaintiffs’ Motion for Attorneys’ Fees and Costs as of September 29, 2015, and

(ii) fully binds the Parties and their successors.

No Admission of Wrongdoing. By executing this Settlement Agreement, Defendants do not admit that Plaintiffs' claim for fees was meritorious, nor do Defendants admit that Defendants were not substantially justified, in law or fact, in the litigation position advanced in the Action.

Complete Agreement. The Parties agree that this document constitutes the complete integration of the Settlement Agreement between the Parties regarding Plaintiffs' claim for costs and fees for work done prior to September 29, 2015, and supersedes any and all prior oral or written representations, understandings, or agreements by or between the Parties regarding Plaintiffs' claim for that work. The Parties further agree that this Settlement Agreement may not be altered, amended, changed, modified, or revised except by a writing duly executed by or on behalf of Plaintiffs and Defendants.

Agreement Does Not Affect Tax Treatment of Payments. This Settlement Agreement is in no way related to income or other taxes for which Plaintiffs or their attorneys are now liable or may become liable in the future as a result of the execution of this Settlement Agreement.

Award Subject to Court Approval Pursuant to Rule 23(e). The Parties agree that this fee award is subject to Court Approval pursuant to Federal Rule of Civil Procedure 23(e). The Parties agree that no further notice is required to the class, given that the fee settlement is substantially less than the fee award noticed by the parties.

TERMS AND CONDITIONS OF AGREEMENT

1. Defendants agree to remit payment of \$9,500,000.00 for attorneys' fees and costs in full settlement of Plaintiffs' claim for costs and fees incurred up to and including September 29, 2015. Payment will be remitted within sixty days

after the Effective Date of this Settlement Agreement. The Effective Date is the date the Settlement Agreement is approved by the Court pursuant to Federal Rule of Civil Procedure 23(e). In the event payment is not made by Defendants within sixty days after the Effective Date, Defendants agree that Plaintiffs may seek enforcement by the Court and agree to bear any fees and costs incurred by Plaintiffs in enforcing the Settlement Agreement.

2. Plaintiffs and Defendants further agree to move to dismiss with prejudice Plaintiffs' Motion for Attorneys' Fees and Costs, Dkt. 827, upon approval by the Court of the fee award set forth in this Agreement.

3. Plaintiffs agree not to seek further fees or costs arising from the routine monitoring of Defendants' compliance with the Court's Permanent Injunction or Implementation Plan Order; however, Plaintiffs may seek further fees and costs regarding future litigation by Plaintiffs to enforce compliance with the Court's Permanent Injunction, Implementation Plan Order, Monitoring Order, and Settlement Agreement regarding procedures for Removal Order Class Members.

4. Plaintiffs agree to file a Notice with the Court acknowledging payment within five calendar days of Plaintiffs' receipt of full payment pursuant to this Settlement Agreement.

5. The Parties agree that no later than five calendar days after the Effective Date of this Agreement, Plaintiffs will provide counsel for Defendants with accurate bank account and transfer information to allow Defendants to make payment to Plaintiffs. The Parties further agree that payment shall be transmitted by electronic monetary transfer. The American Civil Liberties Union of Southern California warrants on behalf of Plaintiffs that it is authorized to accept payment for or on behalf of Plaintiffs and will distribute fees among Plaintiffs to the extent agreed by and between them.

6. Defendants acknowledge that Plaintiffs are receiving partial payment of the amount described herein in order to facilitate the orderly execution of this agreement. In the event that any advance payment by Defendants to Plaintiffs exceeds the amount of fees ordered by the Court, Plaintiffs agree to remit the difference in amount back to Defendants.

7. Plaintiffs represent and warrant that, to the best of their knowledge, the named Plaintiffs do not have any outstanding debts, whether tax debts or otherwise, with the United States of America.

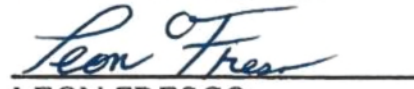
Dated: September 30, 2015

By:


MICHAEL H. STEINBERG
steinbergm@sullcrom.com
Counsel for Plaintiffs

Dated: September 30, 2015

By:


LEON FRESCO
Leon.fresco@usdoj.gov
Counsel for Defendants

AHILAN T. ARULANANTHAM (SBN 237841)
aarulanantham@aclusocal.org
CARMEN IGUINA (SBN 277369)
ciguina@aclusocal.org
ACLU FOUNDATION OF SOUTHERN CALIFORNIA
1313 West 8th Street
Los Angeles, California 90017
Telephone: (213) 977-5211
Facsimile: (213) 417-2211

MICHAEL H. STEINBERG (SBN 134179)
steinbergm@sullcrom.com
SULLIVAN & CROMWELL LLP
1888 Century Park East, Suite 2100
Los Angeles, California 90067-1725
Telephone: (310) 712-6600
Facsimile: (310) 712-8800

Attorneys for Plaintiffs-Petitioners
(Additional Counsel for Plaintiffs on Following Page)

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOSE ANTONIO FRANCO-
GONZALEZ, et al.,

Plaintiffs & Petitioners,

v.

ERIC H. HOLDER, Jr., Attorney
General, et al.,

Defendants & Respondents.

Case No. 10-CV-02211 DMG (DTBx)

**DECLARATION OF MICHAEL H.
STEINBERG IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES**

The Honorable Dolly M. Gee

Hearing Date: October 30, 2015

Hearing Time: 10:00 a.m.

Court Room: 7

1 JUDY LONDON (SBN 149431)
jldon@publiccounsel.org
2 TALIA INLENDER (SBN 253796)
tinlender@publiccounsel.org
3 PUBLIC COUNSEL
610 South Ardmore Avenue
4 Los Angeles, California 90005
Telephone: (213) 385 2977
5 Facsimile: (213) 385-9089

6 JUDY RABINOVITZ (pro hac vice)
jRabinovitz@aclu.org
7 ACLU IMMIGRANTS' RIGHTS PROJECT
125 Broad Street, 18th Floor
8 New York, New York 10004-2400
Telephone: (212) 549-2618
9 Facsimile: (212) 549-2654

10 DAVID LOY (SBN 229235)
davidloy@aclusandiego.org
11 ACLU OF SAN DIEGO & IMPERIAL COUNTIES
Post Office Box 87131
12 San Diego, California 92138
Telephone: (619) 232-2121
13 Facsimile: (619) 232-0036

14 JAMES PREIS (SBN 82690)
jpreis@mhas-la.org
15 MENTAL HEALTH ADVOCACY SERVICES
3255 Wilshire Boulevard, Suite 902
16 Los Angeles, California 90010
Telephone: (213) 389-2077
17 Facsimile: (213) 389-2595

18 MATT ADAMS (SBN 28287)
matt@nwirp.org
19 NORTHWEST IMMIGRANT RIGHTS PROJECT
615 2nd Avenue, Suite 400
20 Seattle, Washington 98104-2244
Telephone: (206) 957-8611
21 Facsimile: (206) 587-4025

22 JAMES LYALL (SBN 330045)
jlyall@acluaz.org
23 ACLU FOUNDATION OF ARIZONA
3707 N. 7th Street, Suite 235
24 Phoenix, Arizona 85014
Telephone: (602) 773-6001
25 Facsimile: (602) 650-1376

26 *Attorneys for Plaintiffs-Petitioner*
27
28

DECLARATION OF MICHAEL H. STEINBERG

I, Michael H. Steinberg, declare as follows.

1. I am a member of the Bar of the State of California, admitted to practice before this Court, and a partner of Sullivan & Cromwell LLP. I am co-lead counsel for Plaintiffs in this action. I submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees ("Motion"). I have personal knowledge of the facts set forth herein, and, if called to testify, could and would testify competently thereto.

2. I am enormously proud of the work that we have accomplished in these five-plus years of litigation. At the commencement of my involvement, I did not believe that the Government would spend the resources it did trying to defeat the fundamental aim of this litigation — providing legal assistance to detainees with serious mental illnesses stuck in immigration proceedings who were being forced to represent themselves. Nevertheless, my co-counsel and my firm lived up to our obligation to zealously prosecute the interests of what became the *Franco* Classes.

