

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF KANSAS  
KANSAS CITY DIVISION**

**M.B.** and **S.E.** through their next friend )  
Katharyn McIntyre, **R.M.** through his next )  
friend Allan Hazlett, **C.A.** through his next )  
friend Allan Hazlett, **E.B.** through his next )  
friend Allan Hazlett, **J.P.** through her next )  
friend Allan Hazlett, **Z.Z.** through her next )  
friend Ashley Thorne, and **M.A.** through his )  
next friend Ashley Thorne, for themselves and )  
those similarly situated, )

Case No. 2:18-cv-02617-DDC-GEB

**Plaintiffs,**

**v.**

**Laura Howard** in her official capacity as )  
Kansas Department for Children and Families )  
Secretary, **Dr. Lee A. Norman** in his official )  
capacity as Kansas Department of Health and )  
Environment Secretary, and **Laura** )  
**Howard** in her official capacity as Kansas )  
Department for Aging and Disability Services )  
Secretary, )

**Defendants.**

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**DECLARATION OF IRA LUSTBADER IN SUPPORT OF PLAINTIFFS’ MOTION FOR  
ATTORNEYS’ FEES AND EXPENSES**

I, Ira Lustbader, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following facts are true and accurate to the best of my knowledge and belief.

1. I am a member of the bar of the State of New York and admitted to practice in the District of Kansas *pro hac vice*.

2. I am the Litigation Director of Children’s Rights (“CR”). I serve as lead counsel for CR in this litigation.

3. On behalf of CR, I submit this sworn declaration and corresponding exhibits in support of Plaintiffs' Motion for Attorneys' Fees and Expenses pursuant to 42 U.S.C. § 1988 and Rules 23(h) and 54(d)(2) of the Federal Rules of Civil Procedure.

**QUALIFICATIONS AND ROLE OF CR ATTORNEYS**

4. Founded in 1995, CR is a privately-funded, non-profit organization that advocates on behalf of youth harmed and at risk of harm in child welfare, juvenile justice, education, and healthcare systems in the United States. CR regularly represents plaintiffs in complex class action lawsuits to ensure child welfare systems adequately serve the needs of children and adolescents in their care and that children's legal rights are protected. CR attorneys have extensive expertise in the various areas of law that affect vulnerable and at-risk children and, in particular, have among the most experience in the country prosecuting child welfare institutional reform cases such as this one.

5. Together with the assistance of other CR attorneys, I serve as co-counsel, along with a team of lawyers at Kansas Appleseed Center for Law and Justice ("Kansas Appleseed"), the Law Office of Loretta Burns-Bucklew, the National Center for Youth Law ("NCYL"), and DLA Piper LLP ("DLA Piper"), to represent Plaintiffs in this case. Together, I, along with lead counsel from the co-counsel team, supervised and coordinated the conduct of Plaintiffs' counsel's work in this case. As Litigation Director and lead counsel for CR on this matter, I am also responsible for the supervision and conduct of CR's work in this case, along with CR Senior Staff Attorney Marissa Nardi.

6. As demonstrated by my resume, submitted as part of Exhibit A to this declaration, I graduated from Boston University School of Law in 1992. I have been an attorney litigating child welfare cases since 1999. *See* Exhibit A at 2. Before joining CR, I practiced litigation at

Wolf Haldenstein Adler Freeman & Herz, LLP, in New York City, concentrating in national plaintiffs' class action litigation in consumer fraud, securities fraud, and antitrust cases. Before that, I handled matters on the defense side involving products liability and malpractice at the firms of Parker Chapin Flattau & Klimpl LLP, and at Bower & Gardner, both in New York City.

7. I have served as counsel for plaintiffs (with co-counsel in each matter) in a large number of federal class action lawsuits, representing tens of thousands of children in systemic impact litigation concerning specific infrastructure failures that harm and/or place children at risk of harm in violation of their federal rights, including the following:

- *H.G. v. Carroll*, No. 18-CV-100 (N.D. Fla.), a federal class action against state officials responsible for the child welfare systems in Miami-Dade and Monroe counties, Florida, concerning violations of foster children's rights under federal statutory and constitutional law, which settled and remains pending.
- *Michelle H. v. McMaster*, No. 15-CV-134 (D.S.C.), a federal class action against state officials responsible for the South Carolina child welfare system, concerning violations of foster children's rights under federal statutory and constitutional law, which settled and remains pending.
- *Brian A. v. Haslam*, No. 00-CV-445 (M.D. Tenn.), a federal class action filed against state officials responsible for the Tennessee child welfare system concerning violations of foster children's rights under federal statutory and constitutional law, which settled and achieved final exit.
- *Kenny A. v. Deal*, No. 02-CV-1686 (N.D. Ga.), a class action originally filed in state court and then removed to federal court, against state officials of the Georgia child welfare system as operated in Fulton and DeKalb Counties (metro Atlanta), and against Fulton and DeKalb County officials responsible for the provision of attorneys for foster children, for violation of children's rights under federal and state statutory and constitutional law. The cases against DeKalb County officials and Fulton County officials settled and achieved final exit. The case against state child welfare officials settled just before trial after full discovery, and remains pending.
- *Andrew C. v. Raimondo*, No. 07-CV-241 (D.R.I.), a federal class action against state officials responsible for the Rhode Island child welfare system concerning violations of foster children's rights under federal statutory and constitutional law, which settled after the First Circuit reversed the district court's trial dismissal of the case, and remains pending.

- *Juan F. v. Malloy*, No. 89-CV-859 (D. Conn.), a federal class action against state officials responsible for the Connecticut child welfare system concerning violations of children’s rights under federal statutory and constitutional law, which settled and remains pending.
- *D.G. v. Yarbrough*, No. 08-CV-074 (N.D. Okla.), a federal class action against state officials responsible for the Oklahoma child welfare system concerning violations of children’s rights under federal statutory and constitutional law, which settled after full discovery, and remains pending.
- *E.C. v. Sherman*, No. 05-CV-726 (W.D. Mo.), a federal class action filed against state officials responsible for the Missouri child welfare system concerning a federal statutory and constitutional challenge to a Missouri state adoption subsidy statute, which secured a permanent injunction finding the state statute unconstitutional.

8. During my professional involvement in the foregoing class action suits, I have participated in numerous class-wide settlements, including direct involvement in the negotiation, implementation, and enforcement of these settlements with state or local government officials and their counsel.

9. In addition to my litigation activities, I have written about and spoken extensively on child welfare reform and child welfare litigation. While a more fulsome list is included on my attached CV, examples of recent speaking engagements include:

- National Association of Counsel for Children, National Child Welfare Law Conference, Virtual, August 2020. Plenary Panel, *We Are Sending More Foster Kids to Prison Than College – A Call to Action to Disrupt Bad Outcomes for Older Youth in Foster Care*.
- ABA, Center on Children and the Law, National Access to Justice Conference, Washington, D.C., April 2019. Panel, *Changing the System: Strategies for Front-Line Lawyers*.
- ABA, Children’s Rights Are Human Rights, Celebrating 20 Years of Fearless Lawyering for Children, San Diego, CA, May 2018. Panel (Moderator), *Addressing Racism in Our Systems*.
- ABA, Annual Children’s Breakfast, ABA Commission on Youth at Risk, New York, NY, August 2017. Co-Presenter, *Developments in Impact Litigation to Reform Child Welfare*.

- ABA, National Webinar Series: Assuring a Successful Transition for Youth, Section on Litigation, Children’s Rights Committee, October 2016. Panel (Moderator): *Assuring a Successful Transition: The Role of Lawyers and the Courts for Transitioning Youth*.
- The White House, U.S. Department of Health and Human Services, and Think of Us, Foster Care & Technology Hackathon, Washington, D.C., May 2016. Co-Presenter, *Results of “Legal Hackathon.”*
- National Association of Counsel for Children, 38th National Child Welfare, Juvenile and Family Law Conference, Monterey, CA, August 2015. Panel, *Systemic Advocacy Roundup*.
- ABA, National Conference on Children and the Law, Washington, D.C., July 2015. Panel, *Asserting the Constitutional Rights of Children in Individual Child Welfare Proceedings and Lessons from Impact Litigation*.

10. I have been actively involved in professional and public service organizations outside of my work at CR. From 1998 to 2006, I served as a trustee of Neighborhood Youth & Family Services, a large community-based nonprofit family preservation agency in the South Bronx. I also previously served on the Committee on Public Service and Education at the Association of the Bar of the City of New York, and am currently a Member of the leadership (and past co-chair) of the Children’s Rights Litigation Committee of the Section on Litigation of the American Bar Association, and member of the National Association of Counsel for Children. Additionally, I was selected and served as a 2016-2017 Child and Family Leadership Fellow of the Annie E. Casey Foundation, a competitive 19-month national executive leadership program for 16 selected leaders across sectors and disciplines working to improve outcomes for children, families, and communities.

11. Several attorneys from CR helped me efficiently and effectively litigate this case. The resumes of all CR attorneys who significantly contributed to the representation, and whose hours CR submits to the Court for reimbursement, are attached herewith as part of Exhibit A.

12. From May 2018 to present, Marissa Nardi has served as the Senior Staff Attorney on this matter.

13. The core staff attorneys on this matter consist of Jonathan King from September 2018 to present; Claire Glasspiegel from July 2019 to present; and Nicole Taykhman from January 2020 to present.

14. Senior Staff Attorney Marissa Nardi has extensive federal class action litigation experience in all phases of litigation. *See* Exhibit A at 6-7. She has several years of experience helping lead complex class action cases at Children’s Rights on behalf of children in child welfare and juvenile justice systems. *See* Exhibit A at 6. She played a critical leadership and project management role in all stages of this case to ensure efficiency across CR’s team of attorneys and paralegals. Ms. Nardi played an important overall role in leading the team’s drafting, editing, synthesis, and finalization of the initial Complaint. Ms. Nardi led the development of the Substantive Due Process claims, spending many hours investigating the facts and law surrounding this claim. She also led the team’s efforts in resisting Defendant Governor Kelly’s Motion to Dismiss. CR’s discovery tasks were largely overseen by Ms. Nardi, who led meet and confers with Defendants regarding discovery issues; co-led electronically-stored information (“ESI”) search term negotiation;<sup>1</sup> offered strategic input on drafting interrogatories, third-party subpoenas, and requests for production; and oversaw document review. Ms. Nardi brings extensive alternative dispute resolution experience to our team, and she played a large role for CR in the mediation and settlement process in this case.

15. Staff Attorneys for whom CR seeks reimbursement are Mr. Jonathan King, Ms. Claire Glasspiegel, and Ms. Nicole Taykhman. They are all litigators with relevant experience

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<sup>1</sup> As of settlement, the parties had completed ESI search term negotiations. Defendants, however, had not run these searches.

who, likewise, played a vital role in the prosecution and resolution of this case, especially on a day-to-day basis. *See* Exhibit A at 8-11. Staff Attorneys at CR participated in on-the-ground investigation trips; reviewed and indexed thousands of pages of documents produced by Defendants; drafted most affirmative discovery requests, responses, and discovery letters; performed legal research regarding legal theories, asserted defenses, discovery issues, and jurisdictional questions throughout the case; prepared for 30(b)(6) depositions; and supported Ms. Nardi and myself throughout the settlement process. They also supported different aspects of the case in the interest of efficiency. For instance, at the time when Mr. King focused most on Defendants' motion to dismiss the Governor, Ms. Glasspiegel focused most on propounding new discovery requests onto Defendants, while Ms. Taykhman focused most on Defendants' ongoing discovery deficiencies. Without these attorneys, Plaintiffs would not have been able to effectively and efficiently litigate this case to resolution.

16. Of Counsel Stephen Dixon has immense child welfare litigation experience and knowledge, having taught a law school Child Advocacy Clinic as well as investigated and developed over 8 child welfare cases over his 11 years at Children's Rights. *See* Exhibit A at 12. He has served an essential role from the inception of the case through its settlement in identifying factual witnesses supporting our claims, client outreach, identifying Plaintiffs and adult Next Friends, regularly communicating with these stakeholders, and synthesizing input from stakeholders with his vast child welfare experience into the litigation strategy. He played a vital role in developing this case and, critically, identifying most Named Plaintiffs and Next Friends, as well as later seeking their approval of the settlement agreement.

17. Mr. Dixon's outreach efforts were assisted by attorney and Senior Policy Analyst Erin McGuinness, JD/MPA. *See* Exhibit A at 15. Ms. McGuinness additionally spent significant

time on this case using her policy and child welfare experience to drive the litigation and mediation. For instance, she collected and analyzed quantitative data, interpreted academic and child welfare policy research, crafted and analyzed potential remedies for Plaintiffs' Medicaid Act claims, and ensured that statistical indicators negotiated and eventually used in the settlement agreement would adequately protect the Plaintiff Class.

18. The number of hours for each attorney for which CR seeks reimbursement, broken down by quarter, are attached as a part of Exhibit B to this declaration.

19. CR also made effective use of CR paralegals during the course of case investigation, litigation, and settlement. These paralegals include Daniel Adamek (June 2018 to present) and Clare Connaughton (December 2018 to present). To be as efficient as possible, Mr. Adamek and Ms. Connaughton focused on different areas to support attorneys during the litigation. For example, Mr. Adamek focused largely on tracking and managing Defendants' productions and their deficiencies, while Ms. Connaughton tracked major correspondence and supported Plaintiffs' search for and vetting of consulting-expert witnesses. The number of hours for the two paralegals for which CR seeks reimbursement, broken down by quarter, are attached as a part of Exhibit B to this declaration. It is important to note that, in practicing billing judgment, CR chose not to seek any reimbursement by hours spent by another paralegal in the investigation phase of this case.

20. As illustrated by their time slips, paralegals in this case were essential in keeping costs in this litigation reasonable. For example, paralegals in this case participated in extensive document review and detailed categorization of thousands of pages of client files for two of our clients. This critical work could have reasonably been assigned to staff attorneys who bill at a much higher rate than paralegals. However, in an effort to efficiently and effectively use CR's

resources, I assigned a significant portion of document review to Mr. Adamek and Ms. Connaughton under attorney supervision.

### **PRE-FILING AND LITIGATION ACTIVITIES**

21. CR has been involved in this case since the inception of the investigation that led to the litigation. In or about the first quarter of 2017, CR engaged in preliminary discussions with NCYL and with Kansas City attorney Loretta Burns-Bucklew about the issues facing the Kansas foster care system and the potential need for targeted litigation. Given the complexity of the foster care system in Kansas, the deep knowledge of child welfare systems supplied by NCYL and Ms. Burns-Bucklew made them valuable early partners for this case.

22. In 2017, I had contact with numerous Kansas child welfare stakeholders who had grave concerns with extreme housing instability, also known as churning, that caused children in the Kansas foster care system to be bounced between placements so frequently that it was not uncommon for foster children to spend only one or two nights at foster homes, facilities, or agency offices, moved again, and to repeat this cycle over weeks or months at a time, while spending their days in a child welfare agency office, and often missing school. Many stakeholders also voiced that Kansas failed to administer vital trauma screening and treatment for foster children in its care, a large problem closely related to the housing crisis, with devastating consequences for youth. Upon having further conversations with stakeholders, I learned that foster children were continually harmed by lack of state oversight for child welfare contractors, dangerous caseworker-to-child ratios, and archaic technology systems. I also learned that Kansas officials frequently lost track of foster children in the system, many of them running away from the harm the system had imposed on them, and being exposed to homelessness and sex trafficking victimization. Upon hearing these concerns, CR, with its initial co-counsel, began extensive factual research and

stakeholder outreach in order to determine how best to represent children to remedy the harms caused by structural failures in Kansas's highly complex child welfare system.

23. For over one year before the filing of the complaint in November 2018, CR, with co-counsel, engaged in an extensive investigation, which included dozens of stakeholder contacts in-person or by phone,<sup>2</sup> usually in confidence; multiple trips to the state for stakeholder and client meetings; collecting and reviewing tens of thousands of pages of publicly available information and performance data—spanning the course of a decade—regarding Kansas's child welfare system;<sup>3</sup> drafting and pursuing a public records request; researching and assessing applicable case law, statutes, regulations, and local policies; and identifying and addressing issues presented by ten appropriate Named Plaintiffs and five adult Next Friends to serve as class representatives in this case, while remaining sensitive to their privacy and the trauma the children had already endured. Throughout the process, attorneys and paralegals consistently checked facts and researched to determine whether viable systemic claims existed. The complex nature of Kansas's systems of care and the intersecting structural failures, detailed in the Amended Complaint and discussed further below, made the investigation especially challenging. As a result of the investigation, Plaintiffs' counsel drafted an extremely detailed 68-page initial Class Action Complaint.

24. During the investigation, CR, NCYL, and Ms. Burns-Bucklew made contact with Kansas Appleseed. Given Kansas Appleseed's extensive involvement in advocacy and reform efforts across the state, including with regard to foster care and health care for vulnerable citizens,

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<sup>2</sup> Among the stakeholders interviewed were lawyers for children and parents; foster parents; former foster youth; providers of mental health and treatment services; and others with direct knowledge of the child welfare system in Kansas.

<sup>3</sup> Examples of the types of documents and information reviewed include contracts between DCF and child welfare contractors; publicly available data on federal child welfare indicators; policies from each of the Defendant agencies and their contractors; legislative reports, audits, and assessments of the Kansas child welfare system; and mental health screens and assessments used by Defendant agencies.

in or about September 2018, Kansas Appleseed joined the co-counsel team, bringing extensive legal, policy, and communications expertise that was essential to the development, litigation, and settlement of this case.

25. After the Complaint was filed, CR and co-counsel recognized that the team would require additional resources and strategic, legal experience in order to effectively and efficiently litigate this case on behalf of the Plaintiff Class. In April 2019, Plaintiffs' counsel partnered with DLA Piper LLP, including partners Caryn Schechtman and Jeffrey Rotenberg and associate Joshua Kane. DLA Piper's attorneys, in particular Class Counsel Caryn Schechtman and Jeffrey Rotenberg, have significant federal class action and electronic discovery experience and expertise. DLA Piper was a critical strategic partner and took the lead on electronic discovery issues, including handling discovery productions, negotiating ESI search terms, and taking a 30(b)(6) deposition focused on Defendants' information systems.

26. Based on my decades of experience in the field of child welfare litigation and my involvement in numerous institutional reform actions throughout the country, it is my opinion that the Settlement Agreement in this case constitutes an extremely favorable result for the Plaintiff Class, as it fully addresses the claims set forth in the Complaint.

**ALLOCATION OF WORK AND EFFICIENT MANAGEMENT OF LITIGATION  
TASKS**

27. As noted above, I was responsible for managing CR's work in this case and made every effort to litigate this case efficiently. In addition to managing assignments within CR, I was in close communication with co-counsel throughout the course of this litigation. During phases of the litigation and settlement process that required it, weekly team meetings were held with the express purpose of ensuring that co-counsel efforts were coordinated and that duplication of effort could be kept to an absolute minimum.

28. To further ensure that Plaintiffs' counsel did not unnecessarily duplicate efforts, co-counsel teams each took the lead on certain tasks and activities during the course of the litigation, while partnering on major strategic decisions. For example, CR and NCYL conducted the vast majority of the pre-trial fact investigation, led efforts to identify potential named plaintiffs and witnesses, served as the main points of client contact throughout the case, and led community outreach efforts. DLA Piper took the lead on handling discovery productions and negotiating ESI search terms during the course of the litigation. Kansas Appleseed and Ms. Burns-Bucklew were critical to litigation strategy and analyzing and achieving the substantive remedies in the Settlement Agreement, informing strategic decisions throughout the litigation given their deep familiarity with Kansas state government and its child welfare and Medicaid delivery systems. Kansas Appleseed and Ms. Burns-Bucklew also provided invaluable expertise on local court rules, procedures, and litigation practices.

29. In my professional judgment, all co-counsel's involvement was necessary to adequately and effectively represent Plaintiffs in this highly complex case, which involves ten Named Plaintiffs and a Plaintiff Class of approximately 7,000 members.

**DEFENDANTS' LACK OF COOPERATION IN DISCOVERY PROLONGED  
LITIGATION AND INCREASED LITIGATION EXPENSES**

30. Obtaining discovery in this case was a particularly arduous task given Defendants' discovery delays, general lack of communication, and poor document production quality. These problems forced CR and co-counsel to expend a significant amount of time on discovery that could have been minimized had Defendants been proactive and compliant in fulfilling their discovery obligations.

31. Plaintiffs received the Named Plaintiffs' own case files from Defendants beginning only in June 2019, eight months after the complaint was filed. For two of the named Plaintiffs,

Plaintiffs only received case files for the first time in April 2020. Much of this delay was attributed to Defendants' unsupported claim that they could not produce the files despite there being a protective order in place. Plaintiffs were therefore forced to spend months negotiating with Defendants just to receive their own clients' files.

32. What Plaintiffs' counsel initially received was grossly insufficient and violated the parties' production protocols. For example, case files lacked custodial information or metadata; often were produced in massive, non-unitized PDF files containing hundreds of pages each; were heavily and inappropriately redacted without explanation as to confidentiality or privilege assertions; presented pages out of order; were missing pages; were poorly scanned and unreadable; did not specify whether the files included documents collected from foster care contractors or other third parties; and lacked information as to the process Defendants used to search for and collect documents. As a result, the several-thousand-page Named Plaintiff case files required time-intensive, manual review by Plaintiffs' counsel. When Plaintiffs communicated these concerns to Defendants' counsel, Plaintiffs were met with resistance and had their communications often ignored.

33. These problems, such as the lack of basic custodial information, persisted in many of Defendants' other productions. It was not until Defendants agreed to meet and confer in April 2020—after months of punting discovery issues down the road—that some of these problems began to be remedied. This process took over a dozen meet and confers, at one point on a weekly basis, at which Plaintiffs explained the deficiencies in Defendants' productions to date and requested production of additional responsive materials. These meet and confers also included conferences focused on electronic discovery, scheduled for the sole purpose of helping Defendants

meet their ESI obligations. By the time the parties reached an ultimate settlement, Defendants had agreed to a set of electronic search terms, but still had yet to run them.

34. On July 2, 2019, Plaintiffs propounded initial discovery requests on DCF, KDADS, and KDHE. Defendant DCF produced documents in response to this request in September 2019. Much of the documents produced, however, were publicly available and did not follow the ESI protocol agreed upon by the parties. On the same day, Defendant KDHE produced one single document. KDHE did not produce any additional documents until April 2020—nearly nine months after Plaintiffs’ first served their initial discovery requests—in response to the total of 41 discovery requests directed to KDHE.

35. Defendants’ lack of proper litigation holds also caused Plaintiffs’ counsel to spend hours investigating potential spoliation. On February 26, 2019, Plaintiffs asked Defendants to confirm they had issued litigation holds to their clients. It was not until approximately a year later that Defendants confirmed that litigation holds had been issued. When Defendants produced those alleged litigation holds more than a year after Plaintiffs first inquired, defense counsel produced only one letter for one agency that could be described as a litigation hold. The so-called “litigation holds” for the other two agencies were not actually litigation holds, as they did not instruct Defendants to preserve documents in light of litigation. Defendants’ failure to issue proper litigation holds and lack of cooperation in disclosing litigation holds left Plaintiffs with no option but to expend time propounding written discovery, as well as prepare for and take an entire 30(b)(6) deposition, on the topic of document preservation.

36. Likewise, in as early as October 2019, Plaintiffs requested a privilege log given Defendants’ extensive redaction of documents. Plaintiffs requested this privilege log on several occasions. Defendants did not produce a privilege log until April 2020.

37. There were delays with Defendants regarding scheduling Rule 30(b)(6) depositions and designating deponents as well. Plaintiffs served Defendants with a detailed Rule 30(b)(6) deposition notice on August 23, 2019. For months, Defendants delayed scheduling depositions and designating deponents despite Plaintiffs raising the issue multiple times. It was not until May 26, 2020—more than nine months after Plaintiffs served the notice—that the first witness was made available to be deposed. Through the resolution of this case, Defendants disclosed only one other witness for other topics in the 30(b)(6) notice. Meanwhile, Plaintiffs invested many hours preparing for depositions on other topics listed in this notice.

38. Other issues also necessarily increased the amount of time Plaintiffs' counsel expended on discovery. In September 2019, Defendants substituted their initial counsel—a private law firm and attorneys at the Kansas Attorney General's Office—for current counsel. While Plaintiffs had already been in discussion with initial counsel for several months regarding discovery issues, the substitution of counsel forced the parties to revisit several discovery issues from the very beginning, such as the excessive redactions in Defendants' document productions, and led to further delays in Defendants' productions.

39. In addition, Defendants' responses and objections to Plaintiffs' requests for production and interrogatories were lengthy and raised a number of issues requiring resolution among the parties or motion practice before the Court. Plaintiffs expended many hours reviewing and analyzing Defendants' discovery responses and productions—a total of over 78,000 pages across over 12,000 documents. During this process, Plaintiffs attempted to raise any discovery issues promptly and resolve issues outside of motion practice wherever possible. In order to be as efficient as possible, Plaintiffs twice moved for extensions of time to file any motions to compel, so that any necessary discovery motions would be handled at one time and focus on outstanding

issues only. Because of this effort to resolve discovery issues through meeting and conferring with Defendants, while simultaneously mediating, Plaintiffs ultimately did not need to file any discovery motions.

40. The parties agreed to stay discovery in December 2019 to focus efforts and resources on mediation, but reinstated discovery in March 2020 when mediation hit an impasse, this time proceeding on a dual track with continued settlement negotiations.<sup>4</sup> Given that Plaintiffs had received little responsive material in discovery prior to the stay, Plaintiffs—with intensive work on the part of CR attorneys—propounded three additional sets of requests for production of documents on DCF, one set of interrogatories on DCF, and an additional set of requests for production of documents to each of KDADS and KDHE. One of these sets included expedited requests for productions concerning Defendants’ response to the ongoing COVID-19 pandemic, given Defendants’ ongoing obligation to keep safe from harm the Class members and named Plaintiffs in DCF custody.

41. Meanwhile, Defendants also served 103 interrogatories and 120 requests for production on the minor named Plaintiffs. While the parties ultimately reached a settlement before responses to those discovery requests were served, Plaintiffs’ counsel—particularly Mr. Dixon—necessarily expended time communicating with clients about and preparing responses to Defendants’ propounded discovery.

42. Given the complex web of private entities involved in managing Kansas’s child welfare system, Plaintiffs sought and began reviewing third-party discovery from several entities,

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<sup>4</sup> While focusing efforts on discovery and productive settlement negotiations, Plaintiffs, with significant work by CR, were also required to spend resources vigorously opposing the motion to dismiss filed by Governor Laura Kelly.

including managed care organizations (“MCOs”) and foster care contractors, in order to support their claims and prepare for trial.

43. At the same time, in addition to written discovery, Plaintiffs also engaged in conversations with several potential consulting-expert witnesses in preparation for a class certification motion, expert reports, and trial.

### **MEDIATION**

44. Given the resource-intensive nature of discovery in this case, and Plaintiffs’ counsel’s desire to secure a favorable result for the Plaintiff Class as efficiently as possible, I, along with co-counsel, decided to vigorously pursue mediation and possible settlement, first through a stay of discovery and then simultaneously alongside litigation.

45. Due to the subject-area expertise necessary to mediate a possible settlement in this case, the parties chose Kevin Ryan of Public Catalyst to serve as mediator. Mr. Ryan is a nationally respected experienced mediator and child welfare systems expert. The parties engaged in six in-person mediation sessions with Mr. Ryan between November 2019 and February 2020, each of which lasted a full day. At the same time, the parties drafted and exchanged lengthy confidential term sheets and mediation statements prior to and in between sessions. Plaintiffs’ counsel expended considerable time preparing settlement proposals and materials to aid each discussion, and spent time analyzing the parties’ respective positions and strategizing on how best to produce a favorable resolution after each session. Ultimately, the parties exchanged approximately a dozen settlement drafts. Despite their best efforts, the parties were unable to reach an agreement after their first six mediation sessions with Mr. Ryan.

46. In May 2020, the parties recommenced settlement discussions, this time unassisted by a mediator, and via video-conferencing because of the COVID-19 pandemic. The parties

participated in four additional settlement discussion sessions in June 2020. In between settlement discussions, Plaintiffs' counsel prepared proposals, reviewed Defendants' settlement proposals, discussed proposals and alternatives with their clients, and communicated with opposing counsel about the many provisions under negotiation. These discussions led to a settlement agreement fully supported by both parties.

47. The mediation process, and the specific relief obtained in the Settlement Agreement as a result, depended heavily on the in-depth knowledge of the Kansas child welfare system Plaintiffs obtained through their extensive investigation, augmented by the information learned during litigation and from ongoing outreach to stakeholders.

48. The mediation process also required time for travel to in-person sessions, extensive time spent negotiating inside the mediation room and strategizing with co-counsel outside the mediation room, and advanced payment of mediator fees. These costs were necessary in order to avoid prolonged litigation, which would have risked delaying essential relief to the Plaintiff Class.

#### **CR'S REQUESTED AMOUNTS**

49. For attorney's fees, CR respectfully requests reimbursement for a total number of 4,955 hours collectively expended on this litigation by CR attorneys (approximately 4,080.71 hours) and paralegals (approximately 874.29 hours).

50. After applying a reasonable Kansas City rate for each attorney, as detailed in the memorandum of law filed herewith, CR requests a total apportioned fee award of \$1,736,167.00.

51. Below is a chart showing the total hours expended by each attorney and paralegal for which CR submits fees, with the corresponding rate and resulting requested fee per person.

<b>Name</b>	<b>Title</b>	<b>JD Class Year</b>	<b>Local Rate</b>	<b>Hours Submitted</b>	<b>Fees Submitted (rate multiplied by hours)</b>
<b>Ira Lustbader</b>	Litigation Director & Lead Counsel	1992	\$500/hour	968.62	\$484,308.33
<b>Stephen Dixon</b>	Of Counsel	1987	\$410/hour	354.30	\$145,263.00
<b>Marissa Nardi</b>	Senior Staff Attorney	2012	\$380/hour	1211.02	\$460,186.33
<b>Jonathan King</b>	Staff Attorney	2012	\$345/hour	702.83	\$242,477.50
<b>Claire Glasspiegel</b>	Staff Attorney	2015	\$310/hour	238.65	\$73,981.50
<b>Nicole Taykhman</b>	Staff Attorney	2016	\$290/hour	196.43	\$56,965.67
<b>Erin McGuinness</b>	Senior Policy Analyst	2012	\$240/hour	408.87	\$98,128.00
<b>Daniel Adamek</b>	Paralegal	N/A	\$200/hour	634.92	\$126,983.33
<b>Clare Connaughton</b>	Paralegal	N/A	\$200/hour	239.37	\$47,873.33
			<b>TOTAL</b>	<b>4,955.00</b>	<b>\$1,736,167.00</b>

52. Exhibit B to this Declaration lists the total number of hours CR seeks for reimbursement for each attorney broken down by quarter and staff.

53. A spreadsheet of the detailed, itemized time records on which these attorneys' fees are based is attached as Exhibit C. This spreadsheet includes all time entries CR submits for reasonable fees with a detailed description of the work performed for each time entry.

54. For expenses, CR respectfully requests reimbursement for \$50,118.62 in out-of-pocket expenses and costs that counsel reasonably incurred from November 16, 2017 to July 27, 2020, such as travel by essential attorneys to necessary litigation activities such as depositions and mediation, as well as mediator fees. The detailed, itemized list of these costs and expenses is attached as Exhibit D.

55. I believe the time, cost, and expense records, and the summaries of them, attached as Exhibits B – D, represent accurate and reliable accounts of the work performed and the compensable costs and expenses incurred by CR and its personnel in this case.

**REASONABLENESS OF BILLING RATES**

56. CR attorneys have been assigned hourly rates based on their respective levels of experience. Although, to my knowledge, no current index of legal rates charged in Kansas exists, I have reviewed the 2019 Missouri Lawyers' Media study of Missouri legal rates (attached as Exhibit E to Plaintiffs' fee application), and the declarations of local Kansas attorney J. Nick Badgerow (filed in conjunction with Plaintiffs' fee application), who does not represent Plaintiffs. I have also reviewed a 2017 Kansas Bar Association survey of billing rates in Kansas (attached as Exhibit F to Plaintiffs' fee application), which, although older, sheds light on the rates typically charged in diverse regions within the Kansas market. In addition to these materials, I have also reviewed case law from the U.S. District Court of the District of Kansas on reasonable rates awarded to attorneys in fee-shifting cases. My review of these items has informed the billing rates sought in this case.

57. CR has calculated its lodestar based on reasonable rates for the Kansas City area and the Kansas legal market. In assigning requested rates, I also considered average rates from the Kansas City area given that Plaintiffs filed this case on behalf of a statewide class. It is my belief that these rates are reasonable and well within the prevailing market billing rates in the geographic region of this case.

58. In assigning the above requested rates, I considered each attorney's years of practice and litigation experience, the arc of his or her career, and his or her role on the team with respect to this particular engagement.

59. I reduced the rate of Erin McGuinness below what would be otherwise charged for an attorney of her class year. Ms. McGuinness has earned both a law degree and a Master's in Public Administration from Syracuse University. Ms. McGuinness, before becoming employed at CR, practiced law representing families and other individuals in the local Syracuse market,

including at the Frank H. Hiscock Legal Aid Society in Syracuse. CR now engages Ms. McGuinness principally as a senior policy analyst, but also utilizes her legal skills in active litigation. I considered these factors in reducing her requested rate to \$240 here.

60. I also reduced Stephen Dixon's rate below what would otherwise be charged by an attorney of his experience. Mr. Dixon graduated from the Paul M. Herbert Law Center at Louisiana State University in 1987, and has practiced law continuously since then. In this matter, Mr. Dixon principally directed his efforts to identifying factual witnesses supporting our claims, client outreach, identification of Plaintiffs and adult Next Friends, regular communication with these stakeholders, and the synthesis of input from stakeholders into the litigation strategy. I considered these factors in reducing his requested rate to \$410 here, though he has extensive experience in child welfare litigation that would justify a higher rate in other matters.

61. Although CR does not seek national rates in this case, CR routinely collaborates with and recruits attorneys from top U.S. and international law firms. The National Law Journal ("NLJ") has conducted surveys of billing rates for the nation's largest law firms (the "NLJ 500") and others to provide a range of hourly billing rates for partners and associates. Attached as Exhibit G is a chart of 2017 billing rate survey data for NLJ 500-ranked law firms. Given the consistent increase in rates in the legal market, these rates would necessarily be higher today. This survey confirms that the requested rates are well within the prevailing rates among firms in the national marketplace. For instance, as reflected in Exhibit G, for firms on the 2017 NLJ 500, the average partner billing rates ranged from \$295 to \$1,320, and the average associate rates ranged from \$200 to \$1,025.

62. The rates CR seeks here are also substantially below prevailing rates in New York City, where CR is located. New York City billing rates approved by federal courts in complex civil litigation are also substantially higher than the billing rates sought here.<sup>5</sup>

### **CR'S BILLING PRACTICES**

63. I am familiar with CR's practices governing the recording of time and expenses and the maintenance of those records. During the period covered by this fee request, it was the consistent policy and business practice of CR to require each attorney and paralegal to maintain contemporaneous and specific records of all time worked in a particular case and for such records to be entered in a computerized billing system.

64. I have supervised staffing levels throughout this litigation and worked with Ms. Nardi to assign team members to tasks only as reasonably necessary to provide suitable representation to Named Plaintiffs and the Plaintiff Class. Throughout this litigation, I have made reasonable efforts to balance the workloads of attorneys and paralegals working on this case to ensure that the work assigned to them was commensurate with their level of experience. Moreover, I have made every effort to keep the number of staff assigned to the case to a minimum at any given time depending on the needs of the case at that time.

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<sup>5</sup> See, e.g., *Vista Outdoor Inc. v. Reeves Family Jr.*, 16 Civ. 5766, 2018 WL 3104631, at \*6-7 (S.D.N.Y. May 24, 2018) (awarding rates up to \$1,260 for partners, up to \$693.75 for associates, and up to \$200 for paralegals); *Williams v. Metro-North Railroad Co.*, No. 1:17-CV-03847 (JGK), 2018 WL 3370678, at \*8 (S.D.N.Y. June 28, 2018), (awarding in a civil rights case rates up to \$800 for partners, \$425 for a senior associate, \$300 for mid-level associates, and \$275 for a junior associate), *report and recommendation adopted*, No. 17 CIV. 3847 (JGK), 2018 WL 3368713 (S.D.N.Y. July 10, 2018); *Gulino v. Bd. of Educ. of City Sch. Dist. of City of New York*, No. 96 CIV. 8414, 2017 WL 4103643, at \*5 (S.D.N.Y. Sept. 7, 2017) (citing cases to support a rate structure setting "the hourly rate for partners from \$600 per hour to \$650 per hour" and "the hourly rate for counsel from \$450 per hour to \$500 per hour"), *report and recommendation adopted*, No. 96-CV-8414 (KMW), 2017 WL 4082304 (S.D.N.Y. Sept. 8, 2017); *Blake v. New York City Health & Hosps. Corp.*, No. 14 Civ. 3340(JGK)(AJP), 2016 WL 6520067, at \*5 (S.D.N.Y. Nov. 3, 2016) (collecting cases for the proposition that recent decisions have moved the upper limits for experienced litigators in civil rights and employment law cases to \$600); *Asare v. Change Grp. of New York, Inc.*, No. 12 Civ. 3371(CM), 2013 WL 6144764, at \*19 (S.D.N.Y. Nov. 18, 2013) (\$750 per hour for partner, \$500 for senior associate, in FLSA action); *In re Nissan Radiator/Transmission Cooler Litig.*, No. 10 Civ. 7493(VB), 2013 WL 4080946, at \*17 (S.D.N.Y. May 30, 2013) (\$795 per hour for partner and \$675 for associate in a products liability class action).

65. I believe this case was appropriately staffed at all times by CR. Each of the attorneys and paralegals working on this case had the ability and experience to perform the work assigned to him or her at a high degree of professionalism and was appropriately supervised by Ms. Nardi and/or myself. I attest that all of the hours submitted in Exhibits B and C were reasonable and necessary in order to furnish adequate representation for Plaintiffs. Throughout this litigation, I also made diligent efforts to keep costs and expenses, which must be paid when incurred, to a minimum. CR seeks \$50,118.62 in out-of-pocket reimbursable costs and expenses which it advanced in this case. The amount sought by CR excluded significant costs and expenses not sought by CR in this petition. These costs and expenses include copying, mailing, conference calls, online legal research, and meal expenses. The costs and expenses reflected in Exhibit D were actually expended to prosecute this action, and were reasonable and necessary to protect the interests of the Named Plaintiffs and Plaintiff Class. The other firms representing the Plaintiffs similarly significantly reduced the expenses they sought. Together, these amount to a reduction of more than 15% of the expenses incurred.

66. Core members of the CR team carefully reviewed all time entries to limit its submission to the Court to only those entries that are necessary, efficient, and sufficiently descript. I also personally reviewed time entries in Exhibit C to ensure that the submissions are appropriate and reasonable.

67. CR and the other Plaintiffs' counsel carefully applied rules in the review and submission of time records to ensure that the work submitted to the Court is as narrow and appropriate as possible. For instance, CR excluded from its fee application all of the time of twelve lawyers and paralegals who each spent less than 50 total hours on the case, prior to any discretionary reductions made in the exercise of billing judgment. Co-counsel did the same.

Counsel has also waived fees for all work performed prior to November 16, 2017, and are not seeking compensation for work performed after the filing of the motion for preliminary approval of the Settlement Agreement on July 27, 2020. Furthermore, although CR attorneys expended hundreds of hours drafting this fee application motion, memorandum, and the CR supporting materials, CR and Plaintiffs seek no fees for any hours performed to prepare this fee application as an additional effort at billing judgment. CR also has excluded all hours spent doing general background research; hours spent working on media-related matters; vague time slips; time slips that were block billed; and hours spent on clerical work.

68. In an effort to avoid duplicative billing for events attended by multiple team members, CR and all Plaintiffs' counsel are billing for no more than two attorneys in attendance at a deposition. In meetings with key stakeholders in the Kansas child welfare community, if three or more firms were represented, Plaintiffs seek reimbursement for only one attendee from each firm. For stakeholder meetings where one or two firms was present, each firm seeks reimbursement for a maximum of two people from that firm. For court hearings, only one attorney from each firm seeks fees for their participation. For telephonic or video conferences with Defendants, including meet and confers, no more than four attorneys across CR, NCYL, Appleseed, and Ms. Burns-Bucklew are billing for their attendance. For regularly scheduled co-counsel meetings with the entire co-counsel team, CR, NCYL, and Appleseed seek reimbursement for a maximum of two attorneys from each firm. For all other internal conferences or calls among co-counsel to discuss strategic decisions and reach consensus on important legal issues, CR, NCYL, and Appleseed seek fees for only one attorney per firm.

69. In addition, all counsel reduced the amount they billed for travel by fifty percent, by reducing either their rate for travel time, or the time billed for travel, by fifty percent.

70. We have received billable and billing judgment time from all co-counsel firms to run calculations and determine the magnitude of the team's exercise of billing discretion. The Plaintiffs' team collectively excluded approximately 3,300 hours of its time devoted to case through July 27, 2020, the day we filed the preliminary settlement approval papers. *See* ECF No. 139. This is a reduction of approximately 25.2% of Plaintiffs' billable time, which equates to a monetary reduction of approximately \$1,115,521.20. Additionally, Plaintiffs collectively excluded all 1,303.8 hours that Plaintiffs worked on this matter after July 27, 2020 on this fee application and its motion for final approval. When that additional excluded time after July 27 is considered, Plaintiffs have effectively written off a total of 31.8% of its time on this matter, equating to a total \$1,560,078.25 write-off. In my opinion, the time submitted in this application includes the reasonable and necessary hours, performed as efficiently as possible, to effectively investigate, litigate, and settle this case.

#### **CONTINGENCY, COMPLEXITY, AND UNDESIRABILITY OF THIS CASE**

71. CR and our co-counsel agreed to represent Plaintiffs on a fully contingent basis. CR, a national organization, undertakes substantial financial risks and burdens to mount a case on behalf of children served by government systems, in this case foster children, fronting a large share of the cost of investigation, litigation, and expert time and expense.

72. Over the course of approximately three years, CR has expended approximately 4,955 attorney and paralegal hours, as well as approximately \$50,118.62 in out-of-pocket costs and expenses, all without any certainty of payment. This matter has necessarily required CR to spend time on this complex and risky litigation that could have been spent on other important matters. At various times during the litigation of this class action, this lawsuit consumed virtually all of my time, along with significant time of attorneys, such as Senior Staff Attorney Marissa

Nardi, and multiple paralegals. Such time could have been spent on other work. This litigation was made even more financially risky given that the complexity and subject matter required Plaintiffs to identify and work with a number of consulting-experts, fees for which are not reimbursable under the § 1988 fee-shifting statute.

73. A number of other hurdles also made this case “undesirable” to undertake. Most notably, the pre-filing investigation was extremely time-consuming, complex, and expensive, and far from certain to ultimately result in the filing of a complaint. As an experienced child-welfare litigator, I can attest to the inherent complexities in this type of litigation—including the difficulty of seeking systemic reform through solely injunctive relief, the central role of statistical evidence, the communication and recruitment challenges posed by retaining minor clients and adult Next Friends, and the intricacies of the particular systems at issue.

74. Aside from the challenges and complexity associated with class actions and child-welfare litigation in general, there were additional hurdles specific to this case. The constitutional substantive due process claims and Medicaid claims in this case are legally complex and difficult to prove. The transient nature of the foster care placements at issue in this case presented additional logistical hurdles, as children in the Plaintiff Class continued to be moved numerous times during the course of the litigation and mediation. Maintaining contact with the Named Plaintiffs, who themselves moved numerous times, was a constant difficulty.

75. Moreover, the context of Kansas’s privatized child welfare system, and in particular its placement and mental health service delivery systems, involving a web of multiple agencies, private contractors, and MCOs, made this case particularly complex and difficult to prosecute. For example, at the time Plaintiffs filed the complaint, Kansas had contracted with two private lead agencies, to provide services within the foster care system throughout the state. During the

litigation, Kansas contracted with two additional private agencies for these services: Cornerstones of Care and TFI Family Services, Inc., bringing the total to four separate private agencies handling foster care services, including the day-to-day delivery of housing services, mental health services, placement matching, and case work. Each of these four lead agencies subcontracts with a variety of other placement providers and agencies. Adding to the complexity, Kansas's Medicaid program involves a managed care model for the day-to-day delivery of services, which has included arrangements in recent years with four different MCOs—each of which has delivered mental health and behavioral health services through its own complex network of providers. The need to develop a deep understanding of these complex systems, and how those systems relate to the interrelated problems Plaintiffs alleged, made successfully investigating, litigating, and negotiating a resolution to this case—in light of the far-reaching changes necessary to remedy the systemic deficiencies alleged—especially difficult.

76. Given the risks and difficulties inherent in child welfare litigation, it is typically difficult to find competent co-counsel willing to expend the time necessary to prosecute this type of action and outlay the associated costs and expenses. In this instance, local stakeholders reached out to CR to bring this lawsuit given how difficult it was to find local counsel with the expertise and resources to investigate and litigate this case alone.

77. The scarcity of competent and willing lawyers to take on these claims on behalf of foster children in systems such as Kansas's creates a significant risk because access to stable and safe placements and adequate mental health services can be, for many of these children, a matter of life and death. As set forth in the complaint, the structural problems Plaintiffs alleged caused serious physical, emotional, and psychological harms and risks of harm, which the Settlement Agreement now addresses.

78. I believe CR, NCYL, Kansas Appleseed, DLA Piper, and Ms. Burns-Bucklew provided the expertise and resources necessary to zealously and successfully investigate and litigate this case and achieve a resolution of the claims that will significantly benefit all of the children in the Plaintiff Class.

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

EXECUTED: November 20, 2020



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Ira Lustbader, *admitted pro hac vice*

CHILDREN'S RIGHTS

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New York, New York 10005

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# **EXHIBIT A**

**IRA P. LUSTBADER**  
**Ilustbader@childrensrights.org**

**EXPERIENCE**

- 6/99 to Present**                    **CHILDREN’S RIGHTS, INC.**                    **New York, NY**  
**Litigation Director.** Senior manager actively involved in the overall vision, direction and day-to-day operations of a leading national civil rights non-profit agency (NGO) advocating for systemic reform in child welfare, juvenile justice, education and healthcare systems for children. Directly engaged in strategic planning and implementation, public education, press engagement, fundraising, and building and maintaining coalitions and key partnerships. Supervise all aspects of high profile federal impact litigation on behalf of children, including grass roots case investigation, building co-counsel teams and stakeholder alliances, fact-finding, oral and written advocacy, settlement negotiations, implementation of court ordered reforms, and collaborative problem-solving with state officials and national experts. Supervise and mentor staff. Regular Board attendance and reporting.
- 4/96 to 6/99**                    **WOLF HALDENSTEIN ADLER FREEMAN & HERZ** **New York, NY**  
**Litigation Associate.** National plaintiff class action practice in securities, consumer fraud and antitrust matters. Managed large, complex federal litigation, including research and motion practice, depositions, discovery, court appearances, settlement evaluations and negotiations (economic and therapeutic). Evaluated potential new actions and drafted complaints.
- 9/94 to 4/96**                    **PARKER CHAPIN FLATTAU & KLIMPL, LLP**                    **New York, NY**  
**Litigation Associate.** Products liability, medical malpractice, general liability and commercial litigation practice. Managed a broad caseload, including research and motion practice, regular court appearances, discovery, depositions, trial preparation and settlement negotiations. Second-seated senior trial counsel in state and federal courts. Completed jury selection and trial to successful directed verdict.
- 9/92 to 9/94**                    **BOWER & GARDNER**                    **New York, NY**  
**Litigation Associate.** High volume products liability, medical malpractice and construction litigation practice. Second seated trials, appeared on all pre-trial matters, conducted depositions and drafted motions. Left with several law partners upon dissolution of firm. (Summer Associate, 1991).

## IRA P. LUSTBADER (cont'd)

- Summer 1990**                    **PUBLIC INTEREST LAW GRANT**                    **Birmingham, AL**  
**Law Clerk.** Interviewed and prepared witnesses and clients in state and federal prisons for civil rights and criminal defense practice. Prepared research memoranda on prisoners' rights, Title VII and state criminal law issues. Assisted in grass roots community-organizing projects.
- EDUCATION**                    **BOSTON UNIVERSITY SCHOOL OF LAW**                    **Boston, MA**  
J.D., May 1992; GPA 3.50  
Honors/Activities: *American Journal of Law and Medicine*  
Hon. Edward F. Hennessey Scholar, 1992  
Public Interest Law Grant Recipient  
First Place and Best Brief, Albers Honors Moot Court  
Director, Albers Honors Moot Court  
Public Defender Clinical Program
- STATE UNIVERSITY OF NEW YORK AT ALBANY**                    **Albany, NY**  
B.S., May 1989; Business Major, Sociology Minor  
Honors/Activities: *Magna cum laude*; Dean's List  
Big Brothers of America, Albany Chapter (10 years)
- NORTH LONDON COLLEGE**                    **London, England**  
Spring 1987; International Trade and British Social Policy
- ADMISSIONS**                    New York State Bar; SDNY, EDNY; 2<sup>nd</sup>, 6<sup>th</sup>, 8<sup>th</sup> and 11<sup>th</sup> Circuit Courts of Appeal; SCOTUS.
- COMMUNITY SERVICE**                    *Trustee* (1998 to 2006), Neighborhood Youth & Family Services, a large community based non-profit providing family preservation services in the South Bronx. *Chair* (1998 to 2001), Committee on Public Service and Education, Association of the Bar of the City of New York.
- PROFESSIONAL ASSOCIATIONS**                    American Bar Association, Section on Litigation, Children's Rights Litigation Committee; National Association of Counsel for Children
- FELLOWSHIP**                    *Fellow*, 2016-2017 Child and Family Leadership Fellowship, Annie E. Casey Foundation. Highly competitive intensive 19-month national executive leadership program for 16 selected leaders across sectors and disciplines working to improve outcomes for children, families and communities.
- PUBLICATIONS**                    I. Lustbader & E. Glucksman-Hyne, *The Urgent Need to Disrupt Structural Violence against Children in U.S. Foster Care*, in VIOLENCE AGAINST CHILDREN, MAKING HUMAN RIGHTS REAL (Gertrud Lenzer, ed.) (Routledge Publishing, January 2018).

## IRA P. LUSTBADER (cont'd)

I. Lustbader, *Taking on the System: The Power of Children's Lawyers and Impact Litigation to Reform the Child Welfare System*, in CHANGING LIVES: LAWYERS FIGHTING FOR CHILDREN (Lourdes Rosado, ed.) (First Chair Press, 2014).

I. Lustbader & E. Pitchal, *Implementation of the Right to Counsel for Children in Juvenile Court Dependency Proceedings*, 36 NOVA L. Rev. 407 (2012).

### CONFERENCES/ PRESENTATIONS (SELECTED)

ABA, Center on Children and the Law, National Access to Justice Conference, Washington, D.C. (April 2019). Panel: *Changing the System: Strategies for Front-Line Lawyers*.

ABA, Children's Rights Are Human Rights, Celebrating 20 years of Fearless Lawyering for Children, San Diego, CA (May 2018). Panel (Moderator): *Addressing Racism in Our Systems*.

ABA, Annual Children's Breakfast, ABA Commission on Youth at Risk, New York, N.Y. (August 2017). Co-Presenter: *Developments in Impact Litigation to Reform Child Welfare*.

ABA, National Webinar Series: Assuring a Successful Transition for Youth, Section on Litigation, Children's Rights Committee (October 2016). Panel (Moderator): *Assuring a Successful Transition: The Role of Lawyers and the Courts for Transitioning Youth*.

National Convening, Envisioning Excellence in Foster Care: Annie E. Casey Foundation, Washington, D.C. (June 2016).

The White House, U.S. Department of Health and Human Services, and Think of Us, Foster Care & Technology Hackathon, Washington, D.C. (May 2016). Co-Presenter: *Results of "Legal Hackathon."*

38th National Child Welfare, Juvenile and Family Law Conference, National Association of Counsel for Children, Monterey, CA (August 2015). Panel: *Systemic Advocacy Roundup*.

16th American Bar Association National Conference on Children and the Law, Washington, D.C. (July 2015). Panel: *Asserting the Constitutional Rights of Children in Individual Child Welfare Proceedings and lessons from Impact Litigation*.

**IRA P. LUSTBADER (cont'd)**

**CONFERENCES/  
PRESENTATIONS  
(CONT'D)** ABA Free National Continuing Legal Education Series, Webinar (May 2015). Panel (Moderator): *Pot, Parenting and Government Intervention*.

National Seminar, Raise Your Bar: What Can a State or County Do to Raise the Performance Bar of the Child Welfare Legal Community, Emory University Conference Center, Atlanta, GA (February 2015). Panel: *Quantity of Attorneys for Parties in Dependency Cases—Can It Be Fixed?*

National Children's Rights Summit, hosted by Google, Inc. and Baker & McKenzie, Mountain View, CA (December 2014). Panel: *Accessing and Protecting Youth Data*.

37th Annual National Child Welfare, Juvenile and Family Law Conference, National Association of Counsel for Children, Denver, CO (July 2014). Presentation: *Changing Child Welfare—What Can One Person Do?*

29th Annual Conference on Treatment Foster Care, Foster Family-Based Treatment Association (FFTA), Nashville, TN (July 2013). Presentation: *Holding Child Welfare Systems Accountable is Good for Kids and Good for the FFTA*.

Third National Conference on the Right to Counsel for Abused and Neglected Children, ABA and the University of Washington School of Law, Seattle, WA (June 2013). Panel: *Litigation Reform*.

75th National Conference of the National Lawyers Guild, Pasadena, CA, October 2012. Panel: *When Foster Care Is Class Warfare*.

ABA Section on Litigation Spring Leadership Conference, San Juan, P.R. (June 2012). Panel: *We Must Do Better: Child Abuse, Neglect and Foster Care*.

Social Justice for Children: To End Child Abuse and Violence Against Children, a National Consultation; Children's Studies Center for Research and Public Service, Brooklyn College (CUNY), New York, N.Y. (November 2011). Presentation: *The Great Hidden Abuse in the U.S.*

\* \* \*

# MARISSA C. NARDI

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## EXPERIENCE

### **Children's Rights**, New York, NY

Senior Staff Attorney, April 2018 – Present

Represent and advocate for child clients in the juvenile justice and child welfare systems.

- Litigate and lead federal civil rights cases in all aspects and stages of litigation, including discovery, trial, and settlement negotiations.
- Investigate state systems through extensive research and engagement with community stakeholders.
- Coordinate systemic advocacy and legal campaigns on diverse issues affecting children.
- Regularly supervise teams of attorneys and paralegals as part of the management team.

### **Winston & Strawn LLP**, New York, NY

Litigation Associate, Fall 2012 – April 2018; Summer Associate, Summer 2011

Advise and represent clients in antitrust, white collar, IP, contract, fraud, tax, employment, real estate, securities, advertising, products liability, investigations, and international arbitration matters.

- First-chaired trials, hearings, oral arguments, negotiations, meet-and-confers, and depositions.
- Extensively participate in arbitrations, mediations, diligence, and investigations.
- Lead and supervise all major aspects of affirmative and defensive discovery in massive litigations.
- Draft complaints, briefs, and critical motions, such as motions to dismiss and for summary judgment.
- Lead interviews and investigations of potential witnesses, experts, and third-parties.
- Draft and analyze client contracts, agreements, public statements, filings, social media, and advertising.
- Advise corporate clients of rights, responsibilities, compliance, risk management, and case strategies.

Representative matters:

- Represent Plaintiff TreeHouse Foods in its intellectual property and antitrust lawsuit against Keurig.
- Represent a shoe designer and manufacturer in a patent litigation.
- Represent Panasonic in the multidistrict, putative class action, optical disk drive antitrust litigation.
- Represented a former state AG in a criminal trial on perjury, official oppression, and obstruction.
- Represented a multinational steel manufacturer in an intellectual property, antitrust, and patent litigation.
- Represented the former Liverpool Football Club owner in a contract litigation.
- Represented a technology solutions provider in a mediation concerning breach of contract.
- Represented a healthcare provider in a litigation concerning taxes and government investigations.
- Represented a multinational telecommunications company in a high-tech patent litigation.
- Represented a multinational luxury retailer in an international arbitration alleging breach of contract.
- Represented a crane manufacturer in over 100 actions in a products liability consolidated litigation.
- Represented a government contractor in an internal investigation concerning the False Claims Act.

**Cornell Law School**, Ithaca, NY, Advocate, Innocence Clinics I-III and Supervised Writing, Fall 2010 - 2012

Investigated and prepared successful post-conviction relief for innocent client without DNA evidence.

**Citizens Concerned for Children** (Attorneys for Children), Ithaca, NY, Legal Extern, Fall 2011

Represented youth clients in hearings and mediations in custody, delinquency, abuse, neglect, and PINS actions.

**Center for Family Representation, Inc.**, New York, NY, Legal Intern, Summer 2010

**Sanctuary for Families**, New York, NY, Criminal Justice Fellow, Summer 2008

**Westchester Children's Association**, White Plains, NY, Child Advocacy Intern, Summer 2007

## EDUCATION

**Cornell Law School**, Ithaca, NY

J.D., Advocacy Concentration, May 2012

**Honors:** Scheinman Institute Arbitration Competition, Winner  
AAJ Trial Advocacy Regional Competition, Semifinalist  
Charles H. Revson Public Interest Fellow  
Public Service Challenge Award (100+ pro bono hours in 1 year)

**Activities:** *Cornell Journal of Law and Public Policy*, Note Editor  
Cornell Law ADR Society, ICC Int'l Mediation Team  
Cornell University Mock Trial Team, Head Coach  
Cornell Law Students Assn. and Career Services, Mentor  
Cornell Law Mock Trial, Co-Founder, President, Captain  
Scheinman Institute Student Mediator

**Barnard College**, Columbia University, New York, NY

B.A., *cum laude*, in Psychology, *dep't honors*, *honors thesis*, Anthropology and Dance Minors, May 2009

**Honors:** Barnard Bear Pin (highest Barnard leadership award)  
Columbia Mock Trial Team Leadership Award  
Barnard Student Leader Award (three times)  
Barnard Club of Distinction Award (Athena Pre-Law President)  
Dean's List (every semester)  
Jewish Fdn. for the Education of Women Scholar (twice)  
Terry Rose Saunders Scholar (twice)  
New York Lottery Leaders of Tomorrow Scholar  
Daniel and Florence Guggenheim Fdn. Oscar S. Straus II Criminal Justice Fellow

**Activities:** Athena Pre-Law Society, President  
Youth Onstage Empowerment, Founder, President  
Columbia Mock Trial (top ten national team), Captain  
Orchesis & Dance Dept. Tap Ensemble, Choreographer, Dancer  
Columbia La Societ  Italiana, President  
Columbia Urban Experience (volunteer program), Leader

**AWARDS**

- NYSBA Empire State Counsel Designation for outstanding pro bono contribution, Apr. 2017
- Legal Aid Pro Bono Publico Award for outstanding pro bono representation, Oct. 2013

**SPEAKING ENGAGEMENTS**

- Co-presenter, "Active Litigation," Children's Rights, Jan. 24, 2020
- Co-presenter, "Written Discovery and Requests to Admit," Winston & Strawn LLP, Nov. 2017, 2016
- Moderator, "The Life of an Associate," Winston & Strawn LLP, Oct. 4, 2017
- Presenter, "Achieving Asylum," Winston & Strawn LLP, June 8, 2017
- Panelist, "Managing Expectations," Winston & Strawn LLP, Sept. 30, 2016
- Presenter, "ADR in the Modern Age," Baruch College Summer Leadership Academy, July 12, 2013
- Coordinator, "Interacting with the Media in High-Profile Cases," Winston & Strawn LLP, June 15, 2017
- Coordinator, "Int'l Arbitration in Africa: The OHADA Model," Winston & Strawn LLP, May 14, 2015

**PUBLICATIONS**

- Co-author, Antitrust Concerns in No-Poaching, Wage-Fixing, and Non-Compete Agreements, Lexis Nexis Practice Advisor, Aug. 20, 2018
- Co-editor, 2017 Updates to Joint Venture Handbook by the ABA Antitrust Section
- Co-author, 2014 - 2017 Suppl., Jeffrey Kessler, Int'l Trade & U.S. Antitrust Law, Thomson Reuters
- Co-author, Delaware Quarterly: Recent Developments in Delaware Busin. & Sec. Law, Sec. Reform Act Litig. Reporter and Bank and Corporate Governance Law Reporter, Vol. IV, No. 1 (Apr. 2015)

**ADMISSIONS** New York Bar; New Jersey Bar; S.D.N.Y.; E.D.N.Y.; N.D.N.Y.; D.N.J.

**PROFESSIONAL ACTIVITIES** All Stars Project, Inc.'s Young Professionals ("ASYP"); U.S. Int'l and NYS H.S. Moot Court Teams, Coach (2017-2018); Winston & Strawn, Training Advisor and Mentor (2016-2018)

**JONATHAN KING**  
Children's Rights  
88 Pine Street, Suite 800, New York, NY 10005  
212 683 2210 [jking@childrensrights.org](mailto:jking@childrensrights.org)

**EDUCATION**

**FORDHAM UNIVERSITY SCHOOL OF LAW**

New York, New York

Juris Doctor

May 2012

**PACE UNIVERSITY**

New York, New York

Master of Science for Teachers, Childhood Education

Concentration in Students with Disabilities

May 2009

**COLLEGE OF THE HOLY CROSS**

Worcester, Massachusetts

Bachelor of Arts, Spanish, *cum laude*

May 2007

**EXPERIENCE**

**CHILDREN'S RIGHTS**

New York, New York

*Staff Attorney*

2018-Present

**GREENHEART INTERNATIONAL**

Bangkok, Thailand

*Teacher*

2017-2018

**VENABLE LLP**

New York, New York

*Associate*

2012-2017

**TEACH FOR AMERICA**

New York, New York

*Corps Member*

2007-2009

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## **EDUCATION**

### **COLUMBIA LAW SCHOOL, New York, NY**

J.D., May 2015

Honors: Harlan Fiske Stone Scholar  
Activities: *Columbia Journal of Law & Social Problems* (2013-2014)  
Columbia Law Women's Association  
Child Advocacy Clinic Teaching Fellow

### **WASHINGTON UNIVERSITY IN ST. LOUIS, St. Louis, MO**

B.A., May 2010

Major: International Studies  
Minor: Psychology  
Honors: Dean's list  
Sigma Iota Rho International and Area Studies Honorary  
Goldman Fellow, Gephardt Institute of Public Service  
Activities: Alpha Phi Omega Community Service Society, VP of Fellowship, VP of Service  
Study Abroad: University of Cape Town, South Africa (Fall 2008)

## **EXPERIENCE**

### **Children's Rights, Inc., New York, NY**

*Staff Attorney*, June 2019 – Present

- Litigated complex federal class actions concerning systemic deficiencies in state child welfare systems on behalf of children in state custody.

### **Skadden, Arps, Slate, Meagher & Flom LLP, New York, NY**

*Litigation Associate*, September 2015 – June 2019; *Summer Associate*, Summer 2014

- Represented and counseled clients in complex civil litigation proceedings in state and federal court, including contractual and commercial disputes and in securities litigation.
- Principal responsibilities included drafting motions and discovery requests and responses, managing document reviews and preparing for depositions, and preparing for oral arguments, hearings, status conferences, and mediations.
- *Pro bono* experience:
  - Representing client in housing repair action to compel landlord to make necessary repairs and correct building violations;
  - Representing single mother in child support action;
  - Represented clients in removal proceedings on both detained and non-detained dockets during six month externship with the Legal Aid Society's New York Immigrant Family Unity Project;
  - Obtained Special Findings Orders on two occasions for clients applying for Special Immigrant Juvenile Status (in both cases, the I-360 is currently pending);
  - Assisted mother in regaining custody of her child; and
  - Assisted Sikh cultural organization in obtaining tax-exempt status

### **Legal Aid Society Externship on Unaccompanied Immigrant Youth, New York, NY**

*Extern*, Spring 2015

- Represented undocumented immigrant youth applying for Special Immigrant Juvenile Status in immigration court and family court. Worked with clients to draft affidavits and complete written applications. In seminar, discussed immigration policy and the unique challenge of representing unaccompanied minors.

**CLAIRE GLASSPIEGEL**

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**Bronx Defenders Externship on Holistic Defense**, New York, NY

*Family Defense Practice Extern*, Fall 2014

- Defended residents of the Bronx against the removal of their children. Performed legal research, wrote memos, and drafted court documents for clients. In seminar, discussed racial and class disparity in the justice system, the social history of the South Bronx, and holistic advocacy.