3. Through this Motion, Plaintiffs are seeking an award of fees and costs, including those of Sullivan & Cromwell LLP, for the successful results achieved in this contentious, but ultimately successful, *pro bono* litigation. While Plaintiffs seek fees for the work that Sullivan & Cromwell LLP has performed, we have committed to donate to our co-counsel all of the fees that we obtain in this action. Sullivan & Cromwell LLP intends to keep only reimbursement of certain (discounted) out of pocket costs.¹ From the beginning, it has been Sullivan & Cromwell LLP's intention to donate all fees to the public interest organizations serving as our co-counsel in this case, to ensure that these organizations are well-

¹ These fees and costs are based on the inception of the case to June 30, 2015, and Sullivan & Cromwell LLP reserves the right to supplement these numbers.

1 funded so they may continue their important work protecting the rights of
2 vulnerable populations.

3 **I. SULLIVAN & CROMWELL LLP QUALIFICATIONS**

4 4. I am serving as Co-Lead Counsel in part because of my
5 extensive experience and expertise in trial work, class action lawsuits and other
6 complex litigation.² I, along with attorneys working under my supervision at
7 Sullivan & Cromwell LLP, first appeared on behalf of Plaintiffs in July of 2010.
8 (Dkt. 17.) However, since April 2010, Sullivan & Cromwell LLP has been an
9 extremely active member of the team planning for (and then litigating) this case on
10 behalf of Plaintiffs, including taking a leading role in formulating all case strategy
11 during the five-plus years of litigation in *Franco*. Although Sullivan & Cromwell
12 LLP was not initially slated to be Co-Lead Counsel on behalf of the *Franco* class,
13 our co-counsel honored Sullivan & Cromwell LLP by elevating us to that status in
14 September of 2011. (*See* Dkt. 307.)

15 **A. My Professional Background**

16 5. I graduated from the University of California at Berkeley with
17 highest honors in 1983. I then graduated from Stanford Law School in 1986,
18 where I was also awarded honors and was a member of, and then articles editor for,
19 the Stanford Law Review. After law school, I clerked for the Honorable Thomas
20 P. Griesa of the United States District Court, Southern District of New York, from
21 1986-87. I was a summer associate at Sullivan & Cromwell in New York in 1986,
22 and have been with Sullivan & Cromwell LLP, resident in its Los Angeles office,
23 since 1990. I was elected to partner in 1994. I am admitted to practice before nine
24 United States Courts of Appeals as well as the Supreme Court of the United States.

25
26
27 ² My parents raised me to never ‘brag’ about what I have accomplished, so please
28 forgive the awkwardness of pages about what I have had the good fortune of doing
in my professional career.

1 6. My practice over the years has primarily focused on complex
2 commercial litigation, including discovery-intensive, complex class actions, and
3 trial work. A list of my published cases is attached as Exhibit A. I have been
4 litigating class actions since 1988. I personally have defended dozens of class
5 actions throughout my career. Highlights of my class action experience include:

- 6 • *In re Volcano Corp. S'holder Litig.*, No. 10485-VCP (Del. Ch.
7 2014-15) (lead counsel for Philips in four class action lawsuits
8 challenging the approximately \$1 billion tender offer for
9 Volcano Corporation made by Philips);
- 10 • *In re Polyurethane Foam Antitrust Litig.*, MDL 2196, No. 10-
11 MD-2196 (JZ) (N.D. Ohio 2014-15) (retained as lead counsel to
12 FXI Holdings, Inc. 11 weeks before trial of multiple direct
13 purchaser class cases seeking \$3 billion in damages and
14 successfully obtained partial summary judgment and a
15 favorable settlement and litigated the indirect purchase class
16 cases as well);
- 17 • *In re American Realty Capital Properties, Inc. Litig.*, 15-mc-
18 00040 (AKH) (S.D.N.Y. 2015) (lead counsel for the Cole Real
19 Estate Defendants for this consolidated litigation challenging a
20 \$4 billion loss of value caused by ARCP's restatement);
- 21 • *Coe v. Philips Oral Healthcare, Inc. et al.*, No. C13-518 (MJP)
22 (W.D. Wa. 2013-14) (as lead counsel for Philips, successfully
23 obtained order denying class certification and entry of judgment
24 in favor of Philips on individual claims potentially valued at
25 \$463 million);
- 26 • *Perkins v. Philips Oral Healthcare*, No. 12-cv-01414 (S.D. Cal.
27 2012-14) (as lead counsel, representing Philips in connection
28

- 1 with class action products liability suit challenging Philips’
2 advertising of the Airfloss Product);
- 3 • *In re Philips/Magnavox Television Litig.*, No. 09-3072 (PGS)
4 (D.N.J. 2009-12) (as lead counsel, representing successfully
5 Philips in connection with a purported consumer class action
6 asserting a defect in more than \$1.7 billion of flat-screen
7 television sets, which was settled on terms favorable to Philips);
 - 8 • *In re Bisphenol A (BPA) Polycarbonate*, MDL 1967, No. 08-
9 1967-MD-W-ODS (W.D. Mo. 2008-11)(including 20 separate
10 class actions) (as lead counsel for Avent, successfully limited
11 and then resolved \$1 billion consumer class-action fraud claim;
12 served as Liason Counsel at the request of co-Defendants);
 - 13 • *Ganjei v. Ralphs et al.*, No. BC367732 (Cal. Super. Ct. 2007-
14 08) (as lead counsel for Avent, defeated class action
15 challenging whether Philips included phthalates in its baby and
16 toddler products);
 - 17 • *Guttman v. McGinnis*, No. 3450-VCL (Del. Ch. 2008)
18 (defeated class action challenging Royal Philips, N.V.’s \$5
19 billion acquisition of Resperionics);
 - 20 • *Union Bank of Switz. et al. v. Argenal*, No. 97-56325 (9th Cir.
21 1997) (defended class action claim that UBS laundered \$500
22 million in funds supposedly obtained from the former president
23 of the Philippines);
 - 24 • *Slomovics v. Gallogly*, No. C-94-2262-CAL (N.D. Cal. 1995-
25 96) (securities fraud class action in connection with offering of
26 Resound Corporation);
 - 27 • *Young’s Market Going Private Litigation*, (Cal. Super. Ct.)
28 (1990-1) (represented Goldman Sachs & Co. in class action

litigation concerning the going private transaction involving Young's Market);

- *Karatz v. Fine, et al.*, No. 92-CV-2172-WJR (C.D. Cal. 1992-94) (class action and consolidated trustee's action for fraud and breach of fiduciary duty, where as Defendants, defeated motion for class certification);
- *Cal. State Electrics Assoc. v. Matsushita*, No. BC048196 (Cal. Super. Ct. 1992-94) (class action seeking reimbursement for warranty repairs from all major electronics manufacturers);
- *Lewis v. Hamilton Oil Corp.*, No. 91 Civ. 2328 (LMM) (U.S.D.C., S.D.N.Y 1991) (class action challenge to the \$4.3 billion acquisition of Hamilton Oil Corporation by Broken Hill Proprietary Company);
- *Shields v. IMA Holdings Corp.*, No. BC024539 (Cal. Super. Ct. 1991) (class action for fraud and breaches of fiduciary duty in connection with sale of company).

7. Part of the value that I bring to this case is my understanding of the trial process and willingness and ability to try all of my cases if necessary and to prepare each case as if it will be tried, including this one. My practice in complex litigation over the years, including my extensive trial practice, has given me a significant amount of expertise strategizing in high stakes litigation, which was critical at various stages of this litigation. I have tried over 20 cases. Even during the pendency of this highly contested lawsuit, I participated in four extremely complex commercial matters (aside from the actions mentioned above), including:

- *Energy Transfer Partners LP v. Enter. Prods. Partners LP*, No. DC1112677 (Tex. Dist. 2011-15) (as lead counsel, obtained unanimous jury verdict after a five week trial in Texas state

1 court where plaintiffs sought in excess of \$1 billion, and where
2 plaintiffs succeeded in obtaining a judgment against a co-
3 defendant in excess of \$500 million);

- 4 • *Brinckerhoff v. Enbridge Energy Co., Inc.*, C.A. No. 5526-VCN
5 (Del. 2013) (as lead counsel, successfully defeated derivative
6 and class action lawsuit seeking approximately \$300 million or
7 to unwind the restructuring of the Alberta Clipper pipeline;
8 representation included two arguments before the Delaware
9 Supreme Court, with the favorable motion on that decision
10 published at 67 A.3d 369, 373 (Del. 2013));
- 11 • *ABN AMRO v. MBIA*, 962 N.Y.S.2d 854 (N.Y. Sup. Ct. 2013)
12 (counsel for leading financial institutions challenging MBIA's
13 2009 multi-billion restructuring, including a five-week
14 evidentiary hearing in New York State Supreme Court); and
- 15 • *NXP Semiconductors USA, Inc. v. Exatel Visual Sys., LTD*, No.
16 10-cv-01808-RJL (D.C. 2010-11) (as lead counsel, successfully
17 defeated, in whole, an \$80 million damage claim against NXP
18 Semiconductors mid-way through the hearing of an in ICDR
19 Arbitration and related federal court proceedings).

20 8. For my work, I have been recognized by my peers and by
21 various courts. I am a Fellow and a contributing member of the Complex
22 Litigation Committee of the American College of Trial Lawyers, one of the
23 premier legal professional associations in America. Fellowship in the College is
24 extended by invitation only after careful investigation by peers to ensure each
25 candidate "demonstrates the highest degree of professionalism, ethics, and
26 civility." *See* President's Message, <http://www.actl.com>. To be invited, a Fellow
27 must be active in trial practice for more than 15 years and be recognized by the
28 judges they practice before and the opponents they face as being among the very

1 best trial lawyers in the state. *Id.* The College is dedicated to maintaining and
2 improving the standards of trial practice, the administration of justice, and the
3 ethics of the profession. *Id.* I am one of only about 90 attorneys listed in the
4 fellowship directory for Los Angeles, many of whom are retired. *See* Attorneys
5 Directory, [http://www.actl.com/Source/Members/actl_Search.cfm?section](http://www.actl.com/Source/Members/actl_Search.cfm?section=Attorney_Directory)
6 [=Attorney_Directory](http://www.actl.com/Source/Members/actl_Search.cfm?section=Attorney_Directory).

7 9. I am also a Fellow in the Litigation Counsel of America
8 (“LCA”), another invitation-only trial honorary society. There are only 3,500
9 fellows peer-selected, accounting for less than one-half of one percent of American
10 lawyers. *See* LCA Proven Trial Lawyers, Overview,
11 <http://www.litcounsel.org/about/>. Fellows are selected after a rigorous evaluation
12 process for “effectiveness and accomplishment in litigation and trial work,” as well
13 as an upstanding “ethical reputation.” *Id.* The selection process includes Fellow
14 review, research, nominations, attorney feedback, evaluation of client selection of
15 counsel, input from active and retired judges, and reviews of acknowledgement
16 and recognition by other peer reviewing sources and associations. *Id.* There are
17 approximately 94 fellows listed in the LCA directory for the Los Angeles Area.
18 *See* LCA Fellows Directory, <http://www.litcounsel.org/directory/>.

19 10. Over the years, I have been consistently recognized in different
20 areas of litigation, including by Chambers USA (2012-2015), Best Lawyers in
21 America (2007-2015), Los Angeles’ Best Lawyers (2012), Super Lawyers
22 Corporate Counsel Edition (2008-2011), Southern California Super Lawyers
23 (2009-2015), The Legal 500 United States (2014) and by BTI Consulting Group as
24 a BTI Client Service All-Star (2013). I have received the following awards for my
25 work in this matter: the American Lawyer Global Awards for Global Pro Bono
26 Dispute of the Year (2014), the National Legal Aid and Defender Association’s
27 Beacon of Justice Award (2014), and the American Immigrants Lawyers
28

1 Association's Jack Wasserman Memorial Award for Excellence in Litigation
2 (2014), among others.

3 11. My specialized experience and knowledge of complex class
4 actions, discovery practice, trial preparation, and litigation strategy were important
5 for the successful litigation of this matter. My experience defending class actions
6 was integral to our Plaintiffs' success in framing the classes in this case, obtaining
7 class certification, and then defending this Court's class certification ruling against
8 numerous challenges from the Government. In addition, this case required
9 strategic thinking at every stage. Throughout this case, I have been instrumental in
10 formulating case strategy and interacting with co-counsel, opposing counsel and
11 the Court. I prepared for and went to numerous hearings and conferences, taking
12 time away from my separate caseload. I also took a leading role in Plaintiffs'
13 written correspondence, motions and negotiations.

14 12. My work on this case continued at all times throughout the last
15 five-plus years. I have spent more than 1,243 hours on this matter. Like any other
16 matter, I have dedicated myself to the success of my clients, and strived to be
17 available at all times, even when I was traveling for other matters or on vacation
18 with my family (including participating in arguments before Judge Bristow during
19 several planned family vacations).

20 13. My expertise was necessary to ensure the success of this
21 litigation. Based on my own experience representing both paying and *pro bono*
22 clients, I am confident that an attorney with my extensive knowledge,
23 qualifications and experience, as described herein, in this geographic area would
24 not have handled a case of this extraordinary complexity and importance for less
25 than the rate I am including in this motion, and certainly not at the current statutory
26 rate under the Equal Access to Justice Act ("EAJA"), which is \$189.68 for FY
27 2015.
28

B. Qualifications of Sullivan & Cromwell LLP's Associates

14. In addition to making the decision to take on this case, I also recruited a team of associates to work with me. Over the life span of this litigation, a total of eight Sullivan & Cromwell LLP associates—under my sole supervision, and usually only two to three participating actively at any given time—have worked on this matter in addition to the rest of their active caseloads. Outside of the work completed for the *Franco* litigation, all of our associates have complex commercial litigation experience in federal and state court, and serve a diverse range of clients. I provide below a brief summary of each of their qualifications:

15. ***Damion D. D. Robinson*** received his J.D. from UCLA School of Law in 2007, where he earned Order of the Coif recognition. Mr. Robinson went on to clerk for the Honorable David O. Carter from 2007 to 2008, before joining the Sullivan & Cromwell LLP team. He worked on the *Franco* litigation from April 27, 2010 to January 13, 2012, during which he won the Pro Bono Attorney of the Month from Kids in Need of Defense (KIND). Mr. Robinson dedicated a total of 322.25 hours to the *Franco* litigation, and Sullivan & Cromwell LLP is only including 269.5 hours in the fee motion: 112.0 in Period 2, 39.5 in Period 3, 95.25 in Period 4, and 22.75 in Period 5. This is a 16.36% discount, reflecting the billing judgments described herein. Although we are only seeking \$865/hour here, Sullivan & Cromwell LLP regularly achieves rates higher than that when billing work of associates of Mr. Robinson's class to other clients.

16. ***Shawn J. Lichaa*** received his J.D. from the University of California, Berkeley, School of Law in 2007, graduating near the top of his class and earning not only the Jurisprudence American Awards, which requires a top score in four classes, but also the Prosser Award, which recognizes the second highest score in one class. While at Law School, Mr. Lichaa earned recognition for the most outstanding oral argument in his Written & Oral Advocacy class. Mr. Lichaa worked on the *Franco* litigation since its inception, until January of 2013,

1 when he left Sullivan & Cromwell LLP to work for Fenwick and West. He is now
2 legal counsel at Gilead Sciences. Mr. Lichaa dedicated 1705.75 hours to this
3 litigation from May 17, 2010 to January 4, 2013, but Sullivan & Cromwell LLP is
4 only requesting reimbursement for 1638.5 in the fee motion: 477.0 in Period 2,
5 431.75 in Period 3, 448.75 in Period 4, and 281.0 in Period 5. This is
6 approximately a 4% discount, reflecting the billing judgments described herein.
7 Although we are only seeking \$865/hour here, Sullivan & Cromwell LLP regularly
8 achieves rates higher than that when billing work of associates of Mr. Lichaa's
9 class to other clients.