**Legal Aid Society, Juvenile Rights Practice**, New York, NY

*Special Litigation & Law Reform Unit Intern*, July-August 2014

- Provided legal representation and advocacy on behalf of children involved in foster care and juvenile delinquency cases. Prepared evidence for depositions, researched and drafted written testimony, and monitored compliance with settlement agreements.

**Child Advocacy Clinic of Columbia Law School**, New York, NY

*Student Intern*, 2013-2014

- Provided legal advice and representation to youth aging out of the foster care system. Assisted clients in addressing issues such as affordable housing search, identity theft remedies, and financial planning. In seminar portion of clinic, learned about effective advocacy techniques and representation of youth.

**Partnership for Children's Rights**, New York, NY

*Summer Associate, Equal Justice Works Summer Corps Member*, Summer 2013

- Represented low-income parents in special education litigation against the New York City Department of Education to ensure that their children received appropriate services. Prepared witnesses for hearings. Performed legal research and drafted hearing requests. Examined and cross-examined witnesses and drafted closing statements.

**Coro Fellows Program in Public Affairs**, St. Louis, MO

*Fellow*, August 2010-May 2011

- Selected as one of sixteen fellows for full-time experiential leadership training program. Completed seven projects across various public affairs sectors, including planning and orchestrating advocacy events for a family and children's services nonprofit, drafting a proposal for the St. Louis County Economic Council detailing how early childhood education policy can promote economic development, and researching and formulating recommendations on company health care strategy for a local business.

**BAR ADMISSIONS**

Admitted in New York State and the Southern District of New York

**NICOLE TAYKHMAN**

198 Van Vorst Street Apt. 418 • Jersey City, NJ 07302 • 516-382-0827 • nicole.taykhman@gmail.com

**EDUCATION**

**Columbia Law School, New York, NY**

Juris Doctor, received May 2016

Honors: James Kent Scholar (2015 – 2016, 2014 – 2015); Harlan Fiske Stone Scholar (2013 – 2014)  
Pauline Berman Heller Prize (for academic achievement in the service of gender equality in law)  
Myra Bradwell Award (for best student note on the topic of women and the law)

Publication: *Defying Silence: Immigrant Women Workers, Wage Theft, and Anti-Retaliation Policy in the States*, 32 COLUM. J. GENDER & L. 96 (2016)

Activities: *Columbia Journal of Gender and Law*; Columbia Public Rights/Private Conscience Project; Externship, Hon. Debra A. Livingston, U.S. Court of Appeals for the Second Circuit; Teaching Assistant, Civil Procedure; Research Assistant, Professor Kent Greenawalt; High School Law Institute; U-Visa Project

**Brown University, Providence, RI**

Bachelor of Arts, Political Science, *magna cum laude*, with focus in American Politics, received May 2011

Study Abroad: Université de Paris: Sorbonne, France, Fall 2009

**EXPERIENCE**

**Children's Rights, Inc., New York, NY**

*Staff Attorney* January 2020 – Present  
Litigated complex federal class actions concerning systemic deficiencies in state child welfare systems on behalf of children in state custody. Investigated child welfare and juvenile justice issues for potential litigation and advocacy.

**Jenner & Block LLP, New York, NY**

*Litigation Associate* November 2018 – January 2020; October 2016 – July 2017  
*Summer Associate* Summer 2015

Participated in variety of complex commercial litigation and arbitration, government-facing and internal investigations, and federal impact litigation. Presented oral argument on dispositive motion in federal district court, took and defended depositions, drafted legal briefs, conducted witness interviews, prepared for cross-examination of witnesses at merits hearing, and handled all aspects of discovery.

**Pro bono:** Co-counseled nationwide class action of veterans diagnosed with PTSD. Litigated constitutional challenge to Wisconsin abortion access restrictions. Represented disabled tenants in federal housing and disability discrimination action. Represented unaccompanied minor in Special Immigrant Juvenile Status proceedings.

**Hon. Michael P. Shea, U.S. District Court for the District of Connecticut, Hartford, CT**

*Law Clerk* August 2017 – August 2018  
Handled all aspects of case management for one-third of docket. Drafted opinions, orders, and jury instructions in civil and criminal cases, including appeals during Second Circuit sitting and several trials. Coordinated Reentry Court program for citizens returning from incarceration.

**Columbia Law School Immigrants' Rights Clinic, New York, NY**

*Student Attorney* January 2015 – May 2016  
Represented refugee mothers and children in bond proceedings in immigration detention center. Represented unaccompanied minors in proceedings in immigration and family courts, including in asylum and Special Immigrant Juvenile Status cases.

**American Civil Liberties Union: Center for Liberty, New York, NY**

*Legal Intern* Summer 2014  
Conducted legal research, drafted memoranda, and edited scholarship on religious exemptions in the fields of reproductive and LGBT rights.

**Balestriere Fariello, New York, NY**

*Legal Analyst* June 2011 – February 2013  
Implemented all aspects of case management in civil litigation, including discovery, legal research, and client communication.

**BAR ADMISSION: New York (2017)**

1330 Highland Park Drive Baton Rouge, Louisiana 70808  
PHONE (225) 588-5407 (Mobile) • sdixon@childrensrights.org

## **STEPHEN A. DIXON**

### **Child Advocacy Lawyer**

- Work as an Attorney with America's leading child advocacy organization
- Recipient of the National Association of Counsel for Children Outstanding Legal Advocacy Award (national award)
- Has demonstrated a long-term commitment to public service and leadership within a fast-paced advocacy office (as Section Chief)
- Experienced in performing outreach for child advocacy campaigns, including organizing plaintiffs and other stakeholders
- Worked at a private law firm, a public defender office, a law school, and national and state public interest legal advocacy organizations; all positions afforded an opportunity to promote healthy childhood development for children in state custody

### **PROFESSIONAL EXPERIENCE**

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#### **2009 – present Of counsel/previously Senior Staff Attorney, Children's Rights, New York, New York**

- Work on teams seeking systemic reform of broken state child protection and foster care systems through policy and legal solutions
- Analyze child protection systems in light of federal, state, and best practice standards
- Practice is centered around federal class action civil rights litigation

#### **2015 – present Of counsel, A Better Childhood, New York**

- Case investigation
- Federal civil rights cases focused on children, healthy childhood development, foster care

#### **2014 – present Private practice, Baton Rouge, Louisiana**

- Select cases with a focus on civil liberties and constitutional law (ACLU cooperating attorney occasionally)

#### **2003 – 2009 Adjunct Professor at the LSU Law Center, Baton Rouge, Louisiana**

- Co-founded the juvenile law clinic at the LSU Law Center
- Taught the Juvenile Representation Workshop
- Supervised law student practitioners representing clients in court

#### **1991 – 2009 Section Chief at Juvenile Court, Baton Rouge, Louisiana, Office of Public Defender**

- Worked as trial attorney

- Has represented hundreds of abused, neglected and troubled youth
- Appellate attorney for special litigation, including actions to affect systemic change
- Supervised seven staff members, including four attorneys
- Supervised numerous social work and legal interns

**1987 – 1991 Private Law Practice, Law Office of Theodor Schirmer, Baton Rouge, Louisiana**

- Worked as a litigation and research attorney in a civil rights/criminal defense oriented law office
- Practiced in federal, state, and city courts
- Garnered substantial trial and motion practice experience

## EDUCATION

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**1999 Trial Lawyer’s College, Dubois, Wyoming, graduate**

- Extended course in trial advocacy conducted by Gerry Spence and others

**1984 – 1987 Louisiana State University, Paul M. Hebert Law Center, Baton Rouge, Louisiana, JD** (admitted to the bar October 1987)

- Ranked in top 10% of class
- Moot Court Board Member

**1985 Loyola University School of Law, New Orleans, Louisiana**

- Summer School (GPA: 4.0)
- Volunteer at Ecumenical Immigration Service assisting refugees apply for immigration relief

**1977 – 1982 Louisiana State University, Baton Rouge, Louisiana, Bachelor of Science, Geology** (Overall GPA 3.67, Major 4.0)

- Teaching assistant for senior-level course as undergraduate
- Field assistant for several international scientific assignments

## ADDITIONAL PROFESSIONAL ACTIVITIES

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**1993 – 2009 Volunteer trainer for Court Appointed Special Advocates (CASA)**

**2008 Lead counsel in *State of Louisiana in the Interest of L.B.***, a Louisiana Supreme Court case which established a new category of abuse and neglect to protect seriously abused infants (“abusive household/environment”), 200-CJ-1539 (La. 2008)

**2004 – 2014 Member of the Louisiana Law Institute Children’s Code Committee**, chair of committee on confessions, organized and hosted a national teleconference to support work of the subcommittee

**2008 Chair, Criminal Litigation Seminar, Louisiana Public Defenders Association, Juvenile Defender Track**, organized and presented on multiple topics at a highly reviewed CLE training for child advocates

**1998 Lead counsel in *In re C.B.***, a landmark Louisiana Supreme Court case on the right to treatment for youth in institutions and the right to trial by jury. This case required bringing together several conflicting public policy imperatives in such a way that all 7 justices formed a consensus in respect to a favorable resolution of the case for children in state custody. 708 So.2d 391 (La. 1998)

## PUBLICATION

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**“The Worst of Both Worlds: Punishments and Procedures for Children in Louisiana,”**  
30 Southern Law Review 329 (2003)

## HONORS RECEIVED

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**2014 Honorary Member of the Order of the Coif**, LSU Law Center (invited to address honor graduates)

**2003 Career Public Interest Award**, Louisiana State Bar Association (statewide award)

**2003 Youth Advocacy Award**, Juvenile Justice Project of Louisiana (statewide award)

**1998 Outstanding Legal Advocate Award**, National Association of Counsel for Children (national award)

**1997 & 2009 Special Award for Dedicated Service**, Office of Public Defender for the Parish of East Baton Rouge

## BAR ADMISSIONS

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**Supreme Court of the United States**

**United States Court of Appeals, Fifth Circuit** (New Orleans)

**Middle District of Louisiana, United States District Court** (Baton Rouge)

**Louisiana** (all state courts)

**Erin G. McGuinness**

1356 Pacific Street, 3D  
Brooklyn, New York 11216  
(315) 729-0891  
egmcguinness@gmail.com

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**EDUCATION**

**Maxwell School of Citizenship and Public Affairs**

Masters of Public Administration, May 2012

**Syracuse University College of Law**

Juris Doctor, May 2012

**Honors:**

*Inducted to the National Order of the Barristers* (2012);  
*Leadership in Advocacy Award*, New York State Academy of Trial Lawyers (2012);  
*Pro Bono and Community Service Award*, Syracuse University College of Law (2012);  
*Ethical Advocacy Award*, National Civil Trial Competition (2011);  
*Grossman Trial Director*, Moot Court Honor Society (2011-2012);  
*Associate Editor*, Journal of International Law and Commerce (2010-2012);  
*Fall Events Director*, Syracuse Public Interest Network (2010).

**Competitions:**

National Trial Competition (2012); National Civil Trial Competition (2011);  
American Association of Justice Trial Competition (2011); Buffalo-Niagara National Trial Competition (2010).

**University at Buffalo, State University of New York**

Bachelor of Arts, Political Science, May 2009

**BAR ADMISSIONS**

New York State

United States District Court, Northern District of New York

**EXPERIENCE**

**Children's Rights**, New York, NY

November 2016 - current

*Senior Policy Analyst*

Conduct policy research and analysis; draft policy research projects based on quantitative and qualitative analysis; draft advocacy reports and public education campaigns; assist in active impact litigation cases, including working with experts and document and data analysis; and assist in the monitoring, enforcement and tracking of system reform.

**Frank H. Hiscock Legal Aid Society**, Syracuse, NY

July 2014 – November 2016

*Staff Attorney*

Represent clients in Family Court Matters. Conducted over a hundred trials, hearings, and inquests.

**Robert E. Lahm, PLLC**, Syracuse, NY

June 2013 – July 2014

*Associate Attorney*

Drafted motions, pleadings, discovery documents; conducted depositions; and assisted in trial preparation for civil litigation cases.

**Davies Law Firm, P.C.**, Syracuse, NY

August 2012 – June 2013

*Law Clerk/Associate Attorney*

Counseled clients on the creation of estate plans and elder law concerns. Drafted and executed Revocable Trusts, Irrevocable Trusts, Supplemental Needs Trusts, and various other estate planning documents.

**Nassau County Supreme Court**, Mineola, NY

Summer 2012

*Intern to Honorable Denise Sher*

Drafted decisions and memoranda for New York Supreme Court Judge, Hon. Denise Sher.

**ACTIVITIES**

**Thurgood Marshall Trial Team**, Syracuse University College of Law

2012 – 2016

*Head Coach*

Coached law students on trial technique in preparation for national tournaments. 2012 Northeast Regional Finalists; 2013 Regional Northeast Regional Finalists; 2015 Northeast Regional Champions & National Finalists.

# **EXHIBIT B**

*M.B. v. Howard*  
Children's Rights Fees Summary

	Hours 4Q 2017	Hours 1Q 2018	Hours 2Q 2018	Hours 3Q 2018	Hours 4Q 2018	Hours 1Q 2019	Hours 2Q 2019	Hours 3Q 2019	Hours 4Q 2019	Hours 1Q 2020	Hours 2Q 2020	Hours 3Q 2020	Total Hours	Total Dollars
<b>Lead Counsel</b>														
Ira Lustbader	2.92	20.15	53.83	77.83	223.72	84.73	44.00	63.93	137.47	137.23	114.80	8.00	968.62	\$ 484,308.33
<b>Senior Staff Attorney</b>														
Marissa Nardi	0.00	0.00	52.38	34.17	168.27	41.40	20.02	95.53	253.08	352.63	171.10	22.43	1211.02	\$ 460,186.33
<b>Staff Attorney</b>														
Jonathan King	0.00	0.00	0.00	53.13	137.95	58.32	89.90	98.55	94.82	126.45	43.13	0.58	702.83	\$ 242,477.50
Claire Glasspiegel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	44.48	68.95	77.23	47.98	0.00	238.65	\$ 73,981.50
Nicole Taykman	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	92.52	98.88	5.03	196.43	\$ 56,965.67
<b>Of Counsel</b>														
Stephen Dixon	0.08	40.73	46.27	69.10	92.35	8.48	25.92	27.45	10.50	2.45	23.27	7.70	354.30	\$ 145,263.00
<b>Senior Policy Analyst</b>														
Erin McGuinness	1.30	34.35	32.57	85.32	149.02	28.72	14.13	22.12	25.75	3.40	12.20	0.00	408.87	\$ 98,128.00
<b>Paralegal</b>														
Daniel Adamek	0.00	0.00	2.63	35.92	148.67	20.50	0.75	38.15	143.37	175.78	68.82	0.33	634.92	\$ 126,983.33
Clare Connaughton	0.00	0.00	0.00	0.00	0.00	5.00	4.37	19.50	112.07	56.82	41.62	0.00	239.37	\$ 47,873.33
<b>TOTAL</b>													<b>4,955.00</b>	<b>\$ 1,736,167.00</b>

# **EXHIBIT C**

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Attorney/Paralegal	Date	Case	Description	Hours	Hourly Rate	Payment
Claire Glasspiegel	7/17/2019	Kansas	Discuss discovery strategy with MN, DA, CC	0.83	\$ 300.00	\$ 250.00
Claire Glasspiegel	7/17/2019	Kansas	Edit draft 30(b)(6) notice	1.00	\$ 300.00	\$ 300.00
Claire Glasspiegel	8/2/2019	Kansas	Review subpoena language for CSAs	0.58	\$ 300.00	\$ 175.00
Claire Glasspiegel	8/5/2019	Kansas	Meeting to discuss draft subpoena language with IL, JK, EM	0.47	\$ 300.00	\$ 140.00
Claire Glasspiegel	8/14/2019	Kansas	Research DG v. Strickland district court decision relevant to case	0.45	\$ 300.00	\$ 135.00
Claire Glasspiegel	8/19/2019	Kansas	Meeting to discuss doc review of NP files with MN, EM, JK, DA, CC	0.30	\$ 300.00	\$ 90.00
Claire Glasspiegel	9/4/2019	Kansas	Conduct legal research on standard applied for foster care SDP cases	3.10	\$ 300.00	\$ 930.00
Claire Glasspiegel	9/5/2019	Kansas	Draft paragraphs on standard applied for SDP foster care cases	1.08	\$ 300.00	\$ 325.00
Claire Glasspiegel	9/12/2019	Kansas	Revise draft mediation statement	2.57	\$ 300.00	\$ 770.00
Claire Glasspiegel	9/18/2019	Kansas	Conduct detailed review with simultaneous written analysis of Named Plaintiff VA case file documents (hereinafter "review of VA case file documents")	2.98	\$ 300.00	\$ 895.00
Claire Glasspiegel	9/23/2019	Kansas	Review of VA case file documents	3.00	\$ 300.00	\$ 900.00
Claire Glasspiegel	9/24/2019	Kansas	Review of VA case file documents	7.00	\$ 300.00	\$ 2,100.00
Claire Glasspiegel	9/25/2019	Kansas	Review of VA case file documents	7.17	\$ 300.00	\$ 2,150.00
Claire Glasspiegel	9/26/2019	Kansas	Review of VA case file documents	7.00	\$ 300.00	\$ 2,100.00
Claire Glasspiegel	9/27/2019	Kansas	Review of VA case file documents	1.55	\$ 300.00	\$ 465.00
Claire Glasspiegel	9/30/2019	Kansas	Review of VA case file documents	5.40	\$ 300.00	\$ 1,620.00
Claire Glasspiegel	10/1/2019	Kansas	Review of VA case file documents	2.00	\$ 300.00	\$ 600.00
Claire Glasspiegel	10/2/2019	Kansas	Conduct detailed review with corresponding written analysis of Named Plaintiff ZZ case file (hereinafter "review of ZZ case file documents")	5.00	\$ 300.00	\$ 1,500.00
Claire Glasspiegel	10/3/2019	Kansas	Review of ZZ case file documents	5.92	\$ 300.00	\$ 1,775.00
Claire Glasspiegel	10/4/2019	Kansas	Review of ZZ case file documents	4.50	\$ 300.00	\$ 1,350.00
Claire Glasspiegel	10/7/2019	Kansas	Review of ZZ case file documents	5.00	\$ 300.00	\$ 1,500.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Claire Glasspiegel	10/8/2019	Kansas	Review of ZZ case file documents	6.63	\$	300.00	\$	1,990.00
Claire Glasspiegel	10/9/2019	Kansas	Review of ZZ case file documents	2.00	\$	300.00	\$	600.00
Claire Glasspiegel	10/10/2019	Kansas	Review of ZZ case file documents	5.00	\$	300.00	\$	1,500.00
Claire Glasspiegel	10/11/2019	Kansas	Review of ZZ case file documents	4.17	\$	300.00	\$	1,250.00
Claire Glasspiegel	10/12/2019	Kansas	Review of ZZ case file documents	3.00	\$	300.00	\$	900.00
Claire Glasspiegel	10/13/2019	Kansas	Review of ZZ case file documents	3.00	\$	300.00	\$	900.00
Claire Glasspiegel	10/14/2019	Kansas	Review of ZZ case file documents	3.00	\$	300.00	\$	900.00
Claire Glasspiegel	10/14/2019	Kansas	Review of ZZ case file documents	4.00	\$	300.00	\$	1,200.00
Claire Glasspiegel	10/23/2019	Kansas	team meeting with co-counsel and CR KS team re discovery strategy	0.68	\$	300.00	\$	205.00
Claire Glasspiegel	11/1/2019	Kansas	Draft language for deposition notice for Defendant Laura Kelly	2.50	\$	300.00	\$	750.00
Claire Glasspiegel	11/4/2019	Kansas	Review draft subpoena and its updated language	0.75	\$	300.00	\$	225.00
Claire Glasspiegel	11/6/2019	Kansas	Prepare subpoena response to share with co-counsel	0.50	\$	300.00	\$	150.00
Claire Glasspiegel	11/21/2019	Kansas	Meeting to discuss settlement/mediation draft outcomes	1.50	\$	300.00	\$	450.00
Claire Glasspiegel	11/25/2019	Kansas	Meeting to discuss draft mediation agreement	1.00	\$	300.00	\$	300.00
Claire Glasspiegel	11/25/2019	Kansas	Review with concurrent analysis of documents produced by Defendants for purposes of preparing team for mediation (hereinafter "review documents produced by Defs in preparation for mediation")	3.37	\$	300.00	\$	1,010.00
Claire Glasspiegel	12/4/2019	Kansas	Meeting re: proposed settlement	0.90	\$	300.00	\$	270.00
Claire Glasspiegel	12/4/2019	Kansas	Review proposed settlement agreement to assist with editing key provision	1.03	\$	300.00	\$	310.00
Claire Glasspiegel	12/9/2019	Kansas	Review documents produced by Defs in preparation for mediation	1.50	\$	300.00	\$	450.00
Claire Glasspiegel	12/11/2019	Kansas	Review documents produced by Defs in preparation for mediation	1.00	\$	300.00	\$	300.00

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Claire Glasspiegel	12/12/2019	Kansas	Review and summarize potential hot docs recently produced by Defendants for purposes of mediation	1.00	\$	300.00	\$	300.00
Claire Glasspiegel	2/5/2020	Kansas	Internal meeting with MN on upcoming discovery strategy and projects	0.33	\$	300.00	\$	100.00
Claire Glasspiegel	2/5/2020	Kansas	Review RFP information on record reviews in order to draft second RFP	2.00	\$	300.00	\$	600.00
Claire Glasspiegel	2/6/2020	Kansas	Phone call with EG re: drafting RFP	0.50	\$	300.00	\$	150.00
Claire Glasspiegel	2/10/2020	Kansas	Draft RFPs for case record review	2.00	\$	300.00	\$	600.00
Claire Glasspiegel	2/11/2020	Kansas	Draft RFPs for other additional documents requested during mediation	3.00	\$	300.00	\$	900.00
Claire Glasspiegel	2/12/2020	Kansas	Review and draft RFP re: case record review	2.00	\$	300.00	\$	600.00
Claire Glasspiegel	2/14/2020	Kansas	Draft interrogatory re: database information	1.50	\$	300.00	\$	450.00
Claire Glasspiegel	2/14/2020	Kansas	Edit second RFPs including instructions and definitions sections	1.00	\$	300.00	\$	300.00
Claire Glasspiegel	2/25/2020	Kansas	Conduct issue review of documents produced by Defendants	1.92	\$	300.00	\$	575.00
Claire Glasspiegel	2/25/2020	Kansas	Draft first set of interrogatories	2.77	\$	300.00	\$	830.00
Claire Glasspiegel	2/25/2020	Kansas	Draft second set of RFPs	2.25	\$	300.00	\$	675.00
Claire Glasspiegel	2/26/2020	Kansas	Discuss RFPs with EPG	0.23	\$	300.00	\$	70.00
Claire Glasspiegel	2/26/2020	Kansas	Edit current draft of second set of RFPs	1.52	\$	300.00	\$	455.00
Claire Glasspiegel	2/26/2020	Kansas	Conduct issue review of documents produced by Defendants	3.17	\$	300.00	\$	950.00
Claire Glasspiegel	2/27/2020	Kansas	Meeting with Kansas team meeting to discuss mediation	0.50	\$	300.00	\$	150.00
Claire Glasspiegel	2/27/2020	Kansas	Edit operative draft second set of RFPs	1.35	\$	300.00	\$	405.00
Claire Glasspiegel	2/27/2020	Kansas	Issue review of documents produced by Defendants	3.45	\$	300.00	\$	1,035.00
Claire Glasspiegel	2/28/2020	Kansas	Meeting with IL, MN, and EPG re: edits to rogs and RFPs	0.50	\$	300.00	\$	150.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Claire Glasspiegel	2/28/2020	Kansas	Revise second RFPs per discussion with IL, MN, and EPG in preparation for serving	2.47	\$	300.00	\$	740.00
Claire Glasspiegel	3/2/2020	Kansas	Revise first set of Rogs to finalize in preparation for serving	4.00	\$	300.00	\$	1,200.00
Claire Glasspiegel	3/3/2020	Kansas	Review federal and local rules relating to responses to RFPs and Rogs	0.50	\$	300.00	\$	150.00
Claire Glasspiegel	3/3/2020	Kansas	Begin drafting third set of RFPs to Defs	3.00	\$	300.00	\$	900.00
Claire Glasspiegel	3/4/2020	Kansas	Edit definitions section in third set of RFPs	2.00	\$	300.00	\$	600.00
Claire Glasspiegel	3/5/2020	Kansas	Continue drafting third set of RFPs to Defs	4.00	\$	300.00	\$	1,200.00
Claire Glasspiegel	3/9/2020	Kansas	Edit draft of third set of RFPs based on suggestions	2.42	\$	300.00	\$	725.00
Claire Glasspiegel	3/10/2020	Kansas	Edit draft third set of RFPs per MN's suggestions	1.00	\$	300.00	\$	300.00
Claire Glasspiegel	3/11/2020	Kansas	Check-in meeting with MN re third set of RFPs	0.63	\$	300.00	\$	190.00
Claire Glasspiegel	3/11/2020	Kansas	Edit third RFPs to share with co-counsel team	1.00	\$	300.00	\$	300.00
Claire Glasspiegel	3/13/2020	Kansas	Conduct issue review of documents produced by Defendants	1.50	\$	300.00	\$	450.00
Claire Glasspiegel	3/16/2020	Kansas	Conduct issue review of Defendants' produced documents	2.68	\$	300.00	\$	805.00
Claire Glasspiegel	3/17/2020	Kansas	Draft and edit the third RFPs re: 30(b)(6) documents	1.85	\$	300.00	\$	555.00
Claire Glasspiegel	3/17/2020	Kansas	Conduct issue review of Defendants' produced documents	2.62	\$	300.00	\$	785.00
Claire Glasspiegel	3/18/2020	Kansas	Draft and edit third RFPs per feedback by co-counsel	0.17	\$	300.00	\$	50.00
Claire Glasspiegel	3/18/2020	Kansas	Meeting with Internal CR team re discovery strategy, ESI	0.50	\$	300.00	\$	150.00
Claire Glasspiegel	3/18/2020	Kansas	Summarize key findings from hot docs identified during my issue review of select documents produced by Defendants	1.00	\$	300.00	\$	300.00
Claire Glasspiegel	3/20/2020	Kansas	Draft certificate of service for third RFPs	0.50	\$	300.00	\$	150.00
Claire Glasspiegel	3/23/2020	Kansas	Review key hot documents identified by others in their doc review of other documents produced by Defs	1.87	\$	300.00	\$	560.00

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Claire Glasspiegel	3/23/2020	Kansas	Edit latest set of RFPs in preparation for service	2.00	\$	300.00	\$	600.00
Claire Glasspiegel	3/24/2020	Kansas	Incorporate final suggestions by co-counsel into RFPs to finalize for service	2.35	\$	300.00	\$	705.00
Claire Glasspiegel	3/25/2020	Kansas	Review new hot documents from doc review of general discovery docs produced by Defs	0.28	\$	300.00	\$	85.00
Claire Glasspiegel	3/26/2020	Kansas	Draft fourth set of RFPs based on letter re: COVID-19	1.42	\$	300.00	\$	425.00
Claire Glasspiegel	3/27/2020	Kansas	Continue drafting fourth RFP set based on letter re: COVID-19	4.00	\$	300.00	\$	1,200.00
Claire Glasspiegel	3/30/2020	Kansas	Edit RFPs per comments from MN	1.50	\$	300.00	\$	450.00
Claire Glasspiegel	3/30/2020	Kansas	Continue revising 4th set of RFPs to DCF	2.00	\$	300.00	\$	600.00
Claire Glasspiegel	4/1/2020	Kansas	Edit RFPs per new comments from MN and other team members	2.50	\$	300.00	\$	750.00
Claire Glasspiegel	4/2/2020	Kansas	Finalize fourth RFPs and certificates of services to three defendants	4.50	\$	300.00	\$	1,350.00
Claire Glasspiegel	4/3/2020	Kansas	Edit discovery letter to defendants	1.50	\$	300.00	\$	450.00
Claire Glasspiegel	4/13/2020	Kansas	Review COVID-related RFPs to preparing talking points re same for meet and confer with defendants re: COVID-19	0.50	\$	300.00	\$	150.00
Claire Glasspiegel	4/17/2020	Kansas	Review and edit outline on 30(b)(6) depositions	1.50	\$	300.00	\$	450.00
Claire Glasspiegel	4/20/2020	Kansas	Review Def's responses and objections to Covid-19 RFPs	0.75	\$	300.00	\$	225.00
Claire Glasspiegel	4/21/2020	Kansas	Review Defendants' R+Os to RFPs re: case record review and others	1.00	\$	300.00	\$	300.00
Claire Glasspiegel	4/21/2020	Kansas	Draft talking points re R+Os in preparation for meet and confer	1.00	\$	300.00	\$	300.00
Claire Glasspiegel	4/23/2020	Kansas	Review all info re: potential expert PF to draft letter regarding engagement letter upcoming meeting	1.00	\$	300.00	\$	300.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Claire Glasspiegel	4/23/2020	Kansas	Review attorney notes from document review specific to technical issues in production in order to draft letter to Defs re: missing attachments from Defs' productions	1.50	\$	300.00	\$	450.00
Claire Glasspiegel	4/24/2020	Kansas	Draft letter to Defs re: Defs' production deficiencies of missing attachments/families	3.00	\$	300.00	\$	900.00
Claire Glasspiegel	4/27/2020	Kansas	Continue review of identified ESI errors in KS productions to draft letter to defendants	3.25	\$	300.00	\$	975.00
Claire Glasspiegel	4/28/2020	Kansas	Following up communication with potential expert re brain science	0.33	\$	300.00	\$	100.00
Claire Glasspiegel	4/28/2020	Kansas	Chat with MN re: production issues and corresponding letter to defendants	0.50	\$	300.00	\$	150.00
Claire Glasspiegel	4/28/2020	Kansas	Continue review of technical errors in KS productions to revise draft letter to defendants	1.55	\$	300.00	\$	465.00
Claire Glasspiegel	4/29/2020	Kansas	Meeting with Internal team re discovery items for next meet and confer	0.33	\$	300.00	\$	100.00
Claire Glasspiegel	4/29/2020	Kansas	Draft email to defendants re: technical issues	1.50	\$	300.00	\$	450.00
Claire Glasspiegel	4/30/2020	Kansas	Review documents to confirm categorizations of technical issues	4.32	\$	300.00	\$	1,295.00
Claire Glasspiegel	5/1/2020	Kansas	Follow up communication with potential expert re brain science	0.50	\$	300.00	\$	150.00
Claire Glasspiegel	5/4/2020	Kansas	Review and analyze COVID-19 production by Defs in response to Pls' COVID-19 RFPs	3.00	\$	300.00	\$	900.00
Claire Glasspiegel	5/5/2020	Kansas	Review COVID-19 Docs produced by Defs to advise team re content and deficiencies in preparation for meet and confer	3.17	\$	300.00	\$	950.00
Claire Glasspiegel	5/6/2020	Kansas	Electronic email with potential expert to set up catch-up call	0.50	\$	300.00	\$	150.00
Claire Glasspiegel	5/6/2020	Kansas	Meeting with MN and NT to discuss research related to named plaintiff discovery	0.67	\$	300.00	\$	200.00

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Claire Glasspiegel	5/7/2020	Kansas	Draft talking points for meet and confer re: COVID 19 production deficiencies	3.50	\$	300.00	\$	1,050.00
Claire Glasspiegel	5/8/2020	Kansas	Reviewing notes on COVID19 production to advise MN on this topic for meet and confer re this issue	1.00	\$	300.00	\$	300.00
Claire Glasspiegel	5/11/2020	Kansas	Draft email to potential brain science expert re collaboration	0.07	\$	300.00	\$	20.00
Claire Glasspiegel	5/12/2020	Kansas	Draft email identifying Defendants' gaps in COVID-19 production	0.95	\$	300.00	\$	285.00
Claire Glasspiegel	5/14/2020	Kansas	Read email discussing next steps on COVID-19 production deficiencies	0.17	\$	300.00	\$	50.00
Claire Glasspiegel	5/14/2020	Kansas	Draft detailed email on recommendations for handling Defs' failures in COVID-19 production	0.60	\$	300.00	\$	180.00
Claire Glasspiegel	5/14/2020	Kansas	Meeting with CR policy experts about settlement offer terms	0.75	\$	300.00	\$	225.00
Claire Glasspiegel	5/15/2020	Kansas	Chat with PJ to prep for meet and confer re COVID-19	0.03	\$	300.00	\$	10.00
Claire Glasspiegel	5/15/2020	Kansas	Call with MN re items Defs have not yet produced in discovery	0.05	\$	300.00	\$	15.00
Claire Glasspiegel	5/20/2020	Kansas	Identify additional COVID-19 production issues	0.33	\$	300.00	\$	100.00
Claire Glasspiegel	5/20/2020	Kansas	Draft email re: 30(B)(6) depositions and contract oversight	0.75	\$	300.00	\$	225.00
Claire Glasspiegel	5/26/2020	Kansas	Review settlement notes from IL	0.20	\$	300.00	\$	60.00
Claire Glasspiegel	5/28/2020	Kansas	Prepare for call with potential expert re brain science	0.50	\$	300.00	\$	150.00
Claire Glasspiegel	6/1/2020	Kansas	Meeting with brain science expert re litigation and scope of potential expert report	0.72	\$	300.00	\$	215.00
Clare Connaughton	2/4/2019	Kansas	Closely read draft settlement terms sheet outline in preparation for internal CR group discussion	0.68	\$	150.00	\$	102.50
Clare Connaughton	2/8/2019	Kansas	Discuss Kansas settlement terms sheet with KS CR internal team (IL MN JK EM DA)	1.50	\$	150.00	\$	225.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Clare Connaughton	2/11/2019	Kansas	Meet to discuss potential edits to Kansas settlement terms sheet with CR internal team (IL MN DA SD EM JK and intern DO)	1.50	\$	150.00	\$	225.00
Clare Connaughton	2/28/2019	Kansas	Provide requested analysis of relevant Kansas SB 122 transcript to internal CR KS team	0.82	\$	150.00	\$	122.50
Clare Connaughton	3/22/2019	Kansas	Collect prior relevant legal research memorandum re SDP for MN	0.50	\$	150.00	\$	75.00
Clare Connaughton	5/8/2019	Kansas	Proofread updated draft terms sheet	0.33	\$	150.00	\$	50.00
Clare Connaughton	5/9/2019	Kansas	incorporate each of CR team's edits into operative draft term sheet for mediation	1.33	\$	150.00	\$	200.00
Clare Connaughton	5/28/2019	Kansas	Review draft of DLA Piper letter retainer for Next Friends	0.73	\$	150.00	\$	110.00
Clare Connaughton	5/30/2019	Kansas	Correspond with SD and PJ re retainers for potential new clients	0.58	\$	150.00	\$	87.50
Clare Connaughton	5/31/2019	Kansas	Factual research re latest news articles re KS foster care placements and MH delivery relevant to the litigation	0.17	\$	150.00	\$	25.00
Clare Connaughton	6/5/2019	Kansas	Email with internal team re acknowledgments to protective order	0.18	\$	150.00	\$	27.50
Clare Connaughton	6/6/2019	Kansas	Email with PJ and internal CR team re planned NP chronologies to accompany NP file review	0.77	\$	150.00	\$	115.00
Clare Connaughton	6/13/2019	Kansas	Email NCYL paralegal re NP file review	0.08	\$	150.00	\$	12.50
Clare Connaughton	6/19/2019	Kansas	Kansas internal team meetin debrief re medicaid claim with IL EM JK and legal intern Hannah	0.18	\$	150.00	\$	27.50
Clare Connaughton	7/10/2019	Kansas	Email internal CR team re litigation deadlines from scheduling order	0.25	\$	150.00	\$	37.50
Clare Connaughton	8/7/2019	Kansas	Analyze intake call re KS child mistreatment relevant to litigation	0.22	\$	150.00	\$	32.50
Clare Connaughton	8/19/2019	Kansas	Internal meeting of CR NP file review team to discuss new findings from NP document review	0.30	\$	150.00	\$	45.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Clare Connaughton	8/30/2019	Kansas	Email factual research to MN to prepare draft mediation statement	0.12	\$	150.00	\$	17.50
Clare Connaughton	9/4/2019	Kansas	Edit citations in mediation statement to conform to Bluebook Rules	0.52	\$	150.00	\$	77.50
Clare Connaughton	9/9/2019	Kansas	Identify factual support for exhibits for Kansas mediation statement	3.35	\$	150.00	\$	502.50
Clare Connaughton	9/10/2019	Kansas	Finalize all exhibits for Kansas mediation statement	2.25	\$	150.00	\$	337.50
Clare Connaughton	9/16/2019	Kansas	Conduct comprehensive factual research regarding potential expert (including review of publications, monitoring reports, and press regarding expert) to email to MN and IL	3.50	\$	150.00	\$	525.00
Clare Connaughton	9/18/2019	Kansas	Internal meeting of CR NP file review team to discuss new findings from NP document review	0.43	\$	150.00	\$	65.00
Clare Connaughton	9/18/2019	Kansas	Incorporate latest findings from file review and other factual research into new draft of KS mediation statement	3.25	\$	150.00	\$	487.50
Clare Connaughton	9/19/2019	Kansas	Edit citations in new mediation statement to conform to Bluebook Rules	2.30	\$	150.00	\$	345.00
Clare Connaughton	9/20/2019	Kansas	Proofread KS mediation statement	1.08	\$	150.00	\$	162.50
Clare Connaughton	9/23/2019	Kansas	Summarize research re potential KS expert to share with MN and entire co-counsel team	1.17	\$	150.00	\$	175.00
Clare Connaughton	9/30/2019	Kansas	Identify key monitoring documents from GL v Sherman docket to share with IL and LBB for purposes of mediation	0.77	\$	150.00	\$	115.00
Clare Connaughton	10/2/2019	Kansas	Discuss new NP file review findings with DA	0.30	\$	150.00	\$	45.00
Clare Connaughton	10/2/2019	Kansas	Closely analyze portion of Named Plaintiff ZZ's file	0.33	\$	150.00	\$	50.00
Clare Connaughton	10/2/2019	Kansas	Closely analyze different portion of Named Plaintiff ZZ's file	0.50	\$	150.00	\$	75.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Clare Connaughton	10/4/2019	Kansas	Closely analyze portion of Named Plaintiff ZZ's files	2.47	\$	150.00	\$	370.00
Clare Connaughton	10/7/2019	Kansas	Identify relevant preparatory documents for MN and IL's discussion with Mediator	0.17	\$	150.00	\$	25.00
Clare Connaughton	10/7/2019	Kansas	Review and index Named Plaintiff ZZ's files	5.77	\$	150.00	\$	865.00
Clare Connaughton	10/8/2019	Kansas	Review and index Named Plaintiff ZZ's files	5.85	\$	150.00	\$	877.50
Clare Connaughton	10/9/2019	Kansas	Review and index Named Plaintiff ZZ's files	8.85	\$	150.00	\$	1,327.50
Clare Connaughton	10/10/2019	Kansas	Review and index Named Plaintiff ZZ's files	5.37	\$	150.00	\$	805.00
Clare Connaughton	10/11/2019	Kansas	Review and index Named Plaintiff ZZ's files	2.23	\$	150.00	\$	335.00
Clare Connaughton	10/15/2019	Kansas	Review and index Named Plaintiff ZZ's files	3.50	\$	150.00	\$	525.00
Clare Connaughton	10/16/2019	Kansas	Proofread and edit final draft of Named Plaintiff document review chronology and spreadsheets	2.17	\$	150.00	\$	325.00
Clare Connaughton	10/21/2019	Kansas	Conduct factual research into new potential expert re mental health	1.13	\$	150.00	\$	170.00
Clare Connaughton	10/22/2019	Kansas	Prepare factual materials for MN, TW, LBB, and LW in-person meetings with potential experts	2.28	\$	150.00	\$	342.50
Clare Connaughton	10/23/2019	Kansas	Email research findings on potential expert to MN for her review	0.20	\$	150.00	\$	30.00
Clare Connaughton	10/31/2019	Kansas	Research potential expert for entire co-counsel team in advance of pre-mediation meeting	0.55	\$	150.00	\$	82.50
Clare Connaughton	11/4/2019	Kansas	Factual research into potential expert in advance of mediation	1.95	\$	150.00	\$	292.50
Clare Connaughton	11/5/2019	Kansas	Continue conducting factual research on potential expert	1.77	\$	150.00	\$	265.00
Clare Connaughton	11/6/2019	Kansas	Continue factual research re potential expert	2.30	\$	150.00	\$	345.00
Clare Connaughton	11/7/2019	Kansas	Meeting with MN and DA re collecting factual support in opposition to Defs' MTD	0.20	\$	150.00	\$	30.00
Clare Connaughton	11/7/2019	Kansas	Review and finalize drafts of motion to extend deadline to respond to Defs' MTD governor	1.65	\$	150.00	\$	247.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Clare Connaughton	11/18/2019	Kansas	Factual research re relevant settlement agreements and consent decrees to send to MN and co-counsel team in drafting settlement	0.63	\$	150.00	\$	95.00
Clare Connaughton	11/25/2019	Kansas	Closely review documents from Defs. for mediation purposes	0.37	\$	150.00	\$	55.00
Clare Connaughton	11/26/2019	Kansas	Closely review and summarize highlights of documents from Defs. specifically for mediation purposes	3.50	\$	150.00	\$	525.00
Clare Connaughton	11/26/2019	Kansas	Continue closely reviewing and summarizing documents from Defs. for mediation purposes	4.17	\$	150.00	\$	625.00
Clare Connaughton	11/27/2019	Kansas	Review and index materials produced by Defs. in preparation for mediation	1.50	\$	150.00	\$	225.00
Clare Connaughton	12/9/2019	Kansas	Closely review documents produced by Defendants to inform aspects of mediation	5.53	\$	150.00	\$	830.00
Clare Connaughton	12/10/2019	Kansas	Review and index portions of Named Plaintiff ML's file produced by Defs	4.37	\$	150.00	\$	655.00
Clare Connaughton	12/11/2019	Kansas	Factual research into potential brain science expert for circulation to entire KS co-counsel team	1.50	\$	150.00	\$	225.00
Clare Connaughton	12/11/2019	Kansas	Review and index ML Named Plaintiff file	3.75	\$	150.00	\$	562.50
Clare Connaughton	12/12/2019	Kansas	Review and index ML Named Plaintiff file	1.53	\$	150.00	\$	230.00
Clare Connaughton	12/13/2019	Kansas	Review and index portions of ML Named Plaintiff file	5.50	\$	150.00	\$	825.00
Clare Connaughton	12/16/2019	Kansas	Review and index portions of ML Named Plaintiff file	4.05	\$	150.00	\$	607.50
Clare Connaughton	12/16/2019	Kansas	Continue review and index ML Named Plaintiff file	3.00	\$	150.00	\$	450.00
Clare Connaughton	12/17/2019	Kansas	Review and index ML Named Plaintiff file	5.88	\$	150.00	\$	882.50
Clare Connaughton	12/18/2019	Kansas	Take notes for contact memo at in-person meeting with potential expert at CR	2.25	\$	150.00	\$	337.50
Clare Connaughton	12/18/2019	Kansas	Review and index ML Named Plaintiff file	4.50	\$	150.00	\$	675.00
Clare Connaughton	12/19/2019	Kansas	Create timeline of significant, relevant events from file review of Named Plaintiff ML file	9.00	\$	150.00	\$	1,350.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Clare Connaughton	12/20/2019	Kansas	Edit index of Named Plaintiff file spreadsheets to send to MN for review	1.50	\$	150.00	\$	225.00
Clare Connaughton	2/4/2020	Kansas	Identify new factual materials to prepare attorney team in advance of mediation sessions	0.42	\$	150.00	\$	62.50
Clare Connaughton	2/4/2020	Kansas	Conduct close review of documents produced by Defendants for attorney team's preparation in advance of 2/7 mediation session with Defendants	1.07	\$	150.00	\$	160.00
Clare Connaughton	2/5/2020	Kansas	KS internal meeting re MTD opp and discovery/workplan with IL MN EPG JK CG and NT DA	0.33	\$	150.00	\$	50.00
Clare Connaughton	2/12/2020	Kansas	Call with DA re refining factual materials for opp to Defs' MTD	0.87	\$	150.00	\$	130.00
Clare Connaughton	2/12/2020	Kansas	Update factual materials in support of Pls' MTD Governor	3.00	\$	150.00	\$	450.00
Clare Connaughton	2/13/2020	Kansas	Edit cites in MTD opposition	2.50	\$	150.00	\$	375.00
Clare Connaughton	2/13/2020	Kansas	Edit oppn table of authorities and table of contents with DA	3.50	\$	150.00	\$	525.00
Clare Connaughton	2/19/2020	Kansas	Telephone call with DA, PJ, and FP re updates from ongoing document review and discovery	0.50	\$	150.00	\$	75.00
Clare Connaughton	2/25/2020	Kansas	Begin reviewing and simultaneously indexing RM named plaintiff file	4.05	\$	150.00	\$	607.50
Clare Connaughton	2/26/2020	Kansas	Index portions of RM named plaintiff file	7.00	\$	150.00	\$	1,050.00
Clare Connaughton	2/27/2020	Kansas	Meeting with IL MN JK EPG JK NT DA CG re mediation and next steps re strategy	0.50	\$	150.00	\$	75.00
Clare Connaughton	2/27/2020	Kansas	Complete detailed review of RM Named Plaintiff file	9.00	\$	150.00	\$	1,350.00
Clare Connaughton	2/28/2020	Kansas	Conduct review of Defs.' latest production of general discovery	1.17	\$	150.00	\$	175.00
Clare Connaughton	2/28/2020	Kansas	Complete chronology of key events from RM's Named Plaintiff file	1.75	\$	150.00	\$	262.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Clare Connaughton	2/28/2020	Kansas	Edit citations in Pls.' responses to Defs.' objections to Pls.' First Requests for Production	0.75	\$	150.00	\$	112.50
Clare Connaughton	3/3/2020	Kansas	Meeting with MN and DA re review of NP and general discovery files	0.47	\$	150.00	\$	70.00
Clare Connaughton	3/12/2020	Kansas	Review all recent discovery / discovery correspondence to calculate all upcoming and past-due deadlines (based on Federal Rules and agreements by counsel) to advise co-counsel team for communications with Defs	1.75	\$	150.00	\$	262.50
Clare Connaughton	3/18/2020	Kansas	KS internal call with MN IL JK NT CG re ESI	0.50	\$	150.00	\$	75.00
Clare Connaughton	3/23/2020	Kansas	Closely review documents produced by KS DCF	1.95	\$	150.00	\$	292.50
Clare Connaughton	3/24/2020	Kansas	Proofread Plaintiffs' 3rd set of RFPs and COS	0.93	\$	150.00	\$	140.00
Clare Connaughton	3/25/2020	Kansas	Review and index documents produced by KS DCF for hot documents	2.00	\$	150.00	\$	300.00
Clare Connaughton	3/26/2020	Kansas	Review and index documents produced by KS DCF for hot documents	2.75	\$	150.00	\$	412.50
Clare Connaughton	3/27/2020	Kansas	Review and index documents produced by KS DCF for hot documents	3.57	\$	150.00	\$	535.00
Clare Connaughton	3/30/2020	Kansas	Analyze and summarize hot documents from DCF batch	0.75	\$	150.00	\$	112.50
Clare Connaughton	3/30/2020	Kansas	Review and index documents produced by KS DCF for hot documents	5.75	\$	150.00	\$	862.50
Clare Connaughton	4/1/2020	Kansas	Draft list of Defendants' past due discovery deadlines to send to MN for TW's letter to Defs	0.25	\$	150.00	\$	37.50
Clare Connaughton	4/20/2020	Kansas	Conduct factual research re local child advocates' new concerns re KS foster children experiencing night to night placements	1.17	\$	150.00	\$	175.00
Clare Connaughton	4/21/2020	Kansas	Conduct news monitoring to send press relevant to this litigation to entire co-counsel team	0.67	\$	150.00	\$	100.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Clare Connaughton	4/21/2020	Kansas	Prepare written summary of findings of factual research findings re concerns re night to nights	0.75	\$	150.00	\$	112.50
Clare Connaughton	4/22/2020	Kansas	Edit letter for CG to potential brain science expert	0.33	\$	150.00	\$	50.00
Clare Connaughton	5/1/2020	Kansas	Factual research for MN re job titles of KS government staff that Defs named in privilege log	0.33	\$	150.00	\$	50.00
Clare Connaughton	5/12/2020	Kansas	Conduct detailed review of MA's Named Plaintiff file on Relativity platform	2.50	\$	150.00	\$	375.00
Clare Connaughton	5/13/2020	Kansas	Review MA Named Plaintiff files on Relativity	2.27	\$	150.00	\$	340.00
Clare Connaughton	5/15/2020	Kansas	Conduct factual research on potential foster care systems expert for NT	1.75	\$	150.00	\$	262.50
Clare Connaughton	5/18/2020	Kansas	Review MA Named Plaintiff files on Relativity	3.00	\$	150.00	\$	450.00
Clare Connaughton	5/21/2020	Kansas	Factual research on 30(b)(6) deponent Melinda Kline to prepare attorney team for Plaintiffs' 30(b)(6) deposition	0.68	\$	150.00	\$	102.50
Clare Connaughton	5/26/2020	Kansas	Factual research for publications, affiliations, prior litigations, and CVs of potential child welfare system experts	2.67	\$	150.00	\$	400.00
Clare Connaughton	5/28/2020	Kansas	Conduct detailed review of MA Named Plaintiff files on Relativity	5.00	\$	150.00	\$	750.00
Clare Connaughton	6/1/2020	Kansas	Research to identify key factual materials for preparation of Melinda Kline deposition	2.77	\$	150.00	\$	415.00
Clare Connaughton	6/3/2020	Kansas	Research specifically re organizational structure of DCF for Melinda Kline deposition	0.40	\$	150.00	\$	60.00
Clare Connaughton	6/3/2020	Kansas	Continue conducting factual research for NT in preparation for 30(b)(6) deposition of Melinda Kline	2.05	\$	150.00	\$	307.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Clare Connaughton	6/3/2020	Kansas	Conduct search of all materials produced by Defendants for references to "on for the night" and night-to-night placements to share with NT for preparation of 30(b)(6) deposition of M. Kline	2.85	\$	150.00	\$	427.50
Clare Connaughton	6/4/2020	Kansas	Index and review MA Named Plaintiff files in Relativity	4.50	\$	150.00	\$	675.00
Clare Connaughton	6/16/2020	Kansas	Identify sources to potentially incorporate into Settlement Agreement	2.00	\$	150.00	\$	300.00
Clare Connaughton	6/17/2020	Kansas	Advise MN re which versions of settlement agreement materials to incorporate into settlement	0.25	\$	150.00	\$	37.50
Clare Connaughton	6/17/2020	Kansas	Assist MN in finalizing Settlement Agreement materials	2.17	\$	150.00	\$	325.00
Clare Connaughton	6/18/2020	Kansas	Conduct search in Relativity re PEFCAS and CAFAS, the assessment tools cited in Settlement Agreement	0.80	\$	150.00	\$	120.00
Clare Connaughton	6/18/2020	Kansas	Finalize all materials for KS settlement agreement for MN's review and to share with Defs	1.22	\$	150.00	\$	182.50
Clare Connaughton	6/22/2020	Kansas	Review all recent correspondence with NFs and NPs to track approval of settlement agreement	0.83	\$	150.00	\$	125.00
Clare Connaughton	6/25/2020	Kansas	Factual research re KS state finance council in re settlement approval process	0.42	\$	150.00	\$	62.50
Daniel Adamek	6/21/2018	Kansas	Meeting to discuss draft findings of fact with MN, EM and HC.	1.00	\$	150.00	\$	150.00
Daniel Adamek	6/25/2018	Kansas	Review documents for our Finding of Facts	0.22	\$	150.00	\$	32.50
Daniel Adamek	6/25/2018	Kansas	Review documents for our Finding of Facts	1.42	\$	150.00	\$	212.50
Daniel Adamek	7/3/2018	Kansas	Review and summarize factual documents for finding of facts	1.17	\$	150.00	\$	175.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Daniel Adamek	7/10/2018	Kansas	Review and summarize factual documents for finding of facts	2.48	\$	150.00	\$	372.50
Daniel Adamek	7/11/2018	Kansas	Review and summarize factual documents for finding of facts	2.02	\$	150.00	\$	302.50
Daniel Adamek	7/16/2018	Kansas	Review and summarize factual documents for finding of facts	0.73	\$	150.00	\$	110.00
Daniel Adamek	7/18/2018	Kansas	Email MN re finding of fact update	0.18	\$	150.00	\$	27.50
Daniel Adamek	7/19/2018	Kansas	Review and summarize factual documents for finding of facts	1.48	\$	150.00	\$	222.50
Daniel Adamek	7/23/2018	Kansas	Compile and organize team members' review of factual research for the finding of facts document	3.45	\$	150.00	\$	517.50
Daniel Adamek	7/24/2018	Kansas	Email to MN and SD re factual updates from co-counsel call	0.17	\$	150.00	\$	25.00
Daniel Adamek	7/24/2018	Kansas	Review and summarize factual documents for finding of facts	0.62	\$	150.00	\$	92.50
Daniel Adamek	7/24/2018	Kansas	Review and summarize factual documents for finding of facts (cont'd)	0.67	\$	150.00	\$	100.00
Daniel Adamek	7/25/2018	Kansas	Draft a master finding of facts incorporating all team members' document reviews	2.25	\$	150.00	\$	337.50
Daniel Adamek	7/26/2018	Kansas	Review and summarize factual documents for finding of facts	0.25	\$	150.00	\$	37.50
Daniel Adamek	7/26/2018	Kansas	Draft a master finding of facts incorporating all team members' document reviews	2.35	\$	150.00	\$	352.50
Daniel Adamek	7/27/2018	Kansas	Draft a master finding of facts incorporating all team members' document reviews	1.67	\$	150.00	\$	250.00
Daniel Adamek	7/30/2018	Kansas	Email to co-counsel team with completed finding of facts document	0.12	\$	150.00	\$	17.50
Daniel Adamek	7/31/2018	Kansas	Organize and compile contact memos from stakeholders for EM	0.22	\$	150.00	\$	32.50
Daniel Adamek	8/7/2018	Kansas	Incorporate co-counsel edits to findings of fact document	1.23	\$	150.00	\$	185.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Daniel Adamek	8/8/2018	Kansas	Incorporate co-counsel edits to findings of fact document	0.48	\$	150.00	\$	72.50
Daniel Adamek	8/16/2018	Kansas	Draft memo to internal CR team re evidence gaps in our finding of facts	0.87	\$	150.00	\$	130.00
Daniel Adamek	8/16/2018	Kansas	Review factual documents to enter into the finding of facts	0.98	\$	150.00	\$	147.50
Daniel Adamek	8/16/2018	Kansas	Compile and organize factual documents for the finding of facts	1.85	\$	150.00	\$	277.50
Daniel Adamek	8/17/2018	Kansas	Analyze factual research in order to input research into the finding of facts	1.78	\$	150.00	\$	267.50
Daniel Adamek	8/20/2018	Kansas	Incorporate information from contact memos with stakeholders into finding of facts	0.18	\$	150.00	\$	27.50
Daniel Adamek	8/21/2018	Kansas	Incorporate information from contact memos with stakeholders into finding of facts	1.68	\$	150.00	\$	252.50
Daniel Adamek	8/22/2018	Kansas	Call with MN re findings of fact evidence gaps	0.15	\$	150.00	\$	22.50
Daniel Adamek	8/22/2018	Kansas	Update and edit finding of facts to include new factual research	0.15	\$	150.00	\$	22.50
Daniel Adamek	9/12/2018	Kansas	Meeting with MN, EM & JK re investigation updates and complaint drafting strategy	0.25	\$	150.00	\$	37.50
Daniel Adamek	9/12/2018	Kansas	Compile and organize legal research memos to disseminate to co-counsel to inform complaint drafting strategy	0.53	\$	150.00	\$	80.00
Daniel Adamek	9/26/2018	Kansas	Meeting with IL, EM and JK re co-counsel meeting and upcoming Kansas trip	0.48	\$	150.00	\$	72.50
Daniel Adamek	9/27/2018	Kansas	Monitor press re Kansas child welfare system to incorporate facts into findings of fact	0.03	\$	150.00	\$	5.00
Daniel Adamek	9/27/2018	Kansas	Draft memo for IL re Children's Rights cases that name governor as a named defendant to use when crafting the named defendant section of our complaint	5.43	\$	150.00	\$	815.00
Daniel Adamek	10/1/2018	Kansas	Draft complaint outline to include new factual research and team drafting assignments	0.98	\$	150.00	\$	147.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Daniel Adamek	10/5/2018	Kansas	Work on adding edits from the co-counsel into the retainer agreement for next friends	1.17	\$	150.00	\$	175.00
Daniel Adamek	10/10/2018	Kansas	Email to co-counsel team regarding DCF documents necessary for drafting the annotated complaint	0.27	\$	150.00	\$	40.00
Daniel Adamek	10/11/2018	Kansas	Edit contact memo from meeting with confidential stakeholder.	0.03	\$	150.00	\$	5.00
Daniel Adamek	10/11/2018	Kansas	Draft memo for internal team regarding DCF responses to Child Welfare System Task Force questions.	0.37	\$	150.00	\$	55.00
Daniel Adamek	10/15/2018	Kansas	Research background of potential next friend	0.33	\$	150.00	\$	50.00
Daniel Adamek	10/17/2018	Kansas	Meeting with IL, MN, JK, and EM re case updates and discussion of suggested complaint revisions	1.00	\$	150.00	\$	150.00
Daniel Adamek	10/18/2018	Kansas	Draft Children's Rights' version of the complaint outline with assignments for external co-counsel.	2.42	\$	150.00	\$	362.50
Daniel Adamek	10/26/2018	Kansas	Draft complaint with team members' complaint sections	2.28	\$	150.00	\$	342.50
Daniel Adamek	10/29/2018	Kansas	Draft paragraphs on named plaintiffs in order to use in complaint for factual allegations section.	0.55	\$	150.00	\$	82.50
Daniel Adamek	10/29/2018	Kansas	Draft complaint with Children's Rights' sections in order to send to co-counsel for review.	8.70	\$	150.00	\$	1,305.00
Daniel Adamek	10/30/2018	Kansas	Edit complaint sections in order to send to co-counsel.	4.00	\$	150.00	\$	600.00
Daniel Adamek	10/30/2018	Kansas	Edit citations and footnotes within the complaint draft in order to send to co-counsel	4.00	\$	150.00	\$	600.00
Daniel Adamek	10/31/2018	Kansas	Work on combining, formatting, and editing CR and NCYL's sections of the complaint.	2.95	\$	150.00	\$	442.50
Daniel Adamek	11/1/2018	Kansas	Edit and circulate meeting notes for yesterday's team meeting.	0.33	\$	150.00	\$	50.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Daniel Adamek	11/1/2018	Kansas	Meeting with IL and EM re complaint edits to incorporate into draft being sent to NCYL.	0.75	\$	150.00	\$	112.50
Daniel Adamek	11/1/2018	Kansas	Edit draft complaint to incorporate all changes suggested by the internal CR team and to circulate to NCYL.	4.52	\$	150.00	\$	677.50
Daniel Adamek	11/5/2018	Kansas	Meeting re complaint drafting with EM, IL, MN and JK	0.50	\$	150.00	\$	75.00
Daniel Adamek	11/5/2018	Kansas	Edit draft complaint and add new sources to placement array facts.	5.50	\$	150.00	\$	825.00
Daniel Adamek	11/6/2018	Kansas	Edit draft complaint in order to incorporate new factual sources	5.88	\$	150.00	\$	882.50
Daniel Adamek	11/7/2018	Kansas	Edit and cite-check draft complaint.	5.07	\$	150.00	\$	760.00
Daniel Adamek	11/8/2018	Kansas	Meeting with IL, EM and MN re complaint drafting updates and stakeholder updates	0.88	\$	150.00	\$	132.50
Daniel Adamek	11/8/2018	Kansas	Edit draft complaint in order to incorporate new sources found through researching evidence gaps and conversations with confidential stakeholders.	1.00	\$	150.00	\$	150.00
Daniel Adamek	11/8/2018	Kansas	Research evidence gaps in the draft Kansas complaint in order to find sources that fit into the complaint.	2.57	\$	150.00	\$	385.00
Daniel Adamek	11/8/2018	Kansas	Compile and organize sources from complaint in order to create an annotated complaint.	5.25	\$	150.00	\$	787.50
Daniel Adamek	11/9/2018	Kansas	Edit and cite check the current version of the draft complaint.	3.78	\$	150.00	\$	567.50
Daniel Adamek	11/9/2018	Kansas	Draft complaint in order to incorporate new factual sources.	4.60	\$	150.00	\$	690.00
Daniel Adamek	11/10/2018	Kansas	Compile and organize sources from complaint in order to have them on file for initial disclosures.	4.00	\$	150.00	\$	600.00
Daniel Adamek	11/10/2018	Kansas	Cite-check draft complaint in order to circulate to the co-counsel group.	5.00	\$	150.00	\$	750.00
Daniel Adamek	11/11/2018	Kansas	Edit and proofread complaint before circulating to co-counsel.	1.00	\$	150.00	\$	150.00

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## Children's Rights Itemized Time Entries

Daniel Adamek	11/11/2018	Kansas	Cite-check complaint in order to circulate to co-counsel	3.00	\$	150.00	\$	450.00
Daniel Adamek	11/12/2018	Kansas	Email to IL re number of class members and sourcing for this.	0.42	\$	150.00	\$	62.50
Daniel Adamek	11/12/2018	Kansas	Compile and organize documents from Sheila A. docket regarding dismissing the governor as a named defendants.	0.62	\$	150.00	\$	92.50
Daniel Adamek	11/12/2018	Kansas	Verify that sources used in the complaint use the most recent data available.	1.78	\$	150.00	\$	267.50
Daniel Adamek	11/12/2018	Kansas	Edit complaint draft in order to incorporate edits from the co-counsel call	6.65	\$	150.00	\$	997.50
Daniel Adamek	11/13/2018	Kansas	Review sources in complaint and fix cites.	2.00	\$	150.00	\$	300.00
Daniel Adamek	11/14/2018	Kansas	Edit and cite-check draft complaint.	4.10	\$	150.00	\$	615.00
Daniel Adamek	11/15/2018	Kansas	Telephone call with confidential stakeholder re sourcing in complaint.	1.17	\$	150.00	\$	175.00
Daniel Adamek	11/15/2018	Kansas	Research effects of caseworker shortages on permanency for citing in the complaint	1.23	\$	150.00	\$	185.00
Daniel Adamek	11/15/2018	Kansas	Combine edits from NCYL and CR into one consolidated complaint	2.03	\$	150.00	\$	305.00
Daniel Adamek	11/15/2018	Kansas	Edit and cite check complaint in advance of filing.	11.57	\$	150.00	\$	1,735.00
Daniel Adamek	11/19/2018	Kansas	Prepare documents to serve on defendants.	1.00	\$	150.00	\$	150.00
Daniel Adamek	11/20/2018	Kansas	Organize courtesy emails to defendants with recently filed documents.	1.25	\$	150.00	\$	187.50
Daniel Adamek	11/20/2018	Kansas	Draft CR's pro hac vice applications.	4.50	\$	150.00	\$	675.00
Daniel Adamek	11/26/2018	Kansas	Draft and edit pro hac vice applications for CR team.	0.63	\$	150.00	\$	95.00
Daniel Adamek	11/26/2018	Kansas	Annotate complaint with sources for allegations.	2.50	\$	150.00	\$	375.00
Daniel Adamek	11/27/2018	Kansas	File pro hac vice applications for CR team.	0.17	\$	150.00	\$	25.00
Daniel Adamek	11/27/2018	Kansas	Add sources to annotated complaint.	2.08	\$	150.00	\$	312.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Daniel Adamek	11/28/2018	Kansas	Edit draft motions for confirmation of summons service to defendants to include recently received return receipts.	1.50	\$	150.00	\$	225.00
Daniel Adamek	11/28/2018	Kansas	Edit and compile sources for annotated complaint.	3.92	\$	150.00	\$	587.50
Daniel Adamek	11/29/2018	Kansas	Edit annotated complaint.	3.70	\$	150.00	\$	555.00
Daniel Adamek	11/30/2018	Kansas	Draft service of summonses delivery confirmation filing for Colyer, Keck, Meier-Hummel, and Andersen.	4.13	\$	150.00	\$	620.00
Daniel Adamek	12/3/2018	Kansas	Compile and organize documents to circulate to confidential stakeholder re placement instability.	1.43	\$	150.00	\$	215.00
Daniel Adamek	12/4/2018	Kansas	Edit proofs of service for service of the complaint to defendants.	0.75	\$	150.00	\$	112.50
Daniel Adamek	12/5/2018	Kansas	Meeting with IL, MN, JK, and EM re debrief from co-counsel meeting in order to divide up internal CR litigation tasks.	0.50	\$	150.00	\$	75.00
Daniel Adamek	12/6/2018	Kansas	Meeting with IL, JK, EM, MN and CC re appearances from defendants' counsel and consequential litigation strategy.	0.28	\$	150.00	\$	42.50
Daniel Adamek	12/6/2018	Kansas	File proofs of service on defendants with court.	0.50	\$	150.00	\$	75.00
Daniel Adamek	12/6/2018	Kansas	Telephone call with confidential stakeholder in Kansas regarding additional evidence for claims in complaint.	0.50	\$	150.00	\$	75.00
Daniel Adamek	12/6/2018	Kansas	Mail certificates of service and corresponding filing to defendants who do not yet receive ECF notifications electronically.	1.00	\$	150.00	\$	150.00
Daniel Adamek	12/6/2018	Kansas	Edit draft proofs of service in order to file with the Court.	1.42	\$	150.00	\$	212.50
Daniel Adamek	12/11/2018	Kansas	Edit pro hac vice application for Benet Magnuson.	2.15	\$	150.00	\$	322.50
Daniel Adamek	12/12/2018	Kansas	File Benet Magnuson's pro hac vice application.	0.50	\$	150.00	\$	75.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Daniel Adamek	1/3/2019	Kansas	Edit resistance to defs' motion for time extension on answering complaint.	0.50	\$	150.00	\$	75.00
Daniel Adamek	1/4/2019	Kansas	Email to co-counsel re filing appearance on case.	0.20	\$	150.00	\$	30.00
Daniel Adamek	1/4/2019	Kansas	Edit and proofread our resistance to defendants' request for an extension to file a responsive pleading.	0.52	\$	150.00	\$	77.50
Daniel Adamek	1/4/2019	Kansas	Meeting with MN re edits to opposition to defendants' motion for extension of time to answer complaint.	0.57	\$	150.00	\$	85.00
Daniel Adamek	1/4/2019	Kansas	File opposition to motion for extension.	1.08	\$	150.00	\$	162.50
Daniel Adamek	1/9/2019	Kansas	Meeting with CC, JK, EM, and MN re co-counsel meeting agenda items	0.08	\$	150.00	\$	12.50
Daniel Adamek	1/10/2019	Kansas	Draft notice of appearance for co-counsel LBB.	0.58	\$	150.00	\$	87.50
Daniel Adamek	2/8/2019	Kansas	File and circulate stipulated confidentiality order to team.	0.25	\$	150.00	\$	37.50
Daniel Adamek	2/8/2019	Kansas	Meeting with MN, IL, CC, EM, SD re draft settlement terms sheet.	1.50	\$	150.00	\$	225.00
Daniel Adamek	2/11/2019	Kansas	Meeting re settlement terms with MN, JK, EM, CC, IL and SD.	1.50	\$	150.00	\$	225.00
Daniel Adamek	2/12/2019	Kansas	Edit settlement terms sheet.	0.77	\$	150.00	\$	115.00
Daniel Adamek	2/13/2019	Kansas	Edit notice of appearance for LBB.	0.20	\$	150.00	\$	30.00
Daniel Adamek	2/14/2019	Kansas	File notice of appearance for LBB.	0.28	\$	150.00	\$	42.50
Daniel Adamek	2/21/2019	Kansas	Edit and proofread settlement terms sheet.	0.05	\$	150.00	\$	7.50
Daniel Adamek	2/27/2019	Kansas	Meeting with IL, MN, CC, JK, and EM re internal litigation strategy.	0.33	\$	150.00	\$	50.00
Daniel Adamek	3/5/2019	Kansas	Research model settlement agreements for similar cases to base model settlement terms upon.	1.00	\$	150.00	\$	150.00
Daniel Adamek	3/5/2019	Kansas	Edit draft settlement terms agreement.	2.00	\$	150.00	\$	300.00
Daniel Adamek	3/6/2019	Kansas	Edit and proofread annotated complaint.	3.48	\$	150.00	\$	522.50
Daniel Adamek	3/13/2019	Kansas	Meeting with JK, MN, CC, and IL re settlement strategy.	0.20	\$	150.00	\$	30.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Daniel Adamek	3/14/2019	Kansas	File, scan, and obtain confidentiality order acknowledgements.	0.50	\$	150.00	\$	75.00
Daniel Adamek	3/18/2019	Kansas	Electronic mail to IL re retainer agreements and co-counsel agreements.	0.25	\$	150.00	\$	37.50
Daniel Adamek	3/18/2019	Kansas	Edit and circulate Benet M.'s motion to withdraw as counsel of record.	0.50	\$	150.00	\$	75.00
Daniel Adamek	3/19/2019	Kansas	Edit Benet M.'s notice of withdrawal.	0.15	\$	150.00	\$	22.50
Daniel Adamek	3/20/2019	Kansas	Meeting with co-counsel, EM, JK, MN, SD, CC, and IL re litigation and settlement strategy and substantive due process claims analysis.	3.75	\$	150.00	\$	562.50
Daniel Adamek	3/21/2019	Kansas	File Benet M.'s motion to withdrawal.	0.25	\$	150.00	\$	37.50
Daniel Adamek	4/1/2019	Kansas	Read and analyze legislative post-audit.	0.08	\$	150.00	\$	12.50
Daniel Adamek	4/1/2019	Kansas	File and circulate motion for extension.	0.22	\$	150.00	\$	32.50
Daniel Adamek	5/15/2019	Kansas	Electronic mail to co-counsel team re previous first RFPs, initial disclosures, and settlement agreements for foster care system cases.	0.45	\$	150.00	\$	67.50
Daniel Adamek	7/31/2019	Kansas	Meeting with MN, JK, CC, EM re follow-up editing to third party subpoenas.	0.10	\$	150.00	\$	15.00
Daniel Adamek	8/19/2019	Kansas	Meeting with CC, MN, EM, CG, and JK re named plaintiff file review protocol and strategy.	0.30	\$	150.00	\$	45.00
Daniel Adamek	8/20/2019	Kansas	Edit file review excel template for named plaintiff file review.	0.50	\$	150.00	\$	75.00
Daniel Adamek	8/20/2019	Kansas	Draft and populate production tracker.	0.62	\$	150.00	\$	92.50
Daniel Adamek	8/21/2019	Kansas	Meeting with MN, EM, JK, CC, CG, SD, and co-counsel re case developments and litigation/settlement strategy.	0.83	\$	150.00	\$	125.00
Daniel Adamek	8/26/2019	Kansas	Listen to and take notes to interview with Laura Howard for memo to circulate to team.	0.72	\$	150.00	\$	107.50
Daniel Adamek	9/3/2019	Kansas	Research and edit factual cites in mediation statement.	1.63	\$	150.00	\$	245.00
Daniel Adamek	9/4/2019	Kansas	Edit Kansas mediation statement to add factual cites.	4.42	\$	150.00	\$	662.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Daniel Adamek	9/5/2019	Kansas	Review mediation statement to ensure factual accuracy.	5.92	\$	150.00	\$	887.50
Daniel Adamek	9/9/2019	Kansas	Cite-check mediation statement.	3.03	\$	150.00	\$	455.00
Daniel Adamek	9/10/2019	Kansas	Review and index named plaintiff file for ML.	1.43	\$	150.00	\$	215.00
Daniel Adamek	9/10/2019	Kansas	Collect sources for mediation statement.	1.87	\$	150.00	\$	280.00
Daniel Adamek	9/11/2019	Kansas	Research references to Kids Zones in named plaintiffs files for MN.	0.80	\$	150.00	\$	120.00
Daniel Adamek	9/18/2019	Kansas	Telephone call with CC re mediation statement cite-checking strategy.	0.22	\$	150.00	\$	32.50
Daniel Adamek	9/18/2019	Kansas	Meeting with IL, MN, CC, JK, and CG re document review progress and discussion of hot documents that have been found.	0.43	\$	150.00	\$	65.00
Daniel Adamek	9/18/2019	Kansas	Edit and cite-check mediation statement.	7.78	\$	150.00	\$	1,167.50
Daniel Adamek	9/19/2019	Kansas	Edit and cite-check mediation statement.	6.27	\$	150.00	\$	940.00
Daniel Adamek	9/20/2019	Kansas	Proofread mediation statement.	1.07	\$	150.00	\$	160.00
Daniel Adamek	9/25/2019	Kansas	Meeting with JK, CC, IL, and CG re meeting follow-up, upcoming tasks, and case strategy.	0.10	\$	150.00	\$	15.00
Daniel Adamek	9/25/2019	Kansas	Edit and proofread letter to Defendants re discovery deficiencies.	0.12	\$	150.00	\$	17.50
Daniel Adamek	10/2/2019	Kansas	Review and index ZZ's named plaintiff file.	2.17	\$	150.00	\$	325.00
Daniel Adamek	10/3/2019	Kansas	Review and index ZZ's named plaintiff file.	6.72	\$	150.00	\$	1,007.50
Daniel Adamek	10/4/2019	Kansas	Review and index ZZ's named plaintiff file.	2.60	\$	150.00	\$	390.00
Daniel Adamek	10/7/2019	Kansas	Review and index ZZ's named plaintiff file.	6.78	\$	150.00	\$	1,017.50
Daniel Adamek	10/8/2019	Kansas	Review and index ZZ's named plaintiff file.	7.22	\$	150.00	\$	1,082.50
Daniel Adamek	10/9/2019	Kansas	Email team re recent fact patterns in ZZ case file.	0.20	\$	150.00	\$	30.00
Daniel Adamek	10/9/2019	Kansas	Review and index ZZ's named plaintiff file.	4.87	\$	150.00	\$	730.00
Daniel Adamek	10/10/2019	Kansas	Draft ZZ's chronology based on document review.	2.55	\$	150.00	\$	382.50
Daniel Adamek	10/10/2019	Kansas	Review and annotate ZZ's case file produced by Defendants.	2.67	\$	150.00	\$	400.00
Daniel Adamek	10/11/2019	Kansas	Research motion to dismiss re governor procedural history in CR's Oklahoma case.	0.38	\$	150.00	\$	57.50

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Daniel Adamek	10/11/2019	Kansas	Draft ZZ's chronology based on document review of their case file.	1.25	\$	150.00	\$	187.50
Daniel Adamek	10/11/2019	Kansas	Review documents re ZZ from their case file.	3.30	\$	150.00	\$	495.00
Daniel Adamek	10/15/2019	Kansas	Edit document review spreadsheet re VA.	0.47	\$	150.00	\$	70.00
Daniel Adamek	10/15/2019	Kansas	Combine and edit document review spreadsheets re ZZ.	1.23	\$	150.00	\$	185.00
Daniel Adamek	10/16/2019	Kansas	Meeting with MN, CC, and JK to debrief on outstanding tasks from meet and confer with defendants.	0.28	\$	150.00	\$	42.50
Daniel Adamek	10/16/2019	Kansas	Draft list of outstanding discovery issues that have not yet been addressed by Defendants in order to raise on meet and confer with defendants.	0.30	\$	150.00	\$	45.00
Daniel Adamek	10/16/2019	Kansas	Combine and edit document review spreadsheets and chronologies for Named Plaintiffs' case files.	2.18	\$	150.00	\$	327.50
Daniel Adamek	10/17/2019	Kansas	Review named plaintiff documents.	0.67	\$	150.00	\$	100.00
Daniel Adamek	10/17/2019	Kansas	Annotate first amended complaint.	1.73	\$	150.00	\$	260.00
Daniel Adamek	10/23/2019	Kansas	Research motion to dismiss governor pleadings from prior litigation in Massachusetts and Missouri.	1.50	\$	150.00	\$	225.00
Daniel Adamek	10/25/2019	Kansas	Review and index ML's case file.	5.08	\$	150.00	\$	762.50
Daniel Adamek	10/29/2019	Kansas	Review and index ML's case file.	1.25	\$	150.00	\$	187.50
Daniel Adamek	10/30/2019	Kansas	Research sample motion for extensions from other litigations, local rules re same, and deposition notices.	2.00	\$	150.00	\$	300.00
Daniel Adamek	11/4/2019	Kansas	Draft deposition notice for governor.	1.00	\$	150.00	\$	150.00
Daniel Adamek	11/7/2019	Kansas	Draft email for MN to opposing counsel re discovery deficiencies.	1.00	\$	150.00	\$	150.00
Daniel Adamek	11/7/2019	Kansas	Cite-check and file motions for extension.	4.00	\$	150.00	\$	600.00
Daniel Adamek	11/8/2019	Kansas	Compile and create binders for IL and MN for mediation and vetting of potential expert.	6.00	\$	150.00	\$	900.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Daniel Adamek	11/14/2019	Kansas	Research statutes re governor's power over DCF, KDHE, and KDADS.	1.17	\$	150.00	\$	175.00
Daniel Adamek	11/18/2019	Kansas	Identify flaws in defendants' productions.	1.63	\$	150.00	\$	245.00
Daniel Adamek	11/19/2019	Kansas	Review defendants' production.	0.30	\$	150.00	\$	45.00
Daniel Adamek	11/20/2019	Kansas	Review documents from latest production.	0.87	\$	150.00	\$	130.00
Daniel Adamek	11/21/2019	Kansas	Meeting with IL, MN, CC, EM, EPG, and CG re outcomes section of settlement agreement draft.	1.50	\$	150.00	\$	225.00
Daniel Adamek	11/21/2019	Kansas	Draft email to JK, MN, and EPG re governor's involvement in foster care and medicaid delivery.	1.50	\$	150.00	\$	225.00
Daniel Adamek	11/26/2019	Kansas	Review documents from Defendants' most recent productions.	3.75	\$	150.00	\$	562.50
Daniel Adamek	12/3/2019	Kansas	Review and index documents produced by Defendants in response to RFPs that may be useful for mediation.	1.38	\$	150.00	\$	207.50
Daniel Adamek	12/3/2019	Kansas	Review and index documents re Named Plaintiff ML.	4.38	\$	150.00	\$	657.50
Daniel Adamek	12/6/2019	Kansas	Review documents produced by Defendants for potential use during mediation / settlement.	3.50	\$	150.00	\$	525.00
Daniel Adamek	12/9/2019	Kansas	Compare draft of motion to dismiss response to see changes to draft.	0.03	\$	150.00	\$	5.00
Daniel Adamek	12/9/2019	Kansas	File extension to file opposition to motion to dismiss.	0.17	\$	150.00	\$	25.00
Daniel Adamek	12/9/2019	Kansas	Edit motion for extension for motion to dismiss.	0.27	\$	150.00	\$	40.00
Daniel Adamek	12/9/2019	Kansas	Review documents from Defendants for possible use during mediation.	1.30	\$	150.00	\$	195.00
Daniel Adamek	12/9/2019	Kansas	Review and index ML's named plaintiff file.	3.02	\$	150.00	\$	452.50
Daniel Adamek	12/10/2019	Kansas	Review and index ML's named plaintiff file.	4.73	\$	150.00	\$	710.00
Daniel Adamek	12/11/2019	Kansas	Review and index ML's named plaintiff file.	5.50	\$	150.00	\$	825.00
Daniel Adamek	12/12/2019	Kansas	Review and index ML's named plaintiff file.	7.18	\$	150.00	\$	1,077.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Daniel Adamek	12/13/2019	Kansas	Review key documents from Defendants' productions for potential use during mediation.	4.50	\$	150.00	\$	675.00
Daniel Adamek	12/16/2019	Kansas	Review and index ML's named plaintiff file.	2.50	\$	150.00	\$	375.00
Daniel Adamek	12/17/2019	Kansas	Draft memo re statements made by governor showing her involvement in foster care system.	2.80	\$	150.00	\$	420.00
Daniel Adamek	12/17/2019	Kansas	Review and index ML's named plaintiff file.	7.43	\$	150.00	\$	1,115.00
Daniel Adamek	12/18/2019	Kansas	Review and index ML's named plaintiff file.	2.37	\$	150.00	\$	355.00
Daniel Adamek	12/19/2019	Kansas	Draft chronology for ML based on her named plaintiff index.	3.28	\$	150.00	\$	492.50
Daniel Adamek	12/19/2019	Kansas	Review and index ML's named plaintiff file.	6.48	\$	150.00	\$	972.50
Daniel Adamek	12/20/2019	Kansas	File joint motion for stay of discovery.	0.25	\$	150.00	\$	37.50
Daniel Adamek	12/20/2019	Kansas	Edit joint motion for stay of discovery.	1.00	\$	150.00	\$	150.00
Daniel Adamek	12/20/2019	Kansas	Combine and edit CC and my indices for ML's named plaintiff file.	1.17	\$	150.00	\$	175.00
Daniel Adamek	1/6/2020	Kansas	Meeting with IL, MN re debriefing on changes to settlement agreement draft.	0.33	\$	150.00	\$	50.00
Daniel Adamek	1/6/2020	Kansas	Draft email to co-counsel team describing hot documents found in our review.	0.58	\$	150.00	\$	87.50
Daniel Adamek	1/6/2020	Kansas	Review documents from RFPs relating to governor identified by Defendants.	1.43	\$	150.00	\$	215.00
Daniel Adamek	1/6/2020	Kansas	Research discovery facts in order to draft email to defendants re discovery deficiencies.	2.00	\$	150.00	\$	300.00
Daniel Adamek	1/7/2020	Kansas	Meeting with IL, JK, MN re motion to dismiss opposition strategy.	0.43	\$	150.00	\$	65.00
Daniel Adamek	1/7/2020	Kansas	Research governor's social media and press releases relating to her power over foster care system and Medicaid.	1.00	\$	150.00	\$	150.00
Daniel Adamek	1/7/2020	Kansas	Run Relativity searches and analyze results in discovery re Governor's role in foster care system.	3.00	\$	150.00	\$	450.00
Daniel Adamek	1/8/2020	Kansas	Factual research re governor's power over foster care system.	0.77	\$	150.00	\$	115.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Daniel Adamek	1/8/2020	Kansas	Transcribe press conference of Sec. Howard and Gov. Kelly re DCF and KDADS merger for potential use in motion to dismiss opposition	3.92	\$	150.00	\$	587.50
Daniel Adamek	1/10/2020	Kansas	Edit and proofread letter to defendants re 12(b)(1) discovery.	2.00	\$	150.00	\$	300.00
Daniel Adamek	1/17/2020	Kansas	Meeting with MN re edits to motion to dismiss opposition	0.50	\$	150.00	\$	75.00
Daniel Adamek	1/17/2020	Kansas	Edit and cite-check motion to dismiss opposition.	5.50	\$	150.00	\$	825.00
Daniel Adamek	1/18/2020	Kansas	Draft motion to dismiss opposition appendix.	4.00	\$	150.00	\$	600.00
Daniel Adamek	1/19/2020	Kansas	Cite-check motion to dismiss opposition appendix.	3.00	\$	150.00	\$	450.00
Daniel Adamek	1/21/2020	Kansas	Cite-check motion to dismiss opposition.	5.97	\$	150.00	\$	895.00
Daniel Adamek	1/22/2020	Kansas	Cite-check motion to dismiss opposition.	2.50	\$	150.00	\$	375.00
Daniel Adamek	1/27/2020	Kansas	Meeting with IL re mediation guide.	0.33	\$	150.00	\$	50.00
Daniel Adamek	1/27/2020	Kansas	Draft guide re responses to Defendants' settlement proposal.	4.33	\$	150.00	\$	650.00
Daniel Adamek	1/28/2020	Kansas	Edit settlement agreement draft.	1.33	\$	150.00	\$	200.00
Daniel Adamek	1/30/2020	Kansas	Edits and cite-check motion to dismiss opposition exhibits.	4.00	\$	150.00	\$	600.00
Daniel Adamek	1/30/2020	Kansas	Review and index RM's named plaintiffs file.	6.00	\$	150.00	\$	900.00
Daniel Adamek	2/4/2020	Kansas	Telephone call with EPG re motion to dismiss opposition legal section.	0.33	\$	150.00	\$	50.00
Daniel Adamek	2/4/2020	Kansas	Cite-check and edit motion to dismiss opposition legal section.	1.75	\$	150.00	\$	262.50
Daniel Adamek	2/4/2020	Kansas	Proofread motion to dismiss opposition draft before circulating to co-counsel.	2.00	\$	150.00	\$	300.00
Daniel Adamek	2/5/2020	Kansas	Meeting with MN, JK, CC, NT, EPG, and CG re debriefing from discovery strategy meeting with co-counsel.	0.33	\$	150.00	\$	50.00
Daniel Adamek	2/5/2020	Kansas	Compile key documents and create binder for MN to use in mediation.	2.00	\$	150.00	\$	300.00
Daniel Adamek	2/6/2020	Kansas	Edit motion to dismiss opposition.	4.37	\$	150.00	\$	655.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Daniel Adamek	2/7/2020	Kansas	Organize exhibits for motion to dismiss opposition.	2.32	\$	150.00	\$	347.50
Daniel Adamek	2/7/2020	Kansas	Edit motion to dismiss opposition transmittal declaration.	3.08	\$	150.00	\$	462.50
Daniel Adamek	2/10/2020	Kansas	Cite-check motion to dismiss opposition.	7.27	\$	150.00	\$	1,090.00
Daniel Adamek	2/11/2020	Kansas	Quality check and add covers to exhibits to motion to dismiss exhibits.	2.13	\$	150.00	\$	320.00
Daniel Adamek	2/11/2020	Kansas	Integrate MN's edits and follow-up into motion to dismiss opposition draft.	2.38	\$	150.00	\$	357.50
Daniel Adamek	2/11/2020	Kansas	Cite-check motion to dismiss opposition.	4.30	\$	150.00	\$	645.00
Daniel Adamek	2/12/2020	Kansas	Meeting with CC re discovery review for MTD	0.87	\$	150.00	\$	130.00
Daniel Adamek	2/12/2020	Kansas	Cite-check and edit motion to dismiss opposition.	12.27	\$	150.00	\$	1,840.00
Daniel Adamek	2/13/2020	Kansas	Proofread and edit motion to dismiss opposition.	3.28	\$	150.00	\$	492.50
Daniel Adamek	2/13/2020	Kansas	Cite-check tables of authorities and contents for motion to dismiss opposition.	3.58	\$	150.00	\$	537.50
Daniel Adamek	2/21/2020	Kansas	Review and evaluate documents produced by Defendants for the purpose of mediation.	1.00	\$	150.00	\$	150.00
Daniel Adamek	2/21/2020	Kansas	Create and assemble binder for MN and IL to use at mediation.	4.42	\$	150.00	\$	662.50
Daniel Adamek	2/22/2020	Kansas	Review and index RM's named plaintiff file.	1.50	\$	150.00	\$	225.00
Daniel Adamek	2/25/2020	Kansas	Review and index RM case file.	5.00	\$	150.00	\$	750.00
Daniel Adamek	2/26/2020	Kansas	Research factual issues raised during mediation for MN.	0.68	\$	150.00	\$	102.50
Daniel Adamek	2/26/2020	Kansas	Review and index RM named plaintiff file.	7.07	\$	150.00	\$	1,060.00
Daniel Adamek	2/27/2020	Kansas	Compare settlement agreement versions to ensure accuracy before sending to defendants.	0.15	\$	150.00	\$	22.50
Daniel Adamek	2/27/2020	Kansas	Calculate total number of pages produced by defendants for incorporation in golden rule letter.	0.57	\$	150.00	\$	85.00
Daniel Adamek	2/27/2020	Kansas	Meeting with JK, EPG, NT, CC, IL, CG and MN re mediation updates and discovery strategy.	0.50	\$	150.00	\$	75.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Daniel Adamek	2/27/2020	Kansas	Compile hot documents from system document review and their summaries for circulation to internal team.	0.78	\$	150.00	\$	117.50
Daniel Adamek	2/27/2020	Kansas	Draft RM's chronology from her named plaintiff file review.	2.78	\$	150.00	\$	417.50
Daniel Adamek	2/27/2020	Kansas	Review batch of documents produced by KDADS.	3.30	\$	150.00	\$	495.00
Daniel Adamek	2/27/2020	Kansas	Review and index RM's case file.	5.28	\$	150.00	\$	792.50
Daniel Adamek	2/28/2020	Kansas	Review systemic documents from KDADS.	1.48	\$	150.00	\$	222.50
Daniel Adamek	2/28/2020	Kansas	Run searching in Relativity for redactions, technical errors, and discovery deficiencies.	1.50	\$	150.00	\$	225.00
Daniel Adamek	2/28/2020	Kansas	Cite-check plaintiffs' responses to defendants' responses and objections.	2.42	\$	150.00	\$	362.50
Daniel Adamek	3/2/2020	Kansas	Search for and download Crabtree class cert decision in In re Epipen.	0.17	\$	150.00	\$	25.00
Daniel Adamek	3/2/2020	Kansas	Compare drafts of RFPs and rogs.	0.40	\$	150.00	\$	60.00
Daniel Adamek	3/2/2020	Kansas	Prepare certificate of service for RFPs and interrogatories.	0.87	\$	150.00	\$	130.00
Daniel Adamek	3/2/2020	Kansas	Review and index batch of documents produced by DCF.	3.95	\$	150.00	\$	592.50
Daniel Adamek	3/3/2020	Kansas	Meeting with MN and CC re discovery strategy and tasks.	0.47	\$	150.00	\$	70.00
Daniel Adamek	3/3/2020	Kansas	Update RFP, rog, and discovery trackers.	0.60	\$	150.00	\$	90.00
Daniel Adamek	3/4/2020	Kansas	Compile ESI search term exemplars from other cases to aid in drafting ours.	0.50	\$	150.00	\$	75.00
Daniel Adamek	3/11/2020	Kansas	Email to EPG re statistical experts.	0.05	\$	150.00	\$	7.50
Daniel Adamek	3/11/2020	Kansas	Research factual items for integration into third set of RFPs on DCF.	0.77	\$	150.00	\$	115.00
Daniel Adamek	3/12/2020	Kansas	Generate data on Relativity for inclusion in discovery deficiencies letter to defendants.	0.80	\$	150.00	\$	120.00
Daniel Adamek	3/12/2020	Kansas	Organize and analyze discovery correspondence for inclusion into discovery deficiencies letter to Defendants.	0.83	\$	150.00	\$	125.00

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## Children's Rights Itemized Time Entries

Daniel Adamek	3/12/2020	Kansas	Review and index documents produced by DCF.	2.47	\$	150.00	\$	370.00
Daniel Adamek	3/13/2020	Kansas	Review and index documents produced by DCF.	1.37	\$	150.00	\$	205.00
Daniel Adamek	3/16/2020	Kansas	Review and index documents produced by DCF.	2.03	\$	150.00	\$	305.00
Daniel Adamek	3/17/2020	Kansas	Review and index documents produced by DCF.	0.28	\$	150.00	\$	42.50
Daniel Adamek	3/18/2020	Kansas	Review and index documents produced by DCF.	3.82	\$	150.00	\$	572.50
Daniel Adamek	3/19/2020	Kansas	Review and index documents produced by DCF.	2.75	\$	150.00	\$	412.50
Daniel Adamek	3/20/2020	Kansas	Review and index documents produced by DCF.	2.25	\$	150.00	\$	337.50
Daniel Adamek	3/23/2020	Kansas	Download and write descriptions of all hot documents to circulate to co-counsel.	1.52	\$	150.00	\$	227.50
Daniel Adamek	3/23/2020	Kansas	Review and index documents produced by DCF.	2.42	\$	150.00	\$	362.50
Daniel Adamek	3/24/2020	Kansas	File certificate of service for third set of RFPs on DCF.	0.25	\$	150.00	\$	37.50
Daniel Adamek	3/24/2020	Kansas	Prepare 3rd Set of RFPs on DCF to be served.	0.67	\$	150.00	\$	100.00
Daniel Adamek	3/25/2020	Kansas	Compile hot documents from document review.	0.12	\$	150.00	\$	17.50
Daniel Adamek	3/26/2020	Kansas	Cite-check letter re discovery deficiencies.	1.33	\$	150.00	\$	200.00
Daniel Adamek	3/30/2020	Kansas	Email to NT re production problems and details.	0.17	\$	150.00	\$	25.00
Daniel Adamek	3/30/2020	Kansas	Compile hot documents from document review.	0.23	\$	150.00	\$	35.00
Daniel Adamek	3/30/2020	Kansas	Edit and cite-check letter re production issues.	1.08	\$	150.00	\$	162.50
Daniel Adamek	4/2/2020	Kansas	Review discovery served on defendants and calculate deadlines.	0.95	\$	150.00	\$	142.50
Daniel Adamek	4/13/2020	Kansas	Assemble correspondence re COVID-19 RFPs for meet and confer.	0.27	\$	150.00	\$	40.00

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## Children's Rights Itemized Time Entries

Daniel Adamek	4/13/2020	Kansas	Generate saved search and spreadsheet of hot docs.	0.28	\$	150.00	\$	42.50
Daniel Adamek	4/13/2020	Kansas	Assemble e-folder for meet and confer preparation.	3.00	\$	150.00	\$	450.00
Daniel Adamek	4/14/2020	Kansas	Draft discovery tracker.	3.38	\$	150.00	\$	507.50
Daniel Adamek	4/15/2020	Kansas	Prepare e-binder for attorneys to use at meet and confer.	1.10	\$	150.00	\$	165.00
Daniel Adamek	4/15/2020	Kansas	Draft and update discovery tracker.	3.15	\$	150.00	\$	472.50
Daniel Adamek	4/16/2020	Kansas	Email to P. Juneja and MN re meet and confer preparation.	0.12	\$	150.00	\$	17.50
Daniel Adamek	4/16/2020	Kansas	Draft and update discovery tracker.	0.42	\$	150.00	\$	62.50
Daniel Adamek	4/16/2020	Kansas	Meeting with CC re discovery tracker.	0.52	\$	150.00	\$	77.50
Daniel Adamek	4/17/2020	Kansas	Research past monitoring agreements for use in settlement discussions.	0.42	\$	150.00	\$	62.50
Daniel Adamek	4/17/2020	Kansas	Perform targeted Relativity searches to gather information on potential 30(b)(6) deponent.	0.42	\$	150.00	\$	62.50
Daniel Adamek	4/21/2020	Kansas	Draft recap of meet and confer.	0.15	\$	150.00	\$	22.50
Daniel Adamek	4/22/2020	Kansas	Research re potential expert.	0.17	\$	150.00	\$	25.00
Daniel Adamek	4/22/2020	Kansas	Compile list of to-do items from meet and confer.	0.37	\$	150.00	\$	55.00
Daniel Adamek	4/23/2020	Kansas	Update discovery tracker.	0.63	\$	150.00	\$	95.00
Daniel Adamek	4/23/2020	Kansas	Update tracker of production issues.	0.67	\$	150.00	\$	100.00
Daniel Adamek	4/27/2020	Kansas	Troubleshoot technical issues with defendants' productions.	0.30	\$	150.00	\$	45.00
Daniel Adamek	4/27/2020	Kansas	Research history of communications with defendants re litigation hold.	0.37	\$	150.00	\$	55.00
Daniel Adamek	4/27/2020	Kansas	Update discovery tracker.	0.38	\$	150.00	\$	57.50
Daniel Adamek	4/27/2020	Kansas	Pull documents related to kids zones in defendants' discovery.	0.50	\$	150.00	\$	75.00
Daniel Adamek	4/28/2020	Kansas	Edit and update discovery tracker.	0.25	\$	150.00	\$	37.50
Daniel Adamek	4/28/2020	Kansas	Draft factual cites for email to Defendants re Kids Zones.	0.57	\$	150.00	\$	85.00
Daniel Adamek	4/28/2020	Kansas	Gather all documents produced by Defendants that reference "Kids Zones."	1.47	\$	150.00	\$	220.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Daniel Adamek	4/30/2020	Kansas	Update and edit discovery tracker.	0.25	\$	150.00	\$	37.50
Daniel Adamek	4/30/2020	Kansas	Compile named plaintiff file review indices.	0.32	\$	150.00	\$	47.50
Daniel Adamek	5/1/2020	Kansas	Draft list of action items to include in email to Defendants re meet and confer.	0.67	\$	150.00	\$	100.00
Daniel Adamek	5/1/2020	Kansas	Research and prepare e-binder for MN to use during meet and confer with defendants.	1.00	\$	150.00	\$	150.00
Daniel Adamek	5/4/2020	Kansas	Update discovery tracker.	1.00	\$	150.00	\$	150.00
Daniel Adamek	5/5/2020	Kansas	Update discovery tracker.	0.02	\$	150.00	\$	2.50
Daniel Adamek	5/6/2020	Kansas	Meeting with internal team regarding discovery logistics and settlement strategy.	0.82	\$	150.00	\$	122.50
Daniel Adamek	5/7/2020	Kansas	Draft potential deponent list.	2.38	\$	150.00	\$	357.50
Daniel Adamek	5/8/2020	Kansas	Draft action items from meet and confer with defendants.	1.22	\$	150.00	\$	182.50
Daniel Adamek	5/11/2020	Kansas	Update discovery trackers.	0.27	\$	150.00	\$	40.00
Daniel Adamek	5/11/2020	Kansas	Draft potential deponent list from discovery reviewed.	1.75	\$	150.00	\$	262.50
Daniel Adamek	5/13/2020	Kansas	Review discovery to draft list of potential deponents.	2.87	\$	150.00	\$	430.00
Daniel Adamek	5/14/2020	Kansas	Email to MN re potential deponents research.	0.12	\$	150.00	\$	17.50
Daniel Adamek	5/14/2020	Kansas	Review discovery in order to draft list of potential deponents.	1.87	\$	150.00	\$	280.00
Daniel Adamek	5/15/2020	Kansas	Draft action item list from meet and confer with Defendants.	0.33	\$	150.00	\$	50.00
Daniel Adamek	5/18/2020	Kansas	Review and index named plaintiff documents.	3.62	\$	150.00	\$	542.50
Daniel Adamek	5/21/2020	Kansas	Find relevant documents in discovery to use as exhibits in Kline deposition.	2.78	\$	150.00	\$	417.50
Daniel Adamek	5/27/2020	Kansas	Update discovery tracker.	0.52	\$	150.00	\$	77.50
Daniel Adamek	5/27/2020	Kansas	Meeting with internal team re discovery tasks.	0.67	\$	150.00	\$	100.00
Daniel Adamek	5/28/2020	Kansas	Compile legal research memos re dismissing plaintiffs.	0.17	\$	150.00	\$	25.00
Daniel Adamek	5/28/2020	Kansas	Review documents to use in Kline deposition outline.	2.58	\$	150.00	\$	387.50
Daniel Adamek	5/29/2020	Kansas	Review documents to incorporate into Kline deposition outline.	0.92	\$	150.00	\$	137.50

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Daniel Adamek	6/2/2020	Kansas	Review and index MA named plaintiff file.	1.27	\$	150.00	\$	190.00
Daniel Adamek	6/3/2020	Kansas	Perform factual research in preparation for Kline deposition.	5.45	\$	150.00	\$	817.50
Daniel Adamek	6/4/2020	Kansas	Organize, process, and file discovery from defendants.	0.62	\$	150.00	\$	92.50
Daniel Adamek	6/4/2020	Kansas	Review and index MA's named plaintiff file.	2.35	\$	150.00	\$	352.50
Daniel Adamek	6/4/2020	Kansas	Research and review documents for Kline deposition.	2.82	\$	150.00	\$	422.50
Daniel Adamek	6/5/2020	Kansas	Review and index MA file produced by defendants.	3.50	\$	150.00	\$	525.00
Daniel Adamek	6/8/2020	Kansas	Update discovery tracker.	0.12	\$	150.00	\$	17.50
Daniel Adamek	6/8/2020	Kansas	Review and index MA named plaintiff file.	2.55	\$	150.00	\$	382.50
Daniel Adamek	6/9/2020	Kansas	Review and index MA named plaintiff file.	1.32	\$	150.00	\$	197.50
Daniel Adamek	6/10/2020	Kansas	Factual research re named plaintiffs' birth dates.	0.35	\$	150.00	\$	52.50
Daniel Adamek	6/10/2020	Kansas	Meeting with MN re settlement filings strategy.	0.53	\$	150.00	\$	80.00
Daniel Adamek	6/15/2020	Kansas	Perform factual research re named plaintiffs.	2.00	\$	150.00	\$	300.00
Daniel Adamek	7/14/2020	Kansas	Review and edit preliminary approval timeline.	0.33	\$	150.00	\$	50.00
Erin G. McGuinness	12/15/2017	Kansas	Discuss investigation strategy with IL & HC	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	12/21/2017	Kansas	Telephone call with NCYL to discuss next steps for investigatory research re KS foster care system	1.05	\$	225.00	\$	236.25
Erin G. McGuinness	1/10/2018	Kansas	Analyze task force report on Kansas child welfare system.	0.63	\$	225.00	\$	142.50
Erin G. McGuinness	1/11/2018	Kansas	Review HC's Kansas foster care investigatory research to share with co-counsel NCYL.	0.10	\$	225.00	\$	22.50
Erin G. McGuinness	1/12/2018	Kansas	Discuss status of Kansas foster care investigation with IL & HC.	0.13	\$	225.00	\$	30.00
Erin G. McGuinness	1/16/2018	Kansas	Review list of potential issues and sources created by co-counsel.	0.43	\$	225.00	\$	97.50
Erin G. McGuinness	1/16/2018	Kansas	Meeting with HC, IL re factual research on potential litigation	0.75	\$	225.00	\$	168.75

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**Children's Rights Itemized Time Entries**

Erin G. McGuinness	1/17/2018	Kansas	Analyze additional factual issues to investigate in preparation for call with NCYL re investigation	0.28	\$	225.00	\$	63.75
Erin G. McGuinness	1/19/2018	Kansas	Call with co-counsel, NCYL, regarding potential issue areas to focus the investigation.	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	1/22/2018	Kansas	Analyze various metrics from Adoption and Foster Care Analysis and Reporting System (AFCARS) concerning Kansas child welfare system and its failures, including number of placement moves.	1.98	\$	225.00	\$	446.25
Erin G. McGuinness	1/23/2018	Kansas	Begin review of Kansas DCF policy & procedure manual to isolate relevant policies	1.03	\$	225.00	\$	232.50
Erin G. McGuinness	1/23/2018	Kansas	Call with NCYL and foster care advocates to discuss contact points in the state.	1.20	\$	225.00	\$	270.00
Erin G. McGuinness	2/5/2018	Kansas	Analyze available Medicaid data for Kansas with respect to mental health for foster youth	0.38	\$	225.00	\$	86.25
Erin G. McGuinness	2/16/2018	Kansas	Analyze latest information on placement moves of foster children.	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	2/16/2018	Kansas	Call with IL, HC, SD, co-counsel from NCYL, and foster care advocates regarding strategy for upcoming trip to Kansas and updates on investigation outreach.	0.82	\$	225.00	\$	183.75
Erin G. McGuinness	3/5/2018	Kansas	Meeting with IL & HC regarding status of Kansas investigation and next steps.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	3/6/2018	Kansas	Review Kansas foster care placement statistics per SD's email.	0.78	\$	225.00	\$	176.25
Erin G. McGuinness	3/7/2018	Kansas	Call with Plaintiff's Team, CR team (EM, SD, IL, HC) and NCYL (LC, PJ) regarding status of the investigation, plans for the next stakeholder trip, and general next steps.	1.00	\$	225.00	\$	225.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	3/9/2018	Kansas	Prepare analysis of most relevant and shocking Adoption and Foster Care Analysis and Reporting System (AFCARS) data to inform Kansas foster care investigation.	2.50	\$	225.00	\$	562.50
Erin G. McGuinness	3/13/2018	Kansas	Closely review latest investigation materials re child welfare placements and mental health issues in preparation for trip to meet with stakeholders.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	3/18/2018	Kansas	Flight to Kansas City, MO.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	3/19/2018	Kansas	Drive with SD & LW (NCYL) from Kansas City to Wichita.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	3/19/2018	Kansas	Meeting with SD & LW to analyze that day's interviews with local Kansas advocates and aged out youth as well as strategy for upcoming meetings.	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	3/19/2018	Kansas	Meet with SD, LW (NCYL), and youth who recently aged out of the Kansas foster care system to discuss issues in KS foster care system.	2.50	\$	225.00	\$	562.50
Erin G. McGuinness	3/19/2018	Kansas	Meeting with SD, LW (NCYL) and advocate LBB (FAC) to discuss best practices in child welfare spearheaded by FACs in Kansas and issues in KS child welfare system	3.07	\$	225.00	\$	690.00
Erin G. McGuinness	3/20/2018	Kansas	Drive back to Kansas City from Wichita.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	3/20/2018	Kansas	Meeting with SD & LW (NCYL) with stakeholder who worked for a private child welfare agency in Wichita.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	3/20/2018	Kansas	Meeting with SD & LW (NCYL co-counsel) to debrief about the day's stakeholder meetings and discuss how the new information informs the investigation.	1.00	\$	225.00	\$	225.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	3/20/2018	Kansas	Meetings in Wichita with SD, LW (NCYL) and foster care system advocates and other involved individuals specifically re: placement and night-to-night issues.	5.25	\$	225.00	\$	1,181.25
Erin G. McGuinness	3/21/2018	Kansas	Drive from stakeholder meeting to airport with SD & LW (NCYL co-counsel).	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	3/21/2018	Kansas	Meeting with SD, LW (NCYL co-counsel), LBB (co-counsel) and foster care advocate to discuss case workers' workload.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	4/3/2018	Kansas	Drafted contact memos summarizing highlights and attorney impressions from recent stakeholder trip to Kansas City and Wichita.	3.10	\$	225.00	\$	697.50
Erin G. McGuinness	4/4/2018	Kansas	Factual research re Kansas foster care system placements and mental health deficiencies.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	4/4/2018	Kansas	Edit other attorneys' contact memos from recent investigatory trip to send to team.	2.55	\$	225.00	\$	573.75
Erin G. McGuinness	4/11/2018	Kansas	Full team telephone call to discuss strategy for upcoming investigation trip, next steps for factual investigation	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	5/8/2018	Kansas	Analyze Adoption and Foster Care Analysis and Reporting System (AFCARS) data specifically re Kansas placement array.	2.28	\$	225.00	\$	513.75
Erin G. McGuinness	5/14/2018	Kansas	Discuss Kansas Medicaid structure with MN to brainstorm angles of a possible ESPDT claim.	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	5/14/2018	Kansas	Legal and factual research re Kansas Medicaid structure in consideration of an EPSDT claim for mental health treatment.	3.77	\$	225.00	\$	847.50
Erin G. McGuinness	5/23/2018	Kansas	Analyze Adoption and Foster Care Analysis and Reporting System (AFCARS) data for Kansas placement stability specifically.	0.77	\$	225.00	\$	172.50
Erin G. McGuinness	6/14/2018	Kansas	Discussion with MN re investigation status, next steps, and upcoming interviews	0.33	\$	225.00	\$	75.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	6/15/2018	Kansas	Check in with MN regarding status of KS foster care investigation document review and evidentiary outline.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	6/15/2018	Kansas	Internal team meeting to discuss document review and evidence outlining.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	6/17/2018	Kansas	Flight from La Guardia to Kansas City.	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	6/17/2018	Kansas Travel	Lyft to Laguardia for flight to Kansas City.	0.37	\$	225.00	\$	82.50
Erin G. McGuinness	6/18/2018	Kansas Travel	Drive from Kansas City to Olathe and back.	0.83	\$	225.00	\$	187.50
Erin G. McGuinness	6/18/2018	Kansas	Meeting with SD & Leecia Welch with a person involved in the foster care system in Kansas City, MO re: foster care system issues.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	6/18/2018	Kansas	Meeting with potential clients re: foster care system placement array issues.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	6/18/2018	Kansas	Meeting with potential fact witness and recently aged out youth re KS foster care system placement issues.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	6/18/2018	Kansas	Meeting with SD, LW, and foster care advocate re KS foster care system investigation, issues facing Kansas foster care system.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	6/19/2018	Kansas Travel	Drive from Kansas City to Olathe for stakeholder meetings and back.	0.83	\$	225.00	\$	187.50
Erin G. McGuinness	6/19/2018	Kansas	Meeting with SD & potential client re issues facing Kansas foster care system.	1.75	\$	225.00	\$	393.75
Erin G. McGuinness	6/20/2018	Kansas Travel	Drive from hotel to airport.	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	6/20/2018	Kansas Travel	Car ride home from airport after return flight from Kansas City.	0.37	\$	225.00	\$	82.50
Erin G. McGuinness	6/20/2018	Kansas Travel	Flight from Kansas City to NYC.	1.00	\$	225.00	\$	225.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	6/21/2018	Kansas	Meeting with MN, HC, DA re document review updates to inform investigation, potential claims.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	6/25/2018	Kansas	Research the practicability of an ESSA claim in Kansas investigation.	1.28	\$	225.00	\$	288.75
Erin G. McGuinness	7/5/2018	Kansas	Analyze KanCare network adequacy report to understand the efficiency and/or gaps in pediatric coverage.	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	7/11/2018	Kansas	Call with Medicaid legal expert to discuss feasibility of an EPSDT claim in Kansas.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	7/13/2018	Kansas	Discuss Kansas EPSDT claim and legal research with IL.	0.42	\$	225.00	\$	93.75
Erin G. McGuinness	7/17/2018	Kansas	Review and analysis of investigation document to incorporate into working Findings of Facts document.	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	7/19/2018	Kansas	Reviewed and analyzed contracts between DCF and contracting agencies to understand agency relationship.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	7/20/2018	Kansas	Analyze what qualifies as a mental health condition to shape EPSDT claims.	0.12	\$	225.00	\$	26.25
Erin G. McGuinness	7/20/2018	Kansas	Reviewed contracts between DCF and KVC and St. Francis for Findings of Facts document.	3.78	\$	225.00	\$	851.25
Erin G. McGuinness	7/30/2018	Kansas	Draft and proofread Next Friend retainer for Kansas foster care investigation.	0.23	\$	225.00	\$	52.50
Erin G. McGuinness	7/30/2018	Kansas	Review fully compiled Finding of Facts document to see where, if any, holes in evidence exist in investigation.	0.28	\$	225.00	\$	63.75
Erin G. McGuinness	7/30/2018	Kansas	Meeting with IL & MN to discuss objectives for KS foster care investigatory trip.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	7/31/2018	Kansas	Airport delays for flight from Atlanta to Kansas City due to weather. Delays continued past midnight, remainder of delay on next day's timeslip.	0.75	\$	225.00	\$	168.75

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	7/31/2018	Kansas Travel	Taxi from office to LaGuardia airport for trip to Kansas.	0.37	\$	225.00	\$	82.50
Erin G. McGuinness	7/31/2018	Kansas Travel	Airport delay for flight from LaGuardia to Atlanta. No other flights available.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	7/31/2018	Kansas Travel	First leg of trip to Kansas from LaGuardia to Atlanta.	1.25	\$	225.00	\$	281.25
Erin G. McGuinness	7/31/2018	Kansas	Upload and review case notes, contact memos, and Findings of Facts document.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	8/1/2018	Kansas	Taxi from KCK airport to 21C Museum Hotel in Kansas City.	0.27	\$	225.00	\$	60.00
Erin G. McGuinness	8/1/2018	Kansas Travel	Drive back to Lawrence from Topeka for meeting with recently aged out youth.	0.27	\$	225.00	\$	60.00
Erin G. McGuinness	8/1/2018	Kansas Travel	Meeting w/ recently aged out youth, and then met with stakeholder regarding further outreach avenues.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	8/1/2018	Kansas Travel	Drive from Kansas City to Topeka for meeting with potential co-counsel.	0.53	\$	225.00	\$	120.00
Erin G. McGuinness	8/1/2018	Kansas Travel	Drive back to Kansas City from dinner meeting in Topeka.	0.60	\$	225.00	\$	135.00
Erin G. McGuinness	8/1/2018	Kansas Travel	Connecting flight from Atlanta to Kansas City.	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	8/1/2018	Kansas Travel	Dinner meeting with stakeholders in Topeka w/ SD.	0.87	\$	225.00	\$	195.00
Erin G. McGuinness	8/1/2018	Kansas Travel	Flight delay in Atlanta for connecting flight to Kansas City, continues from 7/31/18	0.92	\$	225.00	\$	206.25
Erin G. McGuinness	8/1/2018	Kansas	Meeting with SD to plan strategy for stakeholder meetings for the day.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	8/2/2018	Kansas Travel	Drive from meeting with stakeholder in Kansas City to meeting with stakeholder in Topeka.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	8/2/2018	Kansas Travel	Drive from meeting with stakeholder in Topeka back to Kansas City for dinner meeting with stakeholder in KC w/ SD.	0.62	\$	225.00	\$	138.75

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	8/2/2018	Kansas	Meeting with SD to prepare and strategize for stakeholder meetings of the day.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	8/2/2018	Kansas	Meeting with foster care advocate in Kansas City with SD re placement array issues.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	8/2/2018	Kansas	Meeting with foster care advocate in Topeka with SD re placement array, foster care contractor problems.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	8/2/2018	Kansas	Meeting with foster care advocate in Kansas City, with SD re placement array issues.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	8/3/2018	Kansas Travel	Drive from hotel in Kansas City to airport	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	8/3/2018	Kansas Travel	Taxi back to office from LaGuardia airport after return flight from Kansas.	0.35	\$	225.00	\$	78.75
Erin G. McGuinness	8/3/2018	Kansas Travel	Flight home from Kansas City to NYC.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	8/8/2018	Kansas	Email exchange with Martha Hodgesmith to coordinate team discussion regarding Kansas Medicaid and mental health systems.	0.10	\$	225.00	\$	22.50
Erin G. McGuinness	8/8/2018	Kansas	Kansas emails with team discussing major findings, evidence gaps in findings of facts outline.	0.20	\$	225.00	\$	45.00
Erin G. McGuinness	8/9/2018	Kansas	Email exchange with Appleseed board member re mental health delivery system.	0.18	\$	225.00	\$	41.25
Erin G. McGuinness	8/9/2018	Kansas	Review and analyze past NCYL consent decrees as examples for complaint drafting and litigation strategy.	0.30	\$	225.00	\$	67.50
Erin G. McGuinness	8/9/2018	Kansas	Review and analyze notes to update contact memos from 7/31-8/2 stakeholder trip.	1.63	\$	225.00	\$	367.50
Erin G. McGuinness	8/10/2018	Kansas	Draft contact memos from meetings from last investigatory trip for circulation to team and to incorporate into Findings of Facts document.	1.53	\$	225.00	\$	345.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	8/15/2018	Kansas	Review and analyze newspaper article outlining the Kansas psychotropic medication workgroup.	0.17	\$	225.00	\$	37.50
Erin G. McGuinness	8/15/2018	Kansas	Email exchange with foster care advocate in Kansas to coordinate call to discuss KS mental health system and poor outcomes for older youth in foster care.	0.18	\$	225.00	\$	41.25
Erin G. McGuinness	8/15/2018	Kansas	Weekly team meeting to discuss everyone's updates on stakeholder outreach, complaint drafting, and upcoming trip with MN, DA, co-counsel (NCYL & LBB).	0.98	\$	225.00	\$	221.25
Erin G. McGuinness	8/15/2018	Kansas	Research Kansas Medicaid system and interaction between KDHE and KDADS.	1.78	\$	225.00	\$	401.25
Erin G. McGuinness	8/15/2018	Kansas	Prepare for call with foster care stakeholder to discuss mental health system for children in foster care.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	8/20/2018	Kansas	Prepare for call with advocate for mental health in foster care populations in Kansas to discuss outcomes for children aging out of care through review of relevant data.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	8/20/2018	Kansas	Continued drafting contact memos from recent stakeholder trip for inclusion in the Findings of Facts document.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	8/21/2018	Kansas	Call with Kansas foster care advocate to discuss outcomes for older youth in care.	0.83	\$	225.00	\$	187.50
Erin G. McGuinness	8/22/2018	Kansas	Emails with team re strategy for outreach to Kansas foster care community, evidence gaps that need to be filled in upcoming trip.	0.17	\$	225.00	\$	37.50
Erin G. McGuinness	8/23/2018	Kansas	Emails with LW and SD re strategy for upcoming trip.	0.43	\$	225.00	\$	97.50
Erin G. McGuinness	8/27/2018	Kansas	Contact potential client in Topeka re potential interest in lawsuit.	0.20	\$	225.00	\$	45.00
Erin G. McGuinness	8/27/2018	Kansas	Discuss strategy with Stephen and Leecia for stakeholder trip tomorrow.	0.20	\$	225.00	\$	45.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	8/27/2018	Kansas	Review documents re Kansas foster care system in preparation for meetings with foster care advocates tomorrow.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	8/28/2018	Kansas Travel	Taxi to LaGuardia for flight to Kansas.	0.30	\$	225.00	\$	67.50
Erin G. McGuinness	8/28/2018	Kansas Travel	Flight from LaGuardia to Wichita, including transfer in Dallas.	3.12	\$	225.00	\$	701.25
Erin G. McGuinness	8/28/2018	Kansas	Discuss strategy for upcoming meetings with foster care advocates with SD.	0.67	\$	225.00	\$	150.00
Erin G. McGuinness	8/28/2018	Kansas	Meeting with GAL in Wichita with SD re foster care issues to potentially incorporate in litigation.	1.25	\$	225.00	\$	281.25
Erin G. McGuinness	8/29/2018	Kansas Travel	Drive from Wichita to Kansas City w/ SD.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	8/29/2018	Kansas	Meeting with foster care stakeholder in Wichita re placement array issues.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	8/29/2018	Kansas	Debrief about and summarize main findings from meetings with foster care advocates in Kansas with SD.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	8/29/2018	Kansas	Meeting with foster care advocate in Wichita with SD re Medicaid provisions for foster children.	1.25	\$	225.00	\$	281.25
Erin G. McGuinness	8/29/2018	Kansas	Meeting with two foster care advocates in Wichita with SD re placement issues.	2.75	\$	225.00	\$	618.75
Erin G. McGuinness	8/30/2018	Kansas Travel	Drive from KCK to Topeka and back for meeting with stakeholder in Topeka.	1.25	\$	225.00	\$	281.25
Erin G. McGuinness	8/30/2018	Kansas	Draft contact memos from investigatory meetings.	1.25	\$	225.00	\$	281.25
Erin G. McGuinness	8/30/2018	Kansas	Call with potential next friend re major issues in Kansas foster care system.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	8/30/2018	Kansas	Meeting with foster care advocate in Topeka re major issues facing foster care system.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	8/31/2018	Kansas Travel	Return flight from Kansas City	2.25	\$	225.00	\$	506.25

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	9/4/2018	Kansas	Strategize for tomorrow's meeting with foster care advocate and potential client with IL.	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	9/4/2018	Kansas	Draft KS investigatory contact memos.	1.37	\$	225.00	\$	307.50
Erin G. McGuinness	9/5/2018	Kansas	Meeting with IL & JK re EPSDT research.	0.67	\$	225.00	\$	150.00
Erin G. McGuinness	9/5/2018	Kansas	Prepare for meeting with foster care advocate.	0.67	\$	225.00	\$	150.00
Erin G. McGuinness	9/5/2018	Kansas	Meeting with foster care advocate with IL re placement array issues.	3.00	\$	225.00	\$	675.00
Erin G. McGuinness	9/6/2018	Kansas	Review and analyze contact memos and newly gathered information from trip to be incorporated into Findings of Facts document.	4.22	\$	225.00	\$	948.75
Erin G. McGuinness	9/7/2018	Kansas	Drafted out timeline for help in drafting complaint for named plaintiff "J.M."	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	9/14/2018	Kansas	Analyze 10th circuit class certification decision for its application in Kansas investigation.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	9/18/2018	Kansas	Draft contact memo for Next Friend Ashley Thorne.	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	9/18/2018	Kansas	Analyze and review newspaper articles regarding child welfare in Kansas relevant to claims in investigation.	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	9/18/2018	Kansas	Internal team meeting with IL, MN, JK to discuss agenda for tomorrow's full team call, ongoing research tasks, and next steps for retaining plaintiffs.	0.58	\$	225.00	\$	131.25
Erin G. McGuinness	9/18/2018	Kansas	Call with Ashley Thorne to discuss logistics of being a next friend and discuss J.M.'s timeline of her time in care.	2.40	\$	225.00	\$	540.00
Erin G. McGuinness	9/21/2018	Kansas	Review past research re confidentiality to assist in drafting of a confidentiality memo for the 10th circuit.	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	9/26/2018	Kansas	Review and analyze press re: Kansas child welfare system issues relevant to investigation and upcoming litigation.	0.52	\$	225.00	\$	116.25

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	9/26/2018	Kansas	Internal team meeting to discuss strategy for ongoing investigation.	0.48	\$	225.00	\$	108.75
Erin G. McGuinness	9/26/2018	Kansas	Analyze and review draft complaint outline to send feedback to team.	1.03	\$	225.00	\$	232.50
Erin G. McGuinness	9/26/2018	Kansas	Review class definition and support in framing KS complaint.	1.08	\$	225.00	\$	243.75
Erin G. McGuinness	9/26/2018	Kansas	Research KDHE structure and regulations for inclusion in draft complaint.	1.28	\$	225.00	\$	288.75
Erin G. McGuinness	9/27/2018	Kansas	Email with SD to discuss strategy for upcoming investigatory trip to Kansas.	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	9/27/2018	Kansas	Conduct outreach to Kansas child welfare advocates to set up meetings in advance of upcoming investigation trip.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	10/1/2018	Kansas	Call with Martha Hodgesmith (Appleseed) to discuss Kansas mental health delivery system.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	10/3/2018	Kansas	Discuss EPSDT research regarding requirement to provide mental health assessments with JK and IL.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	10/3/2018	Kansas	Draft the J.M. named plaintiff section for Kansas complaint.	1.33	\$	225.00	\$	300.00
Erin G. McGuinness	10/3/2018	Kansas	Research and analyze policy reports showing that mental health screens are medically necessary.	1.67	\$	225.00	\$	375.00
Erin G. McGuinness	10/4/2018	Kansas	Research into the structure of the Kansas medicaid system.	1.42	\$	225.00	\$	318.75
Erin G. McGuinness	10/4/2018	Kansas	Drafted J.M. named plaintiff section for complaint.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	10/4/2018	Kansas	Continue drafting JM named plaintiff section in KS complaint.	2.18	\$	225.00	\$	491.25
Erin G. McGuinness	10/5/2018	Kansas	Review KS retainer language for DA to edit and circulate to team.	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	10/9/2018	Kansas	Taxi from Wichita airport to hotel.	0.17	\$	225.00	\$	37.50
Erin G. McGuinness	10/9/2018	Kansas	Taxi to LaGuardia for flight to Kansas.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	10/9/2018	Kansas	Flight from St. Louis to Wichita	0.72	\$	225.00	\$	161.25

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	10/9/2018	Kansas	Layover in St. Louis during trip from NYC to Wichita.	1.12	\$	225.00	\$	251.25
Erin G. McGuinness	10/9/2018	Kansas	Flight from NY to St. Louis (b/c no direct flights to Wichita).	1.33	\$	225.00	\$	300.00
Erin G. McGuinness	10/9/2018	Kansas	Call with DA regarding Kansas Medicaid documents.	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	10/10/2018	Kansas	Prepare for meeting with Next Friend.	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	10/10/2018	Kansas	Meeting with SD re: strategy and preparation for meetings with Next Friends and stakeholders.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	10/10/2018	Kansas	Meeting with SD & Next Friend in Wichita to discuss case status and next steps.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	10/10/2018	Kansas	Meeting with SD and two foster care stakeholders in Wichita re KS placement array	2.50	\$	225.00	\$	562.50
Erin G. McGuinness	10/11/2018	Kansas	Drive to meeting with Kansas foster care advocate	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	10/11/2018	Kansas	Meeting with SD re: preparation and strategy for stakeholder meetings for the day.	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	10/11/2018	Kansas	Meeting with SD & Kansas foster care advocate re deficiencies in Kansas foster care system.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	10/11/2018	Kansas	Meeting with SD and two Kansas foster care advocates re: child welfare system issues relevant to upcoming litigation.	2.50	\$	225.00	\$	562.50
Erin G. McGuinness	10/12/2018	Kansas	Drive to airport for return flight.	0.17	\$	225.00	\$	37.50
Erin G. McGuinness	10/12/2018	Kansas	Taxi home from LaGuardia after return trip from Wichita.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	10/12/2018	Kansas	Flight from Wichita to St. Louis.	0.62	\$	225.00	\$	138.75
Erin G. McGuinness	10/12/2018	Kansas	Flight from St. Louis to NYC.	1.25	\$	225.00	\$	281.25
Erin G. McGuinness	10/12/2018	Kansas	Meeting with SD and foster care advocate re problems in foster care system relevant to upcoming litigation.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	10/15/2018	Kansas	Research Kansas medicaid system	3.00	\$	225.00	\$	675.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	10/16/2018	Kansas	Team meeting to debrief on EM & SD's trip last week and discuss next steps for outreach to potential clients.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	10/17/2018	Kansas	Telephone call with Kansas foster care advocate in advance of upcoming trip re major problems in Kansas foster care system.	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	10/17/2018	Kansas	Internal team meeting to discuss complaint drafting strategy.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	10/18/2018	Kansas	Call with Kansas foster care advocate re: placement moves of foster youth.	1.43	\$	225.00	\$	322.50
Erin G. McGuinness	10/18/2018	Kansas	Call with Next Friend re: next steps, necessary documents, and questions re: upcoming litigation.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	10/22/2018	Kansas	Draft memo of call with next friends for full team.	0.57	\$	225.00	\$	127.50
Erin G. McGuinness	10/22/2018	Kansas	Call with Kansas foster care advocate re: issues in KS child welfare system relevant to upcoming litigation.	0.62	\$	225.00	\$	138.75
Erin G. McGuinness	10/22/2018	Kansas	Draft summary of Named Plaintiffs and next friends in Wichita to circulate to team for review	0.63	\$	225.00	\$	142.50
Erin G. McGuinness	10/22/2018	Kansas	Drafted caseloads section of the Kansas complaint.	4.43	\$	225.00	\$	997.50
Erin G. McGuinness	10/23/2018	Kansas	Call with next friend regarding named plaintiff complaint section	0.17	\$	225.00	\$	37.50
Erin G. McGuinness	10/23/2018	Kansas	Draft caseloads section of Kansas complaint	1.58	\$	225.00	\$	356.25
Erin G. McGuinness	10/23/2018	Kansas	Drafted named plaintiff section of complaint.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	10/24/2018	Kansas	Edit caseloads section of the Kansas Complaint draft.	2.23	\$	225.00	\$	502.50
Erin G. McGuinness	10/25/2018	Kansas	Outreach to Kansas foster care advocate to inform KS complaint drafting.	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	10/25/2018	Kansas	Draft and edit caseloads section of the complaint with sources	4.28	\$	225.00	\$	963.75

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	10/29/2018	Kansas	Discuss citations and references to complaint with DA.	0.00	\$	225.00	\$	-
Erin G. McGuinness	10/29/2018	Kansas	Discuss complaint draft updates with MN.	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	10/29/2018	Kansas	Analyze and review of Medicaid claim theory with JK.	0.37	\$	225.00	\$	82.50
Erin G. McGuinness	10/29/2018	Kansas	Research KS child welfare agency, contract agency policies, and practices surrounding caseworker duties.	2.50	\$	225.00	\$	562.50
Erin G. McGuinness	10/29/2018	Kansas	Edit caseloads section of complaint	4.08	\$	225.00	\$	918.75
Erin G. McGuinness	10/30/2018	Kansas	Outreach to KS foster care advocate to inform complaint drafting re: placement moves.	0.07	\$	225.00	\$	15.00
Erin G. McGuinness	10/30/2018	Kansas	Review IL & MN redlines of complaint to work on second round of revisions	3.68	\$	225.00	\$	828.75
Erin G. McGuinness	10/31/2018	Kansas	Outreach to KS foster care advocate to inform complaint drafting re: placement moves.	0.13	\$	225.00	\$	30.00
Erin G. McGuinness	10/31/2018	Kansas	Read and analyze first fully compiled complaint draft.	1.83	\$	225.00	\$	412.50
Erin G. McGuinness	10/31/2018	Kansas	Read, edit, and redline full draft of Kansas complaint.	3.20	\$	225.00	\$	720.00
Erin G. McGuinness	11/1/2018	Kansas	Outreach to KS foster care advocate to inform complaint drafting re: placement moves.	0.12	\$	225.00	\$	26.25
Erin G. McGuinness	11/1/2018	Kansas	Call with next friend re KS complaint draft	0.63	\$	225.00	\$	142.50
Erin G. McGuinness	11/1/2018	Kansas	Outlined narratives for two named plaintiffs in complaint draft	0.77	\$	225.00	\$	172.50
Erin G. McGuinness	11/1/2018	Kansas	Discuss with complaint drafting strategy, strategic edits with DA & IL	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	11/1/2018	Kansas	Edit and review recent complaint draft	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	11/1/2018	Kansas	Call with next friend re KS complaint draft input, questions.	1.35	\$	225.00	\$	303.75
Erin G. McGuinness	11/1/2018	Kansas	Research policy best practices for EPSDT mental health screens	1.58	\$	225.00	\$	356.25
Erin G. McGuinness	11/1/2018	Kansas	Add redline edits to draft of Kansas Complaint.	1.72	\$	225.00	\$	386.25