10 17. **Asel M. Aliyasova** received her J.D. from Yale School of Law
11 in 2008 and a Master's Degree from Boston College in 2005. While at Yale, Ms.
12 Aliyasova worked as a Research Assistant for Professor Ian Ayres and was the
13 editor-in-chief of the Yale Journal on Regulation. Ms. Aliyasova worked on the
14 *Franco* litigation since its inception, until late June of 2014. In June of 2014, she
15 left Sullivan & Cromwell LLP to become senior counsel with the global litigation
16 group at GlaxoSmithKline. She is also fluent in Russian, Turkish, and Kyrgyz,
17 which was an added benefit because of her ability to communicate directly with
18 some of our class members who spoke Russian. For example, Ms. Aliyasova was
19 involved in virtually all communication for Plaintiffs with the Zhalezny family,
20 and played a critical role in preparing Piotr Zhalezny for a deposition, because she
21 was able to bring to bear her knowledge and experience of deposition practice in
22 Russian, without our having to hire an interpreter. Ms. Aliyasova's total dedicated
23 hours are 1114, but Sullivan & Cromwell LLP is only including 1024.5 hours in
24 the fee motion: 202.75 in Period 2, 269.25 in Period 3, 58.5 in Period 4, 240.5 in
25 Period 5, and 261.75 in Period 6. This is a 7.29% discount, reflecting the billing
26 judgments described herein. Although we are only seeking \$850/hour here,
27 Sullivan & Cromwell LLP regularly achieves rates higher than that when billing
28 work of associates of Ms. Aliyasova's class to other clients.

1 18. **Theresa A. Buckley** received her J.D. from the University of
2 California, Berkeley, School of Law in 2008, after serving on the California Law
3 Review as the Executive Editor and winning the Jurisprudence Award in Family
4 Law. Ms. Buckley worked on the *Franco* litigation since its inception, until
5 January of 2012, when she left Sullivan & Cromwell LLP to become an associate
6 at Crowell & Moring LLP. She is now Associate General Counsel for Litigation
7 and Risk Management at SunEdison. Ms. Buckley dedicated 584.75 hours from
8 May 26, 2010 to January 20, 2012. Sullivan & Cromwell LLP is only seeking
9 502.0 hours for Ms. Buckley: 232.5 in Period 2, 68.5 in Period 3, 183.25 in Period
10 4, and 17.75 in Period 5. This is a 14.15% discount, reflecting the billing
11 judgments described herein. Although we are only seeking \$850/hour here,
12 Sullivan & Cromwell LLP regularly achieves rates higher than that when billing
13 work of associates of Ms. Buckley's class to other clients.

14 19. **Alexa M. Lawson-Remer** received her J.D. from the University
15 of California Gould School of Law in 2007. Ms. Lawson-Remer has gained
16 extensive experience in complex litigation since she joined Sullivan & Cromwell
17 LLP in 2007. In addition, she has an active pro bono practice. Outside of the
18 *Franco* litigation, Ms. Lawson-Remer has also assisted in securing asylum for a
19 Guatemalan refugee, who fled to the United States at the age of 17 to escape
20 physical torture and sexual abuse. Ms. Lawson-Remer began working on this
21 matter on May 21, 2010. Her total hours dedicated to this litigation are 1041.75.
22 Sullivan & Cromwell LLP is only including 504.5 of Ms. Lawson-Remer's hours
23 in the fee motion: 165.75 in Period 2, 45.5 in Period 3, 69.5 in Period 4, 192.75 in
24 Period 5, and 31.0 in Period 6. This is a 51.57% discount, reflecting the billing
25 judgments described herein, and the decision not to bill certain time related to
26 monitoring. Although we are only seeking \$800/hour here, Sullivan & Cromwell
27 LLP regularly achieves rates higher than that when billing work of associates of
28 Ms. Lawson-Remer's class to other clients.

20. **Antonia E. Stamenova-Dancheva** received her J.D. from UCLA School of Law in 2009. While at law school, Ms. Stamenova-Dancheva was the Co-Editor In Chief of UCLA's Journal of International Law and Foreign Affairs. Ms. Stamenova-Dancheva was born in Sofia, Bulgaria and is fluent in English and Bulgarian. Ms. Stamenova-Dancheva began working on this litigation shortly after its inception on May 11, 2010, and has remained working on it throughout most of the five years in which it has been active. Her total dedicated hours are 1567.5, but Sullivan & Cromwell LLP is only requesting 1413.75 number of hours in the fee motion: 200.75 in Period 2, 48.25 in Period 3, 137.5 in Period 4, 371.75 in Period 5, 652.5 in Period 6, and 3.0 in Period 7. This is a 9.8% discount, reflecting the billing judgments described herein. Although we are only seeking \$800/hour here, Sullivan & Cromwell LLP regularly achieves rates higher than that when billing work of associates of Ms. Stamenova-Dancheva's class to other clients.

21. **Michael P. Murtagh** received his J.D. from UC Hastings College of Law in 2010, graduating *summa cum laude*, Valedictorian and earning Order of the Coif. While at Hastings, Mr. Murtagh served on the Hastings Law Journal, first as a member and then as a Managing Notes Editor. He also earned Best Brief in Moot Court class and was an active member of a Moot Court team, a Moot Court coach and a member of the Moot Court Board. He received the Witkin and CALI orders (top student in class) for 12 classes at Hastings and also graduated first in his class while earning a Comparative Constitutional Law L.L.M in 2007. Mr. Murtagh has published his L.L.M. thesis, Law Journal note and, while working at Sullivan & Cromwell LLP, a law review article on class actions³ and an article regarding fraud claims in New York. He began his career with

³ Michael P. Murtagh, *The Rule 23(b)(3) Superiority Requirement and Transnational Class Actions: Excluding Foreign Class Members in Favor of European Remedies*, 34 Hastings Int'l & Comp. L. Rev. 1 (2011).

1 Sullivan & Cromwell LLP in 2010, and then went on to clerk for the same Judge
2 that I clerked for (The Honorable Thomas P. Griesa of the United States District
3 Court in the Southern District of New York) from 2011-2012, before returning to
4 Sullivan & Cromwell LLP in 2012. Mr. Murtagh is admitted to practice law in
5 both California and New York. Mr. Murtagh joined the *Franco* litigation team on
6 July 31, 2012, shortly after his return to the firm, and has been a consistent
7 member of the team ever since. He has dedicated 1269.5 hours to this matter.
8 Sullivan & Cromwell LLP has only included 1153.75 of his hours in the fee
9 motion: 688.0 in Period 5, 298.5 in Period 6, and 167.25 in Period 7. This is a
10 9.11% discount, reflecting the billing judgment described herein. Although we are
11 only seeking \$750/hour here, Sullivan & Cromwell LLP regularly achieves rates
12 higher than that when billing work of associates of Mr. Murtagh's class to other
13 clients.

14 22. **Lauren M. Cruz** received her J.D. from New York University
15 School of Law in 2014, while serving as the Senior Articles Editor of the *Journal*
16 *of Law and Liberty* and a Staff Editor of the *Environmental Law Journal*. Ms.
17 Cruz joined the *Franco* team shortly after joining the firm in 2014, and has been a
18 consistent member of the team ever since. She has dedicated a total of 522.25
19 hours to this case, but the number of hours included in the fee motion for Ms. Cruz
20 is 248.75: 61.0 in Period 6 and 187.75 in Period 7. This is a 52.36% discount,
21 reflecting the billing judgment described herein, and an exclusion of all of her
22 work relating to this motion. Ms. Cruz also dedicated 89.25 hours to this case as a
23 summer associate in Period 6, but we are not seeking compensation for those
24 hours. Although we are only seeking \$370/hour here, Sullivan & Cromwell LLP
25 regularly achieves rates higher than that when billing work of associates of Ms.
26 Cruz's class to other clients.

27 //

28

II. SULLIVAN & CROMWELL LLP'S BILLING PHILOSOPHY

23. I, along with the team of Sullivan & Cromwell LLP associates, have dedicated over 9,000 hours to litigating this case. Including time spent by non-lawyer staff members and summer associates, Sullivan & Cromwell LLP has identified a total of 11,910.0 total hours on work related to this case.