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Erin G. McGuinness	11/2/2018	Kansas	Reviewed and analyzed co-counsel's edits to the combined complaint.	1.30	\$	225.00	\$	292.50
Erin G. McGuinness	11/2/2018	Kansas	Drafted named plaintiff sections for complaint.	3.18	\$	225.00	\$	716.25
Erin G. McGuinness	11/5/2018	Kansas	Meeting with IL, MN, JK, DA regarding strategy for complaint drafting.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	11/5/2018	Kansas	Research Kansas EPSDT and applicability to complaint.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	11/5/2018	Kansas	Research medical literature and best practices for whether initial trauma screens are required under EPSDT	5.60	\$	225.00	\$	1,260.00
Erin G. McGuinness	11/6/2018	Kansas	Review references and sources to complaint to inform DA's citechecking of complaint footnotes.	0.47	\$	225.00	\$	105.00
Erin G. McGuinness	11/6/2018	Kansas	Compile facts regarding named plaintiffs in Topeka and Kansas City and draft named plaintiff complaint section for each.	4.60	\$	225.00	\$	1,035.00
Erin G. McGuinness	11/7/2018	Kansas	Outreach to KS foster care advocate to inform complaint drafting re: placement moves.	0.30	\$	225.00	\$	67.50
Erin G. McGuinness	11/7/2018	Kansas	Analyze whether children voluntarily placed into out-of-home care should be class members.	0.43	\$	225.00	\$	97.50
Erin G. McGuinness	11/7/2018	Kansas	Redline Ira's edits to the Named Plaintiff complaint section draft.	0.53	\$	225.00	\$	120.00
Erin G. McGuinness	11/7/2018	Kansas	Re-run Adoption and Foster Care Analysis and Reporting System (AFCARS) stats to validate data used in the complaint.	1.25	\$	225.00	\$	281.25
Erin G. McGuinness	11/8/2018	Kansas	Discuss EPSDT claim for trauma screens with JK.	0.42	\$	225.00	\$	93.75
Erin G. McGuinness	11/8/2018	Kansas	Emails with the team coordinating upcoming trip and discussing stakeholders.	0.70	\$	225.00	\$	157.50
Erin G. McGuinness	11/8/2018	Kansas	Internal KS meeting with IL, MN, DA regarding EPSDT claim for trauma screens.	0.88	\$	225.00	\$	198.75

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Erin G. McGuinness	11/8/2018	Kansas	Read prior investigations' research memos about EPSDT claim for trauma screen and discuss with JK for context in Kansas.	1.33	\$	225.00	\$	300.00
Erin G. McGuinness	11/9/2018	Kansas	Confirm citations, references, and sources to various footnotes in KS complaint draft with DA.	0.53	\$	225.00	\$	120.00
Erin G. McGuinness	11/9/2018	Kansas	Outreach to Next Friends re: upcoming complaint filing.	0.60	\$	225.00	\$	135.00
Erin G. McGuinness	11/9/2018	Kansas	Prepare for presentation of EPSDT claim regarding initial trauma screens.	1.25	\$	225.00	\$	281.25
Erin G. McGuinness	11/9/2018	Kansas	Review and add revisions to updated complaint draft.	2.78	\$	225.00	\$	626.25
Erin G. McGuinness	11/10/2018	Kansas	Call with LBB to discuss current and potential clients	0.58	\$	225.00	\$	131.25
Erin G. McGuinness	11/10/2018	Kansas	Provide redline revisions to named plaintiff sections and EPSDT sections of complaint.	3.47	\$	225.00	\$	780.00
Erin G. McGuinness	11/11/2018	Kansas	Outline narratives for several potential named plaintiffs and circulate to team for review.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	11/12/2018	Kansas	Reach out to foster care advocates in preparation for this week's trip.	0.38	\$	225.00	\$	86.25
Erin G. McGuinness	11/12/2018	Kansas	Call with JK, SD, LBB to strategize for this week's trip.	0.58	\$	225.00	\$	131.25
Erin G. McGuinness	11/12/2018	Kansas	Call with next friend in advance of meeting later this week.	1.05	\$	225.00	\$	236.25
Erin G. McGuinness	11/13/2018	Kansas	Email with JK re EPSDT provisions in mental health section.	0.30	\$	225.00	\$	67.50
Erin G. McGuinness	11/13/2018	Kansas	Email with co-counsel regarding EPSDT provisions in the mental health section of the complaint.	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	11/13/2018	Kansas	Telephone call with with Freya re EPSDT section in complaint.	0.37	\$	225.00	\$	82.50
Erin G. McGuinness	11/13/2018	Kansas	Review updated complaint draft	0.50	\$	225.00	\$	112.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	11/13/2018	Kansas	Reach out to foster care advocates in preparation for this week's trip.	0.52	\$	225.00	\$	116.25
Erin G. McGuinness	11/13/2018	Kansas	Call with next friend in advance of our meeting in Kansas later this week.	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	11/13/2018	Kansas	Call with next friend in advance of in-person meeting this week.	1.33	\$	225.00	\$	300.00
Erin G. McGuinness	11/13/2018	Kansas	Drafted named plaintiff sections for the complaint for new named plaintiffs.	2.27	\$	225.00	\$	510.00
Erin G. McGuinness	11/14/2018	Kansas	Taxi to LaGuardia airport for flight to Kansas City.	0.38	\$	225.00	\$	86.25
Erin G. McGuinness	11/14/2018	Kansas	Pick up rental car and drive to stakeholder meeting in KCK.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	11/14/2018	Kansas	Flight from LaGuardia to Kansas City	1.25	\$	225.00	\$	281.25
Erin G. McGuinness	11/14/2018	Kansas	Meeting with JK, foster care advocate in Kansas City re problems facing foster care system, addressing factual gaps in complaint for upcoming litigation	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	11/14/2018	Kansas	Meeting with LBB and JK to debrief, summarize key takeaways re the meeting with next friend and foster care advocate and prep for tomorrow's meetings with other foster care advocates.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	11/14/2018	Kansas	Meeting with JK, next friend, foster care advocate, and co-counsel in Appleseed office re remaining factual gaps in complaint.	2.50	\$	225.00	\$	562.50
Erin G. McGuinness	11/15/2018	Kansas	Drivining to meetings with stakeholders.	0.67	\$	225.00	\$	150.00
Erin G. McGuinness	11/15/2018	Kansas	Call with DA re complaint filing strategy.	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	11/15/2018	Kansas	Call with MN regarding updates in filing status	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	11/15/2018	Kansas	Call with next friend re complaint status.	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	11/15/2018	Kansas	Meeting with next friend at co-counsel's office re: complaint filing.	0.58	\$	225.00	\$	131.25

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	11/15/2018	Kansas	Read and analyze final updated complaint draft.	0.67	\$	225.00	\$	150.00
Erin G. McGuinness	11/15/2018	Kansas	Meeting with JK & SD and next friend re complaint status.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	11/15/2018	Kansas	Meeting with JK & SD to compare notes for the calls and meetings throughout the day to nail down evidence/factual gaps and strategize tomorrow's investigative meetings with foster care advocates and current/prospective clients.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	11/15/2018	Kansas	Meeting with SD & JK to debrief on fact discovered in prior meeting with foster care advocate and strategize for next meeting with foster care advocate.	2.00	\$	225.00	\$	450.00
Erin G. McGuinness	11/16/2018	Kansas	Taxi home from LaGuardia	0.28	\$	225.00	\$	63.75
Erin G. McGuinness	11/16/2018	Kansas	Drive to airport & return rental car.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	11/16/2018	Kansas	Flight from Kansas City to LaGuardia.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	11/16/2018	Kansas	Call with potential client to discuss filing of complaint.	0.42	\$	225.00	\$	93.75
Erin G. McGuinness	11/16/2018	Kansas	Call with Next Friend to discuss filing of complaint.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	11/16/2018	Kansas	Call with Kansas child welfare expert to discuss filing of complaint	0.58	\$	225.00	\$	131.25
Erin G. McGuinness	11/16/2018	Kansas	Review and analyze press articles regarding the Kansas case filing and DCF's response to the media to inform future case development.	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	11/16/2018	Kansas	Meeting with JK and foster care advocate re: placement issues in Kansas.	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	11/16/2018	Kansas	Meeting with JK to discuss main findings from recent meetings with foster care advocates.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	11/17/2018	Kansas	Email with next friend re case filing.	1.00	\$	225.00	\$	225.00

***M.B. v. Howard***  
**Children's Rights Itemized Time Entries**

Erin G. McGuinness	11/19/2018	Kansas	Call with Christina from Appleseed regarding contacts from potential class members, clients.	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	11/19/2018	Kansas	Call with next friends to discuss case being filed and next steps.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	11/29/2018	Kansas	Internal team meeting to discuss post-complaint filing strategy.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	12/4/2018	Kansas	Call with next friend to discuss updates with their named plaintiff.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	12/5/2018	Kansas	Inter-team emails discussing admissions in recent press and updates from potential fact witnesses.	0.27	\$	225.00	\$	60.00
Erin G. McGuinness	12/6/2018	Kansas	Analyze co-counsel's summary of the press conference with DCF secretary Gina Meyer-Hummel.	0.12	\$	225.00	\$	26.25
Erin G. McGuinness	12/6/2018	Kansas	Email potential next friend re communiques from DCF since complaint filing.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	12/6/2018	Kansas	Review the KS Child Welfare Task Force documents circulated by co-counsel by potential inclusion in amended complaint.	1.27	\$	225.00	\$	285.00
Erin G. McGuinness	12/10/2018	Kansas	Emails with co-counsel regarding outreach to foster care advocates.	0.20	\$	225.00	\$	45.00
Erin G. McGuinness	12/10/2018	Kansas	Review and edit Appleseed's proposed draft intake from calls from potential clients, class members in response to the publicity surrounding the case.	0.20	\$	225.00	\$	45.00
Erin G. McGuinness	12/13/2018	Kansas	Internal team emails discussing the clerk's extension of time to answer to the Defendants.	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	1/2/2019	Kansas	Analyze and review Defendants' motion for extension for time to answer.	0.12	\$	225.00	\$	26.25
Erin G. McGuinness	1/2/2019	Kansas	Review contracts received for case management contractors through Kansas open records request.	0.17	\$	225.00	\$	37.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Erin G. McGuinness	1/3/2019	Kansas	Read and give feedback to co-counsel's first draft of opposition to defendant's motion for an extension of time.	0.13	\$	225.00	\$	30.00
Erin G. McGuinness	1/3/2019	Kansas	Research potential KS foster care system experts	0.45	\$	225.00	\$	101.25
Erin G. McGuinness	1/3/2019	Kansas	Review and analyze Kansas press reports about the newly appointed interim agency director.	0.60	\$	225.00	\$	135.00
Erin G. McGuinness	1/4/2019	Kansas	Review final edits to our opposition to the Defendant' motion for an extension of time to answer the complaint.	0.45	\$	225.00	\$	101.25
Erin G. McGuinness	1/7/2019	Kansas	Email with propsective consultant experts.	0.27	\$	225.00	\$	60.00
Erin G. McGuinness	1/9/2019	Kansas	KS internal meeting with MN, JK, DA, CC before full team meeting to discuss agenda.	0.08	\$	225.00	\$	18.75
Erin G. McGuinness	1/10/2019	Kansas	Telephone call with IL and consultant regarding potential Medicaid and systems experts for Kansas.	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	1/16/2019	Kansas	Preliminary research into the list of experts suggested by Medicaid consultant, summarize, and circulate to team.	2.37	\$	225.00	\$	532.50
Erin G. McGuinness	1/17/2019	Kansas	Draft and circulate contact memo for call with foster care expert in Kansas regarding potential mental health experts.	0.53	\$	225.00	\$	120.00
Erin G. McGuinness	1/18/2019	Kansas	Review Defendants' proposed edits to draft protective order.	0.17	\$	225.00	\$	37.50
Erin G. McGuinness	1/18/2019	Kansas	Emails among team and co-counsel to discuss Defendants' edits to proposed protective order and next steps.	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	1/22/2019	Kansas	Review emails among team regarding protective order, give opinion on edits to same.	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	1/25/2019	Kansas	Correspond with team re protective order and strategy for next clients	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	2/4/2019	Kansas	Review proposed draft protective order.	0.17	\$	225.00	\$	37.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	2/5/2019	Kansas	Correspond with prospective expert.	0.13	\$	225.00	\$	30.00
Erin G. McGuinness	2/6/2019	Kansas	Draft contact memo from call with prospective expert and circulate to team.	0.38	\$	225.00	\$	86.25
Erin G. McGuinness	2/6/2019	Kansas	Call with IL and prospective expert re mental health care issues for foster children.	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	2/7/2019	Kansas	Analyze KS term sheet to discuss with team at meeting tomorrow.	2.23	\$	225.00	\$	502.50
Erin G. McGuinness	2/8/2019	Kansas	Internal team meeting with IL, MN, JK, DA, CC to discuss draft settlement term sheet.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	2/11/2019	Kansas	Internal meeting to for settlement terms sheet review improvement plan.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	2/20/2019	Kansas	Email with prospective expert about Medicaid claims.	0.08	\$	225.00	\$	18.75
Erin G. McGuinness	2/20/2019	Kansas	Call with next friend to discuss case updates and named plaintiffs.	0.18	\$	225.00	\$	41.25
Erin G. McGuinness	2/20/2019	Kansas	Email next friend regarding protective order.	0.18	\$	225.00	\$	41.25
Erin G. McGuinness	2/20/2019	Kansas	Calls to next friends re case updates (continued).	0.20	\$	225.00	\$	45.00
Erin G. McGuinness	2/20/2019	Kansas	Email with next friend to discuss case updates and next steps.	0.43	\$	225.00	\$	97.50
Erin G. McGuinness	2/20/2019	Kansas	Correspond with co-counsel regarding status of agenda items for today's team call.	0.52	\$	225.00	\$	116.25
Erin G. McGuinness	2/21/2019	Kansas	Email with next friend regarding case updates.	0.13	\$	225.00	\$	30.00
Erin G. McGuinness	2/21/2019	Kansas	Call with next friend re case updates	0.32	\$	225.00	\$	71.25
Erin G. McGuinness	2/27/2019	Kansas	Internal team meeting with IL, MN, JK, DA, CC to debrief after full team call to discuss immediate next steps and delegations.	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	3/6/2019	Kansas	Email with expert re topics, points of inquiry for upcoming call.	0.15	\$	225.00	\$	33.75
Erin G. McGuinness	3/7/2019	Kansas	Email co-counsel and expert about exploratory call with team.	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	3/7/2019	Kansas	Prepare for call with prospective expert	0.50	\$	225.00	\$	112.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	3/7/2019	Kansas	Call with prospective expert to discuss possibility of collaboration on mental health issues.	0.67	\$	225.00	\$	150.00
Erin G. McGuinness	3/11/2019	Kansas	Email with prospective mental health expert to summarize meeting, pose more questions, and set up a follow-up meeting.	0.17	\$	225.00	\$	37.50
Erin G. McGuinness	3/11/2019	Kansas	Email all next friends a copy of the protective order and acknowledgment and discuss case updates with each.	0.80	\$	225.00	\$	180.00
Erin G. McGuinness	3/12/2019	Kansas	Email team with updates from next friend.	0.20	\$	225.00	\$	45.00
Erin G. McGuinness	3/12/2019	Kansas	Call with next friend re factual updates.	0.87	\$	225.00	\$	195.00
Erin G. McGuinness	3/14/2019	Kansas	Email with co-counsel re potential fact witness.	0.30	\$	225.00	\$	67.50
Erin G. McGuinness	3/14/2019	Kansas	Prepare for call with prospective expert.	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	3/14/2019	Kansas	Call with prospective expert in Medicaid systems with IL and co-counsel from NCYL.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	3/15/2019	Kansas	Call with next friend regarding case updates and strategy.	0.87	\$	225.00	\$	195.00
Erin G. McGuinness	3/19/2019	Kansas	Discuss talking points regarding named plaintiffs and next friends with JK for presentation at full team conference tomorrow.	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	3/20/2019	Kansas	Review research, facts with JK & SD for full team conference this afternoon.	0.13	\$	225.00	\$	30.00
Erin G. McGuinness	3/20/2019	Kansas	Prepare fact patterns of potential new clients for co-counsel meeting.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	3/21/2019	Kansas	Call with Next Friend regarding named plaintiff concerns.	0.30	\$	225.00	\$	67.50
Erin G. McGuinness	3/21/2019	Kansas	Call with Next Friend regarding named plaintiff concerns and update (continued).	0.37	\$	225.00	\$	82.50
Erin G. McGuinness	3/21/2019	Kansas	Emails with team and co-counsel regarding named plaintiff concerns and update.	0.70	\$	225.00	\$	157.50
Erin G. McGuinness	3/21/2019	Kansas	Calls with co-counsel re: named plaintiff status update.	1.57	\$	225.00	\$	352.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Erin G. McGuinness	3/22/2019	Kansas	Email next friends re: Benet's withdrawal as counsel and Teresa's addition.	0.90	\$	225.00	\$	202.50
Erin G. McGuinness	3/25/2019	Kansas	Strategize with team about the potential for interim relief and what it would look like.	0.38	\$	225.00	\$	86.25
Erin G. McGuinness	3/27/2019	Kansas	Emails with the team regarding discussions with Defendants and case strategy.	0.32	\$	225.00	\$	71.25
Erin G. McGuinness	3/28/2019	Kansas	Analyze JK's memo on 5th Circuit SDP opinions.	0.57	\$	225.00	\$	127.50
Erin G. McGuinness	4/1/2019	Kansas	Email with next friend about case updates.	0.37	\$	225.00	\$	82.50
Erin G. McGuinness	4/1/2019	Kansas	Read LPA follow-up audit to inform potential settlement strategy.	0.72	\$	225.00	\$	161.25
Erin G. McGuinness	4/11/2019	Kansas	Analyze one pager re: in camera review of docs.	0.32	\$	225.00	\$	71.25
Erin G. McGuinness	4/12/2019	Kansas	Email prospective expert re meeting topics, questions.	0.23	\$	225.00	\$	52.50
Erin G. McGuinness	4/12/2019	Kansas	Review Kansas documents sent to Ira by foster care advocate and summarize for team.	1.72	\$	225.00	\$	386.25
Erin G. McGuinness	4/15/2019	Kansas	Analyze effect Kansas press on litigation and email conversation with co-counsel regarding KS press.	1.33	\$	225.00	\$	300.00
Erin G. McGuinness	4/29/2019	Kansas	Contact next friends to update on case.	1.08	\$	225.00	\$	243.75
Erin G. McGuinness	4/30/2019	Kansas	Review and analyze Defendants' answer to our complaint.	0.67	\$	225.00	\$	150.00
Erin G. McGuinness	5/1/2019	Kansas	Emails with next friends with case updates.	0.38	\$	225.00	\$	86.25
Erin G. McGuinness	5/20/2019	Kansas	Call with Medicaid expert and MN, JK, LBB, NCYL, and Appleseed, to discuss Plaintiffs' claim.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	5/20/2019	Kansas	Call with JK, NCYL, and Appleseed with subject matter expert to discuss claims in help deciding whether to amend complaint.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	5/29/2019	Kansas	Emails to next friends with raft initial terms sheet for review and approval.	0.53	\$	225.00	\$	120.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	6/6/2019	Kansas	Review sample RFP's for model of how to structure RFP for PIP related material.	0.48	\$	225.00	\$	108.75
Erin G. McGuinness	6/12/2019	Kansas	Discuss strategy for Medicaid claims with JK.	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	6/14/2019	Kansas	Discuss KS RFP strategy with JK	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	6/15/2019	Kansas	Prepare for KS medicaid call with co-counsel and stakeholders.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	6/15/2019	Kansas	Call with JK, NCYL, Appleseed, LBB, and stakeholders to discuss Kansas Medicaid practice.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	6/18/2019	Kansas	Discuss and review RFP's with JK.	0.57	\$	225.00	\$	127.50
Erin G. McGuinness	6/19/2019	Kansas	Debrief after KS call regarding Medicaid claim research with CC.	0.10	\$	225.00	\$	22.50
Erin G. McGuinness	6/19/2019	Kansas	Review FP's notes from call on Saturday with foster care advocates.	0.13	\$	225.00	\$	30.00
Erin G. McGuinness	6/19/2019	Kansas	Internal team meeting after full team call regarding call Saturday with Kansas foster care advocates with IL, JK, CC, interns.	0.18	\$	225.00	\$	41.25
Erin G. McGuinness	6/25/2019	Kansas	Discuss questions regarding edits to initial disclosures with JK.	0.15	\$	225.00	\$	33.75
Erin G. McGuinness	6/25/2019	Kansas	Edit draft initial disclosures.	0.58	\$	225.00	\$	131.25
Erin G. McGuinness	7/9/2019	Kansas	Correspond with prospective expert re upcoming meeting topics.	0.40	\$	225.00	\$	90.00
Erin G. McGuinness	7/22/2019	Kansas	Prepare for call with prospective expert with IL.	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	7/22/2019	Kansas	Call with prospective expert & IL re evaluating feasibility to work on this litigation.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	7/29/2019	Kansas	Emails among Kansas team re: correspondence with Defendants counsel.	0.23	\$	225.00	\$	52.50
Erin G. McGuinness	8/1/2019	Kansas	Email with team about suggestions to include in the 3rd party subpoena.	0.32	\$	225.00	\$	71.25
Erin G. McGuinness	8/1/2019	Kansas	Discuss documents and descriptions to include in 3rd party subpoena with JK & CG.	0.53	\$	225.00	\$	120.00
Erin G. McGuinness	8/5/2019	Kansas	Discuss edits to DLA's draft of the 3rd party subpoena for KVC/St. Francis with IL, CG, JK.	0.47	\$	225.00	\$	105.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	8/7/2019	Kansas	Summarize memo of conversation with proposed trauma expert for team.	0.60	\$	225.00	\$	135.00
Erin G. McGuinness	8/8/2019	Kansas	Emails with team regarding conversations with expert.	0.27	\$	225.00	\$	60.00
Erin G. McGuinness	8/8/2019	Kansas	Call with prospective expert re potentially joining case.	0.28	\$	225.00	\$	63.75
Erin G. McGuinness	8/8/2019	Kansas	Prepare for call with prospective expert	0.60	\$	225.00	\$	135.00
Erin G. McGuinness	8/12/2019	Kansas	Emails among team regarding intake call with potential fact witness and appropriate next steps.	0.43	\$	225.00	\$	97.50
Erin G. McGuinness	8/14/2019	Kansas	Reviewed Named Plaintiff case files in advance of doc review meeting.	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	8/19/2019	Kansas	Meeting to discuss doc review of named plaintiff files.	0.30	\$	225.00	\$	67.50
Erin G. McGuinness	8/20/2019	Kansas	Discuss next friend document collection with DA	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	8/20/2019	Kansas	Call with Poonam and Freya re: document collection from next friends.	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	8/23/2019	Kansas	Emails with KS team to discuss status of amended complaint, conversation with next friends, updated facts, and next steps.	0.20	\$	225.00	\$	45.00
Erin G. McGuinness	8/23/2019	Kansas	Spoke to Katharyn McIntyre to discuss case updates and named plaintiff updates.	0.45	\$	225.00	\$	101.25
Erin G. McGuinness	8/23/2019	Kansas	Emails to Next Friends re: named plaintiffs' statuses.	0.47	\$	225.00	\$	105.00
Erin G. McGuinness	8/26/2019	Kansas	Emails to next friends regarding amended complaint.	0.35	\$	225.00	\$	78.75
Erin G. McGuinness	8/26/2019	Kansas	Review named plaintiff files to fact check amended complaint.	2.28	\$	225.00	\$	513.75
Erin G. McGuinness	8/26/2019	Kansas	Review named plaintiff files produced by Defendants.	5.17	\$	225.00	\$	1,162.50
Erin G. McGuinness	9/4/2019	Kansas	Correspond with co-counsel team re: amending complaint.	0.30	\$	225.00	\$	67.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	9/11/2019	Kansas	Read and analyze Kansas article about FFPSA and Medicaid complications and team emails in response.	0.35	\$	225.00	\$	78.75
Erin G. McGuinness	9/16/2019	Kansas	Read and analyze GAO report regarding CMS screening circulated by co-counsel.	1.23	\$	225.00	\$	277.50
Erin G. McGuinness	9/17/2019	Kansas	Discuss mediation statement and co-counsel's response with JK.	0.42	\$	225.00	\$	93.75
Erin G. McGuinness	9/17/2019	Kansas	Read through co-counsel's edits to mediation statement	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	9/18/2019	Kansas	Internal KS meeting to discuss doc review	0.43	\$	225.00	\$	97.50
Erin G. McGuinness	9/20/2019	Kansas	Review and analyze New Mexico complaint and NACC materials to prep for call with consultant re: Medicaid claims.	1.22	\$	225.00	\$	273.75
Erin G. McGuinness	9/23/2019	Kansas	Prepare for call with consultant re Medicaid screen claims	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	9/23/2019	Kansas	Call with IL, MN, consultants to discuss development of TXIX claims	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	9/27/2019	Kansas	Correspond with team re: opposing counsel withdrawing and new counsel making appearance.	0.40	\$	225.00	\$	90.00
Erin G. McGuinness	10/2/2019	Kansas	Correspond with team discussing letter to Defendants and next steps for settlement discussions.	0.03	\$	225.00	\$	7.50
Erin G. McGuinness	10/7/2019	Kansas	Call with consultant & MN to discuss strategy re Medicaid claims.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	10/10/2019	Kansas	Discuss status, major findings in document review with IL	0.42	\$	225.00	\$	93.75
Erin G. McGuinness	10/21/2019	Kansas	Review and index Named Plaintiff files	6.08	\$	225.00	\$	1,368.75
Erin G. McGuinness	10/22/2019	Kansas	Review and index Named Plaintiff files	1.33	\$	225.00	\$	300.00
Erin G. McGuinness	10/23/2019	Kansas	Review and index Named Plaintiff files	0.75	\$	225.00	\$	168.75

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Erin G. McGuinness	10/24/2019	Kansas	Review and index Named Plaintiff files	6.32	\$	225.00	\$	1,421.25
Erin G. McGuinness	10/29/2019	Kansas	Call with consultant to discuss mediation strategies re Medicaid claims.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	10/30/2019	Kansas	Email prospective mental health experts.	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	11/6/2019	Kansas	Correspond with prospective expert re questions relating to class certification.	0.15	\$	225.00	\$	33.75
Erin G. McGuinness	11/6/2019	Kansas	Discuss expert outreach strategy, governor's role in foster care with MN	0.17	\$	225.00	\$	37.50
Erin G. McGuinness	11/6/2019	Kansas	Call Kansas stakeholder re case strategy and updates.	0.70	\$	225.00	\$	157.50
Erin G. McGuinness	11/21/2019	Kansas	Edit language for draft outcome measures in mediation	0.38	\$	225.00	\$	86.25
Erin G. McGuinness	11/21/2019	Kansas	Internal meeting with IL, MN, EPG, CG, DA, CC to discuss draft outcome measures for settlement.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	11/22/2019	Kansas	Review draft outcomes in settlement.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	11/22/2019	Kansas	Research definition of respite for draft prohibitions in settlement	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	12/9/2019	Kansas	Correspond with team regarding draft settlement proposal.	1.47	\$	225.00	\$	330.00
Erin G. McGuinness	12/12/2019	Kansas	Reviewed kinship model in Kansas to inform settlement agreement negotiations	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	12/12/2019	Kansas	Prepare for call with prospective Kansas expert.	0.58	\$	225.00	\$	131.25
Erin G. McGuinness	12/12/2019	Kansas	Call with prospective Kansas expert.	1.50	\$	225.00	\$	337.50
Erin G. McGuinness	12/17/2019	Kansas	Correspond with team discussing proposed settlement draft.	0.38	\$	225.00	\$	86.25
Erin G. McGuinness	12/17/2019	Kansas	Read and edit updated proposed settlement draft	0.40	\$	225.00	\$	90.00
Erin G. McGuinness	1/13/2020	Kansas	Find source in Named Plaintiff file for use in response to Defendant's motion to dismiss.	0.07	\$	225.00	\$	15.00
Erin G. McGuinness	2/11/2020	Kansas	Contemplate alternative metrics for stability for incorporation into settlement agreement	0.33	\$	225.00	\$	75.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	2/11/2020	Kansas	Meeting with IL & EGH to discuss stability proxy metrics for settlement.	1.00	\$	225.00	\$	225.00
Erin G. McGuinness	2/25/2020	Kansas	Call with EGH & MN to discuss CFSR review instrument and measurement metrics for mediation.	0.20	\$	225.00	\$	45.00
Erin G. McGuinness	2/25/2020	Kansas	Discuss potential measurement metrics for Kansas mediation	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	2/27/2020	Kansas	Review updated Kansas mediation package	0.97	\$	225.00	\$	217.50
Erin G. McGuinness	3/16/2020	Kansas	Discussion regarding measurement metrics with team.	0.33	\$	225.00	\$	75.00
Erin G. McGuinness	4/1/2020	Kansas	Correspond with team re settlement agreement metrics.	0.25	\$	225.00	\$	56.25
Erin G. McGuinness	4/2/2020	Kansas	Correspond with team re: RFP, discovery strategy.	0.43	\$	225.00	\$	97.50
Erin G. McGuinness	4/14/2020	Kansas	Correspond with team re substitution of next friend and case strategy.	0.42	\$	225.00	\$	93.75
Erin G. McGuinness	5/4/2020	Kansas	Review and analyze recap of Kansas meet and confer.	0.42	\$	225.00	\$	93.75
Erin G. McGuinness	5/5/2020	Kansas	Analyze potential for using CFSR Item 18 as a draft settlement metric.	1.60	\$	225.00	\$	360.00
Erin G. McGuinness	5/6/2020	Kansas	Correspond with team re settlement and litigation strategy.	0.37	\$	225.00	\$	82.50
Erin G. McGuinness	5/14/2020	Kansas	Correspond with team re settlement updates and strategy.	0.30	\$	225.00	\$	67.50
Erin G. McGuinness	5/14/2020	Kansas	Highlight and circulate CFSR syntax to Kansas mediation team for integration into settlement agreement.	0.37	\$	225.00	\$	82.50
Erin G. McGuinness	5/14/2020	Kansas	Meeting with IL, CG, NT, EGH re settlement metrics.	0.75	\$	225.00	\$	168.75
Erin G. McGuinness	5/14/2020	Kansas	Review CFSR Item 4 measures and compare language to draft settlement proposal.	2.03	\$	225.00	\$	457.50
Erin G. McGuinness	5/15/2020	Kansas	Call with IL & EGH to discuss draft settlement metrics.	0.50	\$	225.00	\$	112.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Erin G. McGuinness	5/18/2020	Kansas	Correspond with team re settlement strategy.	0.37	\$	225.00	\$	82.50
Erin G. McGuinness	5/28/2020	Kansas	Review CFSR Item 4 definitions references in draft settlement agreement to ensure efficacy.	0.40	\$	225.00	\$	90.00
Erin G. McGuinness	5/28/2020	Kansas	Call with IL, JK, EGH to discuss outcome metrics and CFSR definitions incorporated by reference in settlement agreement.	0.50	\$	225.00	\$	112.50
Erin G. McGuinness	5/28/2020	Kansas	Review updated settlement draft and Defendants' comments in preparation for KS meeting to discuss settlement metrics.	0.88	\$	225.00	\$	198.75
Erin G. McGuinness	5/28/2020	Kansas	Analyze Adoption and Foster Care Analysis and Reporting System (AFCARS) data run for length of stay to aid settlement negotiations	1.33	\$	225.00	\$	300.00
Erin G. McGuinness	6/4/2020	Kansas	Emails with IL & EGH regarding CFSR and KS settlement metrics.	0.38	\$	225.00	\$	86.25
Erin G. McGuinness	6/5/2020	Kansas	Call with IL & EGH & JK to discuss pros and cons to different outcome metrics in preparation for continued settlement negotiations.	0.58	\$	225.00	\$	131.25
Erin G. McGuinness	6/10/2020	Kansas	Confirm language in KS Draft settlement agreement metrics.	0.32	\$	225.00	\$	71.25
Ira Lustbader	11/22/2017	Kansas	Telephone call with NYCL (Leecia Welch) regarding KS partnership interest in lit	0.75	\$	500.00	\$	375.00
Ira Lustbader	12/20/2017	Kansas	Analyze audits reports and data cont'd re pot. Claims	2.17	\$	500.00	\$	1,083.33
Ira Lustbader	1/8/2018	Kansas	Follow up analysis press reports on caseloads; state reports	1.33	\$	500.00	\$	666.67
Ira Lustbader	1/10/2018	Kansas	Review new budget info and prelim leg task force report	1.17	\$	500.00	\$	583.33
Ira Lustbader	1/16/2018	Kansas	Meeting with EM and HC regarding follow up on Prelim legis task force report and spreadsheet re pot lit	0.75	\$	500.00	\$	375.00
Ira Lustbader	1/16/2018	Kansas	Review and analyze issues spreadsheet from co counsel NYCL re potetnial claims	1.17	\$	500.00	\$	583.33

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Ira Lustbader	1/16/2018	Kansas	Review and analyze Task Force Prelim report, including referenced data and findings	2.25	\$	500.00	\$	1,125.00
Ira Lustbader	1/19/2018	Kansas	Telephone call with co counsel regarding fact areas for claims and investigation strategy	0.75	\$	500.00	\$	375.00
Ira Lustbader	1/19/2018	Kansas	Prep for telecom with co counsel on potential fact areas for investigation	1.33	\$	500.00	\$	666.67
Ira Lustbader	2/1/2018	Kansas	Follow up analysis frame for factual investigation trip	0.67	\$	500.00	\$	333.33
Ira Lustbader	2/5/2018	Kansas	Prep and t/c with local KS advocates re regarding systemic issues and pot claim	1.08	\$	500.00	\$	541.67
Ira Lustbader	2/7/2018	Kansas	Telephone call with local KS advocate stakeholder on potential plaintiff access	0.33	\$	500.00	\$	166.67
Ira Lustbader	3/2/2018	Kansas	Follow up with team regarding steps for investigation and priorities for compl filing	1.25	\$	500.00	\$	625.00
Ira Lustbader	3/5/2018	Kansas	Telephone call with SD (and HC and EM) regarding ground investigation, strategy and next steps	0.58	\$	500.00	\$	291.67
Ira Lustbader	3/6/2018	Kansas	Follow up data review and analysis regarding fact support for potential claims	2.17	\$	500.00	\$	1,083.33
Ira Lustbader	3/7/2018	Kansas	Team call with co counsel and CR team regarding investing strategy and next steps (left call early)	0.67	\$	500.00	\$	333.33
Ira Lustbader	3/7/2018	Kansas	Prep for team call on investigation priorities and strategy	1.08	\$	500.00	\$	541.67
Ira Lustbader	3/9/2018	Kansas	Follow up analysis regarding current data and documents to isolate what information has yet to be collected for next steps	1.75	\$	500.00	\$	875.00
Ira Lustbader	3/13/2018	Kansas	Review recent reports from legis task force	0.75	\$	500.00	\$	375.00
Ira Lustbader	3/28/2018	Kansas	Team strategy call with co counsel, including discussion of investigation strategy and pot. claims	1.07	\$	500.00	\$	533.33
Ira Lustbader	4/3/2018	Kansas	Review and analyze updated report and frame for claims (health care)	1.83	\$	500.00	\$	916.67

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Ira Lustbader	4/11/2018	Kansas	Telephone call with co-counsel team regarding investigation strategy and next steps	1.00	\$	500.00	\$	500.00
Ira Lustbader	4/11/2018	Kansas	Prep for team call regarding status and strategy regarding investigation	1.17	\$	500.00	\$	583.33
Ira Lustbader	4/20/2018	Kansas	Analyzing possible experts on health care issues	1.25	\$	500.00	\$	625.00
Ira Lustbader	4/23/2018	Kansas	Follow up research on mental health aggregate performance	1.83	\$	500.00	\$	916.67
Ira Lustbader	4/25/2018	Kansas	Communication to co-counsel NYCL regarding strategy	0.33	\$	500.00	\$	166.67
Ira Lustbader	4/25/2018	Kansas	Internal meeting regarding investigation strategy	0.50	\$	500.00	\$	250.00
Ira Lustbader	5/3/2018	Kansas	Meeting with MN regarding status and strategy for compl	0.50	\$	500.00	\$	250.00
Ira Lustbader	5/3/2018	Kansas	Telephone call with Leecia Welch re strategy for complaint	0.58	\$	500.00	\$	291.67
Ira Lustbader	5/8/2018	Kansas	Read and analyze MH system research and data from MN and EM, follow up with strategic emails on MH claims	2.83	\$	500.00	\$	1,416.67
Ira Lustbader	5/9/2018	Kansas	Conference call with counsel team regarding investigation strategy	1.08	\$	500.00	\$	541.67
Ira Lustbader	5/9/2018	Kansas	Analyzing state health care plan and task force report continued, regarding strategy on claims	3.67	\$	500.00	\$	1,833.33
Ira Lustbader	5/10/2018	Kansas	Analyzing claims and investigation priorities for next trip	2.58	\$	500.00	\$	1,291.67
Ira Lustbader	5/11/2018	Kansas	Analyze/edit to investigate work product guide for counsel team on claims	1.17	\$	500.00	\$	583.33
Ira Lustbader	5/17/2018	Kansas	Strategy emails to co-counsel regarding scope of claims	0.67	\$	500.00	\$	333.33
Ira Lustbader	5/17/2018	Kansas	Analyzing next steps regarding investigation and claims	2.58	\$	500.00	\$	1,291.67

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Ira Lustbader	5/18/2018	Kansas	Analyzing recent investigation and claims strategy regarding mental health allegations and placement array	2.83	\$	500.00	\$	1,416.67
Ira Lustbader	5/21/2018	Kansas	Telephone call with co-counsel (LBB and NCYL) regarding investigation strategy and claims	1.00	\$	500.00	\$	500.00
Ira Lustbader	5/22/2018	Kansas	Analyzing method for organizing all facts to date; assessing delib indiff. issues	1.58	\$	500.00	\$	791.67
Ira Lustbader	5/23/2018	Kansas	Team meeting regarding strategy for investigation and claims (left early)	0.58	\$	500.00	\$	291.67
Ira Lustbader	5/24/2018	Kansas	Follow up analysis on claims structure and complaint FOF outline	1.58	\$	500.00	\$	791.67
Ira Lustbader	5/25/2018	Kansas	Continued analysis case law and exemplars of settlement approaches	2.42	\$	500.00	\$	1,208.33
Ira Lustbader	5/30/2018	Kansas	Team counsel call regarding strategy for claims	0.75	\$	500.00	\$	375.00
Ira Lustbader	5/30/2018	Kansas	Analyzing recent report and contact memos regarding investigation strategy and claims	2.08	\$	500.00	\$	1,041.67
Ira Lustbader	6/5/2018	Kansas	Review analyze outline for FOF and complaint alleg	1.17	\$	500.00	\$	583.33
Ira Lustbader	6/6/2018	Kansas	Team meeting regarding strategy and claims, investigation tasks	1.00	\$	500.00	\$	500.00
Ira Lustbader	6/6/2018	Kansas	Prep for team meeting and next steps strategy on claims	1.83	\$	500.00	\$	916.67
Ira Lustbader	6/7/2018	Kansas	FOF review re factual claim support	1.67	\$	500.00	\$	833.33
Ira Lustbader	6/8/2018	Kansas	Discuss FOF strategy with MN	0.67	\$	500.00	\$	333.33
Ira Lustbader	6/8/2018	Kansas	Analyzing revisions to FOF document to align with potential claims	1.92	\$	500.00	\$	958.33
Ira Lustbader	6/12/2018	Kansas	Revisions to FOF structure regarding focus on children with identified MH needs	3.75	\$	500.00	\$	1,875.00
Ira Lustbader	6/13/2018	Kansas	Telephone call with full co-counsel team regarding claims and investigation strategy	1.00	\$	500.00	\$	500.00
Ira Lustbader	6/13/2018	Kansas	Follow up analysis of alternative FOF structure for kids with MH needs	2.33	\$	500.00	\$	1,166.67
Ira Lustbader	6/14/2018	Kansas	Telephone call with stakeholder regarding plaintiff	0.67	\$	500.00	\$	333.33

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Ira Lustbader	6/25/2018	Kansas	Telephone call with team and co-counsel regarding investigation strategy and drafting FOF / cloaks	1.42	\$	500.00	\$	708.33
Ira Lustbader	7/2/2018	Kansas	Review research memos and contact memos regarding next steps re plaintiffs	1.33	\$	500.00	\$	666.67
Ira Lustbader	7/3/2018	Kansas	Cont'd review research memos and contact memos regarding next steps re plaintiffs	1.58	\$	500.00	\$	791.67
Ira Lustbader	7/5/2018	Kansas	Review/analyze Medicaid research and strategy	2.67	\$	500.00	\$	1,333.33
Ira Lustbader	7/9/2018	Kansas	Follow up review of Medicaid research	1.17	\$	500.00	\$	583.33
Ira Lustbader	7/11/2018	Kansas	Meeting with NYCL co-counsel regarding investigation strategy	0.58	\$	500.00	\$	291.67
Ira Lustbader	7/11/2018	Kansas	Telephone call with NYCL co-counsel and stakeholder on Medicaid structural issues	0.75	\$	500.00	\$	375.00
Ira Lustbader	7/11/2018	Kansas	Prep for discussion with stakeholder on Medicaid issues specific to MH delivery structures	2.17	\$	500.00	\$	1,083.33
Ira Lustbader	7/12/2018	Kansas	Draft summary of strategy meeting and follow up tasks for team	1.17	\$	500.00	\$	583.33
Ira Lustbader	7/12/2018	Kansas	Follow up analysis regarding Medicaid case law	1.67	\$	500.00	\$	833.33
Ira Lustbader	7/18/2018	Kansas	Strategy conference call with co counsel team on investigations status	0.92	\$	500.00	\$	458.33
Ira Lustbader	7/30/2018	Kansas	Discuss investigation strategy with EM and MN	0.50	\$	500.00	\$	250.00
Ira Lustbader	7/31/2018	Kansas	Investigation status meeting with NYCL LBB and CR counsel team	0.33	\$	500.00	\$	166.67
Ira Lustbader	8/2/2018	Kansas	Review draft FOF regarding complaint strategy	1.83	\$	500.00	\$	916.67
Ira Lustbader	8/7/2018	Kansas	Review/edit medicaid research memo	1.75	\$	500.00	\$	875.00
Ira Lustbader	8/8/2018	Kansas	Strategy conference call with co-counsel team (LBB, NYCL, CR) and complaint drafting	1.33	\$	500.00	\$	666.67
Ira Lustbader	8/8/2018	Kansas	Cont'd review/edit Medicaid research memo and strategic email to MN for follow up	1.75	\$	500.00	\$	875.00
Ira Lustbader	8/9/2018	Kansas	Cont'd review/comment on EPSDT research	1.58	\$	500.00	\$	791.67
Ira Lustbader	8/14/2018	Kansas	Review FOF re claims structure	3.75	\$	500.00	\$	1,875.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Ira Lustbader	8/15/2018	Kansas	Review FOF contd on claims structure	1.25	\$	500.00	\$	625.00
Ira Lustbader	8/17/2018	Kansas	Review/analyze FOF regarding complaint outline contd	1.42	\$	500.00	\$	708.33
Ira Lustbader	8/20/2018	Kansas	Review and analyze FOF cont'd regarding framing complaint	1.92	\$	500.00	\$	958.33
Ira Lustbader	8/22/2018	Kansas	Cont'd review and analysis FOF; review of status of plttf potentials; both re outlining complaint	3.67	\$	500.00	\$	1,833.33
Ira Lustbader	8/23/2018	Kansas	Meeting with MN regarding strategy on outline for complaint	1.00	\$	500.00	\$	500.00
Ira Lustbader	8/23/2018	Kansas	Analyzing FOF regarding frame for complaint outline	3.17	\$	500.00	\$	1,583.33
Ira Lustbader	8/24/2018	Kansas	Prep for strategic call with Freya and NYCL, MN regarding strategy for complaint	1.25	\$	500.00	\$	625.00
Ira Lustbader	8/24/2018	Kansas	Telephone call with Freya and NYCL, MN regarding strategy for complaint	1.25	\$	500.00	\$	625.00
Ira Lustbader	9/5/2018	Kansas	Telephone conference with co-counsel team regarding investigation and compl strategy	1.50	\$	500.00	\$	750.00
Ira Lustbader	9/5/2018	Kansas	Prep for and meet with stakeholder and possible client	4.25	\$	500.00	\$	2,125.00
Ira Lustbader	9/6/2018	Kansas	Analyzing co-counsel claim strategy and email to team	1.08	\$	500.00	\$	541.67
Ira Lustbader	9/6/2018	Kansas	Analyzing FOF cont'd regarding complaint outline	1.83	\$	500.00	\$	916.67
Ira Lustbader	9/6/2018	Kansas	Read and analyze updated report Legis Task Force and data	2.33	\$	500.00	\$	1,166.67
Ira Lustbader	9/11/2018	Kansas	Analyzing FOF for complaint outline and strategy	2.08	\$	500.00	\$	1,041.67
Ira Lustbader	9/12/2018	Kansas	Telephone call with team co-counsel regarding next steps and strategy for compl and plttfs	0.58	\$	500.00	\$	291.67
Ira Lustbader	9/14/2018	Kansas	Read/analyze contact memos re plttf sources and systemic fact sources ; analyzing Medicaid strategy	2.42	\$	500.00	\$	1,208.33

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Ira Lustbader	9/17/2018	Kansas	Continued analysis 2018 performance data regarding complaint outline	1.25	\$	500.00	\$	625.00
Ira Lustbader	9/18/2018	Kansas	Discuss strategy with MN, Jon and Erin re plttfs	0.58	\$	500.00	\$	291.67
Ira Lustbader	9/18/2018	Kansas	Telephone call with co-counsel Leecia Welch regarding investigation and filing strategy	0.58	\$	500.00	\$	291.67
Ira Lustbader	9/18/2018	Kansas	Cont'd analyzing FOF and approach for complaint outline	1.83	\$	500.00	\$	916.67
Ira Lustbader	9/21/2018	Kansas	Telephone call with Jon K regarding EPSDT research and strategy	0.33	\$	500.00	\$	166.67
Ira Lustbader	9/21/2018	Kansas	Analysis facts and data for complaint outline contd	2.33	\$	500.00	\$	1,166.67
Ira Lustbader	9/26/2018	Kansas	Telephone call with co-counsel team regarding the timing and strategy for filing	1.00	\$	500.00	\$	500.00
Ira Lustbader	9/26/2018	Kansas	Read/analyzing research memo JK on EPSDT cases and strategy	2.83	\$	500.00	\$	1,416.67
Ira Lustbader	9/27/2018	Kansas	Analyzing and editing complaint outline	6.42	\$	500.00	\$	3,208.33
Ira Lustbader	9/28/2018	Kansas	Cont'd analyzing draft outline for complaint, edit for co-counsel	2.83	\$	500.00	\$	1,416.67
Ira Lustbader	10/1/2018	Kansas	Read memo and caselaw and comment EPSDT claims, edits for JK	1.83	\$	500.00	\$	916.67
Ira Lustbader	10/1/2018	Kansas	Contd analyze and edit complaint outline	3.25	\$	500.00	\$	1,625.00
Ira Lustbader	10/2/2018	Kansas	Telephone call with co-counsel LBB regarding compl strategy	0.92	\$	500.00	\$	458.33
Ira Lustbader	10/2/2018	Kansas	Analyze memo and case law and comment for team regarding class cert standards of in 10th Circuit	4.17	\$	500.00	\$	2,083.33
Ira Lustbader	10/3/2018	Kansas	Strategy meeting for investigation trip week of Oct. 8 ad possible plaintiffs	1.00	\$	500.00	\$	500.00
Ira Lustbader	10/3/2018	Kansas	Follow up analysis of class cert issues	1.75	\$	500.00	\$	875.00
Ira Lustbader	10/4/2018	Kansas	Telephone call with potential expert in health care structures	0.83	\$	500.00	\$	416.67
Ira Lustbader	10/4/2018	Kansas	Revisions to retainer for pot plttfs	1.08	\$	500.00	\$	541.67
Ira Lustbader	10/4/2018	Kansas	Draft strat agenda for team meeting in KC with co-counsel	1.17	\$	500.00	\$	583.33

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Ira Lustbader	10/5/2018	Kansas	Follow up review of Epsdt research to date and claims	1.92	\$	500.00	\$	958.33
Ira Lustbader	10/5/2018	Kansas	Follow review of class issues; email to pro bono firm re follow up research	2.08	\$	500.00	\$	1,041.67
Ira Lustbader	10/5/2018	Kansas	Review of stakeholder memos regarding potential plaintiffs	2.33	\$	500.00	\$	1,166.67
Ira Lustbader	10/6/2018	Kansas	Emails to counsel team regarding stakeholder meetings and strategy re claims and plttfs	1.17	\$	500.00	\$	583.33
Ira Lustbader	10/8/2018	Kansas	Prep for meeting with stakeholder re claims and possible plttfs and meeting with co counsel re same	1.17	\$	500.00	\$	583.33
Ira Lustbader	10/9/2018	Kansas Travel	Travel to Kansas City re mtgs w stakeholders for compl alleg and mtg w co counsel re litigation filing strategy	1.83	\$	500.00	\$	916.67
Ira Lustbader	10/9/2018	Kansas	Meeting with co-counsel regarding stakeholder and plaintiff debrief	2.17	\$	500.00	\$	1,083.33
Ira Lustbader	10/10/2018	Kansas Travel	Return travel from KCK	3.03	\$	500.00	\$	1,516.67
Ira Lustbader	10/10/2018	Kansas	Prep for filing strategy meeting with co-counsel NYCL, CR, Appleseed and LBB	1.92	\$	500.00	\$	958.33
Ira Lustbader	10/10/2018	Kansas	Meeting with full co-counsel team regarding the filing strategy, tasks	3.67	\$	500.00	\$	1,833.33
Ira Lustbader	10/12/2018	Kansas	Analyzing complaint outline revisions	2.33	\$	500.00	\$	1,166.67
Ira Lustbader	10/17/2018	Kansas	Telephone call with co-counsel regarding status of investigation and filing strategy	0.92	\$	500.00	\$	458.33
Ira Lustbader	10/17/2018	Kansas	Internal meeting regarding named plaintiff strategy and next steps	1.00	\$	500.00	\$	500.00
Ira Lustbader	10/17/2018	Kansas	Analyze and draft revised approach to complaint outline, drafting, timeline	3.75	\$	500.00	\$	1,875.00
Ira Lustbader	10/18/2018	Kansas	Drafting complaint factual allegations on instability and night to night, harms	4.33	\$	500.00	\$	2,166.67
Ira Lustbader	10/19/2018	Kansas	Strategic emails to team regarding additional evidence issues and strategy affecting complaint alleg	0.58	\$	500.00	\$	291.67

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Ira Lustbader	10/19/2018	Kansas	Drafting complaint factual allegations on instability and night to night, harms cont'd	5.92	\$	500.00	\$	2,958.33
Ira Lustbader	10/20/2018	Kansas	Drafting complaint factual allegations on instability and night to night, harms contd	6.25	\$	500.00	\$	3,125.00
Ira Lustbader	10/21/2018	Kansas	Drafting complaint factual allegations on instability and night to nights, harms contd	4.67	\$	500.00	\$	2,333.33
Ira Lustbader	10/22/2018	Kansas	Revise draft complaint section re regarding replacement instability	3.25	\$	500.00	\$	1,625.00
Ira Lustbader	10/24/2018	Kansas	Draft complaint section extreme instability	7.17	\$	500.00	\$	3,583.33
Ira Lustbader	10/26/2018	Kansas	Edit draft data section of compaint	1.33	\$	500.00	\$	666.67
Ira Lustbader	10/26/2018	Kansas	Draft complaint section (extreme instability) cont'd	5.83	\$	500.00	\$	2,916.67
Ira Lustbader	10/27/2018	Kansas	Editing caseloads and provider oversight sections on complaint	2.25	\$	500.00	\$	1,125.00
Ira Lustbader	10/27/2018	Kansas	Drafting data section for complaint	2.58	\$	500.00	\$	1,291.67
Ira Lustbader	10/27/2018	Kansas	Draft intro for complaint	2.75	\$	500.00	\$	1,375.00
Ira Lustbader	10/27/2018	Kansas	Drafting complaint section (extreme instability) contd	3.75	\$	500.00	\$	1,875.00
Ira Lustbader	10/28/2018	Kansas	Edit caseloads and provider oversight sections	2.67	\$	500.00	\$	1,333.33
Ira Lustbader	10/29/2018	Kansas	Draft and editing V1 of complaint, churning, workload, oversight and data	6.67	\$	500.00	\$	3,333.33
Ira Lustbader	10/30/2018	Kansas	Draft and editing V1 of complaint, churning, workload, oversight and data contd	7.17	\$	500.00	\$	3,583.33
Ira Lustbader	10/31/2018	Kansas	Telephone call with co-counsel regarding plaintiffs and investigation strategy for complaint	0.77	\$	500.00	\$	383.33
Ira Lustbader	10/31/2018	Kansas	Draft and editing V1 of complaint, churning, workload, oversight and data cont'd	8.08	\$	500.00	\$	4,041.67
Ira Lustbader	11/1/2018	Kansas	Draft and editing V1 of complaint and process for review and fact checking	3.25	\$	500.00	\$	1,625.00
Ira Lustbader	11/5/2018	Kansas	Cont'd review and edit complaint (full version, all)	6.25	\$	500.00	\$	3,125.00
Ira Lustbader	11/6/2018	Kansas	Follow up edits regarding complaint draft (full)	2.92	\$	500.00	\$	1,458.33

***M.B. v. Howard***  
**Children's Rights Itemized Time Entries**

Ira Lustbader	11/7/2018	Kansas	Draft edit complaint regarding NP allegations	4.83	\$	500.00	\$	2,416.67
Ira Lustbader	11/7/2018	Kansas	Research analyzed SDP and MH claims interrelationship, cases	5.17	\$	500.00	\$	2,583.33
Ira Lustbader	11/8/2018	Kansas	Analyzing Medicaid act claim regarding trauma diagnostics	2.83	\$	500.00	\$	1,416.67
Ira Lustbader	11/8/2018	Kansas	Analyze case law and SDP and MH interrelated claims contd	5.75	\$	500.00	\$	2,875.00
Ira Lustbader	11/8/2018	Kansas	Drafting and editing complaint continued - full read and tightening factual allegations	6.08	\$	500.00	\$	3,041.67
Ira Lustbader	11/9/2018	Kansas	Telephone call with co counsel team named plaintiff investigation and filing timing and strategy	1.00	\$	500.00	\$	500.00
Ira Lustbader	11/9/2018	Kansas	Cont'd analyzing Medicaid act claim regarding trauma diagnostics	2.75	\$	500.00	\$	1,375.00
Ira Lustbader	11/9/2018	Kansas	Cont'd editing complaint regarding tightening factual allegations	5.33	\$	500.00	\$	2,666.67
Ira Lustbader	11/12/2018	Kansas	Editing named plaintiff facts	2.83	\$	500.00	\$	1,416.67
Ira Lustbader	11/12/2018	Kansas	Review and analyze follow up legal memo, case law on SDP and churn claim	3.25	\$	500.00	\$	1,625.00
Ira Lustbader	11/12/2018	Kansas	Editing near final draft complaint for team, alleg on Medicaid claim	4.25	\$	500.00	\$	2,125.00
Ira Lustbader	11/13/2018	Kansas	Follow up editing to near final complaint draft	2.67	\$	500.00	\$	1,333.33
Ira Lustbader	11/13/2018	Kansas	Follow up analysis on Medicaid trauma claim and research	3.25	\$	500.00	\$	1,625.00
Ira Lustbader	11/14/2018	Kansas	Editing and finalizing NP alleg.	3.83	\$	500.00	\$	1,916.67
Ira Lustbader	11/14/2018	Kansas	Editing and finalizing complaint systemic alleg.	7.58	\$	500.00	\$	3,791.67
Ira Lustbader	11/15/2018	Kansas	Telephone call with team co counsel on final edits to complaint and strategy	0.83	\$	500.00	\$	416.67
Ira Lustbader	11/15/2018	Kansas	Telephone call with co counsel on final edits - follow up	0.83	\$	500.00	\$	416.67
Ira Lustbader	11/15/2018	Kansas	Strategic emails to co counsel on specific finalizes edits	1.25	\$	500.00	\$	625.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Ira Lustbader	11/15/2018	Kansas	Finalizing complaint for filing per revised strategy	11.25	\$	500.00	\$	5,625.00
Ira Lustbader	11/16/2018	Kansas	Strategic emails with co-counsel post filing regarding judge assignment, next steps	0.58	\$	500.00	\$	291.67
Ira Lustbader	11/16/2018	Kansas	Strategic emails regarding final filing logistics	0.75	\$	500.00	\$	375.00
Ira Lustbader	11/21/2018	Kansas	Team call regarding initial post filing outreach and litigation strategies	0.83	\$	500.00	\$	416.67
Ira Lustbader	11/27/2018	Kansas	Telephone call with co-counsel LBB regarding expert strategy	0.58	\$	500.00	\$	291.67
Ira Lustbader	11/28/2018	Kansas	Team conf call regarding litigation strategy stakeholder/witness engagement	1.08	\$	500.00	\$	541.67
Ira Lustbader	12/5/2018	Kansas	Discuss next steps and strategy for complaint drafting with MN	0.75	\$	500.00	\$	375.00
Ira Lustbader	12/5/2018	Kansas	Analyzing possible experts re placement array	1.17	\$	500.00	\$	583.33
Ira Lustbader	12/5/2018	Kansas	Co-counsel team meeting call regarding next steps post filing regarding fact and plaintiff amendment, initial response, witnesses	1.42	\$	500.00	\$	708.33
Ira Lustbader	12/12/2018	Kansas	Team strategy call with co-counsel re post filing litigation strategy including class cert	0.50	\$	500.00	\$	250.00
Ira Lustbader	12/12/2018	Kansas	Review/analyze witness developments, extension strategy and initial expert vetting for class cert	1.75	\$	500.00	\$	875.00
Ira Lustbader	12/21/2018	Kansas	Telephone call with co-counsel LW/NCYL and LRS/Appleaseed regarding initial deadlines, extension request and discovery strategy	0.75	\$	500.00	\$	375.00
Ira Lustbader	12/31/2018	Kansas	Telephone call with AG for defs and co-counsel L Rute and L Welch regarding same	1.00	\$	500.00	\$	500.00
Ira Lustbader	12/31/2018	Kansas	Prep regarding initial informal discovery and protective order, time to answer/move and extension with def counsel	1.08	\$	500.00	\$	541.67
Ira Lustbader	12/31/2018	Kansas	Researching and analyzing possible consulting experts on child welfare/stability and Medicaid	2.17	\$	500.00	\$	1,083.33

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Ira Lustbader	1/2/2019	Kansas	Team conference call regarding status of litigation and strategy on next steps regarding amendments, experts	0.93	\$	500.00	\$	466.67
Ira Lustbader	1/2/2019	Kansas	Cont'd researching, analyzing consulting experts needed	1.83	\$	500.00	\$	916.67
Ira Lustbader	1/10/2019	Kansas	Telephone call with source regarding potential expert re MH, placement	0.75	\$	500.00	\$	375.00
Ira Lustbader	1/22/2019	Kansas	Conference call with Def counsel (and co-counsel LR, LW) regarding meet and confer on protective order	1.00	\$	500.00	\$	500.00
Ira Lustbader	1/22/2019	Kansas	Comments (internal for co-counsel) to protective order draft and prep for meet and confer	2.58	\$	500.00	\$	1,291.67
Ira Lustbader	1/24/2019	Kansas	Analyzing potential experts contd MH and placement	1.33	\$	500.00	\$	666.67
Ira Lustbader	1/25/2019	Kansas	Read edit proposed protective order alts.	1.08	\$	500.00	\$	541.67
Ira Lustbader	1/29/2019	Kansas	Follow up with Leecia Welch regarding protective order edits and strategy	0.33	\$	500.00	\$	166.67
Ira Lustbader	1/29/2019	Kansas	Analyzing potential experts cont'd (liability and class cert distinguished)	1.75	\$	500.00	\$	875.00
Ira Lustbader	1/29/2019	Kansas	Telephone call with team regarding expert strategy - vetting and engagement	2.17	\$	500.00	\$	1,083.33
Ira Lustbader	1/31/2019	Kansas	Research and drafting proposed Terms Sheet for possible early settlement	7.17	\$	500.00	\$	3,583.33
Ira Lustbader	2/1/2019	Kansas	Analyzing and drafting possibility of immediate (consent) relief	2.08	\$	500.00	\$	1,041.67
Ira Lustbader	2/1/2019	Kansas	Drafting proposed Terms sheet continued	4.25	\$	500.00	\$	2,125.00
Ira Lustbader	2/4/2019	Kansas	Telephone call with potential consulting expert in child welfare structural failures	0.67	\$	500.00	\$	333.33
Ira Lustbader	2/4/2019	Kansas	Analyzing and drafting potential immediate Interim relief for class	3.92	\$	500.00	\$	1,958.33
Ira Lustbader	2/6/2019	Kansas	Telephone call with potential neuroscience expert (with EM)	0.75	\$	500.00	\$	375.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Ira Lustbader	2/6/2019	Kansas	Prep for talk with potential neuroscience expert	1.08	\$	500.00	\$	541.67
Ira Lustbader	2/8/2019	Kansas	Strategy meeting with internal KS team regarding draft settlement terms sheet	1.50	\$	500.00	\$	750.00
Ira Lustbader	2/11/2019	Kansas	Read and analyze final Task Force reccs, draft strategic email to team on same	1.25	\$	500.00	\$	625.00
Ira Lustbader	2/11/2019	Kansas	Settlement terms sheet draft review with CR team	1.50	\$	500.00	\$	750.00
Ira Lustbader	2/12/2019	Kansas	Telephone call with source for potential expert consulting expert Medicaid	0.50	\$	500.00	\$	250.00
Ira Lustbader	2/15/2019	Kansas	Emails to team regarding protective order implementation	0.17	\$	500.00	\$	83.33
Ira Lustbader	2/15/2019	Kansas	Follow edits to draft terms sheet	1.08	\$	500.00	\$	541.67
Ira Lustbader	2/20/2019	Kansas	Email to co-counsel team regarding outreach to Next Friends on protective order and NP identity	0.33	\$	500.00	\$	166.67
Ira Lustbader	2/20/2019	Kansas	Follow up final edits to V1 settlement terms sheet	1.83	\$	500.00	\$	916.67
Ira Lustbader	2/21/2019	Kansas	Finalizing terms sheet contd regarding fees issues and principles section	1.17	\$	500.00	\$	583.33
Ira Lustbader	2/27/2019	Kansas	Team meeting with full counsel team, next steps regarding discovery, strategy regarding settlement potential	1.00	\$	500.00	\$	500.00
Ira Lustbader	2/27/2019	Kansas	Prep for team meeting with new co-counsel, tasks and strategy	1.08	\$	500.00	\$	541.67
Ira Lustbader	2/28/2019	Kansas	Conference with with co counsel regarding Named Plaintiff disclosure and docs	0.33	\$	500.00	\$	166.67
Ira Lustbader	3/6/2019	Kansas	Team call regarding settlement and litigation strategy	0.75	\$	500.00	\$	375.00
Ira Lustbader	3/8/2019	Kansas	Review/analyze class cert cases from pro bono counsel memo regarding discovery strategy	3.08	\$	500.00	\$	1,541.67
Ira Lustbader	3/12/2019	Kansas	Analyzing litigation strategy for meeting with DLA piper and co-counsel - discovery, class cert, amendments	2.42	\$	500.00	\$	1,208.33