24. Sullivan & Cromwell's traditional billing philosophy is based on the value of the professional advice and services we provide, and not the hours spent on any particular matter. The objective is to set a fee that is fair and reasonable, competitive and satisfactory to the client. We believe that value is determined by balancing several factors, including, but not limited to, (a) the contribution made, responsibility assumed, amount involved and results achieved; (b) the novelty, complexity and difficulty of the questions presented and the skills required; (c) any extraordinary efforts required to meet time constraints or other requirements imposed by the client or the circumstances; and (d) the time and labor required and the experience of those performing the services. *See also* ABA MODEL RULES OF PROF'L CONDUCT R. 1.5 and CAL. R. OF PROF. CONDUCT 4-200.

A. Sullivan & Cromwell LLP's Billing on this Matter

25. We are able to achieve the rates we do from our clients, owing to their view (with a vast array of choices and competitive information available to them) that we are worth what we charge them. Nonetheless, I am requesting fees for my time below the rates paid by any of my corporate or individual clients this year, even those for whom I give a discount due to our longstanding relationship. In addition, as I explain further below, the rates I seek here are below those approved by courts as reasonable for me (or other litigation partners of Sullivan & Cromwell LLP).

26. Similarly, the rates set forth below for the associates who worked on this case are below those set by courts in analogous situations involving associates from our firm.

27. Through this Motion, we are seeking attorneys' fees at the following rates for fees awarded pursuant to the Rehabilitation Act:⁴

- Michael H. Steinberg \$1,040.00;
- Damion D.D. Robinson \$865;
- Shawn J. Lichaa \$865;
- Asel M. Aliyasova \$850;
- Theresa A. Buckley \$850;
- Alexa M. Lawson-Remer \$800;
- Antonia E. Stamenova-Dancheva \$800;
- Michael P. Murtagh \$750; and
- Lauren M. Cruz \$370.

28. We also identify the following rates for our support staff for fees awarded pursuant to the Rehabilitation Act: summer associates (see note below) at \$220; e-discovery, litigation support specialists, and librarians at \$290; and project assistants and legal assistants at \$255. (As I note below, we are *not* seeking payment for any of the work performed by our summer associates. We identify a rate solely to show the value of the hours we have waived.)

29. For fees awarded pursuant to the EAJA, we are seeking to recover the following historic market rates for the work I personally did over the course of this litigation, all of which are below the rates I billed my commercial clients for my time during the respective years listed below:

- 2010 - \$890/hour
- 2011 - \$950/hour
- 2012 - \$1,000/hour
- 2013 - \$1,010/hour

⁴ The rates for Sullivan & Cromwell LLP associates were chosen based upon the lowest of the most recent rates approved by courts for Sullivan & Cromwell LLP attorneys.

- 2014 - \$1,020/hour
- 2015 - \$1,040/hour

30. For Sullivan & Cromwell LLP associates and support staff, we are seeking the EAJA statutory maximum rates for fees awarded pursuant to EAJA.

31. The methodology for allocating the hours worked on this case between the Rehabilitation Act and the EAJA is explained in Sub-Exhibit E to the Declaration of Ahilan Arulanantham in Support of Plaintiffs' Motion for Attorneys' Fees. I utilized that methodology to allocate the hours Sullivan & Cromwell LLP spent in this case between the two statutes and to calculate our lodestar. Our lodestar for this matter, comprised of 9,410 total hours at the rates described above, is \$6,131,803.23.

B. Daily Time Entries and Time Charged

32. Attached as Exhibit B is a detailed and itemized accounting of the time for which Sullivan & Cromwell LLP is seeking fees. The time entries in Exhibit B are records maintained by Sullivan & Cromwell LLP beginning in April 2010 through June 30, 2015. These time entries are generated from data input based upon each individual attorney's or non-attorney's timesheet maintained by the attorney or non-attorney in question contemporaneously, or nearly contemporaneously, with the performance of the activity indicated. The time entries are organized by day and task, and divided among the fee periods. I have personally reviewed these time entries and found them sufficient to determine what tasks are being performed and the amount of time spent on the tasks, particularly given my direct involvement in the matter.

33. For my own entries, I take deep personal pride in being available and responsive to my clients at all times of the day. Because of the amount of contact, I keep a running total of my daily tasks in an open email in which I identify the times dedicated to each client. At the end of each day, I

1 identify all of the major tasks in that email, which I then provide to my assistant to
2 input.

3 34. I have reviewed the time records of the timekeepers involved
4 (including my own) in assessing the Sullivan & Cromwell LLP lodestar. In the
5 exercise of billing judgment, Sullivan & Cromwell LLP is only seeking
6 compensation for 9410 hours—a reduction of 20.99% of the hours recorded.
7 Sullivan & Cromwell LLP is not seeking fees in whole for certain projects, and has
8 discounted or reduced the hours of many other projects and timekeepers. As an
9 example, although multiple Sullivan & Cromwell LLP team members typically
10 joined a weekly call with our co-counsel to discuss strategy and developments, we
11 are only seeking recovery for the most senior lawyer involved in those calls.
12 Therefore, we are only seeking fees for one Sullivan & Cromwell LLP attorney, no
13 matter how many participated in each call. Although these group calls enabled our
14 team to operate more efficiently and to achieve solutions to litigation issues we
15 faced, we are not seeking all of the hours associated with them.

16 35. Similarly, where one or more of Sullivan & Cromwell LLP
17 lawyer attended hearings with the Court or Special Master, we are generally only
18 seeking fees for the time of the most senior of those lawyers. We have also
19 subtracted all time relating to press announcements and publicity, even though we
20 understand that they are compensable.

21 36. Although Sullivan & Cromwell LLP summer associates billed
22 over 870 hours to this matter over the last several years, we are not requesting
23 payment for any of their time. We have chosen not to submit their time even
24 though their work undoubtedly contributed to our success in this litigation and
25 saved attorney hours, and even though it is compensable under governing law.

26 37. Additionally, given the high demands that this case put on
27 Sullivan & Cromwell LLP associates over the course of several years, even in the
28 face of an otherwise full caseload, I felt the need to always have associates

1 apprised of the relevant issues so that they could contribute to projects as needed.
2 As a result, I have excluded certain additional associate hours as an exercise of
3 billing judgment.

4 38. Finally, we have reduced the hours we are seeking since the
5 Court's Permanent Injunction (Dkt. 593), including excluding substantial attorney
6 hours from several timekeepers and all but one support staff member, even though
7 Plaintiffs have successfully litigated numerous complex and contested issues over
8 the last two years, including most recently the numerous filings and conferences
9 culminating in the Court entering, over the Government's objections, its Order
10 Appointing Monitor (Dkt. 810) ("Monitoring Order"). We also are not seeking
11 compensation for Lauren Cruz's time spent preparing the fee motion, totaling over
12 230 hours, although her efforts benefitted the entire litigation team and we believe
13 we are entitled to recover our attorneys' fees for such work.

14 C. Expenses

15 39. In addition, Sullivan & Cromwell LLP charges its paying
16 clients for disbursements we incur in connection with other engagements, such as
17 disbursements to third parties, travel costs and significant copying jobs. The firm
18 does not charge its clients for Lexis, Westlaw, or the use of other standard
19 databases, ordinary word processing, or incidental phone calls, postage, document
20 retrieval and faxes. However, these costs are incurred and treated as overhead, to
21 be included in the hourly rates. Sullivan & Cromwell LLP frequently incurred
22 costly disbursements on behalf of the Class, including transcripts of depositions
23 and hearings. Sullivan & Cromwell LLP had a total of \$101,488.70 in costs for
24 this matter.⁵

25
26
27 ⁵ Attached as Exhibit C is a detailed and itemized accounting of the
28 disbursements for which Sullivan & Cromwell LLP is seeking reimbursement.

40. Of the over one hundred thousand dollars in costs that Sullivan & Cromwell LLP spent on this litigation since its inception, Sullivan & Cromwell LLP is only seeking reimbursement for \$53,740.41. This number includes Courier and Public Messenger fees of \$6,331.77, local transportation expenses of \$3,125.49, out-of-town meals totaling \$686.19, attorney travel expenses totaling \$8,584.39, outside professional services at \$2,550.00, and conference or videoconference costs of \$1,930.15. The local transportation expenses include items such as parking for court hearings, and traveling expense from the airport to Sullivan & Cromwell LLP offices. The out-of-town travel expenses have been significantly reduced. For example, on June 21, 2011, I travelled to the District of Columbia to take a 30(b)(6) deposition. My hotel expenses were \$486.63 and my round-trip flight totaled \$2,349.10, but those amounts were not for “coach” travel and I selected a hotel close to my D.C. office where the deposition was set to take place, rather than looking for a less expensive hotel farther away. To account for this more broadly, I have applied a 33% cut to all out-of-town travel and meal expenses for all lawyers.