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Ira Lustbader	3/13/2019	Kansas	Summarize/assess call with potential expert/strategy	0.58	\$	500.00	\$	291.67
Ira Lustbader	3/13/2019	Kansas	Team strategy call with co-counsel; initial disclosures, settlement, NP files	0.83	\$	500.00	\$	416.67
Ira Lustbader	3/13/2019	Kansas	Prep and telephone call potential consulting expert MH	1.67	\$	500.00	\$	833.33
Ira Lustbader	3/14/2019	Kansas	Telephone call with NYCL co counsel and EM with potential Medicaid expert	1.00	\$	500.00	\$	500.00
Ira Lustbader	3/14/2019	Kansas	Prep for call with potential Medicaid consulting expert	1.58	\$	500.00	\$	791.67
Ira Lustbader	3/14/2019	Kansas	Analysis possible expert frame needs, tasks on CW side	1.75	\$	500.00	\$	875.00
Ira Lustbader	3/15/2019	Kansas	Prep for teamwide strategy meeting regarding experts	1.67	\$	500.00	\$	833.33
Ira Lustbader	3/19/2019	Kansas	Telephone call with co-counsel regarding strategy on experts MH	0.50	\$	500.00	\$	250.00
Ira Lustbader	3/20/2019	Kansas	Meeting with entire co-counsel team regarding strategy on discovery, class cert, plan for next 90 days	3.00	\$	500.00	\$	1,500.00
Ira Lustbader	3/20/2019	Kansas	Analyzing discovery strategy and class cert sequencing, expert needs, plan for next 90 days in preo for co counsel mtg	4.25	\$	500.00	\$	2,125.00
Ira Lustbader	3/21/2019	Kansas	Discuss development with Next Friend with EM and steps to protect	0.42	\$	500.00	\$	208.33
Ira Lustbader	3/21/2019	Kansas	Telephone call with LW/NCYL regarding litigation strategy, class cert	0.75	\$	500.00	\$	375.00
Ira Lustbader	3/21/2019	Kansas	Meeting with JK and MN regarding research on MTD issues and opp strat	0.32	\$	500.00	\$	158.33
Ira Lustbader	3/21/2019	Kansas	Telephone call with potential child welfare/placement consulting expert	1.00	\$	500.00	\$	500.00
Ira Lustbader	3/22/2019	Kansas	Analyzing interim consent relief approach mediation	1.83	\$	500.00	\$	916.67
Ira Lustbader	3/22/2019	Kansas	Continued analyzing interim consent relief approach for mediation	2.17	\$	500.00	\$	1,083.33

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Ira Lustbader	3/25/2019	Kansas	Analyze and draft proposed interim relief regarding possible settlement	3.83	\$	500.00	\$	1,916.67
Ira Lustbader	3/27/2019	Kansas	Meeting (call) with co-counsel on strategy, early settlement stay	0.90	\$	500.00	\$	450.00
Ira Lustbader	3/27/2019	Kansas	Review and edit memo from JK on abstention	1.33	\$	500.00	\$	666.67
Ira Lustbader	3/28/2019	Kansas	Cont'd analyzing research on abstention and SDP	1.58	\$	500.00	\$	791.67
Ira Lustbader	3/29/2019	Kansas	Telephone call with Def counsel and co-counsel regarding MTD, answer, discovery	0.50	\$	500.00	\$	250.00
Ira Lustbader	3/29/2019	Kansas	Analyzing proposal on answering and discovery	1.58	\$	500.00	\$	791.67
Ira Lustbader	4/3/2019	Kansas	Team counsel call regarding strategy on discovery, experts, settlement	0.98	\$	500.00	\$	491.67
Ira Lustbader	4/4/2019	Kansas	Analyzing early discovery options as condition of settlement	1.17	\$	500.00	\$	583.33
Ira Lustbader	4/10/2019	Kansas	Full plttf team litigation strategy call re settlement, disc	1.00	\$	500.00	\$	500.00
Ira Lustbader	4/11/2019	Kansas	Telephone call with Leecia Welch NYCL regarding settlement strategy	0.67	\$	500.00	\$	333.33
Ira Lustbader	4/17/2019	Kansas	Telephone call with DLA co-counsel DS regarding strategy for settlement and discovery	0.42	\$	500.00	\$	208.33
Ira Lustbader	4/17/2019	Kansas	Prep for team strategy call regarding settlement strategy	0.75	\$	500.00	\$	375.00
Ira Lustbader	4/17/2019	Kansas	Team strategy call regarding settlement meeting	0.82	\$	500.00	\$	408.33
Ira Lustbader	4/18/2019	Kansas	Telephone call with DS from DLA regarding strategy for settlement discovery	0.83	\$	500.00	\$	416.67
Ira Lustbader	4/18/2019	Kansas	Analyze strategy for settlement meetings with Defs	1.00	\$	500.00	\$	500.00
Ira Lustbader	4/26/2019	Kansas	Analyze issue of Gov as party and share strategy with team	1.08	\$	500.00	\$	541.67

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Ira Lustbader	5/2/2019	Kansas	Telephone call with co-counsel team regarding Answer, settlement strategy and amending complaint	0.93	\$	500.00	\$	466.67
Ira Lustbader	5/2/2019	Kansas	Analyzing answer and identifying strategic issues for team discussion	1.83	\$	500.00	\$	916.67
Ira Lustbader	5/8/2019	Kansas	Follow up regarding initial disclosures and tasks	0.67	\$	500.00	\$	333.33
Ira Lustbader	5/8/2019	Kansas	Co-counsel meeting regarding strategy on next 3 weeks litigation	0.92	\$	500.00	\$	458.33
Ira Lustbader	5/9/2019	Kansas	Review and edit revised terms sheet regarding possible settlement	1.75	\$	500.00	\$	875.00
Ira Lustbader	5/11/2019	Kansas	Edits to revised term sheet for settlement	2.75	\$	500.00	\$	1,375.00
Ira Lustbader	5/13/2019	Kansas	Review and respond to strategy emails on settlement and discovery and initial disclosures	0.83	\$	500.00	\$	416.67
Ira Lustbader	5/15/2019	Kansas	Telephone call with team co counsel re: amendment and discovery strategy, terms sheet for settlement	0.93	\$	500.00	\$	466.67
Ira Lustbader	5/28/2019	Kansas	Analyzing strategy for discovery conf/report	1.25	\$	500.00	\$	625.00
Ira Lustbader	5/29/2019	Kansas	Review and comment on settlement approach to be sent to defendants	0.50	\$	500.00	\$	250.00
Ira Lustbader	5/29/2019	Kansas	Team strategy meeting regarding initial discovery and 26f documents	0.72	\$	500.00	\$	358.33
Ira Lustbader	6/4/2019	Kansas	Meeting with Jonathan King regarding RFP strategy	0.53	\$	500.00	\$	266.67
Ira Lustbader	6/4/2019	Kansas	Analyzing additional targeted discovery for class cert	2.75	\$	500.00	\$	1,375.00
Ira Lustbader	6/10/2019	Kansas	Review and edit initial RFP discovery draft, placements	2.67	\$	500.00	\$	1,333.33
Ira Lustbader	6/12/2019	Kansas	Team meeting regarding discovery strategy	0.67	\$	500.00	\$	333.33
Ira Lustbader	6/12/2019	Kansas	Review/edit first round RFP, placement, CFSR, caseloads	1.50	\$	500.00	\$	750.00
Ira Lustbader	6/13/2019	Kansas	Review draft of initial RFP continue -- narrow requests	1.58	\$	500.00	\$	791.67

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Ira Lustbader	6/18/2019	Kansas	Follow up/review/edit first RFP regarding placement array	1.58	\$	500.00	\$	791.67
Ira Lustbader	6/19/2019	Kansas	Team co counsel strategy call on initial discovery and settlement follow up	0.67	\$	500.00	\$	333.33
Ira Lustbader	6/19/2019	Kansas	continued review and edit first RFP, analyze deposition strategy	1.75	\$	500.00	\$	875.00
Ira Lustbader	6/21/2019	Kansas	Telephone call with DS and LW regarding discovery strategy	0.50	\$	500.00	\$	250.00
Ira Lustbader	6/21/2019	Kansas	Analyze/edit draft discovery schedule	1.25	\$	500.00	\$	625.00
Ira Lustbader	6/25/2019	Kansas	Review draft joint disc report, revised discovery requests.	3.17	\$	500.00	\$	1,583.33
Ira Lustbader	6/26/2019	Kansas	Conference call with DS DLA regarding strategy on upcoming conferences.	0.50	\$	500.00	\$	250.00
Ira Lustbader	6/26/2019	Kansas	Telephone call with team co-counsel regarding strategy for meet and conference.	1.00	\$	500.00	\$	500.00
Ira Lustbader	6/26/2019	Kansas	(Cont'd.) Analyze revised planning conference report, discovery requests.	2.08	\$	500.00	\$	1,041.67
Ira Lustbader	7/12/2019	Kansas	Telephone call with potential mediators re: interest.	0.58	\$	500.00	\$	291.67
Ira Lustbader	7/12/2019	Kansas	Team co-counsel strategy meeting re: discovery next steps.	1.00	\$	500.00	\$	500.00
Ira Lustbader	7/16/2019	Kansas	Follow up on potential mediators (analyzing)	0.42	\$	500.00	\$	208.33
Ira Lustbader	7/17/2019	Kansas	Follow up with potential mediators/outreach	0.33	\$	500.00	\$	166.67
Ira Lustbader	7/17/2019	Kansas	Analyzing strategic questions on settlement and mediation, response to team.	1.25	\$	500.00	\$	625.00
Ira Lustbader	7/22/2019	Kansas	Telephone call with EM and potential consulting expert/trauma.	1.00	\$	500.00	\$	500.00
Ira Lustbader	7/22/2019	Kansas	Prepare for telephone call with potential consulting expert/trauma.	1.25	\$	500.00	\$	625.00
Ira Lustbader	8/1/2019	Kansas	Read/edit third part subpoena.	0.67	\$	500.00	\$	333.33
Ira Lustbader	8/1/2019	Kansas	Analyze and draft co-counsel discovery plan.	3.17	\$	500.00	\$	1,583.33
Ira Lustbader	8/5/2019	Kansas	Analyzing/edit draft discovery plan for full co-counsel team.	3.83	\$	500.00	\$	1,916.67

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Ira Lustbader	8/6/2019	Kansas	Analyzing strategy on 30b6 depo sequencing; MH case review.	1.17	\$	500.00	\$	583.33
Ira Lustbader	8/6/2019	Kansas	Telephone call with co-counsel LW re strategy on discovery work plan.	1.33	\$	500.00	\$	666.67
Ira Lustbader	8/7/2019	Kansas	Telephone call with LW and DS re discovery strategy.	0.58	\$	500.00	\$	291.67
Ira Lustbader	8/7/2019	Kansas	Team co-counsel meeting re discovery strategy--amending compl, Settlement.	0.63	\$	500.00	\$	316.67
Ira Lustbader	8/8/2019	Kansas	Follow up analysis re potential placement array consulting experts.	1.58	\$	500.00	\$	791.67
Ira Lustbader	8/9/2019	Kansas	Telephone call with co-counsel LBB re potential placement array expert.	0.58	\$	500.00	\$	291.67
Ira Lustbader	8/9/2019	Kansas	Follow up research re potential neutral expert for mediation.	0.92	\$	500.00	\$	458.33
Ira Lustbader	8/12/2019	Kansas	Telephone call with additional potential mediator and follow up with team.	1.08	\$	500.00	\$	541.67
Ira Lustbader	8/14/2019	Kansas	Telephone call with Kevin Ryan re available dates for mediation.	0.25	\$	500.00	\$	125.00
Ira Lustbader	8/14/2019	Kansas	Weekly team strategy call--settlement, amended complaint.	0.75	\$	500.00	\$	375.00
Ira Lustbader	8/21/2019	Kansas	Telephone call with co-counsel LW and TW re mediation strategy.	0.42	\$	500.00	\$	208.33
Ira Lustbader	8/21/2019	Kansas	Analyzing frame for mediation statement.	3.25	\$	500.00	\$	1,625.00
Ira Lustbader	8/22/2019	Kansas	Telephone call with potential mediator.	0.33	\$	500.00	\$	166.67
Ira Lustbader	8/23/2019	Kansas	Outlining Mediation Statement and narrative.	4.08	\$	500.00	\$	2,041.67
Ira Lustbader	8/27/2019	Kansas	Review and follow up re mediation agreement, comments from co-counsel.	0.58	\$	500.00	\$	291.67
Ira Lustbader	8/27/2019	Kansas	Review amended complaint draft.	1.25	\$	500.00	\$	625.00
Ira Lustbader	8/28/2019	Kansas	Discuss status of mediation statement, strategy with JK.	0.33	\$	500.00	\$	166.67
Ira Lustbader	8/28/2019	Kansas	Weekly team strategy call (discovery, mediation).	0.83	\$	500.00	\$	416.67
Ira Lustbader	8/29/2019	Kansas	Review/comment amended complaint.	1.33	\$	500.00	\$	666.67
Ira Lustbader	8/29/2019	Kansas	Review/analyze draft mediation statement.	3.25	\$	500.00	\$	1,625.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Ira Lustbader	8/30/2019	Kansas	Analyze and edit V1 mediation statement.	3.67	\$	500.00	\$	1,833.33
Ira Lustbader	9/1/2019	Kansas	Editing mediation statement (cont'd).	2.25	\$	500.00	\$	1,125.00
Ira Lustbader	9/4/2019	Kansas	Strategy conference call with co-counsel re discovery status, and strategy, mediation	0.92	\$	500.00	\$	458.33
Ira Lustbader	9/5/2019	Kansas	Telephone call with co-counsel LBB and potential expert re placement array	2.00	\$	500.00	\$	1,000.00
Ira Lustbader	9/6/2019	Kansas	Reading and editing mediation statement.	5.17	\$	500.00	\$	2,583.33
Ira Lustbader	9/8/2019	Kansas	Editing mediation statement (cont'd).	2.08	\$	500.00	\$	1,041.67
Ira Lustbader	9/11/2019	Kansas	Telephone call with Medicaid expert and co-counsel with MN re claims strategy.	0.83	\$	500.00	\$	416.67
Ira Lustbader	9/11/2019	Kansas	Team conference call with co-counsel re settlement and discovery strategy.	0.80	\$	500.00	\$	400.00
Ira Lustbader	9/11/2019	Kansas	Prepare for telephone call with Medicaid expert counsel re claims strategy.	1.75	\$	500.00	\$	875.00
Ira Lustbader	9/13/2019	Kansas	Review stakeholder contact memos re possible witnesses and deponents on placement array	1.08	\$	500.00	\$	541.67
Ira Lustbader	9/17/2019	Kansas	Review and edit revised mediation statement.	2.17	\$	500.00	\$	1,083.33
Ira Lustbader	9/19/2019	Kansas	Analyze US GOA report on Medicaid/CMS data on EPSDT.	1.17	\$	500.00	\$	583.33
Ira Lustbader	9/25/2019	Kansas	Discuss strategy on enforcing RFP with MN	0.50	\$	500.00	\$	250.00
Ira Lustbader	9/25/2019	Kansas	Telephone call with co-counsel regarding discovery, expert and mediation strategy	0.92	\$	500.00	\$	458.33
Ira Lustbader	9/30/2019	Kansas	Prep for discovery call with Defs	0.58	\$	500.00	\$	291.67
Ira Lustbader	10/1/2019	Kansas	Co-counsel telephone call regarding prep for call with new counsel of record for Defs	0.25	\$	500.00	\$	125.00
Ira Lustbader	10/1/2019	Kansas	Telephone call with new Def counsel regarding discovery and mediation	0.75	\$	500.00	\$	375.00
Ira Lustbader	10/7/2019	Kansas	Draft strategy memo to co counsel for first mediation	1.25	\$	500.00	\$	625.00
Ira Lustbader	10/8/2019	Kansas	Mediation telephone call with Kevin Ryan and plttf team	1.33	\$	500.00	\$	666.67
Ira Lustbader	10/8/2019	Kansas	Prep for mediation ex parte mediator contd	1.92	\$	500.00	\$	958.33
Ira Lustbader	10/10/2019	Kansas	Settlement and expert strategy disc with MN	1.00	\$	500.00	\$	500.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Ira Lustbader	10/15/2019	Kansas	Analyzing recent settlement structures regarding mediation	2.83	\$	500.00	\$	1,416.67
Ira Lustbader	10/15/2019	Kansas	Analyzing class cert decisions	3.08	\$	500.00	\$	1,541.67
Ira Lustbader	10/16/2019	Kansas	Team strategy call regarding ESI and RFP deficiency strategy	0.58	\$	500.00	\$	291.67
Ira Lustbader	10/28/2019	Kansas	Meeting at DLA for strategy on discovery compl.	1.67	\$	500.00	\$	833.33
Ira Lustbader	10/30/2019	Kansas	Co counsel telephone call on strategy on discovery enforcement and 12b1 motion	1.00	\$	500.00	\$	500.00
Ira Lustbader	11/1/2019	Kansas	Team strategy discussion regarding meet and confer	0.25	\$	500.00	\$	125.00
Ira Lustbader	11/1/2019	Kansas	Prep for meet and confer	1.08	\$	500.00	\$	541.67
Ira Lustbader	11/1/2019	Kansas	Meet and confer with Def counsel	1.42	\$	500.00	\$	708.33
Ira Lustbader	11/3/2019	Kansas	Review and revise letter and draft motion for extension, including identification of possible discovery concern	2.67	\$	500.00	\$	1,333.33
Ira Lustbader	11/6/2019	Kansas	Telephone call with mediator regarding mediation session next week	1.00	\$	500.00	\$	500.00
Ira Lustbader	11/6/2019	Kansas	Team call with co-counsel re mediation strategy	0.50	\$	500.00	\$	250.00
Ira Lustbader	11/7/2019	Kansas	Prep for mediation, alternatives re monitor, ADR	2.58	\$	500.00	\$	1,291.67
Ira Lustbader	11/11/2019	Kansas	Prepare for mediation, including analyzing enforcement structure alternatives	1.75	\$	500.00	\$	875.00
Ira Lustbader	11/12/2019	Kansas Travel	Travel to KC for mediation	2.92	\$	500.00	\$	1,458.33
Ira Lustbader	11/12/2019	Kansas	Meeting with co-counsel regarding mediation strategy and presentation	2.50	\$	500.00	\$	1,250.00
Ira Lustbader	11/12/2019	Kansas	Meeting with stakeholder advocate (outside KCK) re placement array	3.33	\$	500.00	\$	1,666.67
Ira Lustbader	11/13/2019	Kansas	Follow up review of notes and next steps from mediation	1.33	\$	500.00	\$	666.67
Ira Lustbader	11/13/2019	Kansas	Mediation in KS	7.25	\$	500.00	\$	3,625.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Ira Lustbader	11/14/2019	Kansas Travel	Return travel	3.20	\$	500.00	\$	1,600.00
Ira Lustbader	11/14/2019	Kansas	Co counsel communication regarding drafting strategy on mediation	0.33	\$	500.00	\$	166.67
Ira Lustbader	11/14/2019	Kansas	Analyzing possible outcome measures for settlement	1.25	\$	500.00	\$	625.00
Ira Lustbader	11/14/2019	Kansas	Meeting with potential experts on structural CW issues	2.00	\$	500.00	\$	1,000.00
Ira Lustbader	11/15/2019	Kansas	Team co counsel meeting regarding mediation strategy (came late)	0.83	\$	500.00	\$	416.67
Ira Lustbader	11/15/2019	Kansas	Meeting with MN re drafting outcome measures for settlement per mediation	1.00	\$	500.00	\$	500.00
Ira Lustbader	11/20/2019	Kansas	Team call regarding strategy on mediation and stakeholder outreach re witnesses (came late)	0.50	\$	500.00	\$	250.00
Ira Lustbader	11/20/2019	Kansas	Drafting outcomes for settlement/mediation, incl measurement, durability, validation, exit structure	6.83	\$	500.00	\$	3,416.67
Ira Lustbader	11/21/2019	Kansas	Co counsel conference call (arrived late) regarding mediation strategy	0.42	\$	500.00	\$	208.33
Ira Lustbader	11/21/2019	Kansas	Drafting and editing outcomes contd	4.58	\$	500.00	\$	2,291.67
Ira Lustbader	11/22/2019	Kansas	Editing practice prohibitions regarding settlement	2.75	\$	500.00	\$	1,375.00
Ira Lustbader	11/24/2019	Kansas	Draft/editing process re prohibitions and outcomes contd	2.83	\$	500.00	\$	1,416.67
Ira Lustbader	11/25/2019	Kansas	Telephone call with co counsel regarding settlement drafting strategy	1.00	\$	500.00	\$	500.00
Ira Lustbader	11/25/2019	Kansas	Continued draft/edit settlement provisions (process)	1.75	\$	500.00	\$	875.00
Ira Lustbader	11/25/2019	Kansas	Draft/edit process re prohibitions and outcomes contd	5.92	\$	500.00	\$	2,958.33
Ira Lustbader	12/3/2019	Kansas	Review edits and finalizing plttfs draft settlement	2.17	\$	500.00	\$	1,083.33

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Ira Lustbader	12/4/2019	Kansas	Team co counsel call regarding plttfs settlement draft	0.90	\$	500.00	\$	450.00
Ira Lustbader	12/4/2019	Kansas	Edit Plttfs settlement draft contd	2.25	\$	500.00	\$	1,125.00
Ira Lustbader	12/5/2019	Kansas	Follow up regarding potential "neutral validators" for settlement	0.92	\$	500.00	\$	458.33
Ira Lustbader	12/5/2019	Kansas	Closely analyze potential hot docs from limited discovery production for mediation purposes	1.33	\$	500.00	\$	666.67
Ira Lustbader	12/5/2019	Kansas	Edit draft MTD opp	3.25	\$	500.00	\$	1,625.00
Ira Lustbader	12/8/2019	Kansas	Draft line edits to Defendants' settlement prop	5.17	\$	500.00	\$	2,583.33
Ira Lustbader	12/9/2019	Kansas	Prep for mediation contd, including finalizing draft counter to defs proposal	2.17	\$	500.00	\$	1,083.33
Ira Lustbader	12/10/2019	Kansas	Telephone call with team regarding counter redline to defs mediation proposal	0.92	\$	500.00	\$	458.33
Ira Lustbader	12/11/2019	Kansas	Prep for t/c with potential expert on brain development	1.67	\$	500.00	\$	833.33
Ira Lustbader	12/11/2019	Kansas	Conference call with co counsel and potential expert on brain development	2.00	\$	500.00	\$	1,000.00
Ira Lustbader	12/11/2019	Kansas	Analyze Defs counter prop on outcomes, prohibitions, and process	3.92	\$	500.00	\$	1,958.33
Ira Lustbader	12/15/2019	Kansas Travel	Travel to Kansas City for mediation (delays)	3.58	\$	500.00	\$	1,791.67
Ira Lustbader	12/15/2019	Kansas	Mediation drafting with co-counsel	2.00	\$	500.00	\$	1,000.00
Ira Lustbader	12/15/2019	Kansas	Mediation session in KCK with parties and K. Ryan	5.00	\$	500.00	\$	2,500.00
Ira Lustbader	12/16/2019	Kansas Travel	Return travel	3.62	\$	500.00	\$	1,808.33
Ira Lustbader	12/16/2019	Kansas	Mediation session in KCK with parties and mediator	6.50	\$	500.00	\$	3,250.00
Ira Lustbader	12/17/2019	Kansas	Telephone call with stakeholder regarding possible expert role	0.58	\$	500.00	\$	291.67

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Ira Lustbader	12/17/2019	Kansas	Finalize current draft of settlement structures for mediation	4.75	\$	500.00	\$	2,375.00
Ira Lustbader	12/18/2019	Kansas	Telephone call with team regarding discovery and mediation strategy	0.92	\$	500.00	\$	458.33
Ira Lustbader	12/18/2019	Kansas	Meeting with potential consulting expert re placement	2.00	\$	500.00	\$	1,000.00
Ira Lustbader	12/18/2019	Kansas	Prep for meeting with potential consulting expert re placement	2.42	\$	500.00	\$	1,208.33
Ira Lustbader	1/2/2020	Kansas	Draft/revise settlement (process, practice, and outcomes)	4.17	\$	500.00	\$	2,083.33
Ira Lustbader	1/3/2020	Kansas	Draft/revise settlement (process, practice and outcomes)	4.83	\$	500.00	\$	2,416.67
Ira Lustbader	1/4/2020	Kansas	Revised and edit plaintiffs counter draft settlement provisions (process, practice, and outcomes)	4.17	\$	500.00	\$	2,083.33
Ira Lustbader	1/6/2020	Kansas	Draft overview of settlement proposal for counsel team	1.08	\$	500.00	\$	541.67
Ira Lustbader	1/6/2020	Kansas	Team conference call regarding settlement draft strategy and 12b1 discovery	1.50	\$	500.00	\$	750.00
Ira Lustbader	1/7/2020	Kansas	Conference call with team regarding strategy on Gov. discovery and MTD opp	1.50	\$	500.00	\$	750.00
Ira Lustbader	1/8/2020	Kansas	Review and revise discovery demand regarding 12b1	1.25	\$	500.00	\$	625.00
Ira Lustbader	1/14/2020	Kansas	Review, analyze and edit draft MTD opp regarding Gov.	3.42	\$	500.00	\$	1,708.33
Ira Lustbader	1/15/2020	Kansas	Team co counsel call regarding mediation strategy and discovery	1.00	\$	500.00	\$	500.00
Ira Lustbader	1/15/2020	Kansas	Follow up edits on MTD draft	2.67	\$	500.00	\$	1,333.33
Ira Lustbader	1/22/2020	Kansas	Read, analysis and MTD opp draft	2.92	\$	500.00	\$	1,458.33
Ira Lustbader	1/23/2020	Kansas	Team co-counsel strategy call regarding mediation and discovery strategy	1.00	\$	500.00	\$	500.00
Ira Lustbader	1/24/2020	Kansas	Close analysis of Def's counter to mediation	1.08	\$	500.00	\$	541.67
Ira Lustbader	1/26/2020	Kansas	Analyze Defs mediation counter and draft responses	3.25	\$	500.00	\$	1,625.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Ira Lustbader	1/26/2020	Kansas	Follow up fact and legal research on analysis of Defs mediation position to prepare internal plaintiff team guide to mediation responses for next mediation session	4.92	\$	500.00	\$	2,458.33
Ira Lustbader	1/27/2020	Kansas	Continue drafting mediation guide (internal) of plaintiffs positions on all items	4.42	\$	500.00	\$	2,208.33
Ira Lustbader	1/28/2020	Kansas	Continue drafting mediation guide (internal) of all plaintiffs positions on all items contd	3.33	\$	500.00	\$	1,666.67
Ira Lustbader	1/29/2020	Kansas	Telephone call with co counsel team regarding mediation strategy (left early)	0.50	\$	500.00	\$	250.00
Ira Lustbader	2/4/2020	Kansas	Meeting with MN regarding discovery strategy regarding new RFP	0.58	\$	500.00	\$	291.67
Ira Lustbader	2/5/2020	Kansas	Telephone call with co counsel L Welch and T Woody regarding mediation strategy	0.42	\$	500.00	\$	208.33
Ira Lustbader	2/5/2020	Kansas	Internal CR lawyer meeting on Motion to Dismiss finalizing	0.50	\$	500.00	\$	250.00
Ira Lustbader	2/5/2020	Kansas	Telephone call with co counsel regarding strategy and discovery plan for Feb	1.00	\$	500.00	\$	500.00
Ira Lustbader	2/6/2020	Kansas	Review and edit near final MTD opp draft	2.83	\$	500.00	\$	1,416.67
Ira Lustbader	2/7/2020	Kansas	Prep for mediation	1.42	\$	500.00	\$	708.33
Ira Lustbader	2/7/2020	Kansas	Mediation, KC (phone dial in remote)	7.17	\$	500.00	\$	3,583.33
Ira Lustbader	2/10/2020	Kansas	Analyzing alternative to stability measure	2.75	\$	500.00	\$	1,375.00
Ira Lustbader	2/11/2020	Kansas	Meeting with EH and EM regarding drafting alternatives to cfsr item 4 on placement stability	1.00	\$	500.00	\$	500.00
Ira Lustbader	2/11/2020	Kansas	Follow up analysis regarding outcome measure alternatives on stability	1.17	\$	500.00	\$	583.33
Ira Lustbader	2/11/2020	Kansas	Review and edit draft updates to settlement for mediation	2.08	\$	500.00	\$	1,041.67
Ira Lustbader	2/12/2020	Kansas	Telephone call with team regarding finalizing MTD opp and mediation strategy, issue for single mediation draft, possible alternatives for next mediation sessions	0.92	\$	500.00	\$	458.33

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Ira Lustbader	2/12/2020	Kansas	Review/finalizing single mediation draft of all positions	2.17	\$	500.00	\$	1,083.33
Ira Lustbader	2/12/2020	Kansas	Review/Finalizing MTD opp final review/edits	2.83	\$	500.00	\$	1,416.67
Ira Lustbader	2/13/2020	Kansas	Continued analysis regarding alternative provision on stability	2.33	\$	500.00	\$	1,166.67
Ira Lustbader	2/20/2020	Kansas	Telephone call with Leecia Welch regarding mediation strategy	0.67	\$	500.00	\$	333.33
Ira Lustbader	2/20/2020	Kansas	Prep for mediation	2.75	\$	500.00	\$	1,375.00
Ira Lustbader	2/21/2020	Kansas	Team co-counsel strategy call regarding mediation issues	0.92	\$	500.00	\$	458.33
Ira Lustbader	2/21/2020	Kansas	Prep for mediation cont'd and draft follow up alternatives	4.83	\$	500.00	\$	2,416.67
Ira Lustbader	2/24/2020	Kansas Travel	Travel to KC for mediation (delays)	3.53	\$	500.00	\$	1,766.67
Ira Lustbader	2/24/2020	Kansas	Prepare for mediation	2.25	\$	500.00	\$	1,125.00
Ira Lustbader	2/25/2020	Kansas	Meeting with co-counsel on stability alt strategy	1.00	\$	500.00	\$	500.00
Ira Lustbader	2/25/2020	Kansas	Discuss mediation strategy with full co-counsel team	1.25	\$	500.00	\$	625.00
Ira Lustbader	2/25/2020	Kansas	Draft alts to stability and placement outliers, contract oversight	2.42	\$	500.00	\$	1,208.33
Ira Lustbader	2/25/2020	Kansas	Mediation with parties KC	8.00	\$	500.00	\$	4,000.00
Ira Lustbader	2/26/2020	Kansas Travel	Return travel mediation (delays)	3.62	\$	500.00	\$	1,808.33
Ira Lustbader	2/26/2020	Kansas	Mediation - strategy debrief with co counsel regarding dual track discovery	1.50	\$	500.00	\$	750.00
Ira Lustbader	2/26/2020	Kansas	Meeting with co counsel regarding analyzing defs last offer and draft counter mediation comprehensive package proposal	2.50	\$	500.00	\$	1,250.00
Ira Lustbader	2/26/2020	Kansas	Mediation cont'd with parties and monitors	3.00	\$	500.00	\$	1,500.00
Ira Lustbader	2/28/2020	Kansas	Meeting with MN and CG regarding RFPs drafts and resumed discovery	0.50	\$	500.00	\$	250.00
Ira Lustbader	2/28/2020	Kansas	Review and analyze final draft RFPs	1.83	\$	500.00	\$	916.67
Ira Lustbader	3/5/2020	Kansas	Edit RFP on MCOs	1.42	\$	500.00	\$	708.33

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Ira Lustbader	3/6/2020	Kansas	Analyzing potential record review expert(s)	1.67	\$	500.00	\$	833.33
Ira Lustbader	3/11/2020	Kansas	Telephone call with LW at NCYL and CS at DLA regarding discovery/endorcement strategy	0.58	\$	500.00	\$	291.67
Ira Lustbader	3/11/2020	Kansas	Co counsel call regarding specific discovery RFP drafts, case review strategy	1.00	\$	500.00	\$	500.00
Ira Lustbader	3/11/2020	Kansas	Analyzing "hot" docs from discovery regarding depo strategy	1.25	\$	500.00	\$	625.00
Ira Lustbader	3/12/2020	Kansas	Follow up analysis of HPAA objections to MCO Third Party discovery	1.08	\$	500.00	\$	541.67
Ira Lustbader	3/18/2020	Kansas	Telephone call with co counsel on discovery strategy and follow up	1.00	\$	500.00	\$	500.00
Ira Lustbader	3/18/2020	Kansas	Analyzing approach to rec review and expert/statistician	1.25	\$	500.00	\$	625.00
Ira Lustbader	3/18/2020	Kansas	Review/analyze hot docs regarding placement issues cont'd	2.17	\$	500.00	\$	1,083.33
Ira Lustbader	3/19/2020	Kansas	Review edit and finalize COVID 19 contingency letter to Defs	0.75	\$	500.00	\$	375.00
Ira Lustbader	3/19/2020	Kansas	Hot doc review contd regarding placement issues	1.33	\$	500.00	\$	666.67
Ira Lustbader	3/20/2020	Kansas	Review/edit RFP3	0.75	\$	500.00	\$	375.00
Ira Lustbader	3/23/2020	Kansas	Closely review Plaintiffs revised RFP set 3 for comments to team	1.83	\$	500.00	\$	916.67
Ira Lustbader	3/25/2020	Kansas	Internal call regarding specific discovery issues in Defendants' productions	0.50	\$	500.00	\$	250.00
Ira Lustbader	3/25/2020	Kansas	Telephone call with full co counsel team regarding discovery strategy, including RFPs and production holes	0.75	\$	500.00	\$	375.00
Ira Lustbader	3/29/2020	Kansas	Review/analyze plaintiff strategy on COVID-19 protocols	0.83	\$	500.00	\$	416.67
Ira Lustbader	3/30/2020	Kansas	Follow up review and strategy on RFP for COVID-19 materials	1.08	\$	500.00	\$	541.67
Ira Lustbader	3/31/2020	Kansas	Prep for call with potential expert regarding contract oversight	0.58	\$	500.00	\$	291.67

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Ira Lustbader	3/31/2020	Kansas	Telephone call with co counsel re potential contract oversight expert	0.67	\$	500.00	\$	333.33
Ira Lustbader	4/1/2020	Kansas	Edit RFP Set 4	0.83	\$	500.00	\$	416.67
Ira Lustbader	4/3/2020	Kansas	Team co counsel call regarding meet and confer and enforcement, COVID startegy	0.83	\$	500.00	\$	416.67
Ira Lustbader	4/8/2020	Kansas	Telephone call with co-counsel regarding M&C strategy and discovery (left early)	0.67	\$	500.00	\$	333.33
Ira Lustbader	4/9/2020	Kansas	Communications with consulting expert, Medicaid and MH	0.17	\$	500.00	\$	83.33
Ira Lustbader	4/9/2020	Kansas	Discuss possible KS settlement alternatives with child welfare and mental health advocate	0.83	\$	500.00	\$	416.67
Ira Lustbader	4/9/2020	Kansas	Analyzing NM settlement regarding possible alts in KS	1.25	\$	500.00	\$	625.00
Ira Lustbader	4/13/2020	Kansas	Telephone call with MN regarding follow up items and strategy for next 2 meet and confer dates	0.42	\$	500.00	\$	208.33
Ira Lustbader	4/13/2020	Kansas	Prep for M&C with MN	0.50	\$	500.00	\$	250.00
Ira Lustbader	4/15/2020	Kansas	Telephone call with co-counsel and potential expert placement/trauma	0.50	\$	500.00	\$	250.00
Ira Lustbader	4/15/2020	Kansas	Telephone call with team co-counsel regarding discovery strategy, enforcement	0.92	\$	500.00	\$	458.33
Ira Lustbader	4/15/2020	Kansas	Prepare for m&c on noncomplaint discovery responses	1.17	\$	500.00	\$	583.33
Ira Lustbader	4/22/2020	Kansas	Telephone call with co-counsel regarding discovery strategy and enforcement issues	0.83	\$	500.00	\$	416.67
Ira Lustbader	4/22/2020	Kansas	Review hot docs from DCF disc responses	1.75	\$	500.00	\$	875.00
Ira Lustbader	4/28/2020	Kansas	Review privilege log and redactions	1.25	\$	500.00	\$	625.00
Ira Lustbader	4/29/2020	Kansas	Telephone call with JK regarding strategy for priv log and redactions	0.40	\$	500.00	\$	200.00
Ira Lustbader	4/29/2020	Kansas	Team co counsel call regarding discovery disputes and enforcement, experts	1.00	\$	500.00	\$	500.00
Ira Lustbader	4/29/2020	Kansas	Cont'd analysis priv log and redactions, draft responses and follow up	1.92	\$	500.00	\$	958.33

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Ira Lustbader	4/30/2020	Kansas	Telephone call with NT, EG, MN regarding potential experts on placement	1.00	\$	500.00	\$	500.00
Ira Lustbader	5/1/2020	Kansas	Review updated doc production/responses	2.17	\$	500.00	\$	1,083.33
Ira Lustbader	5/4/2020	Kansas	Review and analyze Defs settlement prop and possible response	3.08	\$	500.00	\$	1,541.67
Ira Lustbader	5/5/2020	Kansas	Review and analyze Defs settlement proposal and analyzing alternatives for team	4.25	\$	500.00	\$	2,125.00
Ira Lustbader	5/6/2020	Kansas	Discuss settlement response with Leecia W/co counsel	1.00	\$	500.00	\$	500.00
Ira Lustbader	5/6/2020	Kansas	Co-counsel call regarding discovery and settlement strategy	1.00	\$	500.00	\$	500.00
Ira Lustbader	5/6/2020	Kansas	Cont'd analysis of defs settlement proposal	3.17	\$	500.00	\$	1,583.33
Ira Lustbader	5/8/2020	Kansas	Cont'd analysis of settlement proposal/counter	1.33	\$	500.00	\$	666.67
Ira Lustbader	5/9/2020	Kansas	Cont'd analyzing settlement draft, counters	2.33	\$	500.00	\$	1,166.67
Ira Lustbader	5/11/2020	Kansas	Co counsel discussion on strategy for defs proposed settlement and specific responses to each	1.00	\$	500.00	\$	500.00
Ira Lustbader	5/11/2020	Kansas	Cont'd analysis and outlining of defs proposed settlement and specific responses to each new counter	3.25	\$	500.00	\$	1,625.00
Ira Lustbader	5/12/2020	Kansas	Analyzing settlement proposal cont'd and editing counters	2.83	\$	500.00	\$	1,416.67
Ira Lustbader	5/13/2020	Kansas	Discuss strategy for redactions, privilege with JK	0.20	\$	500.00	\$	100.00
Ira Lustbader	5/13/2020	Kansas	Review JK proposal on redactions	0.67	\$	500.00	\$	333.33
Ira Lustbader	5/13/2020	Kansas	Team co-counsel meeting regarding settlement strategy; discovery follow up/strategy	1.00	\$	500.00	\$	500.00
Ira Lustbader	5/13/2020	Kansas	Cont'd analyzing settlement and prep for discussions with co counsel	2.42	\$	500.00	\$	1,208.33
Ira Lustbader	5/14/2020	Kansas	Discuss alternatives to placement stability outcomes with EM and EH	0.75	\$	500.00	\$	375.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Ira Lustbader	5/14/2020	Kansas	Cont'd revise/edit settlement counters on placement stability	2.33	\$	500.00	\$	1,166.67
Ira Lustbader	5/15/2020	Kansas	Follow up call with EM and EGH regarding stability measure	0.50	\$	500.00	\$	250.00
Ira Lustbader	5/15/2020	Kansas	Review/finalizing counter draft settlement	3.75	\$	500.00	\$	1,875.00
Ira Lustbader	5/20/2020	Kansas	Co counsel call regarding discovery strategy and depositions	1.00	\$	500.00	\$	500.00
Ira Lustbader	5/21/2020	Kansas	Discuss depo strategy with MN and discovery plan	0.50	\$	500.00	\$	250.00
Ira Lustbader	5/21/2020	Kansas	Discuss 30b6 depo strategy and prep with NT and MN	0.50	\$	500.00	\$	250.00
Ira Lustbader	5/27/2020	Kansas	Internal CR meeting on specific discovery and CR settlement tasks	0.50	\$	500.00	\$	250.00
Ira Lustbader	5/27/2020	Kansas	Co-counsel strategy meeting regarding discovery and depo	1.00	\$	500.00	\$	500.00
Ira Lustbader	5/28/2020	Kansas	Telephone call with potential expert regarding settlement consult	0.50	\$	500.00	\$	250.00
Ira Lustbader	5/28/2020	Kansas	Internal call with JK, CG and MN regarding expert on brain development	0.50	\$	500.00	\$	250.00
Ira Lustbader	5/28/2020	Kansas	Telephone call with policy team EM and EGH regarding outcome 3a cohort	0.50	\$	500.00	\$	250.00
Ira Lustbader	5/28/2020	Kansas	30b6 depo prep	1.42	\$	500.00	\$	708.33
Ira Lustbader	5/29/2020	Kansas	Co counsel discussion on Pltffs position/settlement	1.50	\$	500.00	\$	750.00
Ira Lustbader	5/29/2020	Kansas	Analyzing settlement prop contd and recs for team	1.75	\$	500.00	\$	875.00
Ira Lustbader	6/1/2020	Kansas	Telephone call with potential expert, brain development	0.72	\$	500.00	\$	358.33
Ira Lustbader	6/2/2020	Kansas	Settlement negotiation prep regarding counters to Defs	2.33	\$	500.00	\$	1,166.67
Ira Lustbader	6/2/2020	Kansas	30b6 depo prep 1-1 and 1-3	3.75	\$	500.00	\$	1,875.00
Ira Lustbader	6/3/2020	Kansas	Co counsel call regarding settlement positions for neg 6/4 discovery	1.00	\$	500.00	\$	500.00
Ira Lustbader	6/3/2020	Kansas	Depo prep M Kline contd	1.50	\$	500.00	\$	750.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Ira Lustbader	6/3/2020	Kansas	Mediation prep	2.67	\$	500.00	\$	1,333.33
Ira Lustbader	6/4/2020	Kansas	M Kline depo prep	1.42	\$	500.00	\$	708.33
Ira Lustbader	6/4/2020	Kansas	Follow up regarding settlement and proposals	1.67	\$	500.00	\$	833.33
Ira Lustbader	6/4/2020	Kansas	Prep for settlement discussion	2.75	\$	500.00	\$	1,375.00
Ira Lustbader	6/4/2020	Kansas	Settlement negotiations w Defs	3.75	\$	500.00	\$	1,875.00
Ira Lustbader	6/5/2020	Kansas	Strategy discussion with NT and MN regarding Melinda Kline depo	0.48	\$	500.00	\$	241.67
Ira Lustbader	6/5/2020	Kansas	Depo prep M Kline	2.67	\$	500.00	\$	1,333.33
Ira Lustbader	6/5/2020	Kansas	Follow on settlement negotiations, specific remaining provisions and alternatives	3.25	\$	500.00	\$	1,625.00
Ira Lustbader	6/8/2020	Kansas	Prep for M. Kline 30b6 depo	5.08	\$	500.00	\$	2,541.67
Ira Lustbader	6/9/2020	Kansas	M Kline depo prep	2.75	\$	500.00	\$	1,375.00
Ira Lustbader	6/10/2020	Kansas	Settlement negotiations w defs	3.00	\$	500.00	\$	1,500.00
Ira Lustbader	6/10/2020	Kansas	Follow up review, final edits settlement	4.75	\$	500.00	\$	2,375.00
Ira Lustbader	6/17/2020	Kansas	Co counsel strategy call regarding settlement and informal stay	1.00	\$	500.00	\$	500.00
Ira Lustbader	6/18/2020	Kansas	Telephone call with parties regarding remaining settlement issues, process	1.00	\$	500.00	\$	500.00
Ira Lustbader	6/18/2020	Kansas	Prep for call with parties on settlement issues for finalizing	1.25	\$	500.00	\$	625.00
Ira Lustbader	6/22/2020	Kansas	Meeting with counsel and Mediator re the settlement agreement	0.50	\$	500.00	\$	250.00
Ira Lustbader	6/22/2020	Kansas	Meeting with counsel and neutral under the settlement agreement	0.58	\$	500.00	\$	291.67
Ira Lustbader	6/23/2020	Kansas	Telephone call with parties and Judge Crabtree (off record)	0.33	\$	500.00	\$	166.67
Ira Lustbader	6/23/2020	Kansas	Prep for call with Judge Crabtree regarding off record status	0.75	\$	500.00	\$	375.00
Ira Lustbader	6/24/2020	Kansas	Telephone call with co-counsel regarding Defendants last minute request regarding senate finance committee	1.17	\$	500.00	\$	583.33
Ira Lustbader	6/29/2020	Kansas	Follow up analysis on SFC and role in approval	1.17	\$	500.00	\$	583.33
Ira Lustbader	6/30/2020	Kansas	Team co-counsel call regarding approval strategy with SFC	0.58	\$	500.00	\$	291.67

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Ira Lustbader	7/1/2020	Kansas	Co-counsel team strategy call on SFC approval, discovery	0.58	\$	500.00	\$	291.67
Ira Lustbader	7/6/2020	Kansas	Follow up strategy discovery on settlement approval and language	0.67	\$	500.00	\$	333.33
Ira Lustbader	7/6/2020	Kansas	Analyze and edit draft prelim approval papers	2.17	\$	500.00	\$	1,083.33
Ira Lustbader	7/13/2020	Kansas	Analyze and edit prelim. appr. papers (brief, notice, decl. order)	2.50	\$	500.00	\$	1,250.00
Ira Lustbader	7/15/2020	Kansas	Meeting with co counsel on preliminary approval strategy	1.50	\$	500.00	\$	750.00
Ira Lustbader	7/22/2020	Kansas	Meeting with co-counsel regarding preliminary approval process and strategy	0.58	\$	500.00	\$	291.67
Jonathan King	9/7/2018	Kansas	Research case law regarding EPSDT for cause of action for complaint	1.38	\$	325.00	\$	449.58
Jonathan King	9/11/2018	Kansas	Conduct legal resaerch re EPSDT provision of Medicaid Act	0.82	\$	325.00	\$	265.42
Jonathan King	9/12/2018	Kansas	Meet with MN, EM, and DA regarding drafting complaint	0.25	\$	325.00	\$	81.25
Jonathan King	9/12/2018	Kansas	Conference call with team regarding case status and next steps	0.58	\$	325.00	\$	189.58
Jonathan King	9/12/2018	Kansas	Legal research re EPSDT provision of Medicaid Act for preparation of EPSDT cause of action in complaint	3.98	\$	325.00	\$	1,294.58
Jonathan King	9/13/2018	Kansas	Legal research re EPSDT provision of Medicaid Act for complaint drafting purposes	4.52	\$	325.00	\$	1,467.92
Jonathan King	9/14/2018	Kansas	Meet with IL and MN regarding EPSDT research	1.00	\$	325.00	\$	325.00
Jonathan King	9/14/2018	Kansas	Continue researching case law regarding potential EPSDT claim for complaint	2.00	\$	325.00	\$	650.00
Jonathan King	9/17/2018	Kansas	Research case law regarding potential EPSDT claim	3.20	\$	325.00	\$	1,040.00
Jonathan King	9/18/2018	Kansas	Meet with internal CR team re updates from EPSDT research	0.58	\$	325.00	\$	189.58

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## Children's Rights Itemized Time Entries

Jonathan King	9/18/2018	Kansas	Research case law regarding potential EPSDT claim	2.38	\$	325.00	\$	774.58
Jonathan King	9/19/2018	Kansas	Conference call with team regarding case status and local updates; discuss research and drafting of complaint	0.78	\$	325.00	\$	254.58
Jonathan King	9/19/2018	Kansas	Begin drafting written analysis of legal research regarding potential EPSDT claim	7.17	\$	325.00	\$	2,329.17
Jonathan King	9/20/2018	Kansas	Meet with MN regarding EPSDT research	0.33	\$	325.00	\$	108.33
Jonathan King	9/20/2018	Kansas	Research case law regarding potential EPSDT claim	5.27	\$	325.00	\$	1,711.67
Jonathan King	9/21/2018	Kansas	Call with IL regarding EPSDT research	0.33	\$	325.00	\$	108.33
Jonathan King	9/21/2018	Kansas	Research case law regarding potential EPSDT claim	6.20	\$	325.00	\$	2,015.00
Jonathan King	9/24/2018	Kansas	Draft summary of research regarding potential EPSDT claim	0.70	\$	325.00	\$	227.50
Jonathan King	9/25/2018	Kansas	Research case law regarding potential EPSDT claim	2.87	\$	325.00	\$	931.67
Jonathan King	9/26/2018	Kansas	Research case law regarding potential EPSDT claim	2.35	\$	325.00	\$	763.75
Jonathan King	9/28/2018	Kansas	Research case law regarding potential EPSDT claim	6.43	\$	325.00	\$	2,090.83
Jonathan King	10/1/2018	Kansas	Revise current EPSDT draft section in draft complaint	1.00	\$	325.00	\$	325.00
Jonathan King	10/1/2018	Kansas	Legal research of case law regarding EPSDT claim	1.77	\$	325.00	\$	574.17

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**Children's Rights Itemized Time Entries**

Jonathan King	10/2/2018	Kansas	Continue drafting written analysis of legal research regarding potential EPSDT claim	5.65	\$	325.00	\$	1,836.25
Jonathan King	10/3/2018	Kansas	Research case law regarding potential EPSDT claim	0.72	\$	325.00	\$	232.92
Jonathan King	10/4/2018	Kansas	Research case law regarding potential EPSDT claim	0.43	\$	325.00	\$	140.83
Jonathan King	10/5/2018	Kansas	Draft summary of research regarding potential EPSDT claim	0.72	\$	325.00	\$	232.92
Jonathan King	10/16/2018	Kansas	Meet with MN and EM regarding ongoing legal research for complaint	0.12	\$	325.00	\$	37.92
Jonathan King	10/16/2018	Kansas	Research case law regarding potential EPSDT claim	4.03	\$	325.00	\$	1,310.83
Jonathan King	10/17/2018	Kansas	Finalize memornadum of analysis of potential EPSDT claim based on legal research	1.27	\$	325.00	\$	411.67
Jonathan King	10/17/2018	Kansas	Meet with IL, MN, EM and DA regarding case status and strategy, including draft complaint, ongoing research, and updates from counsel meeting	1.00	\$	325.00	\$	325.00
Jonathan King	10/18/2018	Kansas	Conduct legal research on Tenth Circuit case law regarding adequacy of next friends for purposes of complaint drafting	8.17	\$	325.00	\$	2,654.17
Jonathan King	10/19/2018	Kansas	Draft written analysis of legal research re next friends	5.02	\$	325.00	\$	1,630.42
Jonathan King	10/22/2018	Kansas	Continue researching Tenth Circuit caselaw regarding next friends to update memorandum	1.50	\$	325.00	\$	487.50

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## Children's Rights Itemized Time Entries

Jonathan King	10/22/2018	Kansas	Draft complaint section regarding oversight of private contract providers	6.35	\$	325.00	\$	2,063.75
Jonathan King	10/23/2018	Kansas	Meet with IL, MN and EG regarding potential revisions to current draft complaint sections prepared by self and EG	0.50	\$	325.00	\$	162.50
Jonathan King	10/23/2018	Kansas	Update legal research memorandum regarding analysis of adequacy of next friends	1.78	\$	325.00	\$	579.58
Jonathan King	10/23/2018	Kansas	Update draft complaint section regarding oversight of private contract providers	3.87	\$	325.00	\$	1,256.67
Jonathan King	10/24/2018	Kansas	Conference call with team regarding case status, plaintiff updates, and complaint drafting	0.85	\$	325.00	\$	276.25
Jonathan King	10/24/2018	Kansas	Continue drafting complaint section regarding oversight of private contract providers	1.10	\$	325.00	\$	357.50
Jonathan King	10/25/2018	Kansas	Draft complaint section regarding oversight of private contract providers	6.75	\$	325.00	\$	2,193.75
Jonathan King	10/26/2018	Kansas	Draft complaint section regarding oversight of private contract providers	2.53	\$	325.00	\$	823.33
Jonathan King	10/29/2018	Kansas	Draft complaint section regarding oversight of private contract providers	2.30	\$	325.00	\$	747.50
Jonathan King	10/29/2018	Kansas	Conduct more targeted legal research of caselaw regarding potential EPSDT claim in response to inquiry by team	8.02	\$	325.00	\$	2,605.42

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Jonathan King	11/2/2018	Kansas	Meet with IL regarding complaint drafting and legal research	0.50	\$	325.00	\$	162.50
Jonathan King	11/2/2018	Kansas	Review current draft complaint for purposes of editing and advising team	2.42	\$	325.00	\$	785.42
Jonathan King	11/5/2018	Kansas	Conference call with team regarding draft complaint	0.50	\$	325.00	\$	162.50
Jonathan King	11/5/2018	Kansas	Revise current draft of complaint	4.57	\$	325.00	\$	1,484.17
Jonathan King	11/6/2018	Kansas	Revise current draft of complaint	0.90	\$	325.00	\$	292.50
Jonathan King	11/6/2018	Kansas	Edit memo regarding potential EPSDT cause of action	2.67	\$	325.00	\$	866.67
Jonathan King	11/7/2018	Kansas	Edit current draft of complaint	0.62	\$	325.00	\$	200.42
Jonathan King	11/7/2018	Kansas	Conference call with team regarding draft complaint	1.00	\$	325.00	\$	325.00
Jonathan King	11/7/2018	Kansas	Research Kansas statutes and case law regarding class definition for purposes of defining class in complaint	5.27	\$	325.00	\$	1,711.67
Jonathan King	11/8/2018	Kansas	Meet with EM and MN regarding draft complaint	0.50	\$	325.00	\$	162.50
Jonathan King	11/8/2018	Kansas	Research Kansas statutes and case law regarding class definition	2.75	\$	325.00	\$	893.75
Jonathan King	11/8/2018	Kansas	Revise and edit current draft of complaint	4.17	\$	325.00	\$	1,354.17
Jonathan King	11/9/2018	Kansas	Meet with IL and EM regarding editing draft complaint	0.50	\$	325.00	\$	162.50
Jonathan King	11/9/2018	Kansas	Research case law regarding potential EPSDT claim	2.47	\$	325.00	\$	801.67
Jonathan King	11/9/2018	Kansas	Research case law regarding substantive due process claim	6.08	\$	325.00	\$	1,977.08

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Jonathan King	11/12/2018	Kansas	Conference call with team regarding outreach to KS next friends regarding potential plaintiffs	1.50	\$	325.00	\$	487.50
Jonathan King	11/12/2018	Kansas	Revise current draft of complaint	3.95	\$	325.00	\$	1,283.75
Jonathan King	11/14/2018	Kansas	Travel within Kansas City for meetings with potential next friends for named plaintiffs	1.00	\$	325.00	\$	325.00
Jonathan King	11/14/2018	Kansas	Travel to Kansas City for meetings with potential next friends and named plaintiffs	3.50	\$	325.00	\$	1,137.50
Jonathan King	11/14/2018	Kansas	Meeting with EM, LBB and LM regarding strategy for Kansas on the ground investigation to locate NFs and NPs	2.00	\$	325.00	\$	650.00
Jonathan King	11/15/2018	Kansas	Travel within Kansas City for meetings with potential next friends for named plaintiffs	1.50	\$	325.00	\$	487.50
Jonathan King	11/15/2018	Kansas	Meeting with EM, SD and EB regarding Kansas complaint	1.00	\$	325.00	\$	325.00
Jonathan King	11/15/2018	Kansas	Meeting with SD and KZ regarding Kansas investigation	1.50	\$	325.00	\$	487.50
Jonathan King	11/15/2018	Kansas	Meeting with EM, SD, and KA regarding Kansas investigation	1.65	\$	325.00	\$	536.25
Jonathan King	11/16/2018	Kansas	Travel within Kansas City for meetings with potential next friends for named plaintiffs	1.00	\$	325.00	\$	325.00
Jonathan King	11/16/2018	Kansas	Travel back to NYC from Kansas City after on the ground investigation to locate named plaintiffs and next friends	3.50	\$	325.00	\$	1,137.50
Jonathan King	11/16/2018	Kansas	Meeting with EM and TP regarding Kansas investigation	1.00	\$	325.00	\$	325.00
Jonathan King	11/19/2018	Kansas	Review final draft Kansas complaint materials	1.12	\$	325.00	\$	362.92
Jonathan King	11/19/2018	Kansas	Research relevant decisions by Judge Lungstrum	2.02	\$	325.00	\$	655.42
Jonathan King	11/20/2018	Kansas	Draft summary of research relevant decisions of Judge Lungstrum to share with co-counsel team	0.73	\$	325.00	\$	238.33

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Jonathan King	11/26/2018	Kansas	Review pro hac vice documents for revisions prior to filing	0.98	\$	325.00	\$	319.58
Jonathan King	11/26/2018	Kansas	Prepare contact memo of attorney impressions regarding investigatory meeting with EM and AR	1.00	\$	325.00	\$	325.00
Jonathan King	11/30/2018	Kansas	Legal research re District of Kansas requirements for service and filing proof of service	3.58	\$	325.00	\$	1,164.58
Jonathan King	12/3/2018	Kansas	Review draft documents regarding filing proof of service	0.35	\$	325.00	\$	113.75
Jonathan King	12/6/2018	Kansas	Review and finalize proofs of service for filing	1.48	\$	325.00	\$	482.08
Jonathan King	12/12/2018	Kansas	Conduct litigation hold research for purposes of advising clients and Defendants to preserve relevant information	1.38	\$	325.00	\$	449.58
Jonathan King	12/13/2018	Kansas	Analyse sample litigation hold letter from similar litigation	0.50	\$	325.00	\$	162.50
Jonathan King	12/14/2018	Kansas	Draft litigation hold letter to next friends	1.02	\$	325.00	\$	330.42
Jonathan King	12/18/2018	Kansas	Revise draft litigation hold to next friends	0.35	\$	325.00	\$	113.75
Jonathan King	1/2/2019	Kansas	Meet with IL and MN regarding research for opposition to motion for extension of time to answer complaint	0.37	\$	325.00	\$	119.17
Jonathan King	1/2/2019	Kansas	Research case law and applicable legal rules in support of Defendants' opposition to motion for extension of time to answer complaint	5.30	\$	325.00	\$	1,722.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Jonathan King	1/3/2019	Kansas	Analyze draft brief in opposition to motion for extension of time to answer complaint	1.00	\$	325.00	\$	325.00
Jonathan King	1/3/2019	Kansas	Continue researching caselaw regarding an opposition to Defendants' motion for extension of time to answer complaint	4.12	\$	325.00	\$	1,337.92
Jonathan King	1/4/2019	Kansas	Finalize brief in opposition to motion for extension of time to answer for filing of same	1.80	\$	325.00	\$	585.00
Jonathan King	1/9/2019	Kansas	Revise draft litigation hold	0.52	\$	325.00	\$	167.92
Jonathan King	1/9/2019	Kansas	Conference call with team regarding case status, strategy for status conference with court, expert updates, and litigation hold	0.77	\$	325.00	\$	249.17
Jonathan King	1/10/2019	Kansas	Revise draft litigation letter to defendants	0.40	\$	325.00	\$	130.00
Jonathan King	1/15/2019	Kansas	Revise draft litigation hold letters	2.02	\$	325.00	\$	655.42
Jonathan King	1/16/2019	Kansas	Conference call with team regarding expert updates, draft litigation hold, joint motion regarding pseudonyms, and draft protective order	0.92	\$	325.00	\$	297.92
Jonathan King	1/17/2019	Kansas	Review draft motion to use pseudonyms	0.33	\$	325.00	\$	108.33
Jonathan King	1/22/2019	Kansas	Revise draft litigation hold materials	1.67	\$	325.00	\$	541.67
Jonathan King	1/25/2019	Kansas	Communicate with internal CR team regarding review of draft protective order	0.40	\$	325.00	\$	130.00
Jonathan King	2/1/2019	Kansas	Communicate with team re potential experts	0.47	\$	325.00	\$	151.67

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Jonathan King	2/6/2019	Kansas	Analyze draft term sheet for potential settlement	2.08	\$	325.00	\$	677.08
Jonathan King	2/7/2019	Kansas	Communicate with team re review of protective order, court communication, and local rules	0.50	\$	325.00	\$	162.50
Jonathan King	2/7/2019	Kansas	Review draft term sheet for potential settlement	5.50	\$	325.00	\$	1,787.50
Jonathan King	2/8/2019	Kansas	Meeting with IL, MN, EM, DA and CC regarding draft settlement term sheet	1.50	\$	325.00	\$	487.50
Jonathan King	2/11/2019	Kansas	Meeting with IL, MN, EM, DA and CC regarding draft settlement term sheet	1.50	\$	325.00	\$	487.50
Jonathan King	2/11/2019	Kansas	Compare current draft settlement terms sheet with complaint and KS task force report to analyze potential gaps for settlement purposes	2.75	\$	325.00	\$	893.75
Jonathan King	2/20/2019	Kansas	Conference call with team regarding plaintiff outreach, experts, and class certification research	0.60	\$	325.00	\$	195.00
Jonathan King	2/28/2019	Kansas	Research case law regarding automatic amendment of official capacity defendants	1.30	\$	325.00	\$	422.50
Jonathan King	3/1/2019	Kansas	Research case law regarding automatic amendment of official capacity defendants	1.02	\$	325.00	\$	330.42
Jonathan King	3/6/2019	Kansas	Conference call with team regarding informal discovery and local stakeholder updates	0.75	\$	325.00	\$	243.75
Jonathan King	3/18/2019	Kansas	Review FOIA response regarding current foster care contracts in comparison to complaint allegations to analyze potential ammendment	1.05	\$	325.00	\$	341.25

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Jonathan King	3/21/2019	Kansas	Meeting with IL and MN regarding legal research for opposition to potential motion to dismiss	0.32	\$	325.00	\$	102.92
Jonathan King	3/25/2019	Kansas	Research Tenth Circuit case law regarding substantive due process claims	5.23	\$	325.00	\$	1,700.83
Jonathan King	3/27/2019	Kansas	Meeting with IL regarding research for opposition to potential motion to dismiss	0.17	\$	325.00	\$	54.17
Jonathan King	3/27/2019	Kansas	Research Tenth Circuit case law regarding Younger abstention in preparation for potential motion to dismiss	3.67	\$	325.00	\$	1,191.67
Jonathan King	3/27/2019	Kansas	Research Tenth Circuit case law regarding MTDs re substantive due process claims in preparation for potential motion to dismiss	4.13	\$	325.00	\$	1,343.33
Jonathan King	3/28/2019	Kansas	Draft summary of Tenth Circuit case law research regarding substantive due process claims	0.63	\$	325.00	\$	205.83
Jonathan King	3/28/2019	Kansas	Draft summary of Tenth Circuit case law research regarding Younger abstention	5.55	\$	325.00	\$	1,803.75
Jonathan King	4/17/2019	Kansas	Conference call with team regarding strategy for upcoming meeting with defendants' counsel	0.82	\$	325.00	\$	265.42
Jonathan King	4/24/2019	Kansas	Conference call with team regarding initial meeting with Defendants' counsel and local stakeholder updates	0.50	\$	325.00	\$	162.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Jonathan King	4/26/2019	Kansas	Analyze relevant briefings and decisions from similar cases regarding motions to dismiss a governor named as a Defendant	3.43	\$	325.00	\$	1,115.83
Jonathan King	5/1/2019	Kansas	Read Defendants' answer to Plaintiffs' complaint for discussion with team	0.60	\$	325.00	\$	195.00
Jonathan King	5/2/2019	Kansas	Conference call with team regarding Defendants' answer to complaint and local stakeholder updates	0.93	\$	325.00	\$	303.33
Jonathan King	5/3/2019	Kansas	Meeting with IL regarding research for potential forthcoming motion to dismiss the governor	0.20	\$	325.00	\$	65.00
Jonathan King	5/3/2019	Kansas	Conduct legal research re case law and statutes regarding motions to dismiss governors in 10th Circuit	4.00	\$	325.00	\$	1,300.00
Jonathan King	5/6/2019	Kansas	Continue researching case law and statutes regarding motions to dismiss governors in 10th Circuit	5.73	\$	325.00	\$	1,863.33
Jonathan King	5/7/2019	Kansas	Prepare written summary of analysis of research into case law and statutes regarding motions to dismiss governors in 10th Circuit	3.80	\$	325.00	\$	1,235.00
Jonathan King	5/8/2019	Kansas	Continue drafting summary of research into case law and statutes regarding motions to dismiss governors in 10th Circuit	1.77	\$	325.00	\$	574.17
Jonathan King	5/8/2019	Kansas	Edit current draft terms sheet to guide potential settlement discussion	3.67	\$	325.00	\$	1,191.67
Jonathan King	5/9/2019	Kansas	Revise draft terms sheet to guide potential settlement discussion	1.58	\$	325.00	\$	514.58

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Jonathan King	5/15/2019	Kansas	Conference call with team regarding scheduling conference and related deadlines, draft terms sheet, and initial disclosures	0.93	\$	325.00	\$	303.33
Jonathan King	5/20/2019	Kansas	Advise co-counsel team regarding EPSDT medicaid claim	0.60	\$	325.00	\$	195.00
Jonathan King	5/23/2019	Kansas	Review draft Rule 26(f) report and associated draft scheduling order for discussion with team	1.07	\$	325.00	\$	346.67
Jonathan King	5/28/2019	Kansas	Communicate with internal CR team re ESI guidelines in re potential ESI protocol	0.25	\$	325.00	\$	81.25
Jonathan King	5/30/2019	Kansas	Review all known documents re Defendants' placement issues to identify gaps in knowledge for drafting initial discovery requests re placement issues	3.12	\$	325.00	\$	1,012.92
Jonathan King	5/31/2019	Kansas	Communicate with MN and IL re drafting initial requests for production regarding placement issues	0.47	\$	325.00	\$	151.67
Jonathan King	6/3/2019	Kansas	Draft initial requests for production regarding placement issues	5.05	\$	325.00	\$	1,641.25
Jonathan King	6/4/2019	Kansas	Meeting with IL regarding draft first request for production re placement issues	0.53	\$	325.00	\$	173.33
Jonathan King	6/4/2019	Kansas	Revise initial requests for production regarding placement issues	1.00	\$	325.00	\$	325.00
Jonathan King	6/5/2019	Kansas	Meeting with IL and MN regarding potential revisions to draft request for production	0.18	\$	325.00	\$	59.58
Jonathan King	6/5/2019	Kansas	Revise draft request for production regarding placement issues	2.17	\$	325.00	\$	704.17

***M.B. v. Howard***  
**Children's Rights Itemized Time Entries**

Jonathan King	6/6/2019	Kansas	Continue updating request for production regarding placement issues	2.53	\$ 325.00	\$ 823.33
Jonathan King	6/7/2019	Kansas	Edit further initial requests for production regarding placement issues	2.75	\$ 325.00	\$ 893.75
Jonathan King	6/10/2019	Kansas	Finalize draft initial requests for production regarding placement issues	1.38	\$ 325.00	\$ 449.58
Jonathan King	6/12/2019	Kansas	Edit draft requests for production regarding caseload and CFSR	2.63	\$ 325.00	\$ 855.83
Jonathan King	6/13/2019	Kansas	Meeting with IL regarding first request for production regarding placement, caseloads, and CFSR	0.78	\$ 325.00	\$ 254.58
Jonathan King	6/13/2019	Kansas	Edit draft of first request for production regarding placement, caseloads, and CFSR	2.77	\$ 325.00	\$ 899.17
Jonathan King	6/14/2019	Kansas	Meeting with EM regarding draft of first request for production of documents	0.33	\$ 325.00	\$ 108.33
Jonathan King	6/14/2019	Kansas	Revise and edit draft of first request for production regarding placement, caseloads, and CFSR	2.03	\$ 325.00	\$ 660.83
Jonathan King	6/15/2019	Kansas	Conference call with EM, FP, TW, LR, MH, JA and BH regarding Medicaid fact questions	1.50	\$ 325.00	\$ 487.50
Jonathan King	6/17/2019	Kansas	Revise and edit draft of first request for production regarding placement, caseloads, and CFSR	3.00	\$ 325.00	\$ 975.00
Jonathan King	6/18/2019	Kansas	Revise and edit draft of first request for production regarding placement, caseloads, and CFSR	3.12	\$ 325.00	\$ 1,012.92

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Jonathan King	6/19/2019	Kansas	Revise and edit draft of first request for production regarding placement, caseloads, and CFSR	1.52	\$	325.00	\$	492.92
Jonathan King	6/20/2019	Kansas	Revise and edit draft of first request for production regarding placement, caseloads, and CFSR	3.53	\$	325.00	\$	1,148.33
Jonathan King	6/21/2019	Kansas	Draft 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR	4.93	\$	325.00	\$	1,603.33
Jonathan King	6/24/2019	Kansas	Revise 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR	2.97	\$	325.00	\$	964.17
Jonathan King	6/25/2019	Kansas	Call with PJ and CC regarding Defs' production of initial disclosure materials and status of draft discovery requests	0.30	\$	325.00	\$	97.50
Jonathan King	6/25/2019	Kansas	Revise and edit draft of first request for production regarding placement, caseloads, and CFSR	3.03	\$	325.00	\$	985.83
Jonathan King	6/26/2019	Kansas	Closely review draft initial disclosures and potential document production to discuss analysis and potential revisions	5.50	\$	325.00	\$	1,787.50
Jonathan King	6/27/2019	Kansas	Propose edits to draft initial disclosures and potential document production	2.88	\$	325.00	\$	937.08

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Jonathan King	7/1/2019	Kansas	Revise 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR	0.37	\$	325.00	\$	119.17
Jonathan King	7/2/2019	Kansas	Edit draft of first request for production regarding placement, caseloads, and CFSR	2.45	\$	325.00	\$	796.25
Jonathan King	7/17/2019	Kansas	Revise and edit 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR	0.33	\$	325.00	\$	108.33
Jonathan King	7/17/2019	Kansas	Conference call with team regarding Defendants' mediation counter-proposal, draft 30(b)(6) notice, and local stakeholder updates	0.88	\$	325.00	\$	287.08
Jonathan King	7/26/2019	Kansas	Review correspondence with Defs re responses to Plaintiffs' First RFP to discuss with internal CR team	0.45	\$	325.00	\$	146.25
Jonathan King	7/29/2019	Kansas	Review draft third party subpoena regarding contractors	0.30	\$	325.00	\$	97.50
Jonathan King	7/31/2019	Kansas	Revise draft subpoena to contractors	1.25	\$	325.00	\$	406.25
Jonathan King	8/1/2019	Kansas	Continue editing draft of subpoena to contractors	2.23	\$	325.00	\$	725.83
Jonathan King	8/5/2019	Kansas	Meeting with IL, EM and CG regarding edits to draft subpoena to contractors	0.47	\$	325.00	\$	151.67
Jonathan King	8/5/2019	Kansas	Revise and edit draft of subpoena to contractors	1.33	\$	325.00	\$	433.33
Jonathan King	8/8/2019	Kansas	Read team protocol for upcoming review of named plaintiff files	0.50	\$	325.00	\$	162.50
Jonathan King	8/9/2019	Kansas	Review document review database and potential tags for upcoming review of documents	0.80	\$	325.00	\$	260.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Jonathan King	8/9/2019	Kansas	Review factual research regarding potential experts	1.02	\$	325.00	\$	330.42
Jonathan King	8/14/2019	Kansas	Review all materials (protocol, templates, and reference guides) to begin named plaintiff file review	1.67	\$	325.00	\$	541.67
Jonathan King	8/15/2019	Kansas	Analyze correspondence regarding mediation and response to Plaintiffs' term sheet	0.55	\$	325.00	\$	178.75
Jonathan King	8/19/2019	Kansas	Meeting with MN, CG, EM, DA and CC regarding strategy for review of named plaintiff files	0.30	\$	325.00	\$	97.50
Jonathan King	8/19/2019	Kansas	Begin review and detailed analysis of named plaintiff file of ZZ as produced by Defendants	0.75	\$	325.00	\$	243.75
Jonathan King	8/20/2019	Kansas	Review and analyze named plaintiff file for ZZ	0.90	\$	325.00	\$	292.50
Jonathan King	8/21/2019	Kansas	Review draft fact sections of complaint amendment regarding named plaintiffs	0.87	\$	325.00	\$	281.67
Jonathan King	8/21/2019	Kansas	Review and analyze named plaintiff file for ZZ	1.43	\$	325.00	\$	465.83
Jonathan King	8/22/2019	Kansas	Draft summary of potential updates for amended complaint regarding named plaintiffs	1.08	\$	325.00	\$	352.08
Jonathan King	8/22/2019	Kansas	Review and analyze named plaintiff file for ZZ	3.10	\$	325.00	\$	1,007.50
Jonathan King	8/22/2019	Kansas	Begin drafting first draft of Plaintiffs' initial mediation statement	3.18	\$	325.00	\$	1,034.58
Jonathan King	8/23/2019	Kansas	Conference call with IL and MN regarding strategy for mediation statement	0.42	\$	325.00	\$	135.42

***M.B. v. Howard***  
**Children's Rights Itemized Time Entries**

Jonathan King	8/23/2019	Kansas	Draft Plaintiffs' initial mediation statement	7.18	\$	325.00	\$	2,334.58
Jonathan King	8/26/2019	Kansas	Draft Plaintiffs' initial mediation statement	8.90	\$	325.00	\$	2,892.50
Jonathan King	8/27/2019	Kansas	Draft Plaintiffs' initial mediation statement	8.00	\$	325.00	\$	2,600.00
Jonathan King	8/28/2019	Kansas	Draft Plaintiffs' initial mediation statement	5.92	\$	325.00	\$	1,922.92
Jonathan King	8/29/2019	Kansas	Review and analyze named plaintiff file for ZZ	0.85	\$	325.00	\$	276.25
Jonathan King	8/29/2019	Kansas	Draft Plaintiffs' initial mediation statement	6.63	\$	325.00	\$	2,155.83
Jonathan King	9/16/2019	Kansas	Read comments by co-counsel to draft mediation statement	0.50	\$	325.00	\$	162.50
Jonathan King	9/16/2019	Kansas	Review and analyze named plaintiff file for ZZ	3.10	\$	325.00	\$	1,007.50
Jonathan King	9/17/2019	Kansas	Review NCYL's edits to plaintiffs' draft mediation statement	0.48	\$	325.00	\$	157.08
Jonathan King	9/17/2019	Kansas	Review and analyze named plaintiff file for ZZ	3.43	\$	325.00	\$	1,115.83
Jonathan King	9/18/2019	Kansas	Review plaintiffs' updated draft mediation statement	0.33	\$	325.00	\$	108.33
Jonathan King	9/18/2019	Kansas	Meeting with team regarding status of named plaintiff document review	0.43	\$	325.00	\$	140.83

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Jonathan King	9/18/2019	Kansas	Review and analyze named plaintiff file for ZZ	5.12	\$	325.00	\$	1,662.92
Jonathan King	9/19/2019	Kansas	Review plaintiffs' draft mediation statement	0.43	\$	325.00	\$	140.83
Jonathan King	9/19/2019	Kansas	Review and analyze named plaintiff file for ZZ	7.15	\$	325.00	\$	2,323.75
Jonathan King	9/20/2019	Kansas	Review and analyze named plaintiff file for ZZ	7.05	\$	325.00	\$	2,291.25
Jonathan King	9/23/2019	Kansas	Review and analyze named plaintiff file for ZZ	1.63	\$	325.00	\$	530.83
Jonathan King	9/24/2019	Kansas	Review and analyze named plaintiff file for ZZ	1.33	\$	325.00	\$	433.33
Jonathan King	9/25/2019	Kansas	Review and analyze named plaintiff file for ZZ	2.18	\$	325.00	\$	709.58
Jonathan King	9/27/2019	Kansas	Conference call with discovery sub-team regarding issues with Defendants' production of documents	0.72	\$	325.00	\$	232.92
Jonathan King	9/30/2019	Kansas	Review and analyze named plaintiff file for ZZ	0.53	\$	325.00	\$	173.33
Jonathan King	10/4/2019	Kansas	Review and analyze named plaintiff file for ZZ	1.95	\$	325.00	\$	633.75
Jonathan King	10/7/2019	Kansas	Review and analyze named plaintiff file for ZZ	8.37	\$	325.00	\$	2,719.17
Jonathan King	10/8/2019	Kansas	Review and analyze named plaintiff file for ZZ	6.92	\$	325.00	\$	2,247.92
Jonathan King	10/9/2019	Kansas	Review and analyze named plaintiff file for ZZ	5.75	\$	325.00	\$	1,868.75
Jonathan King	10/10/2019	Kansas	Review and analyze named plaintiff file for ZZ	6.58	\$	325.00	\$	2,139.58
Jonathan King	10/15/2019	Kansas	Review and analyze named plaintiff file for ZZ	1.33	\$	325.00	\$	433.33
Jonathan King	10/16/2019	Kansas	Conference call with MN and EG regarding strategy for drafting opposition to potential MTD	0.50	\$	325.00	\$	162.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Jonathan King	10/23/2019	Kansas	Conference call with team regarding status of discovery and potential experts	0.68	\$	325.00	\$	222.08
Jonathan King	10/25/2019	Kansas	Read Defendants' filed 12b1 motion to dismiss	0.37	\$	325.00	\$	119.17
Jonathan King	10/28/2019	Kansas	Begin reading caselaw cited in Defendants' motion to dismiss	1.93	\$	325.00	\$	628.33
Jonathan King	10/29/2019	Kansas	Continue review of caselaw cited by Defendants in their motion to dismiss	1.85	\$	325.00	\$	601.25
Jonathan King	10/30/2019	Kansas	Call with EG regarding strategy for opposition to Defendants' motion to dismiss	0.33	\$	325.00	\$	108.33
Jonathan King	10/30/2019	Kansas	Research case law to support Plaintiffs' opposition to Defendants' motion to dismiss	4.97	\$	325.00	\$	1,614.17
Jonathan King	10/31/2019	Kansas	Conference call with MN and EG regarding strategy for opposition to Defendants' motion to dismiss	0.67	\$	325.00	\$	216.67
Jonathan King	10/31/2019	Kansas	Research case law regarding opposition to Defendants' motion to dismiss	8.05	\$	325.00	\$	2,616.25
Jonathan King	11/1/2019	Kansas	Research case law regarding opposition to Defendants' motion to dismiss	4.85	\$	325.00	\$	1,576.25
Jonathan King	11/4/2019	Kansas	Draft opposition to Defendants' motion to dismiss	0.40	\$	325.00	\$	130.00
Jonathan King	11/6/2019	Kansas	Draft opposition to Defendants' motion to dismiss	1.43	\$	325.00	\$	465.83
Jonathan King	11/7/2019	Kansas	Review motions for extension of time regarding discovery and Defendants' MTD	0.77	\$	325.00	\$	249.17
Jonathan King	11/7/2019	Kansas	Research case law regarding opposition to Defendants' motion to dismiss	2.75	\$	325.00	\$	893.75

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Jonathan King	11/11/2019	Kansas	Research case law regarding opposition to Defendants' motion to dismiss	0.40	\$	325.00	\$	130.00
Jonathan King	11/14/2019	Kansas	Draft opposition to Defendants' motion to dismiss	1.80	\$	325.00	\$	585.00
Jonathan King	11/15/2019	Kansas	Draft opposition to Defendants' motion to dismiss	1.73	\$	325.00	\$	563.33
Jonathan King	11/19/2019	Kansas	Call with EG regarding draft opposition to MTD	0.47	\$	325.00	\$	151.67
Jonathan King	11/19/2019	Kansas	Research case law regarding opposition to Defendants' motion to dismiss	0.65	\$	325.00	\$	211.25
Jonathan King	11/20/2019	Kansas	Research case law regarding opposition to Defendants' motion to dismiss	1.67	\$	325.00	\$	541.67
Jonathan King	11/21/2019	Kansas	Draft opposition to Defendants' motion to dismiss	1.25	\$	325.00	\$	406.25
Jonathan King	11/25/2019	Kansas	Draft opposition to Defendants' motion to dismiss	2.25	\$	325.00	\$	731.25
Jonathan King	11/27/2019	Kansas	Draft opposition to Defendants' motion to dismiss	2.50	\$	325.00	\$	812.50
Jonathan King	12/2/2019	Kansas	Draft opposition to Defendants' motion to dismiss	2.85	\$	325.00	\$	926.25
Jonathan King	12/3/2019	Kansas	Call with EG regarding draft opposition to motion to dismiss	0.23	\$	325.00	\$	75.83
Jonathan King	12/3/2019	Kansas	Research case law regarding opposition to Defendants' motion to dismiss	0.75	\$	325.00	\$	243.75

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Jonathan King	12/4/2019	Kansas	Calls with EG regarding draft opposition to motion to dismiss	0.65	\$	325.00	\$	211.25
Jonathan King	12/4/2019	Kansas	Draft opposition to Defendants' motion to dismiss	6.77	\$	325.00	\$	2,199.17
Jonathan King	12/5/2019	Kansas	Draft motion regarding extension of deadline to oppose MTD	1.02	\$	325.00	\$	330.42
Jonathan King	12/6/2019	Kansas	Call with EG regarding draft opposition to motion to dismiss	0.25	\$	325.00	\$	81.25
Jonathan King	12/6/2019	Kansas	Meeting with IL regarding draft opposition to motion to dismiss	0.68	\$	325.00	\$	222.08
Jonathan King	12/6/2019	Kansas	Revise and edit motion regarding second extension of deadline to oppose MTD	0.75	\$	325.00	\$	243.75
Jonathan King	12/8/2019	Kansas	Research case law regarding opposition to Defendants' motion to dismiss	4.00	\$	325.00	\$	1,300.00
Jonathan King	12/9/2019	Kansas	Draft opposition to Defendants' motion to dismiss	3.28	\$	325.00	\$	1,067.08
Jonathan King	12/10/2019	Kansas	Meeting with MN regarding opposition to motion to dismiss	0.42	\$	325.00	\$	135.42
Jonathan King	1/6/2020	Kansas	Draft opposition to Defendants' motion to dismiss	6.87	\$	325.00	\$	2,231.67
Jonathan King	1/7/2020	Kansas	Call with EG regarding opposition to motion to dismiss governor	0.17	\$	325.00	\$	54.17
Jonathan King	1/7/2020	Kansas	Conference call with CR team regarding targeted 12(b)(1) discovery	0.52	\$	325.00	\$	167.92
Jonathan King	1/7/2020	Kansas	Draft opposition to Defendants' motion to dismiss	5.15	\$	325.00	\$	1,673.75
Jonathan King	1/8/2020	Kansas	Call with EG regarding edits to opposition to MTD	0.25	\$	325.00	\$	81.25

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## Children's Rights Itemized Time Entries

Jonathan King	1/8/2020	Kansas	Meetings with MN regarding edits to opposition to MTD	0.33	\$	325.00	\$	108.33
Jonathan King	1/8/2020	Kansas	Draft opposition to Defendants' motion to dismiss	7.32	\$	325.00	\$	2,377.92
Jonathan King	1/9/2020	Kansas	Draft opposition to Defendants' motion to dismiss	7.78	\$	325.00	\$	2,529.58
Jonathan King	1/10/2020	Kansas	Meeting with MN regarding draft opposition to Defendants' motion to dismiss	0.42	\$	325.00	\$	135.42
Jonathan King	1/10/2020	Kansas	Draft opposition to Defendants' motion to dismiss	7.83	\$	325.00	\$	2,545.83
Jonathan King	1/11/2020	Kansas	Draft opposition to Defendants' motion to dismiss	6.50	\$	325.00	\$	2,112.50
Jonathan King	1/13/2020	Kansas	Research case law regarding opposition to Defendants' motion to dismiss	7.17	\$	325.00	\$	2,329.17
Jonathan King	1/14/2020	Kansas	Draft opposition to Defendants' motion to dismiss	4.00	\$	325.00	\$	1,300.00
Jonathan King	1/15/2020	Kansas	Draft opposition to Defendants' motion to dismiss	1.00	\$	325.00	\$	325.00
Jonathan King	2/4/2020	Kansas	Review updates to current draft opposition to motion to dismiss and corresponding factual materials	3.30	\$	325.00	\$	1,072.50
Jonathan King	2/5/2020	Kansas	Review updated draft opposition to motion to dismiss and corresponding exhibits	1.00	\$	325.00	\$	325.00
Jonathan King	2/5/2020	Kansas	Revise draft opposition to motion to dismiss and corresponding exhibits	2.75	\$	325.00	\$	893.75

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Jonathan King	2/10/2020	Kansas	Edit draft opposition to motion to dismiss and corresponding exhibits	8.45	\$	325.00	\$	2,746.25
Jonathan King	2/11/2020	Kansas	Revise draft opposition to motion to dismiss and corresponding exhibits	2.33	\$	325.00	\$	758.33
Jonathan King	2/12/2020	Kansas	Revise and edit draft opposition to motion to dismiss and corresponding exhibits	5.43	\$	325.00	\$	1,765.83
Jonathan King	2/13/2020	Kansas	Revise and edit draft opposition to motion to dismiss and corresponding exhibits	4.42	\$	325.00	\$	1,435.42
Jonathan King	2/24/2020	Kansas	Review documents produced in response to Plaintiffs' first RFP	4.00	\$	325.00	\$	1,300.00
Jonathan King	2/25/2020	Kansas	Draft written analysis of documents produced in response to Plaintiffs' first RFP	1.52	\$	325.00	\$	492.92
Jonathan King	2/26/2020	Kansas	Conference call with team regarding status of document review, new factual findings in document review	0.35	\$	325.00	\$	113.75
Jonathan King	2/26/2020	Kansas	Continue analyzing documents produced in response to Plaintiffs' first RFP	2.78	\$	325.00	\$	904.58
Jonathan King	2/27/2020	Kansas	Meeting with team regarding status of mediation and next steps	0.50	\$	325.00	\$	162.50
Jonathan King	2/28/2020	Kansas	Call with MN and EG regarding draft ESI search terms	0.17	\$	325.00	\$	54.17
Jonathan King	2/28/2020	Kansas	Revise draft of ESI search terms	2.08	\$	325.00	\$	677.08
Jonathan King	2/29/2020	Kansas	Edit draft of ESI search terms	1.75	\$	325.00	\$	568.75
Jonathan King	3/4/2020	Kansas	Meeting with MN, NT, CG, DA, and CC regarding analysis of search terms, requests for for production, and upcoming discovery	0.50	\$	325.00	\$	162.50

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## Children's Rights Itemized Time Entries

Jonathan King	3/4/2020	Kansas	Telephone call with PJ regarding edits to ESI search terms	0.60	\$	325.00	\$	195.00
Jonathan King	3/5/2020	Kansas	Revise draft ESI search terms	1.75	\$	325.00	\$	568.75
Jonathan King	3/6/2020	Kansas	Call with PJ regarding draft ESI search terms	0.15	\$	325.00	\$	48.75
Jonathan King	3/6/2020	Kansas	Revise draft of ESI search terms	3.58	\$	325.00	\$	1,164.58
Jonathan King	3/9/2020	Kansas	Edit draft ESI search terms	2.02	\$	325.00	\$	655.42
Jonathan King	3/12/2020	Kansas	Revise draft of ESI search terms	1.42	\$	325.00	\$	460.42
Jonathan King	3/13/2020	Kansas	Review draft search terms suggestions from DLA	0.58	\$	325.00	\$	189.58
Jonathan King	3/13/2020	Kansas	Read Defendants' reply brief in support of Governor's motion to dismiss for discussion with MN and EG	0.95	\$	325.00	\$	308.75
Jonathan King	3/18/2020	Kansas	Conference call with CR team regarding discovery and ESI	0.50	\$	325.00	\$	162.50
Jonathan King	3/18/2020	Kansas	Review public materials re Defs' plans for COVID-19 with respect to placements and mental health care relevant to litigation	0.70	\$	325.00	\$	227.50
Jonathan King	3/18/2020	Kansas	Conference call with team regarding status of discovery, ESI	0.50	\$	325.00	\$	162.50
Jonathan King	3/19/2020	Kansas	Revise draft of ESI search terms	0.33	\$	325.00	\$	108.33
Jonathan King	3/19/2020	Kansas	Draft letter to defendants regarding plans for COVID-19 with respect to placements and mental health treatment	3.30	\$	325.00	\$	1,072.50
Jonathan King	3/20/2020	Kansas	Conference call with discovery subteam team regarding discovery status	0.27	\$	325.00	\$	86.67
Jonathan King	3/20/2020	Kansas	Review and analyze documents produced in response to Plaintiffs' RFP	1.65	\$	325.00	\$	536.25

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Jonathan King	3/23/2020	Kansas	Review and analyze documents produced in response to Plaintiffs' RFP	2.87	\$	325.00	\$	931.67
Jonathan King	3/25/2020	Kansas	Review and analyze documents produced in response to Plaintiffs' RFP	0.42	\$	325.00	\$	135.42
Jonathan King	3/27/2020	Kansas	Conference call with CG and MN regarding draft document request	0.25	\$	325.00	\$	81.25
Jonathan King	3/27/2020	Kansas	Call with CG regarding draft document request for COVID-19 plans	0.55	\$	325.00	\$	178.75
Jonathan King	3/27/2020	Kansas	Review guidance regarding contingency plans for COVID-19	1.87	\$	325.00	\$	606.67
Jonathan King	3/30/2020	Kansas	Review guidance regarding contingency plans for COVID-19	1.52	\$	325.00	\$	492.92
Jonathan King	3/31/2020	Kansas	Conference call with CG regarding draft RFP relating to COVID-19	0.18	\$	325.00	\$	59.58
Jonathan King	3/31/2020	Kansas	Revise and edit discovery request regarding contingency plans for COVID-19	3.87	\$	325.00	\$	1,256.67
Jonathan King	4/1/2020	Kansas	Conference call with team regarding case status, discovery projects, and potential experts	0.83	\$	325.00	\$	270.83
Jonathan King	4/1/2020	Kansas	Revise and edit discovery request regarding contingency plans for COVID-19	1.17	\$	325.00	\$	379.17
Jonathan King	4/2/2020	Kansas	Revise and edit discovery request regarding contingency plans for COVID-19	2.50	\$	325.00	\$	812.50
Jonathan King	4/13/2020	Kansas	Advise team re COVID-19 RFP and related documents in preparation for meet and confer re same	0.42	\$	325.00	\$	135.42
Jonathan King	4/20/2020	Kansas	Analyze defendants' R&Os to Plaintiffs' RFPs relating to COVID-19	1.52	\$	325.00	\$	492.92

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## Children's Rights Itemized Time Entries

Jonathan King	4/27/2020	Kansas	Closely review Defendants' privilege log	3.17	\$	325.00	\$	1,029.17
Jonathan King	4/28/2020	Kansas	Discuss with CR team re Defendants' privilege log	0.70	\$	325.00	\$	227.50
Jonathan King	4/29/2020	Kansas	Conference call with MN, NT, and CG regarding discovery issues CR will handle at upcoming meet and confer	0.33	\$	325.00	\$	108.33
Jonathan King	4/29/2020	Kansas	Review correspondence re Defendants' privilege log	0.40	\$	325.00	\$	130.00
Jonathan King	4/29/2020	Kansas	Begin review of Defendants' redaction log	1.67	\$	325.00	\$	541.67
Jonathan King	4/30/2020	Kansas	Detailed review of Defendants' redaction log with corresponding documents	3.65	\$	325.00	\$	1,186.25
Jonathan King	5/1/2020	Kansas	Attend meet and confer conference call with Defendants regarding discovery	0.80	\$	325.00	\$	260.00
Jonathan King	5/6/2020	Kansas	Call with MN regarding review of document redactions and privilege designations	0.25	\$	325.00	\$	81.25
Jonathan King	5/6/2020	Kansas	Begin drafting analysis of Defendants' privilege log	0.33	\$	325.00	\$	108.33
Jonathan King	5/7/2020	Kansas	Draft written analysis of Defendants' redaction log with corresponding documents	4.13	\$	325.00	\$	1,343.33
Jonathan King	5/8/2020	Kansas	Draft written analysis Defendants' redaction log and corresponding documents	0.93	\$	325.00	\$	303.33
Jonathan King	5/11/2020	Kansas	Continue drafting written analysis of Defendants' redaction log and corresponding materials	1.53	\$	325.00	\$	498.33

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Jonathan King	5/12/2020	Kansas	Review and analyze Defendants' redaction logs and corresponding documents	2.87	\$	325.00	\$	931.67
Jonathan King	5/13/2020	Kansas	Conference call with IL regarding proposal for Defendants' redactions	0.20	\$	325.00	\$	65.00
Jonathan King	5/13/2020	Kansas	Review and analyze Defendants' redaction logs and corresponding documents	1.38	\$	325.00	\$	449.58
Jonathan King	5/14/2020	Kansas	Advise internal CR team re privilege and redaction log in preparation for M&C including that topic	0.75	\$	325.00	\$	243.75
Jonathan King	5/27/2020	Kansas	Conference call with CR team regarding status of case, discovery, and settlement negotiations	0.67	\$	325.00	\$	216.67
Jonathan King	5/27/2020	Kansas	Closely review Defendants' settlement proposal	0.68	\$	325.00	\$	222.08
Jonathan King	5/28/2020	Kansas	Conference call with team regarding draft settlement agreement	0.50	\$	325.00	\$	162.50
Jonathan King	5/28/2020	Kansas	Review materials collected by CG in preparation for CR meeting with potential expert re brain science	0.92	\$	325.00	\$	297.92
Jonathan King	5/28/2020	Kansas	Communicate with CR team re Defendants' settlement proposal	0.32	\$	325.00	\$	102.92
Jonathan King	5/29/2020	Kansas	Draft outline in preparation for meeting with potential expert PF	1.60	\$	325.00	\$	520.00
Jonathan King	6/1/2020	Kansas	Call with IL, MN, CG, CC and potential expert	0.72	\$	325.00	\$	232.92
Jonathan King	6/2/2020	Kansas	Conduct legal research on case law regarding valid reasons for redactions	1.50	\$	325.00	\$	487.50
Jonathan King	6/3/2020	Kansas	Call with IL and MN regarding prep for settlement negotiation	0.48	\$	325.00	\$	157.08
Jonathan King	6/3/2020	Kansas	Research case law regarding redactions	1.08	\$	325.00	\$	352.08

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## Children's Rights Itemized Time Entries

Jonathan King	6/3/2020	Kansas	Review and analyze updated settlement proposal by Defendants	1.60	\$	325.00	\$	520.00
Jonathan King	6/3/2020	Kansas	Review and analyze decision granting governor's MTD to advise team re same	1.97	\$	325.00	\$	639.17
Jonathan King	6/4/2020	Kansas	Analyze Defendants' settlement proposal	0.48	\$	325.00	\$	157.08
Jonathan King	6/5/2020	Kansas	Conference call with IL, MN, EG, and EM regarding draft settlement agreement	0.58	\$	325.00	\$	189.58
Jonathan King	6/11/2020	Kansas	Analyze updated draft settlement agreement	0.50	\$	325.00	\$	162.50
Jonathan King	7/1/2020	Kansas	Conference call with team regarding status of settlement and discovery	0.58	\$	325.00	\$	189.58
Marissa Nardi	5/3/2018	Kansas	participate in team KS investigatory meeting regarding strategy for foster care investigation	1.00	\$	325.00	\$	325.00
Marissa Nardi	5/11/2018	Kansas	Prepare outline of questions to ask foster care community advocates for upcoming investigatory trip	1.65	\$	325.00	\$	536.25
Marissa Nardi	5/14/2018	Kansas	Discuss factual research from child welfare report and audits with paralegal H. Cherepon	0.48	\$	325.00	\$	157.08
Marissa Nardi	5/14/2018	Kansas	Edit written investigation plan to incorporate edits from I. Lustbader and S. Dixon	0.50	\$	325.00	\$	162.50
Marissa Nardi	5/14/2018	Kansas	meet with E. McGuinness to discuss investigation factual source materials including Medicaid contract	0.65	\$	325.00	\$	211.25
Marissa Nardi	5/14/2018	Kansas	closely review and analyze factual investigation source materials	2.90	\$	325.00	\$	942.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	5/15/2018	Kansas Travel	Investigate KS foster care system with S. Dixon, L. Welch, and L.B.B. via fact-finding meetings with foster care advocates.	4.50	\$	325.00	\$	1,462.50
Marissa Nardi	5/16/2018	Kansas Travel	Investigate KS foster care system with S. Dixon, L. Welch, and L.B.B. via fact-finding meetings with foster care advocates.	3.58	\$	325.00	\$	1,164.58
Marissa Nardi	5/17/2018	Kansas	meet with I. Lustbader to discuss Kansas investigation strategy	0.10	\$	325.00	\$	32.50
Marissa Nardi	5/17/2018	Kansas	factual research for news articles re KS child welfare system and DCF Secretary outreach	0.55	\$	325.00	\$	178.75
Marissa Nardi	5/18/2018	Kansas	read and analyze recent news articles re KS foster care system	0.30	\$	325.00	\$	97.50
Marissa Nardi	5/21/2018	Kansas	edit attorney contact memo from interview with two advocates at KC youth homeless shelter	0.72	\$	325.00	\$	232.92
Marissa Nardi	5/21/2018	Kansas	attend strategy meeting with litigation team re investigation and upcoming interviews	1.00	\$	325.00	\$	325.00
Marissa Nardi	5/24/2018	Kansas	Advise internal team re investigation and next steps for factual research	0.77	\$	325.00	\$	249.17
Marissa Nardi	5/24/2018	Kansas	Add attorney impressions to draft contact memos from meetings with advocates at KC foster and adoption group, 2 foster parents, and a former CASA	2.10	\$	325.00	\$	682.50
Marissa Nardi	5/24/2018	Kansas	draft legal research action items	0.57	\$	325.00	\$	184.17
Marissa Nardi	5/25/2018	Kansas	draft contact memos of interviews with three local civil rights attorneys and youth worker from recent investigatory trip to Kansas	2.03	\$	325.00	\$	660.83
Marissa Nardi	5/29/2018	Kansas	discuss data collection with CR, NYCL, and Foster Adopt Connect teams	0.32	\$	325.00	\$	102.92
Marissa Nardi	5/29/2018	Kansas	discuss and meet with H. Cherepon re fact-gathering for complaint drafting	0.37	\$	325.00	\$	119.17
Marissa Nardi	5/29/2018	Kansas	edit 7 contact memos for circulation to co-counsel team	2.37	\$	325.00	\$	769.17

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## Children's Rights Itemized Time Entries

Marissa Nardi	5/30/2018	Kansas	lead Kansas co-counsel call	0.75	\$	325.00	\$	243.75
Marissa Nardi	5/30/2018	Kansas	Analyze investigation notes to prepare for call with co-counsel	0.45	\$	325.00	\$	146.25
Marissa Nardi	5/31/2018	Kansas	Correspond with internal team and co-counsel re document review of newly located fact documents	0.43	\$	325.00	\$	140.83
Marissa Nardi	5/31/2018	Kansas	Begin close review of DCF Continuum of Care Grant RFP	0.65	\$	325.00	\$	211.25
Marissa Nardi	5/31/2018	Kansas	draft factual document review guidelines for internal team	0.68	\$	325.00	\$	222.08
Marissa Nardi	5/31/2018	Kansas	prepare detailed written analysis of Kansas DCF Foster Care Grant	2.53	\$	325.00	\$	823.33
Marissa Nardi	6/1/2018	Kansas	read news article re DCF lobbying restrictions and lack of oversight	0.10	\$	325.00	\$	32.50
Marissa Nardi	6/1/2018	Kansas	review new KS RFP re continuum of care	0.75	\$	325.00	\$	243.75
Marissa Nardi	6/5/2018	Kansas	prepare for and discuss upcoming Kansas trip	0.23	\$	325.00	\$	75.83
Marissa Nardi	6/5/2018	Kansas	review current draft findings of fact (FOF)	0.27	\$	325.00	\$	86.67
Marissa Nardi	6/5/2018	Kansas	revise draft summaries by H. Cherepon of her factual document review	0.33	\$	325.00	\$	108.33
Marissa Nardi	6/6/2018	Kansas	discuss legal research projects with I. Lustbader	0.08	\$	325.00	\$	27.08
Marissa Nardi	6/6/2018	Kansas	review and correspond with P. Juneja re legal research projects	0.13	\$	325.00	\$	43.33
Marissa Nardi	6/6/2018	Kansas	participate in Kansas co-counsel team mtg re complaint drafting and investigation	1.00	\$	325.00	\$	325.00
Marissa Nardi	6/7/2018	Kansas	Correspond with legal intern E. Fowler re deliberate indifference research for substantive due process (SDP) cause of action (COA) for draft complaint	0.13	\$	325.00	\$	43.33
Marissa Nardi	6/8/2018	Kansas	meet with I. Lustbader re revising FOF	0.10	\$	325.00	\$	32.50
Marissa Nardi	6/8/2018	Kansas	meet with intern V. Weber re policy research for complaint drafting	0.27	\$	325.00	\$	86.67

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	6/8/2018	Kansas	review E. Fowler's research to date re SDP COA	0.28	\$	325.00	\$	92.08
Marissa Nardi	6/8/2018	Kansas	revise FOF	0.37	\$	325.00	\$	119.17
Marissa Nardi	6/8/2018	Kansas	meet with E. Fowler re Kansas legal research on deliberate indifference	0.47	\$	325.00	\$	151.67
Marissa Nardi	6/10/2018	Kansas	research re confidential individuals with knowledge of KS foster care system for upcoming meetings	0.47	\$	325.00	\$	151.67
Marissa Nardi	6/11/2018	Kansas	correspond with co-counsel re legal research re SDP	0.08	\$	325.00	\$	27.08
Marissa Nardi	6/11/2018	Kansas	continue editing FOF	0.68	\$	325.00	\$	222.08
Marissa Nardi	6/12/2018	Kansas	discuss with H. Cherepon factual document review and analysis	0.18	\$	325.00	\$	59.58
Marissa Nardi	6/12/2018	Kansas	email with I. Lustbader re key factual allegations from FOF	0.20	\$	325.00	\$	65.00
Marissa Nardi	6/12/2018	Kansas	prepare for and meet with internal team re FOF and case development	0.52	\$	325.00	\$	167.92
Marissa Nardi	6/13/2018	Kansas	correspond with V. Weber re policy research for complaint drafting	0.25	\$	325.00	\$	81.25
Marissa Nardi	6/13/2018	Kansas	prepare for and lead Kansas co-counsel conference call	1.00	\$	325.00	\$	325.00
Marissa Nardi	6/15/2018	Kansas	correspond with L. Welch re FOF	0.13	\$	325.00	\$	43.33
Marissa Nardi	6/15/2018	Kansas	meet and discuss with E. McGuinness Kansas FOF, research tasks, and strategy	0.47	\$	325.00	\$	151.67
Marissa Nardi	6/15/2018	Kansas	Lead internal CR team meeting re Kansas investigation and projects	1.00	\$	325.00	\$	325.00
Marissa Nardi	6/19/2018	Kansas	meet with E. Fowler re deliberate indifference legal research	0.50	\$	325.00	\$	162.50
Marissa Nardi	6/20/2018	Kansas	correspond with co-counsel re upcoming group call and strategy	0.38	\$	325.00	\$	124.58
Marissa Nardi	6/20/2018	Kansas	participate in Kansas co-counsel team call re complaint and stakeholder strategy	1.32	\$	325.00	\$	427.92

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Marissa Nardi	6/21/2018	Kansas	meet with paralegal H. Cherepon re fact development as to deliberate indifference	1.00	\$	325.00	\$	325.00
Marissa Nardi	6/25/2018	Kansas	Meet with external co-counsel team re complaint drafting and investigatory meetings with individuals on the group	1.42	\$	325.00	\$	460.42
Marissa Nardi	6/25/2018	Kansas	conduct legal research re EPSDT	3.92	\$	325.00	\$	1,272.92
Marissa Nardi	6/27/2018	Kansas	Strategy conference call with co-counsel team	0.25	\$	325.00	\$	81.25
Marissa Nardi	6/29/2018	Kansas	continue conducting legal research re EPSDT COA	2.15	\$	325.00	\$	698.75
Marissa Nardi	7/1/2018	Kansas	conduct EPSDT research	4.07	\$	325.00	\$	1,321.67
Marissa Nardi	7/2/2018	Kansas	add additional factual research into FOF	0.80	\$	325.00	\$	260.00
Marissa Nardi	7/2/2018	Kansas	Draft written summary of EPSDT research for circulation to team	0.88	\$	325.00	\$	287.08
Marissa Nardi	7/3/2018	Kansas	Advise E. Fowler re legal research re SDP	0.25	\$	325.00	\$	81.25
Marissa Nardi	7/3/2018	Kansas	Discuss key updates to FOF with internal team	0.42	\$	325.00	\$	135.42
Marissa Nardi	7/3/2018	Kansas	Review new fact documents re ESPDT to incorporate into FOF	0.92	\$	325.00	\$	297.92
Marissa Nardi	7/17/2018	Kansas	correspond with team re edits to FOF	0.13	\$	325.00	\$	43.33
Marissa Nardi	7/18/2018	Kansas	follow up from KS team meeting re local KS youth advocate contacts	0.17	\$	325.00	\$	54.17
Marissa Nardi	7/18/2018	Kansas	prepare for team meeting	0.17	\$	325.00	\$	54.17
Marissa Nardi	7/18/2018	Kansas	participate in Kansas external co-counsel team meeting re complaint drafting and new facts	0.92	\$	325.00	\$	297.92
Marissa Nardi	7/19/2018	Kansas	correspond with team re setting up call w B. Magnuson at Kansas Appleseed re potential collaboration	0.22	\$	325.00	\$	70.42
Marissa Nardi	7/23/2018	Kansas	correspond with team re call with Kansas Appleseed and next steps re co-counseling	0.17	\$	325.00	\$	54.17
Marissa Nardi	7/24/2018	Kansas	participate in call with Kansas Appleseed re factual development and potential collaboration	1.00	\$	325.00	\$	325.00

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Marissa Nardi	7/25/2018	Kansas	follow-up correspondence with Kansas Appleseed	0.17	\$	325.00	\$	54.17
Marissa Nardi	7/25/2018	Kansas	review new factual documents from KS foster care news monitoring for incorporation into FOF	0.75	\$	325.00	\$	243.75
Marissa Nardi	7/26/2018	Kansas	correspond with co-counsel team re next steps re Kansas Appleseed collaboration	0.17	\$	325.00	\$	54.17
Marissa Nardi	7/28/2018	Kansas	review new factual documents re deliberate indifference to incorporate into FOF	1.37	\$	325.00	\$	444.17
Marissa Nardi	7/29/2018	Kansas	Edit FOF section re mental health care	0.75	\$	325.00	\$	243.75
Marissa Nardi	7/31/2018	Kansas	prepare draft retainer agreement	0.30	\$	325.00	\$	97.50
Marissa Nardi	7/31/2018	Kansas	participate in team external co-counsel agreement re FOF, complaint drafting, and collaboration	0.33	\$	325.00	\$	108.33
Marissa Nardi	8/1/2018	Kansas	participate in follow-up call with B. Magnuson	1.08	\$	325.00	\$	352.08
Marissa Nardi	8/6/2018	Kansas	discuss latest interviews with foster parents with Erin McGuinness	0.22	\$	325.00	\$	70.42
Marissa Nardi	8/6/2018	Kansas	correspond with D. Adamek, I. Lustbader, and E. McGuinness re FOF	0.22	\$	325.00	\$	70.42
Marissa Nardi	8/6/2018	Kansas	correspond with I. Lustbader, P. Juneja, and E. McGuinness re review of FOF	0.50	\$	325.00	\$	162.50
Marissa Nardi	8/6/2018	Kansas	review contact memorandum from recent meeting with foster parent	0.63	\$	325.00	\$	205.83
Marissa Nardi	8/7/2018	Kansas	edit and supervise updates to finding of fact	0.87	\$	325.00	\$	281.67
Marissa Nardi	8/7/2018	Kansas	review EPSDT legal research re private right of action	0.87	\$	325.00	\$	281.67
Marissa Nardi	8/7/2018	Kansas	Edit FOF section re missing foster youth	1.33	\$	325.00	\$	433.33
Marissa Nardi	8/8/2018	Kansas	Review recent contact memos in preparation for Kansas team meeting	0.22	\$	325.00	\$	70.42

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	8/8/2018	Kansas	review updated draft memo by E. Fowler re EPSDT pleading requirements	0.55	\$	325.00	\$	178.75
Marissa Nardi	8/8/2018	Kansas	help lead Kansas co-counsel team meeting re complaint drafting and fact updates from investigation (and time reflects needing to leave the meeting early)	0.87	\$	325.00	\$	281.67
Marissa Nardi	8/8/2018	Kansas	Edit FOF section re missing foster youth	1.03	\$	325.00	\$	335.83
Marissa Nardi	8/10/2018	Kansas	Edit new 8-10 version of FOF	1.33	\$	325.00	\$	433.33
Marissa Nardi	8/10/2018	Kansas	Edit draft EPSDT legal research memo by E. Fowler	1.57	\$	325.00	\$	509.17
Marissa Nardi	8/13/2018	Kansas	correspond with L. Welch re B. Magnuson contact	0.08	\$	325.00	\$	27.08
Marissa Nardi	8/13/2018	Kansas	Discuss call with I. Lustbader re co-counsel and strategy	0.12	\$	325.00	\$	37.92
Marissa Nardi	8/15/2018	Kansas	meeting with D. Adamek and E. McGuinness re factual research for complaint EPSDT COA	0.30	\$	325.00	\$	97.50
Marissa Nardi	8/15/2018	Kansas	review updated EPSDT memo by E. Fowler	0.48	\$	325.00	\$	157.08
Marissa Nardi	8/15/2018	Kansas	participate in external co-counsel team meeting re factual investigation updates, co-counsel partnerships, and complaint drafting	0.98	\$	325.00	\$	319.58
Marissa Nardi	8/16/2018	Kansas	Discuss follow-up with internal CR team re tasks from Kansas call	0.33	\$	325.00	\$	108.33
Marissa Nardi	8/20/2018	Kansas	correspond with E. McGuinness and D. Adamek re FOF and contact memos	0.25	\$	325.00	\$	81.25
Marissa Nardi	8/20/2018	Kansas	correspond with S. Dixon and E. McGuinness re Kansas meetings with foster parent stakeholders	0.37	\$	325.00	\$	119.17
Marissa Nardi	8/21/2018	Kansas	discuss next steps re FOF with D. Adamek	0.08	\$	325.00	\$	27.08
Marissa Nardi	8/21/2018	Kansas	discuss updates to FOF with I. Lustbader	0.25	\$	325.00	\$	81.25

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	8/22/2018	Kansas	Correspond with S. Dixon, team, and new contact re potential next friend relationship	0.25	\$	325.00	\$	81.25
Marissa Nardi	8/22/2018	Kansas	Begin legal analysis of EPSDT COAs in other foster care and civil rights litigations	0.30	\$	325.00	\$	97.50
Marissa Nardi	8/22/2018	Kansas	Edit FOF re EPSDT issues	0.45	\$	325.00	\$	146.25
Marissa Nardi	8/22/2018	Kansas	help lead co-counsel team meeting re complaint drafting and investigatory updates	0.93	\$	325.00	\$	303.33
Marissa Nardi	8/24/2018	Kansas	correspond with F. Pitts re complaint drafting	0.23	\$	325.00	\$	75.83
Marissa Nardi	8/27/2018	Kansas	meet with Ira, Freya, and Amanda re deliberate indifference	1.20	\$	325.00	\$	390.00
Marissa Nardi	8/28/2018	Kansas	prepare for and correspond with internal CR team re Kansas external co-counsel meeting	0.30	\$	325.00	\$	97.50
Marissa Nardi	8/28/2018	Kansas	participate in Kansas group call re complaint drafting	0.52	\$	325.00	\$	167.92
Marissa Nardi	9/11/2018	Kansas	correspond with E. McGuinness re complaint drafting	0.10	\$	325.00	\$	32.50
Marissa Nardi	9/12/2018	Kansas	meet with JK EMG and DA re legal, policy, and fact research for complaint COAs	0.25	\$	325.00	\$	81.25
Marissa Nardi	9/13/2018	Kansas	prepare for KS joint co-counsel call re complaint drafting and investigation	0.25	\$	325.00	\$	81.25
Marissa Nardi	9/14/2018	Kansas	meet with I. Lustbader and J. King re Kansas legal research	0.50	\$	325.00	\$	162.50
Marissa Nardi	9/18/2018	Kansas	read KS news articles with new info re foster care grantees	0.42	\$	325.00	\$	135.42
Marissa Nardi	10/1/2018	Kansas	review latest relevant news articles re KS foster care system circulated by D. Adamek	0.17	\$	325.00	\$	54.17
Marissa Nardi	10/1/2018	Kansas	correspond with D. Adamek re sourcing for draft complaint	0.33	\$	325.00	\$	108.33
Marissa Nardi	10/1/2018	Kansas	meeting with I. Lustbader re complaint drafting	1.00	\$	325.00	\$	325.00
Marissa Nardi	10/2/2018	Kansas	prepare for upcoming trip to Kansas re investigation and complaint	0.32	\$	325.00	\$	102.92

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	10/2/2018	Kansas	analyze research memorandum re 10th Circuit post-Walmart class certification standards	0.47	\$	325.00	\$	151.67
Marissa Nardi	10/3/2018	Kansas	correspond with S. Dixon re foster parent research	0.17	\$	325.00	\$	54.17
Marissa Nardi	10/3/2018	Kansas	review updated class certification legal research	0.25	\$	325.00	\$	81.25
Marissa Nardi	10/3/2018	Kansas	analyze potential Next Friends (NFs) and Named Plaintiffs (NPs)	0.25	\$	325.00	\$	81.25
Marissa Nardi	10/3/2018	Kansas	Advise E. McGuinness re research project on trauma-informed care for complaint drafting	0.33	\$	325.00	\$	108.33
Marissa Nardi	10/3/2018	Kansas	participate in Kansas co-counsel meeting re complaint drafting and selecting NPs & NFs	1.00	\$	325.00	\$	325.00
Marissa Nardi	10/5/2018	Kansas	correspond with internal team re stakeholder contact at disability advocacy group	0.08	\$	325.00	\$	27.08
Marissa Nardi	10/7/2018	Kansas	prepare with I. Lustbader for stakeholder meeting with foster parent	0.57	\$	325.00	\$	184.17
Marissa Nardi	10/9/2018	Kansas	participate in meeting with foster parent re KS foster care night to nights	1.00	\$	325.00	\$	325.00
Marissa Nardi	10/9/2018	Kansas Travel	travel from home in NY to NY airport to KC airport to Kansas hotel for foster care investigation fact-finding and complaint drafting trip	3.12	\$	325.00	\$	1,012.92
Marissa Nardi	10/10/2018	Kansas Travel	travel from KC to KC airport to NY airport to home in NY for foster care investigation fact-finding and complaint drafting trip	2.40	\$	325.00	\$	780.00
Marissa Nardi	10/10/2018	Kansas	prepare for meeting with co-counsel re updated stakeholder outreach, complaint drafting, and new facts	0.22	\$	325.00	\$	70.42
Marissa Nardi	10/10/2018	Kansas	participate in in-depth in-person meeting with co-counsel I. Lustbader, LBB, L. Welch, F. Pitts, and L. Rute re complaint drafting, including potential NPs and NFs, COAs, key allegations, and Defendants to name	3.67	\$	325.00	\$	1,191.67

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	10/15/2018	Kansas	correspond with E. McGuinness re foster care policies for complaint drafting	0.17	\$	325.00	\$	54.17
Marissa Nardi	10/16/2018	Kansas	meet with external co-counsel team members re complaint drafting and named plaintiffs	0.50	\$	325.00	\$	162.50
Marissa Nardi	10/17/2018	Kansas	lead internal Kansas team meeting re complaint drafting	1.00	\$	325.00	\$	325.00
Marissa Nardi	10/17/2018	Kansas	participate in weekly KS co-counsel call re complaint drafting	0.92	\$	325.00	\$	297.92
Marissa Nardi	10/18/2018	Kansas	meeting w I. Lustbader and E. Hyne re complaint drafting	0.55	\$	325.00	\$	178.75
Marissa Nardi	10/19/2018	Kansas	correspond with I. Lustbader re factual support for complaint	0.20	\$	325.00	\$	65.00
Marissa Nardi	10/19/2018	Kansas	correspond with team re strategy re complaint drafting	0.33	\$	325.00	\$	108.33
Marissa Nardi	10/22/2018	Kansas	correspond with I. Lustbader re FOIA and CORA research	0.32	\$	325.00	\$	102.92
Marissa Nardi	10/23/2018	Kansas	meeting with internal team re complaint outline	0.50	\$	325.00	\$	162.50
Marissa Nardi	10/24/2018	Kansas	prepare for co-counsel meeting re litigation strategy	0.38	\$	325.00	\$	124.58
Marissa Nardi	10/25/2018	Kansas	begin writing NP sections of draft complaint	2.92	\$	325.00	\$	947.92
Marissa Nardi	10/26/2018	Kansas	begin drafting complaint factual allegations section	8.18	\$	325.00	\$	2,659.58
Marissa Nardi	10/27/2018	Kansas	continue drafting complaint factual allegation sections	12.57	\$	325.00	\$	4,084.17
Marissa Nardi	10/29/2018	Kansas	Advise J. King and E. McGuinness re their respective complaint draft sections	1.37	\$	325.00	\$	444.17
Marissa Nardi	10/29/2018	Kansas	draft complaint factual allegation sections	8.82	\$	325.00	\$	2,865.42
Marissa Nardi	10/30/2018	Kansas	edit complaint sections by J. King	2.78	\$	325.00	\$	904.58
Marissa Nardi	10/30/2018	Kansas	draft complaint factual allegation sections	5.25	\$	325.00	\$	1,706.25
Marissa Nardi	11/2/2018	Kansas	correspond with team regarding complaint drafting	0.27	\$	325.00	\$	86.67
Marissa Nardi	11/2/2018	Kansas	Closely analyze new potential sources for complaint	2.13	\$	325.00	\$	693.33

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	11/5/2018	Kansas	correspond with internal Kansas team re EPSDT research	0.20	\$	325.00	\$	65.00
Marissa Nardi	11/5/2018	Kansas	review contact memo from S. Dixon re new next friends	0.32	\$	325.00	\$	102.92
Marissa Nardi	11/5/2018	Kansas	review draft Kansas complaint	0.85	\$	325.00	\$	276.25
Marissa Nardi	11/6/2018	Kansas	discuss Named Plaintiff strategy with S. Dixon	0.13	\$	325.00	\$	43.33
Marissa Nardi	11/6/2018	Kansas	discuss with F. Pitts re model complaint and complaint strategy	0.25	\$	325.00	\$	81.25
Marissa Nardi	11/6/2018	Kansas	Correspond re Kansas potential new Governor as it relates to naming Defendants in the complaint	0.80	\$	325.00	\$	260.00
Marissa Nardi	11/7/2018	Kansas	correspond with B. Magnuson re KORA request	0.10	\$	325.00	\$	32.50
Marissa Nardi	11/7/2018	Kansas	review current draft named plaintiff section of complaint	0.17	\$	325.00	\$	54.17
Marissa Nardi	11/7/2018	Kansas	Circulate draft named plaintiff section to co-counsel	0.22	\$	325.00	\$	70.42
Marissa Nardi	11/7/2018	Kansas	discuss complaint sources with D. Adamek	0.33	\$	325.00	\$	108.33
Marissa Nardi	11/7/2018	Kansas	discuss FOIA/KORA with D. Adamek and I. Lustbader	0.40	\$	325.00	\$	130.00
Marissa Nardi	11/7/2018	Kansas	discuss with I. Lustbader and J. King substantive due process research	0.45	\$	325.00	\$	146.25
Marissa Nardi	11/7/2018	Kansas	Advise D. Adamek on collecting sources for draft complaint	0.50	\$	325.00	\$	162.50
Marissa Nardi	11/7/2018	Kansas	Edit current draft named plaintiff section of complaint	0.58	\$	325.00	\$	189.58
Marissa Nardi	11/7/2018	Kansas	Participate in co-counsel call re updated draft of complaint	1.00	\$	325.00	\$	325.00
Marissa Nardi	11/7/2018	Kansas	Begin researching substantive due process re night-to-night placements	1.25	\$	325.00	\$	406.25
Marissa Nardi	11/8/2018	Kansas	discuss research project re substantive due process with J. King and I. Lustbader	0.30	\$	325.00	\$	97.50
Marissa Nardi	11/8/2018	Kansas	edit draft Kansas complaint allegations re night-to-night placements	0.78	\$	325.00	\$	254.58

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## Children's Rights Itemized Time Entries

Marissa Nardi	11/8/2018	Kansas	meeting with D. Adamek, I. Lustbader, and E. McGuinness re complaint drafting	0.88	\$	325.00	\$	287.08
Marissa Nardi	11/8/2018	Kansas	conduct legal research re substantive due process re placements	1.92	\$	325.00	\$	622.92
Marissa Nardi	11/8/2018	Kansas	supervise D. Adamek in factual research for new draft complaint allegations	0.80	\$	325.00	\$	260.00
Marissa Nardi	11/9/2018	Kansas	review redline of draft Kansas complaint	0.70	\$	325.00	\$	227.50
Marissa Nardi	11/9/2018	Kansas	analyze potential sources for draft complaint allegations	1.28	\$	325.00	\$	417.08
Marissa Nardi	11/9/2018	Kansas	participate in Kansas team co-counsel meeting re draft complaint and locating NPs	1.00	\$	325.00	\$	325.00
Marissa Nardi	11/9/2018	Kansas	edit draft complaint allegations	3.80	\$	325.00	\$	1,235.00
Marissa Nardi	11/9/2018	Kansas	draft memorandum analyzing night-to-night legal research to inform complaint	3.85	\$	325.00	\$	1,251.25
Marissa Nardi	11/10/2018	Kansas	Discuss with CR Kansas team draft complaint	0.63	\$	325.00	\$	205.83
Marissa Nardi	11/10/2018	Kansas	Call with foster parent re night-to-nights	0.67	\$	325.00	\$	216.67
Marissa Nardi	11/10/2018	Kansas	Discuss and fill gaps in complaint with F. Pitts and D. Adamek	3.13	\$	325.00	\$	1,018.33
Marissa Nardi	11/10/2018	Kansas	Edit draft complaint	8.32	\$	325.00	\$	2,702.92
Marissa Nardi	11/11/2018	Kansas	Supervise complaint allegation sourcing	1.32	\$	325.00	\$	427.92
Marissa Nardi	11/11/2018	Kansas	Edit updated draft complaint	8.73	\$	325.00	\$	2,838.33
Marissa Nardi	11/12/2018	Kansas	Prepare for Kansas co-counsel team call by reviewing latest emails re NPs	0.32	\$	325.00	\$	102.92
Marissa Nardi	11/12/2018	Kansas	correspond with D. Adamek and I. Lustbader re follow-up tasks for complaint	0.55	\$	325.00	\$	178.75
Marissa Nardi	11/12/2018	Kansas	attend part of Kansas co-counsel team call meeting re NPs/NFs and complaint drafting (left early)	0.75	\$	325.00	\$	243.75
Marissa Nardi	11/12/2018	Kansas	review Sheila A. complaint documents to prepare related complaint filings here	1.83	\$	325.00	\$	595.83
Marissa Nardi	11/12/2018	Kansas	edit draft complaint	6.07	\$	325.00	\$	1,971.67
Marissa Nardi	11/13/2018	Kansas	correspond with team re Senate Bill 367	0.27	\$	325.00	\$	86.67

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	11/13/2018	Kansas	review new draft Named Plaintiff write-ups	0.48	\$	325.00	\$	157.08
Marissa Nardi	11/13/2018	Kansas	analyze Defendant's Facebook live video for incorporation into the complaint	0.53	\$	325.00	\$	173.33
Marissa Nardi	11/13/2018	Kansas	edit draft legal research memo re night-to-nights	1.80	\$	325.00	\$	585.00
Marissa Nardi	11/13/2018	Kansas	edit draft complaint COAs and introduction	7.57	\$	325.00	\$	2,459.17
Marissa Nardi	11/14/2018	Kansas	correspond with co-counsel L. Rute and I. Lustbader re complaint filing plan	0.33	\$	325.00	\$	108.33
Marissa Nardi	11/14/2018	Kansas	Discuss call with foster parent re night-to-night placements	0.55	\$	325.00	\$	178.75
Marissa Nardi	11/14/2018	Kansas	Research local filing requirements specific to D. Kan.	0.82	\$	325.00	\$	265.42
Marissa Nardi	11/14/2018	Kansas	Edit draft complaint	1.00	\$	325.00	\$	325.00
Marissa Nardi	11/14/2018	Kansas	Participate in call with co-counsel re edits to draft complaint	0.58	\$	325.00	\$	189.58
Marissa Nardi	11/14/2018	Kansas	Edit draft Kansas complaint sections re class and fact allegations and Defendants	6.93	\$	325.00	\$	2,253.33
Marissa Nardi	11/15/2018	Kansas	correspond with E. Gretter re motion to use pseudonyms	0.18	\$	325.00	\$	59.58
Marissa Nardi	11/15/2018	Kansas	call with internal teams re updated complaint draft	1.65	\$	325.00	\$	536.25
Marissa Nardi	11/16/2018	Kansas	Monitor news re Kansas foster care system	0.45	\$	325.00	\$	146.25
Marissa Nardi	11/16/2018	Kansas	Correspond with local KS law firm re complaint filing and necessary summonses	1.55	\$	325.00	\$	503.75
Marissa Nardi	11/16/2018	Kansas	Edit final complaint draft	6.27	\$	325.00	\$	2,036.67
Marissa Nardi	11/18/2018	Kansas	correspond with D. Adamek re summonses	0.10	\$	325.00	\$	32.50
Marissa Nardi	11/19/2018	Kansas	discuss preparation of annotated complaint with D. Adamek	0.30	\$	325.00	\$	97.50
Marissa Nardi	11/19/2018	Kansas	meet with D. Adamek re service of summonses	0.50	\$	325.00	\$	162.50
Marissa Nardi	11/19/2018	Kansas	finalize service of process with D. Adamek	0.92	\$	325.00	\$	297.92
Marissa Nardi	11/19/2018	Kansas	discuss service of complaint with co-counsel	1.58	\$	325.00	\$	514.58
Marissa Nardi	11/20/2018	Kansas	review J. King's legal research re D. Kan. and MTDs	0.32	\$	325.00	\$	102.92

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	11/20/2018	Kansas	discuss motion to use pseudonyms with co-counsel team	0.40	\$	325.00	\$	130.00
Marissa Nardi	11/20/2018	Kansas	prepare potential edits for first amended complaint	0.42	\$	325.00	\$	135.42
Marissa Nardi	11/20/2018	Kansas	correspond with co-counsel re pro hac vice forms	0.47	\$	325.00	\$	151.67
Marissa Nardi	11/20/2018	Kansas	discuss receipt of service with J. King, D. Adamek, and I. Lustbader	0.55	\$	325.00	\$	178.75
Marissa Nardi	11/20/2018	Kansas	correspond with L. Rute re service via email	0.65	\$	325.00	\$	211.25
Marissa Nardi	11/20/2018	Kansas	Advise D. Adamek on preparation on pro hac vice forms	1.38	\$	325.00	\$	449.58
Marissa Nardi	11/20/2018	Kansas	prepare detailed written plan for service of process	0.73	\$	325.00	\$	238.33
Marissa Nardi	11/29/2018	Kansas	meeting with I. Lustbader re complaint follow-up	0.50	\$	325.00	\$	162.50
Marissa Nardi	11/29/2018	Kansas	discuss receipts of service with D. Adamek and J. King	0.80	\$	325.00	\$	260.00
Marissa Nardi	11/30/2018	Kansas	discuss return receipts for filing proof of service with D. Adamek and J. King	0.78	\$	325.00	\$	254.58
Marissa Nardi	11/30/2018	Kansas	edit draft proof of service	0.85	\$	325.00	\$	276.25
Marissa Nardi	12/3/2018	Kansas	discuss service of J. Colyer's summonses with D. Adamek	0.23	\$	325.00	\$	75.83
Marissa Nardi	12/3/2018	Kansas	supervise D. Adamek re editing certificates of service	0.70	\$	325.00	\$	227.50
Marissa Nardi	12/4/2018	Kansas	Edit proof of service for Def. Hummel	0.30	\$	325.00	\$	97.50
Marissa Nardi	12/4/2018	Kansas	Advise D. Adamek and J. King re editing remaining proofs of service	0.40	\$	325.00	\$	130.00
Marissa Nardi	12/4/2018	Kansas	factual research re return receipt delivery for Def. Hummel	0.53	\$	325.00	\$	173.33
Marissa Nardi	12/5/2018	Kansas	meeting with I. Lustbader in preparation for upcoming co-counsel call re litigation strategy	0.75	\$	325.00	\$	243.75
Marissa Nardi	12/5/2018	Kansas	co-counsel meeting re complaint service, preparation for first conference, and complaint amendments	1.42	\$	325.00	\$	460.42