41. Sullivan & Cromwell LLP is also seeking reimbursement for other costs, including filing fees for \$1,638.15, deposition transcripts used to draft briefing and other case documents for \$21,668.61, hearing transcripts for \$5,155.86, other transcripts necessary to the case for \$1,040.25, and outside reproduction expenses totaling \$1,029.56.

III. SULLIVAN & CROMWELL LLP AND MICHAEL STEINBERG’S HISTORY OF RATES ACHIEVED

42. Courts have approved the hourly rates of attorneys working for Sullivan & Cromwell LLP on several occasions in the past. Sullivan & Cromwell LLP does not have different “prices” or rates for different locations in the United States; in the markets in which we participate, the work is judged among a national market of lawyers familiar with highly complex litigation. For example, in 2014

1 and 2015, my cases have principally been litigated in locations outside of
2 California, including (i) New York City; (ii) Dallas, Texas; (iii) Seattle,
3 Washington; (iv) Toledo, Ohio; and (v) Winnebago County, Illinois.

4 43. Sullivan & Cromwell LLP's rates are rarely litigated.
5 However, I have attached the only three comprehensive analyses of Sullivan &
6 Cromwell LLP's billing and rate structures for partners and associates that I am
7 aware of. Two of these decisions (*Kodak* and *EFH*) are from complex matters in
8 bankruptcy court where a variety of Sullivan & Cromwell LLP lawyers, including
9 litigation partners and associates, represented the debtor in connection with
10 complex commercial disputes, and one is from the *McCourt* litigation, where a Los
11 Angeles-based team of Sullivan & Cromwell LLP lawyers represented Frank
12 McCourt in an action to set aside a marital property settlement agreement on the
13 basis of fraud concerning the value of the Los Angeles Dodgers.

14 44. Attached hereto as Exhibit D is a copy of the Court's decision
15 in *Energy Future Holdings Corp.*, No. 14-10979, slip op. at 3 (CSS) (Bankr.
16 D.Del. January 12, 2015), and the accompanying Application For An Order
17 Authorizing the Retention and Employment of Sullivan & Cromwell LLP as
18 Counsel. In this recent decision, the bankruptcy court in the District of
19 Delaware—upon an extensive record—upholds hourly rates of Sullivan &
20 Cromwell LLP partners of my seniority to be \$1,295, associate rates between
21 \$460-\$865, and legal assistants between \$225-\$355, as well as other timekeepers
22 such as electronic discovery personnel at rates between \$315-\$355, Project
23 Assistants between \$225-\$335, and Research Librarians between \$225-\$355. The
24 fees represented a discount from the rates used by Sullivan & Cromwell LLP when
25 preparing estimates of fees under its normal billing procedures.

26 45. Attached hereto as Exhibit E is a copy of the Court's decision
27 in *In re McCourt v. McCourt*, No. BD514309, slip op. at 28, 33 (Cal. Super. Ct.
28 June 24, 2014). In this recent decision, the Los Angeles Superior Court upheld

1 hourly rates of Sullivan & Cromwell LLP partners of my seniority to be between
2 \$1,130 and \$1,390, associate rates between \$430-\$875, legal assistants at \$255,
3 and research librarians at \$290.

4 46. Attached hereto as Exhibit F is a copy of the Court's decision in
5 *In re Eastman Kodak Co.*, No. 12-10202 (ALG), slip op. at 2-3 (Bankr. S.D.N.Y.
6 Dec. 03, 2013), and accompanying excerpts of the Summary of Fourth Interim Fee
7 Application and the Fifth and Final Interim Fee Applications of Sullivan &
8 Cromwell LLP. This order, which will be nearly two years old at the time the
9 Court hears the instant fee motion, reflects the rates charged by Sullivan &
10 Cromwell LLP lawyers and nonlawyer staff in the Kodak bankruptcy and approved
11 by the United States Bankruptcy Court for the Southern District of New York. The
12 Order upholds rates of Sullivan & Cromwell LLP partners of my seniority to be
13 between \$990 and \$1,150, associate rates between \$395-\$875, legal assistant rates
14 between \$255-\$290, and legal librarians at \$290.

15 47. Finally, the Ninth Circuit approved my own legal fees eight
16 years ago. Attached as Exhibit G is a copy of the Ninth Circuit's decision in
17 *Softbank Content Servs. Inc. v. MPO Canada Inc.*, 225 F. App'x. 687, 690 (9th
18 Cir. 2007), upholding my fee award.

19 48. Below is a chart showing the highest rates approved for
20 Sullivan & Cromwell LLP associates in the above mentioned cases, for associates
21 of comparable class years.

22 //

Associate	Class Year	Hourly Rates Sought in This Case	Comparable Energy Future Hourly Rate (2014) Associate Range \$460-865	Comparable McCourt Hourly Rate (2013) Associate Range: \$430-875	Comparable Kodak Hourly Rate (2013) Associate Range: \$395-875
Damion D.D. Robinson	2007	\$865	\$865	\$875	\$850
Shawn J. Lichaa	2007	\$865	\$865	\$875	\$850
Asel M. Aliyasova	2008	\$850	\$865	N/A	\$850
Theresa A. Buckley	2008	\$850	\$865	N/A	\$850
Alexa M. Lawson-Remer	2009	\$800	\$865	N/A	\$825
Antonia Stamenova-Dancheva	2009	\$800	\$865	N/A	\$825
Michael P. Murtagh	2010	\$750	\$855	N/A	\$800
Lauren M. Cruz	2014	\$370	\$460	\$430 ⁶	\$345 ⁷

49. The rates requested in this Motion are competitive in the market in which I work. As part of providing value to my clients, I track the rates used by other competitive firms. Below is a sample of the firms with which I regularly, and successfully, compete to both garner and maintain a vast client base.

Category	Gibson Dunn	Latham & Watkins	Skadden	Quinn Emanuel	Morrison & Foerster	Orrick Herrington & Sutcliffe
Partner High	\$1,800	\$1,110	\$1,150	\$1,075	\$1,195	\$1,095
Partner Average	\$980	\$990	\$1,035	\$915	\$865	\$845
Associate High	\$930	\$725	\$845	\$675	\$725	\$710
Associate Average	\$590	\$605	\$620	\$410	\$525	\$560

⁶ This rate was for an associate with two years of experience.

⁷ This range is for a 2013 graduate, a first year associate when the fees were requested.

1 *Billing Rates at the Nation's Priciest Law Firms*, Nat'l L.J (Online), (Jan. 5, 2015),
2 <http://www.nationallawjournal.com/id=1202713889426?keywords=billing&slretur>
3 [n=20150630205331](http://www.nationallawjournal.com/id=1202713889426?keywords=billing&slretur).

4 50. I have also reviewed publicly available materials reflecting the
5 rates of other firms with which Sullivan & Cromwell LLP regularly competes for
6 commercial clients, which are similar to the rates Sullivan & Cromwell LLP seeks
7 through this motion.

8 51. Attached hereto as Exhibit H is a true and correct copy of an
9 excerpt from the application of Kirkland & Ellis LLP for retention as debtors'
10 counsel in *In re Sbarro LLC*, No. 14-10557 (MB) (Bankr. S.D.N.Y.), showing
11 2014 hourly rates ranging from \$450 to \$835 for associates and partners from \$665
12 to \$1225.

13 52. Attached hereto as Exhibit I is a true and correct copy of an
14 excerpt from the application of Latham & Watkins LLP for retention as debtors'
15 counsel in *In re Tuscan International Holdings (U.S.A.) Ltd.*, No. 14-10193 (KB)
16 (Bankr. D. Del.), showing 2014 hourly rates ranging from \$395 to \$855 for
17 associates and \$875 to \$1275 for partners.

18 53. Attached hereto as Exhibit J is a true and correct copy of an
19 excerpt from the First Interim Fee Application of Skadden, Arps, Slate, Meagher &
20 Flom LLP, counsel for debtors in *In re Excel Maritime Carries Ltd.*, No. 13-23060
21 (RDD) (Bankr. S.D.N.Y.), showing 2013 hourly rates ranging from \$425 (class of
22 2013) to \$755 for associates and from \$795 to \$1,910 for partners.

23 **IV. SULLIVAN & CROMWELL LLP DEDICATION TO PRO BONO**

24 54. Sullivan & Cromwell LLP is dedicated to pro bono work, and
25 considers it an important commitment of every lawyer. In 2014, Sullivan &
26 Cromwell LLP devoted more than 65,000 hours to a range of pro bono activities,
27 and served untold individuals as well as legal, charitable, and government
28 organizations. *See Pro Bono*, <http://www.sullcrom.com/pro-bono>. Some of

Sullivan & Cromwell LLP's signature projects include Bet Tzedek Holocaust Reparations Project, Sanctuary for Families' U Visa Project, Transgender Legal Defense and Education Fund's name change clinic, Microsoft KIND, and the Sullivan and Cromwell Foundation.⁸ See Pro Bono, <http://www.sullcrom.com/pro-bono?view=Representations>.

55. Sullivan & Cromwell LLP takes pride in not only taking part in large-scale efforts, but upholding justice under the laws for every person, even when protecting one individual at a time. I too have a long history of dedication to pro bono work. As a member of the firm's Pro Bono Committee as well as a member of the Board of Directors and Executive Committee of Public Counsel, I dedicate myself to pro bono matters like any other professional responsibility. As an example, I represented Bruce Sons for 11 years and obtained his freedom in a case where he was convicted in 1994 of premeditated murder. It was after Mr. Sons was sentenced that we became involved in his representation. After over a decade of devotion by the Sullivan & Cromwell LLP team, and three retrials, Mr. Sons has been freed. Appellate decisions related to this representation can be found at 22 Cal. Rptr. 3d 647 (Cal. App. Dep't Super. Ct. 2004) and 78 Cal. Rptr. 3d 679 (Cal. Ct. App. 2008).

V. DEFENDANTS' LITIGATION CONDUCT DRASTICALLY INCREASED SULLIVAN & CROMWELL'S HOURS

56. Defendants' litigation conduct dramatically increased the amount of time that Sullivan & Cromwell LLP needed to expend in litigating this

⁸ "Since its inception in 2001, the Foundation has collected and disbursed more than \$2.4 million in contributions to aid those affected by the September 11 attacks on the World Trade Center and the Pentagon; organizations dedicated to rebuilding the Downtown and Battery Park areas of New York City; organizations dedicated to providing aid to the victims of the tsunami that struck Southeast Asia; and charitable organizations in Louisiana and Mississippi to aid the victims of Hurricane Katrina." See Pro Bono, <http://www.sullcrom.com/pro-bono?view=Representations>.

1 case. For example, many of Sullivan & Cromwell LLP's billable hours were
2 expended during discovery, including class certification discovery. Owing to our
3 expertise in this area, Sullivan & Cromwell LLP took the lead on many discovery
4 and class certification issues for the Plaintiff class, and Defendants' litigation
5 strategy included contesting discovery throughout the course of the case. A
6 substantial portion of this discovery was imposed by Defendants' strategic decision
7 to oppose class certification on numerosity grounds, even though Defendants had
8 possession, custody and control of information establishing the numerosity of the
9 Class. Defendants actually argued that because they did not track the number of
10 individuals with serious mental health illnesses in their custody, we could not show
11 numerosity. *See* Dkt. 126-1, Ex. 131 at 2. This delayed class certification for
12 months and led to additional time expended, including extra briefing, hearings and,
13 unfortunately, discovery motions directed toward obtaining relevant evidence.

14 57. I and other Sullivan & Cromwell LLP attorneys also expended
15 a great deal of time litigating the merits of the class certification on numerosity
16 grounds even after our discovery efforts had revealed that the class was clearly
17 numerous under governing law. To give but one example, Defendants argued that
18 the Main Class was not numerous even though there were 112 members in it on a
19 given "snapshot" day when data was gathered. (*See* Dkt. 328 at 4-15.)

20 58. After class certification, Sullivan & Cromwell LLP, on behalf
21 of Plaintiffs, filed six motions to compel from July 11, 2012 to August 1, 2013.
22 (Dkts. 405, 406, 499, 522, 632, 633.) Oftentimes, Plaintiffs would need to seek the
23 Court's intervention again even after being successful in a prior motion. For
24 example, Plaintiffs had to file three separate motions to compel in order to secure
25 the necessary Class member files to litigate this case. (Dkts. 405, 522, 633.)
26 Again, Defendants' litigation strategy caused Plaintiffs to expend significant hours
27 seeking to compel Defendants to comply with their obligations.
28

59. Plaintiffs even had to file motions regarding the timing of discovery motions: in one instance, Plaintiffs had to file an *ex parte* motion to change a discovery motion hearing date set by the Judge Bristow because Defendants' counsel refused to accommodate my family vacation. (Dkt. 429.) In another instance, Plaintiffs had to file an *ex parte* motion for more time to reply to a motion to compel because Defendants' counsel would not grant Plaintiffs an extension of time to respond to a Local Rule 37-1 joint statement that would otherwise have been due the day after the Christmas holiday, when nearly every member of the team was with their families. (Dkt. 511.)

60. Similarly, Defendants required extensive litigation regarding the appropriate form and scope of a protective order to allow for the production of confidential information in discovery. Although in many cases a stipulated protective order is easily negotiated between the parties, in this case it required multiple hearings and conferences before Judge Bristow and the Court. (Dkts. 246, 278, 281, 282, 290, 291, 292, 303, 321, 462.) The Government further insisted that each stipulated protective order cover only certain designated discovery requests, which meant that the parties had to negotiate five protective orders over the life of this case.⁹ This, also, had the consequence of making compliance with each of the

⁹ The December 3, 2010 protective order was limited to Ex. 78 in Dkt. 60-2. *See* Dkt. 84. The June 7, 2011 protective order was limited to copies of validly executed ICE Form 60-001 (Privacy Waiver Authorizing Disclosure to a Third Party). *See* Dkt. 214. The August 29, 2011 Protective Order was limited to a July 29, 2011 Joint Stipulation, consisting of A-number and mental competency evaluations of ICE detainees, plus the names of individuals identified as class or subclass members. *See* Dkt. 294. The January 24, 2012 protective order solely governed the discovery produced as a result of Plaintiffs' October 17, 2011, November 29, 2011, and December 13, 2011 requests for production, Defendants' November 20, 2011 and January 10, 2012 requests for production, as well as any further merits discovery. *See* Dkt. 367. The Revised November 2, 2012 protective order governed Plaintiffs' October 17, 2011, November 29, 2011, December 13, 2011, July 13, 2012, and July 16, 2012 requests for production, and Defendants' November 30, 2011, January 10, 2012, and August 17, 2012 requests for production, as well as any further merits discovery propounded by the parties. *See* Dkt. 507.

1 various (and different) protective orders difficult. Even after those orders were
2 entered, Defendants continued to object to discovery production on grounds that
3 were covered by the Protective Orders. Defendants repeatedly claimed, almost as
4 a mantra, that they could not provide responsive data to Plaintiffs' own counsel
5 absent privacy waivers from the detainees whom it concerns because the
6 information is covered by the Privacy Act, 5 U.S.C. § 522a. (*See e.g.*, Dkt. 499-1,
7 Arulananthum Dec. at ¶ 35). This necessitated constant renegotiation and litigation
8 of protective orders, even though each comprehensively governed the disclosure of
9 such information.

10 61. I also appeared at a telephonic discovery conference because
11 Defendants' former counsel, Victor Lawrence, engaged in what I considered
12 inappropriate behavior in a Rule 30(b)(6) deposition by, *inter alia*, failing to
13 properly prepare the witness on the deposition topics and instructing him not to
14 answer valid questions. Mr. Lawrence also continued to assert a *Touhy* protection
15 that Judge Bristow ruled was invalid based on controlling Ninth Circuit precedent
16 that Mr. Lawrence had failed to cite. (Dkt. 244, at 32-34.) Again, Defendants'
17 litigation conduct caused Plaintiffs to expend significantly more hours than would
18 otherwise have been necessary to secure basic discovery. As a sanction, Judge
19 Bristow gave us the opportunity to conduct the deposition again if we so wished.
20 (*See* Dkt. 234.) Because of the production of other materials (again, fought over
21 but ultimately provided), no further deposition became necessary.