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	12/6/2018	Kansas	review edited draft proofs of service	0.22	\$	325.00	\$	70.42
Marissa Nardi	12/6/2018	Kansas	discuss AG's request for extension with co-counsel	0.30	\$	325.00	\$	97.50
Marissa Nardi	12/6/2018	Kansas	finalize proofs of service	0.60	\$	325.00	\$	195.00
Marissa Nardi	12/11/2018	Kansas	discuss pro hac vice form for B. Magnuson	0.22	\$	325.00	\$	70.42
Marissa Nardi	12/12/2018	Kansas	participate in Kansas call meeting with co-counsel re fact development	0.50	\$	325.00	\$	162.50
Marissa Nardi	12/18/2018	Kansas	edit draft litigation holds	0.22	\$	325.00	\$	70.42
Marissa Nardi	1/2/2019	Kansas	analyze legal research re KS motions for extension with J. King	0.33	\$	325.00	\$	108.33
Marissa Nardi	1/2/2019	Kansas	analyze current draft response to Defendants' request for an extension	0.42	\$	325.00	\$	135.42
Marissa Nardi	1/2/2019	Kansas	discuss legal research with I. Lustbader and J. King re standard for granting extension	0.37	\$	325.00	\$	119.17
Marissa Nardi	1/2/2019	Kansas	correspond with team re strategy for response to Defendants' motion for an extension	0.92	\$	325.00	\$	297.92
Marissa Nardi	1/2/2019	Kansas	attend weekly co-counsel team meeting re litigation strategy	0.93	\$	325.00	\$	303.33
Marissa Nardi	1/3/2019	Kansas	prepare written analysis of Defendants' motion for extension of time to file answer as it relates to our draft opposition	0.43	\$	325.00	\$	140.83
Marissa Nardi	1/3/2019	Kansas	edit draft opposition to motion for extension of time to file response to complaint	3.02	\$	325.00	\$	980.42
Marissa Nardi	1/4/2019	Kansas	Advise internal CR team on motion in opposition for extension of time	0.55	\$	325.00	\$	178.75
Marissa Nardi	1/4/2019	Kansas	edit motion in opposition for extension of time	1.50	\$	325.00	\$	487.50
Marissa Nardi	1/8/2019	Kansas	read news article re KS foster care system	0.12	\$	325.00	\$	37.92
Marissa Nardi	1/8/2019	Kansas	draft discovery plan	0.43	\$	325.00	\$	140.83
Marissa Nardi	1/8/2019	Kansas	Review legal research re class certification strategy	0.48	\$	325.00	\$	157.08
Marissa Nardi	1/9/2019	Kansas	review email correspondence re KS foster care placement	0.08	\$	325.00	\$	27.08

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	1/9/2019	Kansas	meeting with internal team to discuss case strategy updates	0.08	\$	325.00	\$	27.08
Marissa Nardi	1/9/2019	Kansas	correspond with C. Connaughton re notes from joint call with co-counsel re strategy for court conference	0.17	\$	325.00	\$	54.17
Marissa Nardi	1/9/2019	Kansas	Telephone call with call with I. Lustbader re strategy for upcoming court conference	0.30	\$	325.00	\$	97.50
Marissa Nardi	1/9/2019	Kansas	attend weekly co-counsel telephonic meeting re strategy for litigation and upcoming conference (and left early)	0.38	\$	325.00	\$	124.58
Marissa Nardi	1/10/2019	Kansas	Review revised litigation hold	0.18	\$	325.00	\$	59.58
Marissa Nardi	1/11/2019	Kansas	attend court conference re motion hearing	0.42	\$	325.00	\$	135.42
Marissa Nardi	1/15/2019	Kansas	Review updated litigation hold	0.13	\$	325.00	\$	43.33
Marissa Nardi	1/15/2019	Kansas	Discuss litigation hold considerations with internal CR KS team	0.27	\$	325.00	\$	86.67
Marissa Nardi	1/16/2019	Kansas	debrief with internal CR KS team re next steps for follow-up from litigation strategy call	0.08	\$	325.00	\$	27.08
Marissa Nardi	1/16/2019	Kansas	prepare for meeting re litigation strategy	0.12	\$	325.00	\$	37.92
Marissa Nardi	1/16/2019	Kansas	participate in Kansas weekly co-counsel team telephonic meeting re litigation strategy, including litigation hold and initial discovery	0.92	\$	325.00	\$	297.92
Marissa Nardi	1/18/2019	Kansas	Discuss notice of appearance for co-counsel	0.20	\$	325.00	\$	65.00
Marissa Nardi	1/23/2019	Kansas	attend team meeting re protective order	0.53	\$	325.00	\$	173.33
Marissa Nardi	1/30/2019	Kansas	attend co-counsel team call re initial discovery	0.38	\$	325.00	\$	124.58
Marissa Nardi	2/3/2019	Kansas	email with co-counsel re NP fact update	0.30	\$	325.00	\$	97.50
Marissa Nardi	2/7/2019	Kansas	review correspondence with opposing counsel re PO	0.17	\$	325.00	\$	54.17
Marissa Nardi	2/7/2019	Kansas	discuss case strategy re PO with co-counsel	0.33	\$	325.00	\$	108.33
Marissa Nardi	2/8/2019	Kansas	attend draft settlement terms sheet meeting	1.50	\$	325.00	\$	487.50
Marissa Nardi	2/8/2019	Kansas	edit draft settlement terms	2.85	\$	325.00	\$	926.25
Marissa Nardi	2/11/2019	Kansas	review operative draft terms sheet for settlement purposes	0.30	\$	325.00	\$	97.50
Marissa Nardi	2/11/2019	Kansas	Edit draft terms sheet	0.83	\$	325.00	\$	270.83

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## Children's Rights Itemized Time Entries

Marissa Nardi	2/11/2019	Kansas	meeting with internal team to strategize and edit substance of draft proposed settlement terms sheet	1.50	\$	325.00	\$	487.50
Marissa Nardi	2/12/2019	Kansas	review C. Connaughton's notes from KS Task Force Recommendations re fact issues in litigation	0.47	\$	325.00	\$	151.67
Marissa Nardi	2/12/2019	Kansas	read final KS task force recommendations	0.70	\$	325.00	\$	227.50
Marissa Nardi	2/13/2019	Kansas	edit draft terms sheet	0.62	\$	325.00	\$	200.42
Marissa Nardi	2/13/2019	Kansas	continue editing draft terms sheet	1.50	\$	325.00	\$	487.50
Marissa Nardi	2/13/2019	Kansas	meeting with co-counsel re case updates and ongoing litigation strategy	1.38	\$	325.00	\$	449.58
Marissa Nardi	2/19/2019	Kansas	discuss co-counsel update with IL	0.12	\$	325.00	\$	37.92
Marissa Nardi	2/19/2019	Kansas	discuss NP updates with co-counsel team	0.47	\$	325.00	\$	151.67
Marissa Nardi	2/19/2019	Kansas	edit draft terms sheet	2.22	\$	325.00	\$	720.42
Marissa Nardi	2/20/2019	Kansas	prepare for team meeting	0.20	\$	325.00	\$	65.00
Marissa Nardi	2/20/2019	Kansas	discuss updated draft terms sheet with IL	0.30	\$	325.00	\$	97.50
Marissa Nardi	2/20/2019	Kansas	discuss updates re next friend with internal team	0.33	\$	325.00	\$	108.33
Marissa Nardi	2/20/2019	Kansas	review potential settlement documents	0.33	\$	325.00	\$	108.33
Marissa Nardi	2/20/2019	Kansas	discuss PO with EMG	0.42	\$	325.00	\$	135.42
Marissa Nardi	2/20/2019	Kansas	attend weekly co-counsel meeting re NP/NF updates and discovery strategy	0.60	\$	325.00	\$	195.00
Marissa Nardi	2/25/2019	Kansas	discuss hearing transcript project with C. Connaughton	0.25	\$	325.00	\$	81.25
Marissa Nardi	2/27/2019	Kansas	attend team meeting with co-counsel re discovery and mediation strategy	1.00	\$	325.00	\$	325.00
Marissa Nardi	3/13/2019	Kansas	discuss acknowledgements with team	0.32	\$	325.00	\$	102.92
Marissa Nardi	3/13/2019	Kansas	discuss electronic document management system with co-counsel	0.33	\$	325.00	\$	108.33
Marissa Nardi	3/13/2019	Kansas	prepare for Kansas co-counsel call	0.37	\$	325.00	\$	119.17
Marissa Nardi	3/13/2019	Kansas	analyze and share relevant caselaw with co-counsel team	0.93	\$	325.00	\$	303.33

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## Children's Rights Itemized Time Entries

Marissa Nardi	3/13/2019	Kansas	attend Kansas co-counsel meeting re discovery	0.83	\$	325.00	\$	270.83
Marissa Nardi	3/18/2019	Kansas	prepare plans for document management system with co-counsel	0.42	\$	325.00	\$	135.42
Marissa Nardi	3/19/2019	Kansas	email team in preparation for upcoming co-counsel meeting re case strategy	0.30	\$	325.00	\$	97.50
Marissa Nardi	3/19/2019	Kansas	prepare for meeting with co-counsel	0.27	\$	325.00	\$	86.67
Marissa Nardi	3/19/2019	Kansas	analyze substantive due process claims	0.83	\$	325.00	\$	270.83
Marissa Nardi	3/20/2019	Kansas	meet with internal Kansas team re case strategy	0.50	\$	325.00	\$	162.50
Marissa Nardi	3/20/2019	Kansas	attend in-person co-counsel strategy meeting at DLA office re discovery and MTD	3.00	\$	325.00	\$	975.00
Marissa Nardi	3/21/2019	Kansas	internal CR legal research meeting re MTD	0.32	\$	325.00	\$	102.92
Marissa Nardi	3/22/2019	Kansas	discuss SDP research with C. Connaughton and J. King	0.55	\$	325.00	\$	178.75
Marissa Nardi	4/1/2019	Kansas	discuss electronic document storage with co-counsel	0.23	\$	325.00	\$	75.83
Marissa Nardi	4/1/2019	Kansas	discuss recent news article re KS foster care system with D. Adamek	0.32	\$	325.00	\$	102.92
Marissa Nardi	4/1/2019	Kansas	review legislative post audit reports	0.40	\$	325.00	\$	130.00
Marissa Nardi	4/3/2019	Kansas	email with clerk re filings	0.17	\$	325.00	\$	54.17
Marissa Nardi	4/3/2019	Kansas	discuss fact-gathering with CR co-counsel	0.28	\$	325.00	\$	92.08
Marissa Nardi	4/3/2019	Kansas	review latest correspondence re discovery	0.32	\$	325.00	\$	102.92
Marissa Nardi	4/4/2019	Kansas	discuss document review coding palette with I. Lustbader	0.13	\$	325.00	\$	43.33
Marissa Nardi	4/4/2019	Kansas	draft categories and list of tags for electronic document review of files produced by Defs thus far	1.15	\$	325.00	\$	373.75
Marissa Nardi	4/10/2019	Kansas	prepare for weekly call by reading relevant documents	0.27	\$	325.00	\$	86.67
Marissa Nardi	4/10/2019	Kansas	Review discovery documents that discuss foster care agency with I. Lustbader	0.33	\$	325.00	\$	108.33
Marissa Nardi	4/10/2019	Kansas	attend weekly KS team meeting re discovery and legal research	1.00	\$	325.00	\$	325.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	4/11/2019	Kansas	review materials from Health Forward Fdtn	0.33	\$	325.00	\$	108.33
Marissa Nardi	4/15/2019	Kansas	prepare for team meeting by reviewing relevant documents	0.22	\$	325.00	\$	70.42
Marissa Nardi	4/15/2019	Kansas	attend team meeting with co-counsel re litigation strategy, including discovery and MTD and fact updates from stakeholders	1.00	\$	325.00	\$	325.00
Marissa Nardi	4/26/2019	Kansas	discuss legal research re initial disclosures with J. King	0.25	\$	325.00	\$	81.25
Marissa Nardi	4/26/2019	Kansas	review recent filings	0.33	\$	325.00	\$	108.33
Marissa Nardi	5/22/2019	Kansas	attend 30 minutes of KS weekly co-counsel meeting re investigation, terms sheet (needed to leave early)	0.50	\$	325.00	\$	162.50
Marissa Nardi	6/20/2019	Kansas	discuss Kansas court conference with IL	0.50	\$	325.00	\$	162.50
Marissa Nardi	6/21/2019	Kansas	edit discovery schedule	0.83	\$	325.00	\$	270.83
Marissa Nardi	6/24/2019	Kansas	Telephone call with IL to discuss upcoming KS discovery projects	0.50	\$	325.00	\$	162.50
Marissa Nardi	6/25/2019	Kansas	review redline of initial disclosures	0.40	\$	325.00	\$	130.00
Marissa Nardi	6/26/2019	Kansas	edit initial disclosures	0.75	\$	325.00	\$	243.75
Marissa Nardi	6/26/2019	Kansas	participate in KS co-counsel group meeting re discovery strategy, including initial disclosures and rule 26 M&C	1.00	\$	325.00	\$	325.00
Marissa Nardi	6/26/2019	Kansas	meet with external co-counsel in KS in preparation for 26f	1.00	\$	325.00	\$	325.00
Marissa Nardi	6/27/2019	Kansas	email with F. Pitts re preparation for discovery conference	0.63	\$	325.00	\$	205.83
Marissa Nardi	6/27/2019	Kansas	participate in rule 26 meet and confer with opposing counsel	2.00	\$	325.00	\$	650.00
Marissa Nardi	6/27/2019	Kansas	prepare for 26(f) conference	1.67	\$	325.00	\$	541.67
Marissa Nardi	6/27/2019	Kansas	strategy session with co-counsel LBB & TW in preparation for 26f	2.00	\$	325.00	\$	650.00
Marissa Nardi	6/28/2019	Kansas	meeting to discuss and analyze 26f conference	1.50	\$	325.00	\$	487.50
Marissa Nardi	7/2/2019	Kansas	discuss litigation schedule with JK and CG	0.13	\$	325.00	\$	43.33
Marissa Nardi	7/3/2019	Kansas	discuss litigation schedule with CG	0.17	\$	325.00	\$	54.17

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	7/3/2019	Kansas	follow-up with external co-counsel re rule 26 M&C	0.40	\$	325.00	\$	130.00
Marissa Nardi	7/7/2019	Kansas Travel	travel from NY to Kansas City for purposes of appearing at 26(f) conference	3.25	\$	325.00	\$	1,056.25
Marissa Nardi	7/8/2019	Kansas Travel	travel from KS to NYC from 26f conference in KS	3.50	\$	325.00	\$	1,137.50
Marissa Nardi	7/9/2019	Kansas	discuss appearances with team	0.22	\$	325.00	\$	70.42
Marissa Nardi	7/10/2019	Kansas	prepare for KS group mtg	0.33	\$	325.00	\$	108.33
Marissa Nardi	7/12/2019	Kansas	discuss potential mediators w/ IL & CC	0.23	\$	325.00	\$	75.83
Marissa Nardi	7/12/2019	Kansas	prepare internal CR plan for NP document review	0.33	\$	325.00	\$	108.33
Marissa Nardi	7/12/2019	Kansas	email with internal CR team re electronic review of documents produced by Defs in discovery	0.33	\$	325.00	\$	108.33
Marissa Nardi	7/12/2019	Kansas	participate in KS team mtg re mediation and litigation strategy, including depositions and discovery conference	1.00	\$	325.00	\$	325.00
Marissa Nardi	7/16/2019	Kansas	discuss 30b6 strategy with internal CR KS team	0.23	\$	325.00	\$	75.83
Marissa Nardi	7/16/2019	Kansas	review draft 30b6 deposition notice	0.40	\$	325.00	\$	130.00
Marissa Nardi	7/17/2019	Kansas	edit draft 30b6 notice	0.62	\$	325.00	\$	200.42
Marissa Nardi	7/17/2019	Kansas	attend KS co-counsel meeting with external team re discovery and mediation strategy	0.88	\$	325.00	\$	287.08
Marissa Nardi	7/23/2019	Kansas	email re upcoming court deadlines with CC and DA	0.17	\$	325.00	\$	54.17
Marissa Nardi	7/23/2019	Kansas	email w/ external co-counsel re discovery schedule	0.22	\$	325.00	\$	70.42
Marissa Nardi	7/23/2019	Kansas	discuss w/ IL draft email to opposing counsel	0.23	\$	325.00	\$	75.83
Marissa Nardi	7/24/2019	Kansas	email external co-counsel team re editing draft subpoena	0.17	\$	325.00	\$	54.17
Marissa Nardi	7/24/2019	Kansas	prepare for KS external co-counsel call by reviewing recent team correspondence re discovery	0.23	\$	325.00	\$	75.83
Marissa Nardi	7/24/2019	Kansas	review draft subpoena	0.67	\$	325.00	\$	216.67

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	7/24/2019	Kansas	attend KS external co-counsel team meeting re discovery strategy, including document review and MTD	0.72	\$	325.00	\$	232.92
Marissa Nardi	7/26/2019	Kansas	Telephone call w/ NCYL re electronic document review of files produced by Defendants as part of discovery	0.75	\$	325.00	\$	243.75
Marissa Nardi	7/29/2019	Kansas	discuss with IL review of NP files produced by Defs	0.20	\$	325.00	\$	65.00
Marissa Nardi	7/29/2019	Kansas	email internal CR team re forthcoming review by internal team of select NP files	0.42	\$	325.00	\$	135.42
Marissa Nardi	7/29/2019	Kansas	discuss doc review of NP files with JK, DA & CC	0.43	\$	325.00	\$	140.83
Marissa Nardi	7/29/2019	Kansas	review DLA chart with comparison between proposals	0.80	\$	325.00	\$	260.00
Marissa Nardi	7/29/2019	Kansas	draft updated litigation plan for all co-counsel KS case teams	1.68	\$	325.00	\$	547.08
Marissa Nardi	7/30/2019	Kansas	email w/ IL re draft litigation plan	0.10	\$	325.00	\$	32.50
Marissa Nardi	7/30/2019	Kansas	email with internal team re edits to draft subpoena	0.17	\$	325.00	\$	54.17
Marissa Nardi	7/30/2019	Kansas	email with CC DA JK and CC re document review of NP files	0.25	\$	325.00	\$	81.25
Marissa Nardi	7/30/2019	Kansas	email with CR co-counsel re edits to DLA draft subpoena	0.30	\$	325.00	\$	97.50
Marissa Nardi	7/30/2019	Kansas	discuss potential discovery addition with IL	0.33	\$	325.00	\$	108.33
Marissa Nardi	7/30/2019	Kansas	discuss relativity NP review with internal team	0.42	\$	325.00	\$	135.42
Marissa Nardi	7/30/2019	Kansas	edit written draft litigation plan	0.77	\$	325.00	\$	249.17
Marissa Nardi	7/30/2019	Kansas	edit DLA's draft subpoena	1.17	\$	325.00	\$	379.17
Marissa Nardi	7/31/2019	Kansas	discuss follow-up from mtg with internal CR KS team	0.10	\$	325.00	\$	32.50
Marissa Nardi	7/31/2019	Kansas	edit litigation plan document	0.28	\$	325.00	\$	92.08
Marissa Nardi	7/31/2019	Kansas	attend co-counsel weekly call with external co-counsel re litigation strategy, including updated litigation plan and document review of files produced by Defs	0.67	\$	325.00	\$	216.67

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	8/12/2019	Kansas	review recent correspondence re NP file review	0.13	\$	325.00	\$	43.33
Marissa Nardi	8/12/2019	Kansas	email with NCYL re doc review protocol	0.12	\$	325.00	\$	37.92
Marissa Nardi	8/12/2019	Kansas	draft email to co-counsel re discovery letters	0.27	\$	325.00	\$	86.67
Marissa Nardi	8/12/2019	Kansas	discuss news monitoring re KS foster care system with DA, CC, and IL	0.30	\$	325.00	\$	97.50
Marissa Nardi	8/12/2019	Kansas	discuss discovery letters with IL and CG	0.35	\$	325.00	\$	113.75
Marissa Nardi	8/12/2019	Kansas	meet with IL re case strategy	0.75	\$	325.00	\$	243.75
Marissa Nardi	8/12/2019	Kansas	edit KS doc review protocol	0.75	\$	325.00	\$	243.75
Marissa Nardi	8/12/2019	Kansas	Analyze CG's summary of subset of discovery produced by Defs	0.85	\$	325.00	\$	276.25
Marissa Nardi	8/13/2019	Kansas	Email with IL re litigation strategy	0.42	\$	325.00	\$	135.42
Marissa Nardi	8/13/2019	Kansas	Analyze mediation strategy with IL in light of court order	0.50	\$	325.00	\$	162.50
Marissa Nardi	8/13/2019	Kansas	edit draft addition to complaint for amended complaint	0.83	\$	325.00	\$	270.83
Marissa Nardi	8/14/2019	Kansas	meet with NCYL and DLA discovery subcommittee re NP document review	1.00	\$	325.00	\$	325.00
Marissa Nardi	8/14/2019	Kansas	participate in team meeting re litigation and mediation strategy, including review of files produced by Defs	0.75	\$	325.00	\$	243.75
Marissa Nardi	8/19/2019	Kansas	discussion with JK, DA, CC, and CG re CR NP file review	0.30	\$	325.00	\$	97.50
Marissa Nardi	8/21/2019	Kansas	discuss mediation strategy with IL	0.50	\$	325.00	\$	162.50
Marissa Nardi	8/21/2019	Kansas	edit discovery document maintenance protocol	0.50	\$	325.00	\$	162.50
Marissa Nardi	8/21/2019	Kansas	participate in KS co-counsel team meeting re litigation and mediation strategies	0.75	\$	325.00	\$	243.75
Marissa Nardi	8/23/2019	Kansas	meeting with IL and JK re mediation statement	0.50	\$	325.00	\$	162.50
Marissa Nardi	8/30/2019	Kansas	analyze draft sections of mediation statement by JK	1.30	\$	325.00	\$	422.50
Marissa Nardi	9/3/2019	Kansas	edit draft mediation statement sections	6.38	\$	325.00	\$	2,074.58

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	9/4/2019	Kansas	meeting with external co-counsel team re discovery strategy and updates	0.92	\$	325.00	\$	297.92
Marissa Nardi	9/4/2019	Kansas	draft new sections of mediation statement	9.63	\$	325.00	\$	3,130.83
Marissa Nardi	9/5/2019	Kansas	Discuss fact discovery deadlines with internal team	0.17	\$	325.00	\$	54.17
Marissa Nardi	9/5/2019	Kansas	Edit draft mediation statement	2.93	\$	325.00	\$	953.33
Marissa Nardi	9/7/2019	Kansas	Discuss edits to mediation statement with IL	0.18	\$	325.00	\$	59.58
Marissa Nardi	9/8/2019	Kansas	Edit draft mediation statement	4.67	\$	325.00	\$	1,516.67
Marissa Nardi	9/9/2019	Kansas	Telephone call with DA re Defendants' general discovery rolling production	0.17	\$	325.00	\$	54.17
Marissa Nardi	9/9/2019	Kansas	Meeting with JK and IL re draft mediation statement	0.25	\$	325.00	\$	81.25
Marissa Nardi	9/9/2019	Kansas	Electronic mail to internal CR team re drafting mediation statement	0.47	\$	325.00	\$	151.67
Marissa Nardi	9/9/2019	Kansas	Edit draft mediation statement for circulation to co-counsel	7.87	\$	325.00	\$	2,556.67
Marissa Nardi	9/10/2019	Kansas	Edit draft mediation statement based on suggestions by co-counsel	0.63	\$	325.00	\$	205.83
Marissa Nardi	9/10/2019	Kansas	Continue editing draft mediation statement based on suggestions by co-counsel	2.80	\$	325.00	\$	910.00
Marissa Nardi	9/11/2019	Kansas	Discuss Kid Zones fact issue noted in Defendants' discovery with DA	0.10	\$	325.00	\$	32.50
Marissa Nardi	9/11/2019	Kansas	Discuss document review of NPs with DA	0.17	\$	325.00	\$	54.17
Marissa Nardi	9/11/2019	Kansas	Electronic mail with internal team re finalizing mediation statement draft	0.17	\$	325.00	\$	54.17
Marissa Nardi	9/11/2019	Kansas	discussion with external co-counsel and internal team re litigation strategy and mediation strategy, including draft mediation statement	0.80	\$	325.00	\$	260.00
Marissa Nardi	9/11/2019	Kansas	Read documents in Named Plaintiff files produced by Defendants that reference Kid Zones	1.00	\$	325.00	\$	325.00
Marissa Nardi	9/12/2019	Kansas	Electronic mail with external co-counsel re mediation statement draft editing	0.22	\$	325.00	\$	70.42

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	9/12/2019	Kansas	discussion with CG re document review of Defendants' general discovery	0.33	\$	325.00	\$	108.33
Marissa Nardi	9/12/2019	Kansas	meeting with IL re case strategy re mediation	0.67	\$	325.00	\$	216.67
Marissa Nardi	9/16/2019	Kansas	Electronic mail with CC re follow-up research re psychologist stakeholder	0.27	\$	325.00	\$	86.67
Marissa Nardi	9/16/2019	Kansas	Discuss Named Plaintiff document review fact updates with internal team	0.30	\$	325.00	\$	97.50
Marissa Nardi	9/16/2019	Kansas	Electronic mail with internal team re draft mediation statement	0.33	\$	325.00	\$	108.33
Marissa Nardi	9/16/2019	Kansas	Edit draft mediation statement	2.48	\$	325.00	\$	807.08
Marissa Nardi	9/17/2019	Kansas	Review tracked changes by co-counsel on draft mediation statement	0.38	\$	325.00	\$	124.58
Marissa Nardi	9/17/2019	Kansas	Edit draft mediation statement	1.52	\$	325.00	\$	492.92
Marissa Nardi	9/17/2019	Kansas	Continue editing draft mediation statement	5.82	\$	325.00	\$	1,890.42
Marissa Nardi	9/18/2019	Kansas	Review litigation hold letters	0.25	\$	325.00	\$	81.25
Marissa Nardi	9/18/2019	Kansas	Prepare for meeting with external co-counsel	0.33	\$	325.00	\$	108.33
Marissa Nardi	9/18/2019	Kansas	Discuss potential expert with internal team	0.33	\$	325.00	\$	108.33
Marissa Nardi	9/18/2019	Kansas	Discuss finalizing mediation statement with internal team	0.33	\$	325.00	\$	108.33
Marissa Nardi	9/18/2019	Kansas	Discuss next steps re discovery efforts with IL	0.47	\$	325.00	\$	151.67
Marissa Nardi	9/18/2019	Kansas	Discussion with internal team re ongoing NP document review	0.43	\$	325.00	\$	140.83
Marissa Nardi	9/18/2019	Kansas	Analyze correspondence with Defs re discovery	0.57	\$	325.00	\$	184.17
Marissa Nardi	9/18/2019	Kansas	Analyze draft spreadsheet of key litigation stakeholder contacts	0.97	\$	325.00	\$	314.17
Marissa Nardi	9/18/2019	Kansas	Attend strategy meeting with external co-counsel re litigation and mediation strategies	1.00	\$	325.00	\$	325.00
Marissa Nardi	9/18/2019	Kansas	Edit draft mediation statement	2.93	\$	325.00	\$	953.33
Marissa Nardi	9/23/2019	Kansas	prepare talking points for Medicaid call with Medicaid expert	0.67	\$	325.00	\$	216.67
Marissa Nardi	9/23/2019	Kansas	call w/ Medicaid expert re ESPDT COA	1.50	\$	325.00	\$	487.50
Marissa Nardi	10/1/2019	Kansas	Discuss discovery letter with NCYL	0.22	\$	325.00	\$	70.42
Marissa Nardi	10/1/2019	Kansas	Discuss protective order with internal team	0.23	\$	325.00	\$	75.83

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	10/1/2019	Kansas	Prepare for Kansas co-counsel team meeting by reviewing updated discovery protocol	0.32	\$	325.00	\$	102.92
Marissa Nardi	10/1/2019	Kansas	Draft email to mediator	0.32	\$	325.00	\$	102.92
Marissa Nardi	10/1/2019	Kansas	Advise internal team re NP document review	0.47	\$	325.00	\$	151.67
Marissa Nardi	10/1/2019	Kansas	Meeting with external co-counsel team in preparation for M&C re discovery	0.25	\$	325.00	\$	81.25
Marissa Nardi	10/1/2019	Kansas	Edit discovery letter	0.65	\$	325.00	\$	211.25
Marissa Nardi	10/2/2019	Kansas	Review first draft summaries of NP file review	0.90	\$	325.00	\$	292.50
Marissa Nardi	10/2/2019	Kansas	Meeting with external co-counsel team re litigation and mediation strategies, including document review and mediation statements	0.97	\$	325.00	\$	314.17
Marissa Nardi	10/3/2019	Kansas	Discuss mediation with IL	0.17	\$	325.00	\$	54.17
Marissa Nardi	10/3/2019	Kansas	Calculate discovery deadlines under FRCP to advise team accordingly	0.33	\$	325.00	\$	108.33
Marissa Nardi	10/4/2019	Kansas	Discuss review of Named Plaintiff files with CR and NCYL team	0.30	\$	325.00	\$	97.50
Marissa Nardi	10/4/2019	Kansas	Prepare for discovery strategy meeting with DLA Piper	0.47	\$	325.00	\$	151.67
Marissa Nardi	10/4/2019	Kansas	Discuss with internal CR team updated discovery strategy that developed from mtg with DLA	0.80	\$	325.00	\$	260.00
Marissa Nardi	10/7/2019	Kansas	Analyze notes from strategy call re similar litigations to discuss with IL	0.28	\$	325.00	\$	92.08
Marissa Nardi	10/7/2019	Kansas	Prepare for meetings with expert re brain science and child development	0.33	\$	325.00	\$	108.33
Marissa Nardi	10/7/2019	Kansas	Prepare for mediation call with Kevin Ryan	0.77	\$	325.00	\$	249.17
Marissa Nardi	10/7/2019	Kansas	Discuss meetings with experts with external co-counsel	0.80	\$	325.00	\$	260.00
Marissa Nardi	10/7/2019	Kansas	Review hot documents from ongoing NP file review	0.88	\$	325.00	\$	287.08
Marissa Nardi	10/7/2019	Kansas	Prepare for strategy call re mediation and discovery in similar litigation	1.00	\$	325.00	\$	325.00
Marissa Nardi	10/7/2019	Kansas	Discuss Kansas litigation strategy with IL	1.00	\$	325.00	\$	325.00

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Marissa Nardi	10/7/2019	Kansas	Prepare for mediation ex parte call with mediator	1.62	\$	325.00	\$	525.42
Marissa Nardi	10/8/2019	Kansas	Prepare for ex parte call with mediator by reviewing mediation materials	0.83	\$	325.00	\$	270.83
Marissa Nardi	10/9/2019	Kansas	Prepare for Kansas co-counsel team meeting by reviewing correspondence and notes from call with mediator	0.30	\$	325.00	\$	97.50
Marissa Nardi	10/9/2019	Kansas	Prepare for meeting with potential experts	0.37	\$	325.00	\$	119.17
Marissa Nardi	10/9/2019	Kansas	Strategy mtg with external Kansas co-counsel team re discovery efforts	0.70	\$	325.00	\$	227.50
Marissa Nardi	10/9/2019	Kansas	Review model settlement agreements for circulation to team	1.28	\$	325.00	\$	417.08
Marissa Nardi	10/11/2019	Kansas	Discuss with NCYL electronic document review of discovery produced by Defendants	0.23	\$	325.00	\$	75.83
Marissa Nardi	10/11/2019	Kansas	Prepare for meeting with DLA re discovery	0.28	\$	325.00	\$	92.08
Marissa Nardi	10/11/2019	Kansas	meeting with external co-counsel re alternative approaches to settlement decrees	1.48	\$	325.00	\$	482.08
Marissa Nardi	10/12/2019	Kansas	read brief re class certification in federal epsdt litigation relevant to our litigation	0.75	\$	325.00	\$	243.75
Marissa Nardi	10/15/2019	Kansas	Discuss annotated complaint preparation with external co-counsel and internal team	0.47	\$	325.00	\$	151.67
Marissa Nardi	10/15/2019	Kansas	prepare for meetings with potential expert by reviewing articles they've written and their CV	0.73	\$	325.00	\$	238.33
Marissa Nardi	10/15/2019	Kansas	telephone call with external co-counsel team re preparation of opposition to Defs' MTD	1.00	\$	325.00	\$	325.00
Marissa Nardi	10/15/2019	Kansas	Prepare summary of recent MTD caselaw for co-counsel team	1.03	\$	325.00	\$	335.83
Marissa Nardi	10/15/2019	Kansas	Review documents identified as hot from recent review of NP file	1.32	\$	325.00	\$	427.92
Marissa Nardi	10/16/2019	Kansas	Discuss discovery strategy with IL	0.23	\$	325.00	\$	75.83
Marissa Nardi	10/16/2019	Kansas	Prepare for ESI call with NCYL	0.35	\$	325.00	\$	113.75
Marissa Nardi	10/16/2019	Kansas	Prepare for weekly Kansas call by reviewing relevant correspondence	0.17	\$	325.00	\$	54.17

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	10/16/2019	Kansas	Telephone call with EPG and JK re preparing opposition to MTD filed by Defs	0.50	\$	325.00	\$	162.50
Marissa Nardi	10/16/2019	Kansas	Analyze Defendants' discovery letter	0.73	\$	325.00	\$	238.33
Marissa Nardi	10/16/2019	Kansas	Meeting with external co-counsel re ESI strategy	1.00	\$	325.00	\$	325.00
Marissa Nardi	10/16/2019	Kansas	Meeting with external co-counsel re discovery strategy	1.00	\$	325.00	\$	325.00
Marissa Nardi	10/16/2019	Kansas	Review NP indices	1.40	\$	325.00	\$	455.00
Marissa Nardi	10/17/2019	Kansas	discuss with IL analysis of potential experts	0.50	\$	325.00	\$	162.50
Marissa Nardi	10/18/2019	Kansas	discuss with CC background materials for expert meeting	0.40	\$	325.00	\$	130.00
Marissa Nardi	10/18/2019	Kansas	Prepare for meeting with expert	0.50	\$	325.00	\$	162.50
Marissa Nardi	10/21/2019	Kansas	Electronic mail with external co-counsel re upcoming expert materials	0.30	\$	325.00	\$	97.50
Marissa Nardi	10/21/2019	Kansas	Prepare for upcoming mediation trip by reviewing most recent mediation materials	0.32	\$	325.00	\$	102.92
Marissa Nardi	10/21/2019	Kansas	Analyze with SD ongoing discovery efforts	0.33	\$	325.00	\$	108.33
Marissa Nardi	10/21/2019	Kansas	Discuss with internal team strategy and preparation for expert meetings	0.40	\$	325.00	\$	130.00
Marissa Nardi	10/21/2019	Kansas	Discuss annotated amended complaint with external co-counsel team	0.45	\$	325.00	\$	146.25
Marissa Nardi	10/21/2019	Kansas	Continue reading background materials for upcoming expert meetings	0.52	\$	325.00	\$	167.92
Marissa Nardi	10/21/2019	Kansas	draft outline for potential expert meetings	3.20	\$	325.00	\$	1,040.00
Marissa Nardi	10/22/2019	Kansas Travel	travel from NYC to Kansas for meetings with potential experts in Kansas	3.42	\$	325.00	\$	1,110.42
Marissa Nardi	10/22/2019	Kansas	email with CC re potential expert prep materials	0.27	\$	325.00	\$	86.67
Marissa Nardi	10/23/2019	Kansas Travel	travel from KC for expert meetings back to NYC home	2.83	\$	325.00	\$	920.83
Marissa Nardi	10/23/2019	Kansas	meet with co-counsel TW and LBB to prepare for meetings with experts	1.00	\$	325.00	\$	325.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	10/23/2019	Kansas	meetings with external co-counsel LBB, TW, and LW and potential expert witnesses re EPSDT COA	5.67	\$	325.00	\$	1,841.67
Marissa Nardi	10/24/2019	Kansas	Discuss review of NP files with EMG	0.27	\$	325.00	\$	86.67
Marissa Nardi	10/24/2019	Kansas	Review draft discovery letter	0.30	\$	325.00	\$	97.50
Marissa Nardi	10/24/2019	Kansas	Review potential expert's CV	0.32	\$	325.00	\$	102.92
Marissa Nardi	10/24/2019	Kansas	Draft written analysis and recommendation of meetings with potential experts	0.47	\$	325.00	\$	151.67
Marissa Nardi	10/24/2019	Kansas	meeting with IL re potential experts	0.70	\$	325.00	\$	227.50
Marissa Nardi	10/25/2019	Kansas	Discuss next steps for discovery with co-counsel NCYL	0.25	\$	325.00	\$	81.25
Marissa Nardi	10/25/2019	Kansas	Review draft correspondence with opposing counsel	0.30	\$	325.00	\$	97.50
Marissa Nardi	10/25/2019	Kansas	Discuss Defs' motion to dismiss with external co-counsel team	0.38	\$	325.00	\$	124.58
Marissa Nardi	10/25/2019	Kansas	Meeting w/ IL re case factual developments	0.42	\$	325.00	\$	135.42
Marissa Nardi	10/25/2019	Kansas	Discuss discovery updates with external co-counsel team	0.55	\$	325.00	\$	178.75
Marissa Nardi	10/25/2019	Kansas	Read Defendants' motion to dismiss motion and brief	0.67	\$	325.00	\$	216.67
Marissa Nardi	10/25/2019	Kansas	Prepare for upcoming mediation call	0.82	\$	325.00	\$	265.42
Marissa Nardi	10/26/2019	Kansas	Email with IL SS SB HF CRW & AF re MTD	0.17	\$	325.00	\$	54.17
Marissa Nardi	10/27/2019	Kansas	Begin reading legal opinions cited in Defs' brief ISO its MTD	2.32	\$	325.00	\$	752.92
Marissa Nardi	10/28/2019	Kansas	Prepare for MTD opp meeting	0.20	\$	325.00	\$	65.00
Marissa Nardi	10/28/2019	Kansas	Discuss MTD opp drafting with EG and JK	0.65	\$	325.00	\$	211.25
Marissa Nardi	10/28/2019	Kansas	Prepare for discovery meeting with DLA	0.90	\$	325.00	\$	292.50
Marissa Nardi	10/28/2019	Kansas	Begin drafting outline for opposition to Defs' MTD	1.33	\$	325.00	\$	433.33
Marissa Nardi	10/28/2019	Kansas	Meeting with external co-counsel team re litigation strategy, including discovery and opposition to Defs' MTD	1.67	\$	325.00	\$	541.67

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Marissa Nardi	10/29/2019	Kansas	Prepare for call with IL re similar ongoing foster care litigation by reviewing filing from similar litigation	0.40	\$	325.00	\$	130.00
Marissa Nardi	10/29/2019	Kansas	Telephone call with EG and JK re MTD opp	0.50	\$	325.00	\$	162.50
Marissa Nardi	10/29/2019	Kansas	Meeting with IL re opp to Defs' MTD and motion for extension	0.75	\$	325.00	\$	243.75
Marissa Nardi	10/29/2019	Kansas	Telephone call with attorney stakeholders re EPSDT COA	1.00	\$	325.00	\$	325.00
Marissa Nardi	10/29/2019	Kansas	Conduct legal research re correct legal standard for 12b1 motions	4.75	\$	325.00	\$	1,543.75
Marissa Nardi	10/30/2019	Kansas	Prepare for meeting with external co-counsel by reviewing weekly correspondence	0.23	\$	325.00	\$	75.83
Marissa Nardi	10/30/2019	Kansas	Discuss drafting motions with external co-counsel	0.70	\$	325.00	\$	227.50
Marissa Nardi	10/30/2019	Kansas	Prepare written analysis of 12b1 legal research for external co-counsel	0.87	\$	325.00	\$	281.67
Marissa Nardi	10/30/2019	Kansas	meeting with external co-counsel team re discovery strategy, including opposition to Defs' 12b1 MTD	1.00	\$	325.00	\$	325.00
Marissa Nardi	10/30/2019	Kansas	Conduct legal research re potential motion for extension	3.75	\$	325.00	\$	1,218.75
Marissa Nardi	10/31/2019	Kansas	Telephone call with EG and JK re MTD opp	0.67	\$	325.00	\$	216.67
Marissa Nardi	10/31/2019	Kansas	Begin drafting motion for extension	3.50	\$	325.00	\$	1,137.50
Marissa Nardi	10/31/2019	Kansas	Legal research re evidence considered for 12b1	5.03	\$	325.00	\$	1,635.83
Marissa Nardi	11/4/2019	Kansas	Electronic mail with external co-counsel re mediation updates	0.35	\$	325.00	\$	113.75
Marissa Nardi	11/4/2019	Kansas	Advise team re deposition notice	0.47	\$	325.00	\$	151.67
Marissa Nardi	11/4/2019	Kansas	Finalize draft motion for extension before sharing with Defendants	2.30	\$	325.00	\$	747.50
Marissa Nardi	11/4/2019	Kansas	Edit draft motion for extension	3.22	\$	325.00	\$	1,045.42
Marissa Nardi	11/4/2019	Kansas Travel	Prepare for upcoming mediation by reviewing proposals and notes	0.80	\$	325.00	\$	260.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	11/6/2019	Kansas	Discuss with IL follow-up with Defs re motion for extension	0.10	\$	325.00	\$	32.50
Marissa Nardi	11/6/2019	Kansas	Discuss Governor's role in re foster care with EMG	0.17	\$	325.00	\$	54.17
Marissa Nardi	11/6/2019	Kansas	Review draft deposition notice	0.20	\$	325.00	\$	65.00
Marissa Nardi	11/6/2019	Kansas	Analyze potential expert with internal team	0.30	\$	325.00	\$	97.50
Marissa Nardi	11/6/2019	Kansas	Draft email to Defs re MTD Opp extension and share with external co-counsel	0.33	\$	325.00	\$	108.33
Marissa Nardi	11/6/2019	Kansas	Prepare for call with KR re mediation	0.33	\$	325.00	\$	108.33
Marissa Nardi	11/6/2019	Kansas	Prepare for mtg re alternatives to consent decrees	0.35	\$	325.00	\$	113.75
Marissa Nardi	11/6/2019	Kansas	Electronic mail with co-counsel re draft settlement agreement strategy	0.47	\$	325.00	\$	151.67
Marissa Nardi	11/6/2019	Kansas	Prepare for mediation by creating talking points	0.87	\$	325.00	\$	281.67
Marissa Nardi	11/6/2019	Kansas	Edit draft motion for extension	1.13	\$	325.00	\$	368.33
Marissa Nardi	11/15/2019	Kansas	Read media article re KS foster care system issues	0.32	\$	325.00	\$	102.92
Marissa Nardi	11/15/2019	Kansas	Discuss overnight placement issue with team	0.33	\$	325.00	\$	108.33
Marissa Nardi	11/15/2019	Kansas	Prepare for call with potential expert re brain science and child development by reading their most recent relevant article	0.50	\$	325.00	\$	162.50
Marissa Nardi	11/15/2019	Kansas	follow up from the email re MH re 12b1 facts	0.67	\$	325.00	\$	216.67
Marissa Nardi	11/15/2019	Kansas	Analyze strategy re discovery	0.67	\$	325.00	\$	216.67
Marissa Nardi	11/15/2019	Kansas	Continue preparing for telephone call with potential expert re brain science and child development by reading most recent article	0.75	\$	325.00	\$	243.75
Marissa Nardi	11/15/2019	Kansas	Telephone call with potential expert re brain science and child development	1.00	\$	325.00	\$	325.00
Marissa Nardi	11/15/2019	Kansas	Meeting with external co-counsel re litigation strategy, including discussion of experts and MTD opp and discovery	1.00	\$	325.00	\$	325.00
Marissa Nardi	11/15/2019	Kansas	Meeting w/ IL re mediation draft agreement	1.00	\$	325.00	\$	325.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	11/18/2019	Kansas	Discuss production of documents by Defendants with internal CR team	0.42	\$	325.00	\$	135.42
Marissa Nardi	11/18/2019	Kansas	Prepare for upcoming call with potential expert	0.67	\$	325.00	\$	216.67
Marissa Nardi	11/18/2019	Kansas	Review documents produced by Defs	0.75	\$	325.00	\$	243.75
Marissa Nardi	11/18/2019	Kansas	Answer questions by internal CR review team re document review of documents produced by Defs	0.58	\$	325.00	\$	189.58
Marissa Nardi	11/18/2019	Kansas	Prepare talking points for upcoming mediation	0.83	\$	325.00	\$	270.83
Marissa Nardi	11/18/2019	Kansas	Analyze relevant settlement agreements in preparation for mediation	1.50	\$	325.00	\$	487.50
Marissa Nardi	11/18/2019	Kansas	Draft settlement outcomes section for draft settlement agreement	8.97	\$	325.00	\$	2,914.17
Marissa Nardi	11/19/2019	Kansas	Coordinate with external co-counsel team re next steps for potential experts	0.33	\$	325.00	\$	108.33
Marissa Nardi	11/19/2019	Kansas	Prepare for meeting with potential expert	0.67	\$	325.00	\$	216.67
Marissa Nardi	11/19/2019	Kansas	Discuss meeting with potential expert with internal CR team	0.75	\$	325.00	\$	243.75
Marissa Nardi	11/19/2019	Kansas	Analyze rolling results of document review of discovery produced by Defendants	1.50	\$	325.00	\$	487.50
Marissa Nardi	11/19/2019	Kansas	Continue drafting settlement outcomes for mediation	3.75	\$	325.00	\$	1,218.75
Marissa Nardi	11/19/2019	Kansas	Edit draft settlement outcomes	5.92	\$	325.00	\$	1,922.92
Marissa Nardi	11/20/2019	Kansas	Telephone call with external co-counsel re case developments and litigation strategy	1.00	\$	325.00	\$	325.00
Marissa Nardi	11/20/2019	Kansas	Edit draft outcomes of settlement agreement further	1.17	\$	325.00	\$	379.17
Marissa Nardi	11/20/2019	Kansas	Edit draft prohibitions sections of draft settlement agreement	4.75	\$	325.00	\$	1,543.75
Marissa Nardi	11/20/2019	Kansas	Edit draft outcomes section of draft settlement agreement	6.50	\$	325.00	\$	2,112.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	11/21/2019	Kansas	Electronic mail with external co-counsel re doc review and preparation for meeting with expert	0.50	\$	325.00	\$	162.50
Marissa Nardi	11/21/2019	Kansas	Edit draft outcomes section of draft settlement agreement	3.17	\$	325.00	\$	1,029.17
Marissa Nardi	11/21/2019	Kansas	Continue editing draft outcomes in draft settlement agreement	3.75	\$	325.00	\$	1,218.75
Marissa Nardi	11/22/2019	Kansas	Discuss recent document production by Defendants with external co-counsel team	0.32	\$	325.00	\$	102.92
Marissa Nardi	11/22/2019	Kansas	Incorporate co-counsel team's edits into draft prohibitions in draft settlement agreement	0.58	\$	325.00	\$	189.58
Marissa Nardi	11/22/2019	Kansas	Edit draft settlement agreement throughout	3.00	\$	325.00	\$	975.00
Marissa Nardi	11/22/2019	Kansas	Edit draft prohibitions section of draft settlement agreement	3.25	\$	325.00	\$	1,056.25
Marissa Nardi	11/27/2019	Kansas	Discuss draft standards section of brief in opposition to Defs' 12b1 MTD with EPG	0.65	\$	325.00	\$	211.25
Marissa Nardi	12/9/2019	Kansas	Discuss draft motion for extension re Oppn to Defs' 12b1 MTD with IL and JK	0.50	\$	325.00	\$	162.50
Marissa Nardi	12/9/2019	Kansas	Discuss draft opposition to Defs' 12b1 MTD with JK and EPG	0.83	\$	325.00	\$	270.83
Marissa Nardi	12/9/2019	Kansas	Prepare for mediation by outlining talking points	1.50	\$	325.00	\$	487.50
Marissa Nardi	12/9/2019	Kansas	Review and edit draft opposition brief to Defs' 12b1 MTD	3.92	\$	325.00	\$	1,272.92
Marissa Nardi	12/9/2019	Kansas	Edit current draft opposition to Defs' 12b1 MTD	8.65	\$	325.00	\$	2,811.25
Marissa Nardi	12/10/2019	Kansas	Prepare written analysis of oppn to Defs' 12b1 MTD	0.50	\$	325.00	\$	162.50
Marissa Nardi	12/10/2019	Kansas	Discuss with internal team strategy re mediation and brief in oppn to Defs' 12b1 MTD	0.75	\$	325.00	\$	243.75
Marissa Nardi	12/10/2019	Kansas	Telephone call with external co-counsel re mediation strategy	0.92	\$	325.00	\$	297.92
Marissa Nardi	12/10/2019	Kansas	Telephone call with re JK drafting opp to 12b1 MTD	0.42	\$	325.00	\$	135.42

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	12/10/2019	Kansas	Draft discovery letter to share with Defs	1.50	\$	325.00	\$	487.50
Marissa Nardi	12/10/2019	Kansas	Edit draft brief in oppn to Defs' 12b1 MTD	2.50	\$	325.00	\$	812.50
Marissa Nardi	12/11/2019	Kansas	Advise internal CR team re analysis of documents produced by Defs	0.33	\$	325.00	\$	108.33
Marissa Nardi	12/11/2019	Kansas	Review updated settlement draft agreement	0.75	\$	325.00	\$	243.75
Marissa Nardi	12/11/2019	Kansas	Prepare for meeting with potential expert	1.40	\$	325.00	\$	455.00
Marissa Nardi	12/11/2019	Kansas	Draft updates to settlement agreement by cross-referencing to notes from settlement meetings	2.40	\$	325.00	\$	780.00
Marissa Nardi	12/11/2019	Kansas	Draft letter to Defendants re targeted discovery	2.57	\$	325.00	\$	834.17
Marissa Nardi	12/11/2019	Kansas	Read hot documents from document review to analyze new key facts in preparation for mediation	2.75	\$	325.00	\$	893.75
Marissa Nardi	12/12/2019	Kansas	Electronic mail with potential expert re case update	0.25	\$	325.00	\$	81.25
Marissa Nardi	12/12/2019	Kansas	Advise team re my analysis of hot documents	0.33	\$	325.00	\$	108.33
Marissa Nardi	12/12/2019	Kansas	Meet with potential expert re involvement in litigation	1.50	\$	325.00	\$	487.50
Marissa Nardi	12/13/2019	Kansas	Discuss settlement drafts with IL	0.25	\$	325.00	\$	81.25
Marissa Nardi	12/13/2019	Kansas	Discuss with CC and DA collection of relevant discovery for discovery letter to Defendants	0.50	\$	325.00	\$	162.50
Marissa Nardi	12/13/2019	Kansas	Review and edit updated draft discovery letter to Defendants	0.67	\$	325.00	\$	216.67
Marissa Nardi	12/13/2019	Kansas	Edit draft letter to Defendants re needing targeted discovery	1.08	\$	325.00	\$	352.08
Marissa Nardi	12/13/2019	Kansas	Closely review Defendants' settlement proposal in response to Pls' draft settlement proposal	1.37	\$	325.00	\$	444.17
Marissa Nardi	12/13/2019	Kansas	Discuss plan for mediation with external co-counsel team	1.50	\$	325.00	\$	487.50
Marissa Nardi	12/13/2019	Kansas	Prepare for mediation by analyzing relevant documents	2.75	\$	325.00	\$	893.75

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	12/14/2019	Kansas	Electronic mail with co-counsel from DLA re mediation plan	0.17	\$	325.00	\$	54.17
Marissa Nardi	12/15/2019	Kansas Travel	Travel from home in NYC to NYC airport to KC airport to Kansas City office of Lathrop Gage for mediation	3.50	\$	325.00	\$	1,137.50
Marissa Nardi	12/15/2019	Kansas	Prepare and participate in all-day mediation	7.50	\$	325.00	\$	2,437.50
Marissa Nardi	12/16/2019	Kansas Travel	Travel from KC office of Lathrop Gage to airport in Kansas to airport in NY to home in NYC from mediation trip to KS	3.25	\$	325.00	\$	1,056.25
Marissa Nardi	12/16/2019	Kansas	Prepare and participate in all-day mediation	8.00	\$	325.00	\$	2,600.00
Marissa Nardi	12/17/2019	Kansas	Prepare for mtg with potential expert	1.75	\$	325.00	\$	568.75
Marissa Nardi	12/18/2019	Kansas	Prepare for KS co-counsel team mtg by reviewing latest correspondence	0.33	\$	325.00	\$	108.33
Marissa Nardi	12/18/2019	Kansas	Discuss meeting with potential expert with internal CR team	0.33	\$	325.00	\$	108.33
Marissa Nardi	12/18/2019	Kansas	Edit draft engagement letter for potential expert	0.83	\$	325.00	\$	270.83
Marissa Nardi	12/18/2019	Kansas	Meeting with external co-counsel team re litigation team strategy re discovery and settlement	0.92	\$	325.00	\$	297.92
Marissa Nardi	12/18/2019	Kansas	Edit draft motion for stay of litigation	1.50	\$	325.00	\$	487.50
Marissa Nardi	12/18/2019	Kansas	Meeting with potential expert	2.00	\$	325.00	\$	650.00
Marissa Nardi	12/18/2019	Kansas	Edit draft settlement agreement	3.00	\$	325.00	\$	975.00
Marissa Nardi	12/18/2019	Kansas	Edit draft motion for stay	3.93	\$	325.00	\$	1,278.33
Marissa Nardi	12/19/2019	Kansas	Discuss document review of documents newly produced by Defs in discovery with internal team	0.50	\$	325.00	\$	162.50
Marissa Nardi	12/19/2019	Kansas	Edit draft engagement letter for potential expert	2.38	\$	325.00	\$	774.58
Marissa Nardi	12/20/2019	Kansas	Discuss strategy with team re settlement update and motion to expedite	0.75	\$	325.00	\$	243.75
Marissa Nardi	12/20/2019	Kansas	Edit joint motion for stay	4.35	\$	325.00	\$	1,413.75
Marissa Nardi	12/23/2019	Kansas	Discuss deadline modification and court conference with IL	0.17	\$	325.00	\$	54.17

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Marissa Nardi	12/24/2019	Kansas	Read JK legal research memo and caselaw re oppn to Defs' 12b1 motion	2.33	\$	325.00	\$	758.33
Marissa Nardi	12/27/2019	Kansas	Discuss mediation plan with IL	0.42	\$	325.00	\$	135.42
Marissa Nardi	12/31/2019	Kansas	Edit current draft opposition to Defs' 12b1 MTD	4.75	\$	325.00	\$	1,543.75
Marissa Nardi	1/2/2020	Kansas	Discuss upcoming litigation events with internal CR team	0.50	\$	325.00	\$	162.50
Marissa Nardi	1/2/2020	Kansas	Draft introductory sections to draft opposition to Defs' 12b1 motion to dismiss	8.75	\$	325.00	\$	2,843.75
Marissa Nardi	1/3/2020	Kansas	Continue drafting sections in draft opposition to Defs' 12b1 motion to dismiss	12.92	\$	325.00	\$	4,197.92
Marissa Nardi	1/4/2020	Kansas	Edit draft oppn to Defs' 12b1 MTD	5.80	\$	325.00	\$	1,885.00
Marissa Nardi	1/4/2020	Kansas	Edit draft settlement agreement	6.63	\$	325.00	\$	2,155.83
Marissa Nardi	1/5/2020	Kansas	Edit draft opposition to Defs' 12b1 MTD	10.88	\$	325.00	\$	3,537.08
Marissa Nardi	1/6/2020	Kansas	Discuss document reviews w/ NCYL and internal team	1.20	\$	325.00	\$	390.00
Marissa Nardi	1/6/2020	Kansas	Telephone call with external co-counsel team re settlement draft	1.50	\$	325.00	\$	487.50
Marissa Nardi	1/6/2020	Kansas	Analyze revised settlement draft	1.33	\$	325.00	\$	433.33
Marissa Nardi	1/6/2020	Kansas	Draft letter to Defs in response to Defs' Dec. 23 2019 letter to Pls	4.58	\$	325.00	\$	1,489.58
Marissa Nardi	1/7/2020	Kansas	Prepare for telephone call with potential neutral	0.67	\$	325.00	\$	216.67
Marissa Nardi	1/7/2020	Kansas	Telephone call with internal co-counsel team re discovery on Defendant Governor	1.00	\$	325.00	\$	325.00
Marissa Nardi	1/7/2020	Kansas	Edit draft letter to Defs	3.00	\$	325.00	\$	975.00
Marissa Nardi	1/7/2020	Kansas	Edit draft opposition to Defs' 12b1 MTD	3.42	\$	325.00	\$	1,110.42
Marissa Nardi	1/8/2020	Kansas	Edit draft settlement markup	1.25	\$	325.00	\$	406.25
Marissa Nardi	1/8/2020	Kansas	Edit draft opp to MTD	2.83	\$	325.00	\$	920.83
Marissa Nardi	1/9/2020	Kansas	Edit draft opp to MTD	9.50	\$	325.00	\$	3,087.50
Marissa Nardi	1/10/2020	Kansas	Edit draft letter to Defs re 12b1 motion for targeted discovery	0.58	\$	325.00	\$	189.58

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## Children's Rights Itemized Time Entries

Marissa Nardi	1/10/2020	Kansas	telephone call with J. King re 12b1 opposition draft	0.42	\$	325.00	\$	135.42
Marissa Nardi	1/10/2020	Kansas	Finalize draft letter to Defs	0.75	\$	325.00	\$	243.75
Marissa Nardi	1/10/2020	Kansas	Telephone call with P Juneja re edits to draft motion re targeted discovery for 12b1 motion	0.80	\$	325.00	\$	260.00
Marissa Nardi	1/10/2020	Kansas	Edit draft 12b1 discovery letter	1.23	\$	325.00	\$	400.83
Marissa Nardi	1/10/2020	Kansas	Edit draft letter to Defs	1.35	\$	325.00	\$	438.75
Marissa Nardi	1/10/2020	Kansas	Edit draft opp to Defs' 12b1 MTD	1.45	\$	325.00	\$	471.25
Marissa Nardi	1/10/2020	Kansas	Discuss edits to letter with external co-counsel	1.63	\$	325.00	\$	530.83
Marissa Nardi	1/10/2020	Kansas	Edit draft opp to Defs 12b1 MTD	4.50	\$	325.00	\$	1,462.50
Marissa Nardi	1/11/2020	Kansas	Discuss edits to mtd opp with internal team	0.25	\$	325.00	\$	81.25
Marissa Nardi	1/12/2020	Kansas	Analyze settlement draft documents circulated by Defendants	1.75	\$	325.00	\$	568.75
Marissa Nardi	1/12/2020	Kansas	Edit draft mtd opp	4.50	\$	325.00	\$	1,462.50
Marissa Nardi	1/13/2020	Kansas	Analyze Defs' lack of production of Governor's files for potential response	0.80	\$	325.00	\$	260.00
Marissa Nardi	1/14/2020	Kansas	Discuss Defs' lack of response with external co-counsel	0.50	\$	325.00	\$	162.50
Marissa Nardi	1/14/2020	Kansas	Edit draft opp to MTD	3.60	\$	325.00	\$	1,170.00
Marissa Nardi	1/15/2020	Kansas	Prepare for team meeting by reviewing most recent emails	0.30	\$	325.00	\$	97.50
Marissa Nardi	1/15/2020	Kansas	meeting with external co-counsel team re litigation strategy and discovery, including mediation and opposition draft	1.00	\$	325.00	\$	325.00
Marissa Nardi	1/15/2020	Kansas	Edit draft opposition to Defs' 12b1 MTD	5.22	\$	325.00	\$	1,695.42
Marissa Nardi	1/16/2020	Kansas	Edit opposition to Defs' 12b1 MTD	9.30	\$	325.00	\$	3,022.50
Marissa Nardi	1/17/2020	Kansas	Discussion with internal CR team JK and EPG re draft opp to MTD	0.50	\$	325.00	\$	162.50
Marissa Nardi	1/17/2020	Kansas	Edit draft opp to MTD	6.75	\$	325.00	\$	2,193.75
Marissa Nardi	1/18/2020	Kansas	Edit draft opp to MTD	5.17	\$	325.00	\$	1,679.17
Marissa Nardi	1/19/2020	Kansas	Edit opposition brief to Kansas Defs' MTD	4.50	\$	325.00	\$	1,462.50
Marissa Nardi	1/20/2020	Kansas	Telephone call with EPG re edits to draft opp to Defs' MTD	1.00	\$	325.00	\$	325.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	1/20/2020	Kansas	Edit draft MTD opp	6.75	\$	325.00	\$	2,193.75
Marissa Nardi	1/21/2020	Kansas	Meeting with IL and EPG re draft opp	1.00	\$	325.00	\$	325.00
Marissa Nardi	1/21/2020	Kansas	Edit opposition to Defs' MTD	7.67	\$	325.00	\$	2,491.67
Marissa Nardi	1/22/2020	Kansas	Edit draft brief	3.33	\$	325.00	\$	1,083.33
Marissa Nardi	1/23/2020	Kansas	Meeting with external co-counsel team re mediation strategy	1.00	\$	325.00	\$	325.00
Marissa Nardi	1/23/2020	Kansas	Edit draft brief	9.25	\$	325.00	\$	3,006.25
Marissa Nardi	1/24/2020	Kansas	Edit draft MTD opp brief	4.75	\$	325.00	\$	1,543.75
Marissa Nardi	1/28/2020	Kansas	Edit comments visible to Defs to draft mediation proposal	0.92	\$	325.00	\$	297.92
Marissa Nardi	1/29/2020	Kansas	Telephone call with external co-counsel and mediator re upcoming mediation	0.42	\$	325.00	\$	135.42
Marissa Nardi	1/29/2020	Kansas	Prepare for telephone call with mediator	1.00	\$	325.00	\$	325.00
Marissa Nardi	1/29/2020	Kansas	Telephone call with external co-counsel re mediation and litigation strategy	1.00	\$	325.00	\$	325.00
Marissa Nardi	1/30/2020	Kansas	Advise internal CR team re mediation and litigation updates	0.50	\$	325.00	\$	162.50
Marissa Nardi	1/30/2020	Kansas	Analyze hot doc from Defs' production	0.67	\$	325.00	\$	216.67
Marissa Nardi	1/30/2020	Kansas	Analyze draft opposition brief with external co-counsel	0.75	\$	325.00	\$	243.75
Marissa Nardi	1/30/2020	Kansas	Analyze litigation strategy and upcoming projects with internal team	0.75	\$	325.00	\$	243.75
Marissa Nardi	1/30/2020	Kansas	Edit draft opposition brief	1.25	\$	325.00	\$	406.25
Marissa Nardi	2/3/2020	Kansas	Analyze suggested edits to draft opp to MTD from external co-counsel team	0.92	\$	325.00	\$	297.92
Marissa Nardi	2/3/2020	Kansas	Advise IL on discovery updates	0.92	\$	325.00	\$	297.92
Marissa Nardi	2/4/2020	Kansas	Meeting with IL re ongoing discovery efforts	0.58	\$	325.00	\$	189.58
Marissa Nardi	2/4/2020	Kansas	Telephone call with NCYL re discovery strategy	1.08	\$	325.00	\$	352.08
Marissa Nardi	2/5/2020	Kansas	Discuss next steps for discovery with internal CR team	0.33	\$	325.00	\$	108.33
Marissa Nardi	2/5/2020	Kansas	Telephone call with NCYL re document review of documents recently produced by Defs	0.50	\$	325.00	\$	162.50
Marissa Nardi	2/5/2020	Kansas	Meeting with IL re upcoming mediation	0.67	\$	325.00	\$	216.67