22 62. During the period of time between April 29, 2011 and April 2,
23 2013, I personally argued at 12 separate discovery conferences in front of Judge
24 Bristow to resolve discovery disputes, including telephonic conferences during my
25 personal pre-scheduled vacations on July 18, 2011, August 30, 2012, and April 3,
26 2013. (Dkts. 243, 463, 578.) I viewed my personal appearance at these
27 conferences as necessary because Judge Bristow had previously directed that lead
28

1 counsel must be present at all hearings, referring to Victor Lawrence (U.S.
2 Department of Justice, Civil Division) and myself. (Dkt. 421-2.)¹⁰

3 63. Sullivan & Cromwell LLP also devoted substantial effort to the
4 four preliminary injunctions filed on behalf of individual Class members, including
5 the necessary factual development for those motions. Although Plaintiffs prevailed
6 on all of these motions (the last of which was rendered moot by the grant of
7 summary judgment), Defendants continued their scorched-earth resistance to this
8 Court's orders and did not change their policies to prospectively comply with the
9 holdings of this Court's preliminary injunction orders. *See Franco-Gonzalez v.*
10 *Holder*, 767 F. Supp. 2d 1034, 1061-62 (C.D. Cal. 2010); 828 F. Supp. 2d 1133,
11 1150 (C.D. Cal. 2011); 2011 WL 5966657, at *7, n.3 (C.D. Cal. Aug. 2, 2011)
12 ("As Andre Gide, the French author, once observed, 'Everything has been said
13 already; but no one listens, we must always begin again.'"); 2013 WL 3674492, at
14 *20 (C.D. Ca. April 23, 2013). *See* Dkts. 107, 204, 285, 592.

15 **VI. FRANCO LITIGATION SUCCESS**

16 64. On April 23, 2013, this Court entered summary judgment on
17 Counts Four and Eight, and granted permanent injunctive relief on behalf of Sub-
18 Class One and Sub-Class Two Members, ordering Defendants to provide Qualified
19 Representatives as a reasonable accommodation and a bond hearing after 180 days
20 in detention. (Dkts. 592, 593; *Franco-Gonzalez v. Holder*, 2013 WL 8115423, at
21 *1 (C.D. Cal. Apr. 23, 2013); *Franco-Gonzalez*, 2013 WL 3674492, at *20.) Since
22 then, Sullivan & Cromwell LLP has remained actively involved in litigating the
23 remaining issues, including taking the lead on monitoring issues, and negotiating

24
25 ¹⁰ The Court: "And the reason I only wanted you two gentlemen [Messrs.
26 Steinberg and Lawrence] on the call was, one, it becomes extraordinarily unwieldy
27 if all counsel want to weigh in on a topic So, for purposes of efficiency, I
28 only want two participants to speak for each side, but, more to the point, I chose
the two of you [Messrs. Steinberg and Lawrence] because I – it seems to me you
are the senior members of each side's respective team." (Dkt. 421-2, July 8, 2011
Telephonic Status Conference Tr. 11:13-15, 19-22.)

1 and litigating the scope of the Court's Order Further Implementing the Court's
2 Permanent Injunction ("Implementation Plan Order"), which was entered on
3 October 29, 2014. (Dkt. 786.) In my view, the Permanent Injunction and
4 Implementation Plan Order provide class members with important relief.

5 65. This case has fundamentally altered the legal landscape for
6 people with serious mental disabilities facing removal. So far, this lawsuit has
7 already helped hundreds of individuals obtain representation as a matter of legal
8 right. It also created an entirely new system to identify immigration detainees with
9 mental disabilities.

10 66. The Court's Permanent Injunction is the first decision to
11 provide for free legal representation in immigration proceedings. This landmark
12 ruling has been hailed by the *National Law Journal* as the "first fundamental
13 expansion of the right to counsel in 30 years" and represents an enormous victory
14 in the fight for humane treatment of people with mental disabilities. Jenna Greene,
15 *Incompetent Immigration Detainees Win Right to Counsel*, Nat'l L.J. (Online),
16 (Apr. 25, 2013), <http://www.nationallawjournal.com/id=1202597575709>
17 *Incompetent-Immigration-Detainees-Win-Right-to-Counsel*. (See Exhibit K) The
18 New York Times notes that the decision was "the first time a court has required the
19 government to provide legal assistance for any group of people before the nation's
20 immigration courts." Julia Preston, *In a Fist, Judge Orders Legal Aid for Mentally*
21 *Disabled Immigrants Facing Deportation*, N.Y. TIMES, Apr. 24, 2013, at A18.
22 (See Exhibit L.) The *Los Angeles Times* editorial board applauded the decision as
23 "welcome," and one that "could help bring more fairness to the system." Times
24 Editorial Board, *Legal help for detainees*, (Apr. 25, 2013),
25 [http://articles.latimes.com/2013/apr/25/opinion/la-ed-mentally-ill-detainees-](http://articles.latimes.com/2013/apr/25/opinion/la-ed-mentally-ill-detainees-20130425)
26 [20130425](http://articles.latimes.com/2013/apr/25/opinion/la-ed-mentally-ill-detainees-20130425). (See Exhibit M.) Since the date of this Court's Permanent Injunction,
27 Plaintiffs estimate that over 300 Class Members have been found not competent to
28

1 represent themselves (and thus eligible for representation by qualified
2 representatives).

3 67. Upon threat of further litigation, the Government has also
4 announced that they will extend similar protections nationwide. (Dkt. 583.)
5 During various settlement efforts, Defendants offered the “carrot” of a nationwide
6 class, if Plaintiffs would only agree to limited relief in the *Franco* case. My
7 repeated response was that we were prepared to litigate this case fully until a
8 nationwide solution was achieved. In fact, I made this point quite directly in a
9 conversation with Deputy Attorney General James Cole in early April of 2013,
10 during which I threatened to file similar lawsuits in every Circuit until I covered
11 the United States and obtained the relief that I thought was appropriate. Two
12 weeks later, the Government filed its nationwide plan before this Court,
13 undoubtedly to make my efforts to bring other cases more difficult.

14 68. The Court’s Implementation Plan Order is the first to create
15 binding screening rules for immigration detainees, require disclosure of medical
16 information in removal proceedings, establish a fixed *pro se* competency definition
17 in any context, and provide for competency evaluations for the immigration
18 system.

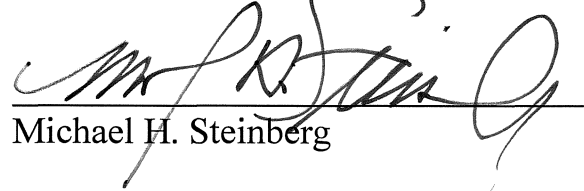
19 69. The Court’s Monitoring Order is the first time that Plaintiffs are
20 aware of the Department of Homeland Security being subject to a third party
21 Monitor. The Monitoring Order requires independent scrutiny and oversight of the
22 Government’s conduct, to ensure “Defendants’ ongoing compliance with the
23 Implementation Plan Documents, and that such compliance will continue without
24 the presence of a Monitor.” (Dkt. 810 at 3 n.2.)

25 70. All of these landmark rulings came after significant efforts by
26 Plaintiffs’ counsel, including 11,910.0 hours of efforts by Sullivan & Cromwell
27 LLP, and they occurred despite Defendants’ vigorous opposition at every stage of
28 the case.

1 71. For these reasons, Sullivan & Cromwell LLP seeks fees of
2 \$5,599,675.53 under the Rehabilitation Act and \$532,127.72 under the EAJA.

3
4 I declare under the penalty of perjury under the laws of the State of
5 California that the foregoing is true and correct to the best of my knowledge.

6 Executed this 31st day of July, 2015 in Los Angeles, California.

7
8 
Michael H. Steinberg