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	2/5/2020	Kansas	Meeting with external co-counsel team re litigation strategy, including discovery and opposition to Defs' MTD and mediation	1.00	\$	325.00	\$	325.00
Marissa Nardi	2/5/2020	Kansas	Edit new draft opp to MTD	5.25	\$	325.00	\$	1,706.25
Marissa Nardi	2/6/2020	Kansas Travel	Travel from home in NYC to NYC airport to KC airport to KS hotel for mediation	3.50	\$	325.00	\$	1,137.50
Marissa Nardi	2/6/2020	Kansas	Edit draft opposition to MTD to circulate to co-counsel	3.33	\$	325.00	\$	1,083.33
Marissa Nardi	2/7/2020	Kansas Travel	Travel from KS office of Lathrop to KC airport to NYC airport to home in NYC from mediation	3.62	\$	325.00	\$	1,175.42
Marissa Nardi	2/7/2020	Kansas	Meeting with external co-counsel in preparation for mediation in KS	1.00	\$	325.00	\$	325.00
Marissa Nardi	2/7/2020	Kansas	Mediation with opposing counsel in KS at Lathrop	6.00	\$	325.00	\$	1,950.00
Marissa Nardi	2/10/2020	Kansas	Discuss strategy for mediation with IL	0.33	\$	325.00	\$	108.33
Marissa Nardi	2/10/2020	Kansas	Discuss next steps for draft settlement agreement with IL	0.37	\$	325.00	\$	119.17
Marissa Nardi	2/10/2020	Kansas	Edit draft settlement agreement	8.63	\$	325.00	\$	2,805.83
Marissa Nardi	2/11/2020	Kansas	Telephone call with IL re updated settlement agreement	0.58	\$	325.00	\$	189.58
Marissa Nardi	2/11/2020	Kansas	Telephone call with DA re checking of fact cites in legal brief	0.67	\$	325.00	\$	216.67
Marissa Nardi	2/11/2020	Kansas	Meeting with IL re stability outcomes for draft settlement agreement	1.00	\$	325.00	\$	325.00
Marissa Nardi	2/11/2020	Kansas	Edit draft opposition to Defs 12b1 MTD	10.50	\$	325.00	\$	3,412.50
Marissa Nardi	2/12/2020	Kansas	Telephone call with external co-counsel group re opp and mediation strategy	0.92	\$	325.00	\$	297.92
Marissa Nardi	2/12/2020	Kansas	Edit draft opposition to MTD	11.82	\$	325.00	\$	3,840.42
Marissa Nardi	2/13/2020	Kansas	Edit draft transmittal decl for opp to mtd	1.17	\$	325.00	\$	379.17
Marissa Nardi	2/14/2020	Kansas	Telephone call with NCYL re draft settlement agreement	0.50	\$	325.00	\$	162.50
Marissa Nardi	2/14/2020	Kansas	Meeting with IL re draft settlement agreement edits	1.50	\$	325.00	\$	487.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	2/14/2020	Kansas	Finalize updated draft settlement agreement to share with mediator and Defs	2.67	\$	325.00	\$	866.67
Marissa Nardi	2/17/2020	Kansas	Electronic mail with team re Defs' mot for extension	0.42	\$	325.00	\$	135.42
Marissa Nardi	2/24/2020	Kansas Travel	Travel from home in NYC to LGA to Kansas City airport to hotel in Kansas City for mediation	2.75	\$	325.00	\$	893.75
Marissa Nardi	2/24/2020	Kansas	Prepare for mediation by creating talking points	2.42	\$	325.00	\$	785.42
Marissa Nardi	2/25/2020	Kansas	Edit draft settlement agreement	0.85	\$	325.00	\$	276.25
Marissa Nardi	2/25/2020	Kansas	Meeting to prepare for settlement with external co-counsel team	1.00	\$	325.00	\$	325.00
Marissa Nardi	2/25/2020	Kansas	Edit settlement agreement	2.70	\$	325.00	\$	877.50
Marissa Nardi	2/25/2020	Kansas	Mediation session at Lathrop Gage with opposing counsel and mediator	6.50	\$	325.00	\$	2,112.50
Marissa Nardi	2/26/2020	Kansas Travel	Travel from KC mediation to KC airport to NY airport to NY home from mediation	3.08	\$	325.00	\$	1,002.08
Marissa Nardi	2/26/2020	Kansas	Meeting with external co-counsel to debrief on mediation	1.50	\$	325.00	\$	487.50
Marissa Nardi	2/26/2020	Kansas	Meeting with external co-counsel team to prepare for mediation	1.75	\$	325.00	\$	568.75
Marissa Nardi	2/26/2020	Kansas	Mediation session with mediator and opposing counsel	3.00	\$	325.00	\$	975.00
Marissa Nardi	2/27/2020	Kansas	Meeting with CR internal team re updates and follow-up from mediation sessions	0.50	\$	325.00	\$	162.50
Marissa Nardi	2/27/2020	Kansas	Review draft interrogatories	0.92	\$	325.00	\$	297.92
Marissa Nardi	2/27/2020	Kansas	Edit draft responses to Defs' responses to Pls' RFPs	2.95	\$	325.00	\$	958.75
Marissa Nardi	2/27/2020	Kansas	Edit draft RFPs	3.30	\$	325.00	\$	1,072.50
Marissa Nardi	2/28/2020	Kansas	Discuss with internal CR team new hot documents from review of Defendants' documents recently produced in discovery	0.43	\$	325.00	\$	140.83
Marissa Nardi	2/28/2020	Kansas	Edit RFPs to circulate to co-counsel	0.83	\$	325.00	\$	270.83
Marissa Nardi	2/28/2020	Kansas	Finalize draft interrogatories to circulate to co-counsel	1.63	\$	325.00	\$	530.83

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	2/28/2020	Kansas	Finalize draft RFPs for circulation to co-counsel	2.25	\$	325.00	\$	731.25
Marissa Nardi	3/1/2020	Kansas	Meeting with IL re written discovery drafts	0.67	\$	325.00	\$	216.67
Marissa Nardi	3/1/2020	Kansas	Comment on draft letter re 30b6 deps	0.82	\$	325.00	\$	265.42
Marissa Nardi	3/1/2020	Kansas	Edit draft letter re RFPs	0.93	\$	325.00	\$	303.33
Marissa Nardi	3/1/2020	Kansas	Telephone call with CR policy team re policy-related proposals for settlement agreement	1.00	\$	325.00	\$	325.00
Marissa Nardi	3/1/2020	Kansas	Finalize current draft of second set of RFPs to Def. DCF	1.28	\$	325.00	\$	417.08
Marissa Nardi	3/1/2020	Kansas	Edit draft search terms for Defs to use for ESI searches of their files	3.30	\$	325.00	\$	1,072.50
Marissa Nardi	3/2/2020	Kansas	Draft certificate of services for discovery documents to be propounded shortly	0.37	\$	325.00	\$	119.17
Marissa Nardi	3/2/2020	Kansas	Revise further Plaintiffs' responses to Defs' responses to Pls' first set of rfps	0.67	\$	325.00	\$	216.67
Marissa Nardi	3/2/2020	Kansas	Advise team on finalizing written discovery for today's service onto Defs	0.73	\$	325.00	\$	238.33
Marissa Nardi	3/2/2020	Kansas	Discuss with CG and EPG suggested edits by NCYL to second set of draft rfps	0.75	\$	325.00	\$	243.75
Marissa Nardi	3/2/2020	Kansas	Edit draft discovery letter for Defs to incorporate comments by NCYL	0.90	\$	325.00	\$	292.50
Marissa Nardi	3/2/2020	Kansas	Revise further package of second set of rfps and first set of rogs for dcf	1.83	\$	325.00	\$	595.83
Marissa Nardi	3/2/2020	Kansas	Edit package of rogs and draft second set of RFPs to incorporate co-counsel comments	2.48	\$	325.00	\$	807.08
Marissa Nardi	3/3/2020	Kansas	Telephone call with IL to prepare immediate discovery strategy	0.25	\$	325.00	\$	81.25
Marissa Nardi	3/3/2020	Kansas	Meeting with discovery team re updates from document review, written discovery, and ESI	0.47	\$	325.00	\$	151.67
Marissa Nardi	3/3/2020	Kansas	Telephone call with external co-counsel at NCYL and IL re discovery strategy	0.83	\$	325.00	\$	270.83
Marissa Nardi	3/3/2020	Kansas	Finalize draft RFPs	2.32	\$	325.00	\$	752.92

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## Children's Rights Itemized Time Entries

Marissa Nardi	3/4/2020	Kansas	Meeting with external co-counsel team to discuss litigation strategy, including written discovery, ESI, and mediation	0.50	\$	325.00	\$	162.50
Marissa Nardi	3/4/2020	Kansas	Discuss draft subpoenas with NT and IL	0.20	\$	325.00	\$	65.00
Marissa Nardi	3/4/2020	Kansas	Telephone call with PJ re ESI	0.23	\$	325.00	\$	75.83
Marissa Nardi	3/4/2020	Kansas	Review document review batch completion	0.33	\$	325.00	\$	108.33
Marissa Nardi	3/4/2020	Kansas	Discuss ESI agreement with PJ	0.40	\$	325.00	\$	130.00
Marissa Nardi	3/4/2020	Kansas	Telephone call with P. Juneja re discovery plan	0.75	\$	325.00	\$	243.75
Marissa Nardi	3/4/2020	Kansas	Edit draft search terms for ESI	0.92	\$	325.00	\$	297.92
Marissa Nardi	3/4/2020	Kansas	Telephone calls with P. Juneja re status and strategy for propounding upcoming discovery	1.75	\$	325.00	\$	568.75
Marissa Nardi	3/9/2020	Kansas	Electronic email with PJ re discovery call	0.17	\$	325.00	\$	54.17
Marissa Nardi	3/9/2020	Kansas	Electronic email re ESI with PJ and JK	0.33	\$	325.00	\$	108.33
Marissa Nardi	3/9/2020	Kansas	Discuss potential use of statistical expert with EPG and IL	0.47	\$	325.00	\$	151.67
Marissa Nardi	3/9/2020	Kansas	Analyze draft list of search terms	0.75	\$	325.00	\$	243.75
Marissa Nardi	3/9/2020	Kansas	Edit draft RFPs	0.75	\$	325.00	\$	243.75
Marissa Nardi	3/9/2020	Kansas	Revise draft list of search terms	1.23	\$	325.00	\$	400.83
Marissa Nardi	3/10/2020	Kansas	Telephone call with EPG re statistician	0.12	\$	325.00	\$	37.92
Marissa Nardi	3/10/2020	Kansas	Electronic email with IL re types of experts to engage	0.17	\$	325.00	\$	54.17
Marissa Nardi	3/10/2020	Kansas	Electronic email with PJ re selection of potential experts	0.22	\$	325.00	\$	70.42
Marissa Nardi	3/10/2020	Kansas	Electronic email with KP and PJ re weekly discovery calls	0.25	\$	325.00	\$	81.25
Marissa Nardi	3/10/2020	Kansas	Electronic email with internal CR team re new discovery to be propounded	0.25	\$	325.00	\$	81.25
Marissa Nardi	3/10/2020	Kansas	Discuss upcoming document review with internal CR team	0.38	\$	325.00	\$	124.58
Marissa Nardi	3/10/2020	Kansas	Analyze use of potential statistician with EPG and IL	0.40	\$	325.00	\$	130.00
Marissa Nardi	3/10/2020	Kansas	Electronic email with NK and IL re new draft discovery letter to Defs	0.47	\$	325.00	\$	151.67

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Marissa Nardi	3/10/2020	Kansas	Edit list of potential experts	0.60	\$	325.00	\$	195.00
Marissa Nardi	3/10/2020	Kansas	Telephone call with IL re discovery	0.75	\$	325.00	\$	243.75
Marissa Nardi	3/10/2020	Kansas	Telephone call with PJ re discovery projects	0.90	\$	325.00	\$	292.50
Marissa Nardi	3/11/2020	Kansas	Prepare for team meeting by reviewing latest expert proposal	0.13	\$	325.00	\$	43.33
Marissa Nardi	3/11/2020	Kansas	Electronic email to internal CR team re discovery document review to be completed	0.27	\$	325.00	\$	86.67
Marissa Nardi	3/11/2020	Kansas	Meeting with KS co-counsel team re litigation strategy, including written discovery, review of documents produced by Defs, experts, and ESI	1.00	\$	325.00	\$	325.00
Marissa Nardi	3/11/2020	Kansas	Edit draft third set of RFPs	3.42	\$	325.00	\$	1,110.42
Marissa Nardi	3/12/2020	Kansas	Electronic email with internal CR team re edits to written discovery	0.32	\$	325.00	\$	102.92
Marissa Nardi	3/12/2020	Kansas	Telephone call with NT and PJ re production deficiencies letter to draft	0.53	\$	325.00	\$	173.33
Marissa Nardi	3/13/2020	Kansas	Meeting with co-counsel discovery subcommittee re discovery projects, including document review, production deficiencies, ESI, and written discovery	0.50	\$	325.00	\$	162.50
Marissa Nardi	3/16/2020	Kansas	Review three hot documents from recent discovery produced by Defs	0.58	\$	325.00	\$	189.58
Marissa Nardi	3/17/2020	Kansas	Electronic email with NT re drafting subpoenas	0.20	\$	325.00	\$	65.00
Marissa Nardi	3/18/2020	Kansas	Discuss discovery schedule with T. Woody	0.17	\$	325.00	\$	54.17
Marissa Nardi	3/18/2020	Kansas	Electronic email with JK re search terms	0.23	\$	325.00	\$	75.83
Marissa Nardi	3/18/2020	Kansas	Discuss third set of rfps with CG and EPG	0.28	\$	325.00	\$	92.08
Marissa Nardi	3/18/2020	Kansas	Prepare for co-counsel call by reviewing latest drafts of written discovery	0.32	\$	325.00	\$	102.92
Marissa Nardi	3/18/2020	Kansas	Electronic email with EPG and CG re third set of draft RFPs	0.32	\$	325.00	\$	102.92
Marissa Nardi	3/18/2020	Kansas	Electronic email with NCYL re email search term strategy	0.32	\$	325.00	\$	102.92
Marissa Nardi	3/18/2020	Kansas	Analyze email search term strategy	0.40	\$	325.00	\$	130.00

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Marissa Nardi	3/18/2020	Kansas	Edit draft letter to Defs re ESI search terms	0.40	\$	325.00	\$	130.00
Marissa Nardi	3/18/2020	Kansas	Meeting with internal CR team re ESI and document review and written discovery	0.50	\$	325.00	\$	162.50
Marissa Nardi	3/18/2020	Kansas	Discuss discovery plan with P. Juneja	0.75	\$	325.00	\$	243.75
Marissa Nardi	3/18/2020	Kansas	Prepare written plan for targeted searches for document review	0.75	\$	325.00	\$	243.75
Marissa Nardi	3/18/2020	Kansas	Meeting with external co-counsel team re litigation strategy, including written discovery, review of documents, and experts	1.00	\$	325.00	\$	325.00
Marissa Nardi	3/18/2020	Kansas	Edit third set of draft RFPs to DCF	1.93	\$	325.00	\$	628.33
Marissa Nardi	3/19/2020	Kansas	Electronic email with CG re draft RFPs	0.28	\$	325.00	\$	92.08
Marissa Nardi	3/19/2020	Kansas	Electronic email with G. Trimarco at DLA Piper re ESI-related draft RFP	0.30	\$	325.00	\$	97.50
Marissa Nardi	3/19/2020	Kansas	Electronic email re 3 hot docs produced by Defs with IL and DA	0.33	\$	325.00	\$	108.33
Marissa Nardi	3/19/2020	Kansas	Edit draft letter re COVID-19	0.50	\$	325.00	\$	162.50
Marissa Nardi	3/19/2020	Kansas	Edit draft third set of rfps	0.97	\$	325.00	\$	314.17
Marissa Nardi	3/20/2020	Kansas	Edit discovery deficiencies letter for Defs	0.23	\$	325.00	\$	75.83
Marissa Nardi	3/20/2020	Kansas	Discuss edits to draft third set of rfps with CG	0.48	\$	325.00	\$	157.08
Marissa Nardi	3/20/2020	Kansas	Electronic email with MF and PJ re open issues re discovery	0.75	\$	325.00	\$	243.75
Marissa Nardi	3/23/2020	Kansas	Discuss subpoenas with NCYL	0.17	\$	325.00	\$	54.17
Marissa Nardi	3/23/2020	Kansas	Edit draft third set of RFPs	0.88	\$	325.00	\$	287.08
Marissa Nardi	3/23/2020	Kansas	Closely review draft third set of RFPs	0.97	\$	325.00	\$	314.17
Marissa Nardi	3/24/2020	Kansas	Discuss draft discovery deficiencies letter with N. Taykhman	0.28	\$	325.00	\$	92.08
Marissa Nardi	3/24/2020	Kansas	Prepare summary to KS team re legal research update re similar case's class certification ruling	0.33	\$	325.00	\$	108.33
Marissa Nardi	3/24/2020	Kansas	Edit third draft set of rfps	0.45	\$	325.00	\$	146.25
Marissa Nardi	3/24/2020	Kansas	Advise external co-counsel re third set of rfps	0.55	\$	325.00	\$	178.75
Marissa Nardi	3/24/2020	Kansas	Telephone call with M. Fowler at DLA & P. Juneja to discuss discovery projects	0.75	\$	325.00	\$	243.75
Marissa Nardi	3/24/2020	Kansas	Edit third set of RFPs	1.13	\$	325.00	\$	368.33

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	3/25/2020	Kansas	Analyze letter from Defs	0.33	\$	325.00	\$	108.33
Marissa Nardi	3/25/2020	Kansas	Meeting with IL re written discovery and Defs' letter	0.50	\$	325.00	\$	162.50
Marissa Nardi	3/25/2020	Kansas	Meeting with external KS co-counsel team re litigation strategy, including Defendants' production deficiencies, written discovery, and 30b6 depositions	0.75	\$	325.00	\$	243.75
Marissa Nardi	3/26/2020	Kansas	Prepare timeline of discovery deadlines Defs missed	0.37	\$	325.00	\$	119.17
Marissa Nardi	3/26/2020	Kansas	Edit NT's draft letter re production deficiencies	1.60	\$	325.00	\$	520.00
Marissa Nardi	3/26/2020	Kansas	Draft letter re discovery deadlines Defs missed	1.65	\$	325.00	\$	536.25
Marissa Nardi	3/27/2020	Kansas	Read letter from Defs	0.23	\$	325.00	\$	75.83
Marissa Nardi	3/27/2020	Kansas	Read notes from prior m&c in re forthcoming letter re discovery issues	0.32	\$	325.00	\$	102.92
Marissa Nardi	3/27/2020	Kansas	Meeting with CG & JK re RFPs	0.25	\$	325.00	\$	81.25
Marissa Nardi	3/27/2020	Kansas	Edit NT's draft discovery deficiencies letter	3.45	\$	325.00	\$	1,121.25
Marissa Nardi	3/30/2020	Kansas	Edit written analysis of key facts in documents produced by Defendants	0.23	\$	325.00	\$	75.83
Marissa Nardi	3/30/2020	Kansas	Electronic email with internal CR team re important discovery documents	0.28	\$	325.00	\$	92.08
Marissa Nardi	3/30/2020	Kansas	Edit timeline of discovery deadlines Defs missed	0.48	\$	325.00	\$	157.08
Marissa Nardi	3/30/2020	Kansas	Read latest key documents from CR's review of Defs' general discovery	0.67	\$	325.00	\$	216.67
Marissa Nardi	3/30/2020	Kansas	Edit draft rfps re new covid-19 issues re placements and MH	1.37	\$	325.00	\$	444.17
Marissa Nardi	3/31/2020	Kansas	edit draft RFPs	0.83	\$	325.00	\$	270.83
Marissa Nardi	4/2/2020	Kansas	Advise internal team on letter for Defs re discovery issues	0.40	\$	325.00	\$	130.00
Marissa Nardi	4/2/2020	Kansas	Edit draft RFPs	0.60	\$	325.00	\$	195.00
Marissa Nardi	4/2/2020	Kansas	Advise team on edits to rfps	0.73	\$	325.00	\$	238.33
Marissa Nardi	4/2/2020	Kansas	Finalize draft rfps	0.80	\$	325.00	\$	260.00

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## Children's Rights Itemized Time Entries

Marissa Nardi	4/7/2020	Kansas	Telephone call with PJ re issue specific analysis of discovery docs	0.47	\$	325.00	\$	151.67
Marissa Nardi	4/8/2020	Kansas	Electronic email with external co-counsel re M&C	0.27	\$	325.00	\$	86.67
Marissa Nardi	4/8/2020	Kansas	Discuss potential MH expert with LW and IL	0.33	\$	325.00	\$	108.33
Marissa Nardi	4/8/2020	Kansas	Review and analyze proposed updated discovery schedule	0.38	\$	325.00	\$	124.58
Marissa Nardi	4/8/2020	Kansas	Electronic email with internal CR team re document review and written discovery	0.48	\$	325.00	\$	157.08
Marissa Nardi	4/8/2020	Kansas	Meeting with external co-counsel re litigation strategy, including M&C with Defs, COVID-19 issues, third party subpoenas, NFs, and experts	1.00	\$	325.00	\$	325.00
Marissa Nardi	4/9/2020	Kansas	Telephone call with IL re Defs' production deficiencies	0.17	\$	325.00	\$	54.17
Marissa Nardi	4/13/2020	Kansas	Discuss Defs' letter with NT	0.20	\$	325.00	\$	65.00
Marissa Nardi	4/13/2020	Kansas	Review excel of potential updated litigation timelines	0.20	\$	325.00	\$	65.00
Marissa Nardi	4/13/2020	Kansas	Electronic email with LW and DA re near-final draft settlement	0.30	\$	325.00	\$	97.50
Marissa Nardi	4/13/2020	Kansas	Electronic email with DA and CC re RFP responses	0.35	\$	325.00	\$	113.75
Marissa Nardi	4/13/2020	Kansas	Analyze M&C strategy with external co-counsel	0.42	\$	325.00	\$	135.42
Marissa Nardi	4/13/2020	Kansas	Review new COVID-19 placement and MH discovery	0.47	\$	325.00	\$	151.67
Marissa Nardi	4/13/2020	Kansas	Meeting with IL to prepare for M&C	0.50	\$	325.00	\$	162.50
Marissa Nardi	4/13/2020	Kansas	Prepare talking points for M&C	0.73	\$	325.00	\$	238.33
Marissa Nardi	4/13/2020	Kansas	M&C with Defs re discovery disputes	1.50	\$	325.00	\$	487.50
Marissa Nardi	4/14/2020	Kansas	Read letter from Defendants in re Pls' 4/3 production issues letter	0.48	\$	325.00	\$	157.08
Marissa Nardi	4/14/2020	Kansas	Draft agenda for next M&C	0.63	\$	325.00	\$	205.83
Marissa Nardi	4/14/2020	Kansas	Telephone call with PJ to prepare for M&C	1.00	\$	325.00	\$	325.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	4/14/2020	Kansas	Review most recent letters and discovery responses to prepare for M&C	1.12	\$	325.00	\$	362.92
Marissa Nardi	4/15/2020	Kansas	Electronic email with external co-counsel re draft expert engagement letter	0.37	\$	325.00	\$	119.17
Marissa Nardi	4/15/2020	Kansas	Finalize engagement letter for expert	0.43	\$	325.00	\$	140.83
Marissa Nardi	4/15/2020	Kansas	Electronic email with IL re expert strategy and plan	0.45	\$	325.00	\$	146.25
Marissa Nardi	4/15/2020	Kansas	Meeting with PJ in preparation for M&C	1.00	\$	325.00	\$	325.00
Marissa Nardi	4/15/2020	Kansas	Meeting with external co-counsel re weekly litigation strategy issues, including depositions, case schedule, M&C, NPs, NFs, and experts	0.92	\$	325.00	\$	297.92
Marissa Nardi	4/16/2020	Kansas	Meeting with external co-counsel in preparation for M&C	1.70	\$	325.00	\$	552.50
Marissa Nardi	4/16/2020	Kansas	Draft outline of talking points for M&C	1.82	\$	325.00	\$	590.42
Marissa Nardi	4/17/2020	Kansas	M&C with Defs re discovery disputes	1.50	\$	325.00	\$	487.50
Marissa Nardi	4/17/2020	Kansas	Prepare for M&C with Defs re discovery issues	2.32	\$	325.00	\$	752.92
Marissa Nardi	4/20/2020	Kansas	Email with CC re discovery deadlines	0.15	\$	325.00	\$	48.75
Marissa Nardi	4/20/2020	Kansas	Discuss targeted factual investigatory re COVID-19 placement issues with CC	0.30	\$	325.00	\$	97.50
Marissa Nardi	4/20/2020	Kansas	Review recent R&Os from Defs	0.47	\$	325.00	\$	151.67
Marissa Nardi	4/20/2020	Kansas	Analyze case updates re COVID-19 issues re placements and MH	0.48	\$	325.00	\$	157.08
Marissa Nardi	4/21/2020	Kansas	Review CC's investigatory analysis re COVID-19 placement issues	0.20	\$	325.00	\$	65.00
Marissa Nardi	4/21/2020	Kansas	Electronic email to external co-counsel team re engagement letter	0.23	\$	325.00	\$	75.83
Marissa Nardi	4/21/2020	Kansas	Electronic email to KS external co-counsel to advise re results of CC investigatory project	0.25	\$	325.00	\$	81.25
Marissa Nardi	4/21/2020	Kansas	Analyze draft updated litigation schedule with IL	0.37	\$	325.00	\$	119.17
Marissa Nardi	4/21/2020	Kansas	Meeting with NCYL re discovery items and disputes with Defs	0.50	\$	325.00	\$	162.50

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## Children's Rights Itemized Time Entries

Marissa Nardi	4/21/2020	Kansas	Meeting with external co-counsel PJ FP TW and JK to discuss potential arguments and strategy for M&C	1.00	\$	325.00	\$	325.00
Marissa Nardi	4/21/2020	Kansas	Prepare talking points for M&C	1.35	\$	325.00	\$	438.75
Marissa Nardi	4/21/2020	Kansas	M&C with opposing counsel re discovery disputes	1.50	\$	325.00	\$	487.50
Marissa Nardi	4/22/2020	Kansas	Prepare for KS co-counsel team mtg by reviewing M&C notes and expert correspondence	0.32	\$	325.00	\$	102.92
Marissa Nardi	4/22/2020	Kansas	Electronic email with CG about new issues in Def's electronic production of discovery	0.38	\$	325.00	\$	124.58
Marissa Nardi	4/22/2020	Kansas	Discuss experts with internal CR team	0.55	\$	325.00	\$	178.75
Marissa Nardi	4/22/2020	Kansas	Prepare follow-up from yesterday's M&C	0.83	\$	325.00	\$	270.83
Marissa Nardi	4/22/2020	Kansas	Meeting with external co-counsel re litigation strategy, including COVID-related discovery issues, experts, M&C, and updates from NFs	1.00	\$	325.00	\$	325.00
Marissa Nardi	4/23/2020	Kansas	Electronic email with external co-counsel re discovery tasks	0.25	\$	325.00	\$	81.25
Marissa Nardi	4/23/2020	Kansas	Review Defs' 3rd Set of R&Os	0.73	\$	325.00	\$	238.33
Marissa Nardi	4/27/2020	Kansas	Speak with KS co-counsel PJ TW and JK to prepare for next M&C	0.50	\$	325.00	\$	162.50
Marissa Nardi	4/27/2020	Kansas	Review discovery produced by Defendants to locate and analyze references to kidzones	0.50	\$	325.00	\$	162.50
Marissa Nardi	4/27/2020	Kansas	M&C with Defs and external co-counsel re ESI issues specifically	1.00	\$	325.00	\$	325.00
Marissa Nardi	4/28/2020	Kansas	Electronic email with internal team re COVID-19 placement and MH doc production and doc review	0.13	\$	325.00	\$	43.33
Marissa Nardi	4/28/2020	Kansas	Electronic email with PJ and FP re Relativity review of NP files	0.17	\$	325.00	\$	54.17
Marissa Nardi	4/28/2020	Kansas	Electronic email with PJ re topics for ESI M&C	0.18	\$	325.00	\$	59.58
Marissa Nardi	4/28/2020	Kansas	Discuss NP file review of MA file with DA, CC, and IL	0.23	\$	325.00	\$	75.83
Marissa Nardi	4/28/2020	Kansas	Telephone call with PJ re upcoming discovery	0.33	\$	325.00	\$	108.33

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	4/28/2020	Kansas	Meeting with CG re identification of outstanding production issues for upcoming discovery M&C with Defs	0.50	\$	325.00	\$	162.50
Marissa Nardi	4/28/2020	Kansas	Edit NT draft letter re litigation holds	0.80	\$	325.00	\$	260.00
Marissa Nardi	4/28/2020	Kansas	Read closely newly identified KidZone records from discovery produced by Defs	1.27	\$	325.00	\$	411.67
Marissa Nardi	4/29/2020	Kansas	Electronic email with PJ re ESI M&C prep	0.13	\$	325.00	\$	43.33
Marissa Nardi	4/29/2020	Kansas	Review draft email from CG re open issues in Defs production to alert Defs to	0.25	\$	325.00	\$	81.25
Marissa Nardi	4/29/2020	Kansas	Meeting with internal KS team re ongoing discovery issues to address in meet and confer	0.33	\$	325.00	\$	108.33
Marissa Nardi	4/29/2020	Kansas	Review NT's chart of potential CW experts	0.37	\$	325.00	\$	119.17
Marissa Nardi	4/29/2020	Kansas	Prepare for ESI M&C by creating talking points	0.40	\$	325.00	\$	130.00
Marissa Nardi	4/29/2020	Kansas	M&C with Defs re ESI	1.00	\$	325.00	\$	325.00
Marissa Nardi	4/29/2020	Kansas	Meeting with external co-counsel team for litigation strategy mtg, including discussion of subpoenas, M&Cs, privilege and redaction logs, case schedule, experts, and new COVID-19 issues	1.00	\$	325.00	\$	325.00
Marissa Nardi	4/30/2020	Kansas	Review most relevant COVID-19 documents re placements & MH produced by Defs as isolated by CG	0.32	\$	325.00	\$	102.92
Marissa Nardi	4/30/2020	Kansas	Edit draft motion for extension to file motions to compel	0.40	\$	325.00	\$	130.00
Marissa Nardi	4/30/2020	Kansas	Discuss with JK privilege and redaction log analysis	0.45	\$	325.00	\$	146.25
Marissa Nardi	4/30/2020	Kansas	Telephone call with PJ to follow-up re discovery open issues	0.50	\$	325.00	\$	162.50
Marissa Nardi	4/30/2020	Kansas	Read rogs and rfps just served by Defs	0.53	\$	325.00	\$	173.33
Marissa Nardi	4/30/2020	Kansas	Analyze draft talking points re litigation holds in advance of meet and confer	0.58	\$	325.00	\$	189.58
Marissa Nardi	4/30/2020	Kansas	Meeting with NT, IL, and EPG re CW experts	1.00	\$	325.00	\$	325.00
Marissa Nardi	4/30/2020	Kansas	Draft outline of talking points for M&C re discovery	2.63	\$	325.00	\$	855.83

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	5/1/2020	Kansas	Discuss Defs' produced COVID-19 discovery with CG	0.37	\$	325.00	\$	119.17
Marissa Nardi	5/1/2020	Kansas	Draft summary of all agreements and representations from M&C for external co-counsel's review and circulation to Defs	0.53	\$	325.00	\$	173.33
Marissa Nardi	5/1/2020	Kansas	Meeting with external co-counsel re discovery during M&C	0.75	\$	325.00	\$	243.75
Marissa Nardi	5/1/2020	Kansas	Review COVID-19 production by Defendants	0.77	\$	325.00	\$	249.17
Marissa Nardi	5/1/2020	Kansas	Meeting with internal CR co-counsel and external co-counsel PJ TW and JK (DLA) to prepare for M&C later today	1.00	\$	325.00	\$	325.00
Marissa Nardi	5/1/2020	Kansas	Edit M&C outline in preparation for M&C	1.28	\$	325.00	\$	417.08
Marissa Nardi	5/4/2020	Kansas	Electronic email with JK at DLA re search terms	0.18	\$	325.00	\$	59.58
Marissa Nardi	5/4/2020	Kansas	Review Defs' letter re draft settlement agreement	0.20	\$	325.00	\$	65.00
Marissa Nardi	5/4/2020	Kansas	Electronic email with internal team re privilege log	0.22	\$	325.00	\$	70.42
Marissa Nardi	5/4/2020	Kansas	Electronic email with external co-counsel re summary of M&C to share with Defs	0.23	\$	325.00	\$	75.83
Marissa Nardi	5/4/2020	Kansas	Electronic email with IL re mediation	0.27	\$	325.00	\$	86.67
Marissa Nardi	5/4/2020	Kansas	Electronic email IL re analysis of Defs' draft settlement agreement dated 5-4-20	0.27	\$	325.00	\$	86.67
Marissa Nardi	5/4/2020	Kansas	Electronic email with internal CR team re NP file review	0.32	\$	325.00	\$	102.92
Marissa Nardi	5/4/2020	Kansas	Read and discuss updated NP doc review protocol	0.43	\$	325.00	\$	140.83
Marissa Nardi	5/4/2020	Kansas	Analyze and correspond with NT, IL, and EPG re update re potential CW experts	0.68	\$	325.00	\$	222.08
Marissa Nardi	5/4/2020	Kansas	Analyze last draft of settlement agreement to analyze potential items for further negotiations	0.72	\$	325.00	\$	232.92
Marissa Nardi	5/4/2020	Kansas	Analyze Defendants' new 5-4-20 marked up draft settlement agreement	0.90	\$	325.00	\$	292.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	5/5/2020	Kansas	Discuss follow-up re brain science expert with CG	0.27	\$	325.00	\$	86.67
Marissa Nardi	5/5/2020	Kansas	Review CG's draft summary re production issues	0.37	\$	325.00	\$	119.17
Marissa Nardi	5/5/2020	Kansas	Analyze COVID-19 production holes	1.32	\$	325.00	\$	427.92
Marissa Nardi	5/6/2020	Kansas	Electronic email with NK re CW expert progress	0.13	\$	325.00	\$	43.33
Marissa Nardi	5/6/2020	Kansas	Electronic email with CC DA and CG re location of COVID-19 files	0.18	\$	325.00	\$	59.58
Marissa Nardi	5/6/2020	Kansas	Electronic email with PJ re ESI search terms	0.20	\$	325.00	\$	65.00
Marissa Nardi	5/6/2020	Kansas	Prepare for co-counsel meeting by reviewing latest correspondence	0.27	\$	325.00	\$	86.67
Marissa Nardi	5/6/2020	Kansas	Discuss with PJ review of documents produced by Defs and M&Cs	0.32	\$	325.00	\$	102.92
Marissa Nardi	5/6/2020	Kansas	Electronic email with JK and IL re analysis of privilege and redaction logs	0.32	\$	325.00	\$	102.92
Marissa Nardi	5/6/2020	Kansas	Meeting with JK re privilege and redaction log	0.25	\$	325.00	\$	81.25
Marissa Nardi	5/6/2020	Kansas	Meeting with internal CR KS team re experts and productions	0.58	\$	325.00	\$	189.58
Marissa Nardi	5/6/2020	Kansas	Prepare and email internal team re plan for identifying deponents	0.63	\$	325.00	\$	205.83
Marissa Nardi	5/6/2020	Kansas	Meeting with CG re rfps (4th set of rfps to dcf and 2nd set to kdhe and kdads)	0.67	\$	325.00	\$	216.67
Marissa Nardi	5/6/2020	Kansas	Meeting with external co-counsel team re litigation strategy, including discovery disputes, litigation schedule, experts, and settlement	1.00	\$	325.00	\$	325.00
Marissa Nardi	5/6/2020	Kansas	Edit COVID-19 production holes summary and analysis in preparation for M&C	1.45	\$	325.00	\$	471.25
Marissa Nardi	5/7/2020	Kansas	Electronic email with JK re video depositions and vendors	0.18	\$	325.00	\$	59.58
Marissa Nardi	5/7/2020	Kansas	Electronic email with DA and CC re NP MA files and supplemental production	0.33	\$	325.00	\$	108.33

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	5/7/2020	Kansas	Analyze and discuss with IL updated draft case calendar to propose to Defs	0.40	\$	325.00	\$	130.00
Marissa Nardi	5/7/2020	Kansas	Electronic email with DA and CC re COVID-19 production and updates	0.47	\$	325.00	\$	151.67
Marissa Nardi	5/7/2020	Kansas	Review and edit privilege log and redaction analysis in conjunction with logs provided by Defs	0.87	\$	325.00	\$	281.67
Marissa Nardi	5/7/2020	Kansas	Draft talking points and outline for upcoming discovery disputes M&C	1.73	\$	325.00	\$	563.33
Marissa Nardi	5/8/2020	Kansas	Electronic email with NT re legal research re NP rogs	0.13	\$	325.00	\$	43.33
Marissa Nardi	5/8/2020	Kansas	electronic mail with CG re production deficiencies from Defendants' covid-19 production	0.22	\$	325.00	\$	70.42
Marissa Nardi	5/8/2020	Kansas	discuss with PJ discovery issues to address during next M&C	0.23	\$	325.00	\$	75.83
Marissa Nardi	5/8/2020	Kansas	electronic mail with internal CR team re first 30b6 depositions and communications with Defs	0.27	\$	325.00	\$	86.67
Marissa Nardi	5/8/2020	Kansas	electronic mail with CC and DA re outline for M&C	0.30	\$	325.00	\$	97.50
Marissa Nardi	5/8/2020	Kansas	electronic mail with JK and PJ re search terms and ESI issues	0.32	\$	325.00	\$	102.92
Marissa Nardi	5/8/2020	Kansas	electronic mail with IL, LW, PJ, and DLA re upcoming 30b6 topic	0.37	\$	325.00	\$	119.17
Marissa Nardi	5/8/2020	Kansas	prepare for M&C by editing outline	0.83	\$	325.00	\$	270.83
Marissa Nardi	5/8/2020	Kansas	read legal research re responding to rogs posed to NPs	0.97	\$	325.00	\$	314.17
Marissa Nardi	5/8/2020	Kansas	draft letter to Defs with key assertions from M&C to share with external co-counsel and then Defs	0.97	\$	325.00	\$	314.17
Marissa Nardi	5/8/2020	Kansas	M&C with opposing co-counsel re discovery matters	1.50	\$	325.00	\$	487.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	5/14/2020	Kansas	electronic mail with NT and SD re discovery requests by Defs directed at NPs	0.25	\$	325.00	\$	81.25
Marissa Nardi	5/14/2020	Kansas	electronic mail with NT re potential CW experts	0.28	\$	325.00	\$	92.08
Marissa Nardi	5/14/2020	Kansas	discuss M&C prep with PJ	0.32	\$	325.00	\$	102.92
Marissa Nardi	5/14/2020	Kansas	analyze discovery directed toward NPs	0.32	\$	325.00	\$	102.92
Marissa Nardi	5/14/2020	Kansas	prepare agenda for M&C	0.33	\$	325.00	\$	108.33
Marissa Nardi	5/14/2020	Kansas	discuss M&C strategy with internal team	0.37	\$	325.00	\$	119.17
Marissa Nardi	5/14/2020	Kansas	prepare list and analysis of CR M&C topics for PJ	0.47	\$	325.00	\$	151.67
Marissa Nardi	5/14/2020	Kansas	analyze proposed case schedule and email team re same	0.47	\$	325.00	\$	151.67
Marissa Nardi	5/14/2020	Kansas	edit CG draft letter to Pls' re COVID-19 production issues	0.68	\$	325.00	\$	222.08
Marissa Nardi	5/15/2020	Kansas	review notes and recap from M&C	0.27	\$	325.00	\$	86.67
Marissa Nardi	5/15/2020	Kansas	electronic mail with LF, NT, and CC re discovery to NPs	0.30	\$	325.00	\$	97.50
Marissa Nardi	5/15/2020	Kansas	electronic mail re deposition prep	0.30	\$	325.00	\$	97.50
Marissa Nardi	5/15/2020	Kansas	read letters from Defs re custodians	0.43	\$	325.00	\$	140.83
Marissa Nardi	5/15/2020	Kansas	electronic mail with internal and co-counsel team re 30(b)(6) designees and scheduling	0.48	\$	325.00	\$	157.08
Marissa Nardi	5/15/2020	Kansas	electronic mail with internal team and PJ re proposed updated case schedule	0.80	\$	325.00	\$	260.00
Marissa Nardi	5/18/2020	Kansas	electronic mail with CC re upcoming litigation deadlines	0.13	\$	325.00	\$	43.33
Marissa Nardi	5/18/2020	Kansas	electronic mail with co-counsel re email letter to Defs summarizing Defs' admissions from M&C	0.28	\$	325.00	\$	92.08
Marissa Nardi	5/18/2020	Kansas	edit M&C summary to share with Defs	0.33	\$	325.00	\$	108.33
Marissa Nardi	5/18/2020	Kansas	discuss preparation for Koehn deposition with PJ and JK	0.57	\$	325.00	\$	184.17
Marissa Nardi	5/18/2020	Kansas	prepare for Koehn deposition	0.93	\$	325.00	\$	303.33

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	5/19/2020	Kansas	electronic mail with JK re rough drafts, video, feeds, and deposition details for upcoming Koehn 30b6 deposition	0.38	\$	325.00	\$	124.58
Marissa Nardi	5/19/2020	Kansas	electronic mail with PJ, JK (CR), and JK (DLA) re remote deposition prep	0.47	\$	325.00	\$	151.67
Marissa Nardi	5/19/2020	Kansas	analyze 30(b)(6) deposition notice in preparation for depositions	0.53	\$	325.00	\$	173.33
Marissa Nardi	5/19/2020	Kansas	discuss with IL deposition strategy	0.70	\$	325.00	\$	227.50
Marissa Nardi	5/20/2020	Kansas	read KS local rules re depositions	0.12	\$	325.00	\$	37.92
Marissa Nardi	5/20/2020	Kansas	electronic mail to internal team re supplementation of initial disclosures	0.17	\$	325.00	\$	54.17
Marissa Nardi	5/20/2020	Kansas	electronic mail with JK re prepare for upcoming settlement session	0.18	\$	325.00	\$	59.58
Marissa Nardi	5/20/2020	Kansas	advise DA & CC re MA file review	0.22	\$	325.00	\$	70.42
Marissa Nardi	5/20/2020	Kansas	review sample outlines	0.22	\$	325.00	\$	70.42
Marissa Nardi	5/20/2020	Kansas	electronic mail with internal team re custodian lists	0.28	\$	325.00	\$	92.08
Marissa Nardi	5/20/2020	Kansas	discuss 30b6 topic 1(1&3) deposition strategy with IL and NT	0.08	\$	325.00	\$	27.08
Marissa Nardi	5/20/2020	Kansas	electronic mail with NT, CC, and DA re 30b6 topic 1(1&3) deposition preparation tasks	0.30	\$	325.00	\$	97.50
Marissa Nardi	5/20/2020	Kansas	discuss with SD and IL re news re contractors and updated 30b6 strategy	0.33	\$	325.00	\$	108.33
Marissa Nardi	5/20/2020	Kansas	prepare for co-counsel meeting with external team re litigation strategy by reviewing recent correspondence	0.20	\$	325.00	\$	65.00
Marissa Nardi	5/20/2020	Kansas	Closely review newly produced docs by Defendants re retention policy and litigation hold	0.40	\$	325.00	\$	130.00
Marissa Nardi	5/20/2020	Kansas	advise JK (DLA) for upcoming 30b6 deposition	0.45	\$	325.00	\$	146.25
Marissa Nardi	5/20/2020	Kansas	meeting with internal team re upcoming CR 30(b)(6) deposition	0.50	\$	325.00	\$	162.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	5/20/2020	Kansas	meeting with external co-counsel re litigation strategy, including 30(b)(6) depositions, subpoenas, NPs, mediation, and experts	1.00	\$	325.00	\$	325.00
Marissa Nardi	5/21/2020	Kansas	email with IL and NT re custodian attachment shared today	0.20	\$	325.00	\$	65.00
Marissa Nardi	5/21/2020	Kansas	electronic mail with LBB and TW re deposition on Tues of Koehn	0.22	\$	325.00	\$	70.42
Marissa Nardi	5/21/2020	Kansas	electronic mail co-counsel draft 30b6 update letter and email with external co-counsel re same	0.32	\$	325.00	\$	102.92
Marissa Nardi	5/21/2020	Kansas	meeting with IL re litigation case strategy for Kansas, including 30(b)(6) deposition of Kline and responding to Defs' discovery requests re NPs	0.50	\$	325.00	\$	162.50
Marissa Nardi	5/21/2020	Kansas	meeting with NT and IL re 30b6 deposition topic I(1&3) prep	0.50	\$	325.00	\$	162.50
Marissa Nardi	5/21/2020	Kansas	edit draft third party subpoenas	0.53	\$	325.00	\$	173.33
Marissa Nardi	5/21/2020	Kansas	advise JK (DLA) re preparation of 30b6 deposition of topic 3(3)	0.55	\$	325.00	\$	178.75
Marissa Nardi	5/21/2020	Kansas	Factual research re Melinda Kline 30b6 designee	0.72	\$	325.00	\$	232.92
Marissa Nardi	5/21/2020	Kansas	prepare list of admissions from M&C	0.85	\$	325.00	\$	276.25
Marissa Nardi	5/21/2020	Kansas	edit CG draft letter to Defs re 30b6 issues and new priority deposition	1.23	\$	325.00	\$	400.83
Marissa Nardi	5/22/2020	Kansas	telephone call with PJ re deposition preparation	0.13	\$	325.00	\$	43.33
Marissa Nardi	5/22/2020	Kansas	M&C with opposing counsel re ESI	1.00	\$	325.00	\$	325.00
Marissa Nardi	5/22/2020	Kansas	meeting with PJ and JK (DLA) in preparation for Tues's deposition of Koehn 30b6 topic III(3)	1.00	\$	325.00	\$	325.00
Marissa Nardi	5/25/2020	Kansas	review J. Koehn deposition preparation outline in preparation for deposition	0.67	\$	325.00	\$	216.67
Marissa Nardi	5/26/2020	Kansas	edit draft settlement markup document and share with IL	0.32	\$	325.00	\$	102.92

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Marissa Nardi	5/26/2020	Kansas	prepare for 30b6 deposition by reviewing outline	0.88	\$	325.00	\$	287.08
Marissa Nardi	5/27/2020	Kansas	electronic mail with NT EPG and IL re experts for child welfare	0.15	\$	325.00	\$	48.75
Marissa Nardi	5/27/2020	Kansas	electronic mail with JK re settlement prep	0.18	\$	325.00	\$	59.58
Marissa Nardi	5/27/2020	Kansas	discuss J. Koehn deposition with IL and NT in preparation for upcoming M. Kline deposition	0.23	\$	325.00	\$	75.83
Marissa Nardi	5/27/2020	Kansas	discuss with DA and CC plan for discovery deadline	0.25	\$	325.00	\$	81.25
Marissa Nardi	5/27/2020	Kansas	prepare to discuss J. Koehn deposition highlights at external co-counsel team mtg by reviewing notes	0.23	\$	325.00	\$	75.83
Marissa Nardi	5/27/2020	Kansas	electronic mail with JK and PJ re Koehn deposition exhibits	0.30	\$	325.00	\$	97.50
Marissa Nardi	5/27/2020	Kansas	meeting with internal CR team re potential exhibits for deposition of Melinda Kline, other discovery, settlement strategy.	0.67	\$	325.00	\$	216.67
Marissa Nardi	5/27/2020	Kansas	review select portions of J. Koehn deposition. rough transcript	0.80	\$	325.00	\$	260.00
Marissa Nardi	5/27/2020	Kansas	meeting with external co-counsel team re litigation strategy, including responding to discovery posed by Defs, third parties, depositions, aging out NPs, and experts	1.00	\$	325.00	\$	325.00
Marissa Nardi	5/28/2020	Kansas	electronic mail with M. Hawley re his legal research re discovery directed to children	0.33	\$	325.00	\$	108.33
Marissa Nardi	5/28/2020	Kansas	electronic mail with IL, NT, and KS co-counsel re M. Hawley's legal research re propounding discovery to children	0.40	\$	325.00	\$	130.00
Marissa Nardi	5/28/2020	Kansas	meeting with CR neuroscience team to prepare for session w/ expert	0.50	\$	325.00	\$	162.50
Marissa Nardi	5/28/2020	Kansas	meeting with IL re KS discovery and settlement	0.73	\$	325.00	\$	238.33

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	5/29/2020	Kansas	discuss with NT and MH NP aging out legal research issue	0.32	\$	325.00	\$	102.92
Marissa Nardi	5/29/2020	Kansas	meeting with external co-counsel re draft settlement agreement and proposed responses for Defs	1.50	\$	325.00	\$	487.50
Marissa Nardi	6/1/2020	Kansas	electronic mail with PJ and JK re ESI M&C	0.15	\$	325.00	\$	48.75
Marissa Nardi	6/1/2020	Kansas	prepare for mtg with expert re brain science	0.33	\$	325.00	\$	108.33
Marissa Nardi	6/1/2020	Kansas	edit draft settlement agreement	0.35	\$	325.00	\$	113.75
Marissa Nardi	6/1/2020	Kansas	electronic mail with NT re Kline deposition topic	0.37	\$	325.00	\$	119.17
Marissa Nardi	6/1/2020	Kansas	review KS expert research materials	0.40	\$	325.00	\$	130.00
Marissa Nardi	6/1/2020	Kansas	review newly updated draft settlement	0.65	\$	325.00	\$	211.25
Marissa Nardi	6/1/2020	Kansas	review part 1 of first draft deposition outline for M. Kline	0.83	\$	325.00	\$	270.83
Marissa Nardi	6/1/2020	Kansas	meeting with potential expert re brain science	0.72	\$	325.00	\$	232.92
Marissa Nardi	6/2/2020	Kansas	prepare for ESI M&C	0.22	\$	325.00	\$	70.42
Marissa Nardi	6/2/2020	Kansas	draft letter to Defendants re depositions	0.75	\$	325.00	\$	243.75
Marissa Nardi	6/2/2020	Kansas	M&C with Defs re ESI	1.00	\$	325.00	\$	325.00
Marissa Nardi	6/2/2020	Kansas	edit full 30(b)(6) deposition outline for Kline	2.67	\$	325.00	\$	866.67
Marissa Nardi	6/3/2020	Kansas	discuss with NCYL colloquial terms for night-to-night placements for Kline deposition outline	0.30	\$	325.00	\$	97.50
Marissa Nardi	6/3/2020	Kansas	analyze new EPSDT data from Defs	0.32	\$	325.00	\$	102.92
Marissa Nardi	6/3/2020	Kansas	prepare for co-counsel team mtg by reading latest correspondence	0.17	\$	325.00	\$	54.17
Marissa Nardi	6/3/2020	Kansas	advise JK re settlement drafts in preparation for settlement session	0.33	\$	325.00	\$	108.33
Marissa Nardi	6/3/2020	Kansas	electronic mail to internal CR re analysis of MA NP file	0.37	\$	325.00	\$	119.17
Marissa Nardi	6/3/2020	Kansas	read public info Defs directed Pls to on agency website for purposes of settlement discussion	0.38	\$	325.00	\$	124.58
Marissa Nardi	6/3/2020	Kansas	revise deposition exhibits for Kline deposition outline	0.42	\$	325.00	\$	135.42

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	6/3/2020	Kansas	meeting with external co-counsel team to discuss mediation strategy	0.50	\$	325.00	\$	162.50
Marissa Nardi	6/3/2020	Kansas	meeting with internal KS team re mediation updates, Kline deposition, review of materials produced by Defs, ESI and discovery responses	0.50	\$	325.00	\$	162.50
Marissa Nardi	6/3/2020	Kansas	advise NT re Kline deposition outline edits	0.67	\$	325.00	\$	216.67
Marissa Nardi	6/3/2020	Kansas	prepare for negotiation session with Defs re settlement by reviewing latest drafts and creating talking points	0.82	\$	325.00	\$	265.42
Marissa Nardi	6/3/2020	Kansas	discuss NP file review with IL, PJ, DA, and CC	0.83	\$	325.00	\$	270.83
Marissa Nardi	6/3/2020	Kansas	meeting with external co-counsel team re litigation strategy, including settlement, third party subpoenas, and depositions	1.00	\$	325.00	\$	325.00
Marissa Nardi	6/4/2020	Kansas	review updated ESI sources for DCF doc collection	0.25	\$	325.00	\$	81.25
Marissa Nardi	6/4/2020	Kansas	electronic mail with internal CR team re settlement session update	0.25	\$	325.00	\$	81.25
Marissa Nardi	6/4/2020	Kansas	draft updated settlement package to share with Defs	0.63	\$	325.00	\$	205.83
Marissa Nardi	6/4/2020	Kansas	meeting with IL re upcoming settlement session	0.67	\$	325.00	\$	216.67
Marissa Nardi	6/4/2020	Kansas	prepare for negotiation session re settlement by drafting talking points and reviewing latest materials	1.00	\$	325.00	\$	325.00
Marissa Nardi	6/4/2020	Kansas	meeting with Defs re settlement	5.00	\$	325.00	\$	1,625.00
Marissa Nardi	6/5/2020	Kansas	prepare list of relevant listserv email addresses to share with opposing counsel CJ and RD for potential ESI searches of their inboxes and outboxes	0.33	\$	325.00	\$	108.33
Marissa Nardi	6/5/2020	Kansas	electronic mail with internal CR team re deposition strategy for Kline in light of M&C	0.35	\$	325.00	\$	113.75
Marissa Nardi	6/5/2020	Kansas	telephone call with IL and NT re deposition adjustment plan	0.48	\$	325.00	\$	157.08

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	6/5/2020	Kansas	edit draft settlement package proposal language	0.50	\$	325.00	\$	162.50
Marissa Nardi	6/5/2020	Kansas	draft outline for KS general discovery M&C	0.85	\$	325.00	\$	276.25
Marissa Nardi	6/5/2020	Kansas	M&C with Defs re ESI	1.00	\$	325.00	\$	325.00
Marissa Nardi	6/5/2020	Kansas	M&C with Defs re discovery issues including depositions and document productions	1.00	\$	325.00	\$	325.00
Marissa Nardi	6/8/2020	Kansas	review sunflower's supplemental response to subpoena	0.17	\$	325.00	\$	54.17
Marissa Nardi	6/8/2020	Kansas	discuss legal research memo re aging out with NT	0.22	\$	325.00	\$	70.42
Marissa Nardi	6/8/2020	Kansas	edit legal research memo on KS NPs aging out	0.48	\$	325.00	\$	157.08
Marissa Nardi	6/9/2020	Kansas	discuss with SD and team conversations with clients re aging out	0.38	\$	325.00	\$	124.58
Marissa Nardi	6/9/2020	Kansas	discuss discovery follow-up re aging out NPs with PJ	0.52	\$	325.00	\$	167.92
Marissa Nardi	6/9/2020	Kansas	prepare updated filing plan	0.65	\$	325.00	\$	211.25
Marissa Nardi	6/9/2020	Kansas	prepare for upcoming schedule 30(b)(6) deposition re placement	0.82	\$	325.00	\$	265.42
Marissa Nardi	6/9/2020	Kansas	analyze draft Kansas settlement in preparation for settlement mtg with Defs	0.93	\$	325.00	\$	303.33
Marissa Nardi	6/10/2020	Kansas	electronic mail with external co-counsel re edits to draft settlement	0.37	\$	325.00	\$	119.17
Marissa Nardi	6/10/2020	Kansas	discuss settlement updates with internal and external co-counsel team	0.45	\$	325.00	\$	146.25
Marissa Nardi	6/10/2020	Kansas	prepare for settlement session with Defs today by reviewing latest drafts by each party	0.55	\$	325.00	\$	178.75
Marissa Nardi	6/10/2020	Kansas	electronic mail with SB and IL re suggested edits to KS draft settlement	0.65	\$	325.00	\$	211.25
Marissa Nardi	6/10/2020	Kansas	electronic mail with external KS co-counsel re potential edits to updated settlement draft	1.28	\$	325.00	\$	417.08
Marissa Nardi	6/10/2020	Kansas	edit draft settlement agreement	1.72	\$	325.00	\$	557.92
Marissa Nardi	6/10/2020	Kansas	Settlement negotiation meetings with Defendants and co-counsel	3.00	\$	325.00	\$	975.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	6/11/2020	Kansas	electronic mail with team re motions re 18 year old NPs	0.35	\$	325.00	\$	113.75
Marissa Nardi	6/11/2020	Kansas	prepare for settlement session	0.70	\$	325.00	\$	227.50
Marissa Nardi	6/11/2020	Kansas	Settlement negotiation meetings and breakout sessions with Defs and Pls for settlement purposes	3.00	\$	325.00	\$	975.00
Marissa Nardi	6/12/2020	Kansas	prepare draft email to NFs advising them of settlement terms	0.48	\$	325.00	\$	157.08
Marissa Nardi	6/12/2020	Kansas	meeting with IL and CJ re settlement communications	0.50	\$	325.00	\$	162.50
Marissa Nardi	6/12/2020	Kansas	electronic mail with external co-counsel team re all follow-up needed for settlement finalization	0.72	\$	325.00	\$	232.92
Marissa Nardi	6/15/2020	Kansas	electronic mail with LW and SD re communications with NFs re settlement	0.23	\$	325.00	\$	75.83
Marissa Nardi	6/15/2020	Kansas	discuss research re NP facts re settlement with CC	0.30	\$	325.00	\$	97.50
Marissa Nardi	6/15/2020	Kansas	electronic mail with IL and SD re NF approvals	0.37	\$	325.00	\$	119.17
Marissa Nardi	6/15/2020	Kansas	edit draft communication re settlement agreement	0.48	\$	325.00	\$	157.08
Marissa Nardi	6/15/2020	Kansas	draft email letter to NFs re approval of settlement agreement	0.73	\$	325.00	\$	238.33
Marissa Nardi	6/15/2020	Kansas	prepare fee app filing plan and timeline	0.83	\$	325.00	\$	270.83
Marissa Nardi	6/16/2020	Kansas	electronic mail with CC and PJ re preliminary approval pre-class cert in re settlement	0.32	\$	325.00	\$	102.92
Marissa Nardi	6/16/2020	Kansas	review draft stipulation	0.38	\$	325.00	\$	124.58
Marissa Nardi	6/16/2020	Kansas	edit draft stipulation	0.47	\$	325.00	\$	151.67
Marissa Nardi	6/16/2020	Kansas	edit draft communications re proposed settlement	0.65	\$	325.00	\$	211.25
Marissa Nardi	6/17/2020	Kansas	prepare for KS co-counsel team mtg by reviewing emails	0.22	\$	325.00	\$	70.42
Marissa Nardi	6/17/2020	Kansas	electronic mail with NCYL and Martha re screening instruments in re settlement	0.33	\$	325.00	\$	108.33

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	6/17/2020	Kansas	electronic mail with expert re brain science re next steps	0.38	\$	325.00	\$	124.58
Marissa Nardi	6/17/2020	Kansas	finalize draft attachments to settlement agreements subject to Defs' potential additions	0.48	\$	325.00	\$	157.08
Marissa Nardi	6/17/2020	Kansas	telephone call with IL CJ and BR re settlement agreement	0.50	\$	325.00	\$	162.50
Marissa Nardi	6/17/2020	Kansas	review closely the set of attachments pulled by CC as potential settlement exhibits	0.57	\$	325.00	\$	184.17
Marissa Nardi	6/17/2020	Kansas	electronic mail with CC, IL, and co-counsel re settlement exhibits	0.80	\$	325.00	\$	260.00
Marissa Nardi	6/17/2020	Kansas	meeting with external co-counsel team re settlement and litigation strategy, including settlement revisions, settlement communications with clients, preliminary approval motion, and third party discovery	1.00	\$	325.00	\$	325.00
Marissa Nardi	6/18/2020	Kansas	electronic mail with Corliss and internal CR team re final exhibits	0.15	\$	325.00	\$	48.75
Marissa Nardi	6/18/2020	Kansas	edit draft email to Defs	0.18	\$	325.00	\$	59.58
Marissa Nardi	6/18/2020	Kansas	electronic mail with FP and MH re screening instruments in settlement agreement	0.30	\$	325.00	\$	97.50
Marissa Nardi	6/18/2020	Kansas	review filing from Hapka case in re preliminary approval proposed timeline	0.37	\$	325.00	\$	119.17
Marissa Nardi	6/18/2020	Kansas	electronic mail with PJ and NT re FRCP research re preliminary approval	0.38	\$	325.00	\$	124.58
Marissa Nardi	6/18/2020	Kansas	meeting with IL re settlement agreement and preliminary approval p	0.50	\$	325.00	\$	162.50
Marissa Nardi	6/18/2020	Kansas	edit final set of settlement exhibits to include new materials from Defendants approved by Plaintiffs and tabs	0.50	\$	325.00	\$	162.50
Marissa Nardi	6/18/2020	Kansas	analyze closely sample PECFS and CAFAS from Defendants in re settlement	0.63	\$	325.00	\$	205.83

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	6/18/2020	Kansas	prepare for meeting with Defendants re settlement by reviewing latest drafts and correspondence	0.80	\$	325.00	\$	260.00
Marissa Nardi	6/18/2020	Kansas	meeting with Defs and co-counsel re settlement	1.00	\$	325.00	\$	325.00
Marissa Nardi	6/19/2020	Kansas	electronic mail with SD and IL re draft updated settlement agreement in re communications with NFs	0.32	\$	325.00	\$	102.92
Marissa Nardi	6/22/2020	Kansas	telephone call with potential mediator for settlement in re settlement	0.25	\$	325.00	\$	81.25
Marissa Nardi	6/22/2020	Kansas	Conference call with proposed monitor re settlement agreement draft	0.33	\$	325.00	\$	108.33
Marissa Nardi	6/24/2020	Kansas	prepare for external team meeting by reviewing correspondence re settlement and preliminary approval	0.23	\$	325.00	\$	75.83
Marissa Nardi	6/24/2020	Kansas	meeting with external co-counsel team re litigation and settlement strategy, including AG's proposed settlement changes, client approvals, and preliminary approval motion	1.17	\$	325.00	\$	379.17
Marissa Nardi	6/29/2020	Kansas	discuss potential upcoming 30(b)(6) deposition with internal CR team	0.23	\$	325.00	\$	75.83
Marissa Nardi	6/30/2020	Kansas	meeting with external co-counsel re settlement strategy and next steps	0.58	\$	325.00	\$	189.58
Marissa Nardi	7/1/2020	Kansas	review proposed email to opposing counsel	0.17	\$	325.00	\$	54.17
Marissa Nardi	7/1/2020	Kansas	prepare for KS team meeting by reviewing status of third party discovery	0.22	\$	325.00	\$	70.42
Marissa Nardi	7/2/2020	Kansas	meeting with IL re upcoming KS litigation and settlement tasks	0.50	\$	325.00	\$	162.50
Marissa Nardi	7/2/2020	Kansas	Research re KS State Finance Council in re KS settlement approval process	1.57	\$	325.00	\$	509.17
Marissa Nardi	7/6/2020	Kansas	review email to Defs re next steps	0.17	\$	325.00	\$	54.17
Marissa Nardi	7/6/2020	Kansas	electronic mail with IL re edits to preliminary approval motion	0.18	\$	325.00	\$	59.58

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	7/6/2020	Kansas	electronic mail with IL re proposed sequencing of papers to be filed with Court re settlement	0.32	\$	325.00	\$	102.92
Marissa Nardi	7/6/2020	Kansas	electronic mail with IL re draft declaration by IL for CR ISO class certification with preliminary approval	0.33	\$	325.00	\$	108.33
Marissa Nardi	7/6/2020	Kansas	read draft preliminary approval papers for settlement	0.45	\$	325.00	\$	146.25
Marissa Nardi	7/6/2020	Kansas	read notice of settlement in similar litigation to compare with draft notice of settlement here	0.47	\$	325.00	\$	151.67
Marissa Nardi	7/6/2020	Kansas	edit draft preliminary approval motion	1.30	\$	325.00	\$	422.50
Marissa Nardi	7/7/2020	Kansas	electronic mail with SD re aged out NPs' stipulation of dismissal	0.17	\$	325.00	\$	54.17
Marissa Nardi	7/7/2020	Kansas	electronic mail with JS re preliminary approval affidavit	0.17	\$	325.00	\$	54.17
Marissa Nardi	7/7/2020	Kansas	electronic mail with IL re preliminary approval papers	0.30	\$	325.00	\$	97.50
Marissa Nardi	7/7/2020	Kansas	analyze KS finance committee statute with SD	0.33	\$	325.00	\$	108.33
Marissa Nardi	7/7/2020	Kansas	review KS settlement agreement updated by JP tonight	0.53	\$	325.00	\$	173.33
Marissa Nardi	7/7/2020	Kansas	discuss NP and NF approvals needed with SD and IL	0.67	\$	325.00	\$	216.67
Marissa Nardi	7/7/2020	Kansas	edit preliminary approval motion to share with NCYL	0.70	\$	325.00	\$	227.50
Marissa Nardi	7/8/2020	Kansas	finalize settlement filings	0.32	\$	325.00	\$	102.92
Marissa Nardi	7/8/2020	Kansas	review updated filings with respect to settlement	0.37	\$	325.00	\$	119.17
Marissa Nardi	7/8/2020	Kansas	analyze and share updates from state finance committee with Plaintiffs' team	0.63	\$	325.00	\$	205.83
Marissa Nardi	7/8/2020	Kansas	discuss final settlement with internal co-counsel team at CR	0.67	\$	325.00	\$	216.67
Marissa Nardi	7/8/2020	Kansas	finalize stip of dismissal for aged out NPs in collaboration with SD	0.82	\$	325.00	\$	265.42

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Marissa Nardi	7/8/2020	Kansas	meeting with external co-counsel team re settlement and next steps, including State Finance Council and dismissals for aged out NPs	0.83	\$	325.00	\$	270.83
Marissa Nardi	7/8/2020	Kansas	observe and take notes at Kansas State Finance Committee hearing public sessions discussing this settlement agreement	2.50	\$	325.00	\$	812.50
Marissa Nardi	7/9/2020	Kansas	discuss settlement with LBB, TW, and MH	0.48	\$	325.00	\$	157.08
Marissa Nardi	7/9/2020	Kansas	edit IL draft declaration for preliminary approval	0.80	\$	325.00	\$	260.00
Marissa Nardi	7/13/2020	Kansas	review updated draft motion for preliminary approval	0.20	\$	325.00	\$	65.00
Marissa Nardi	7/13/2020	Kansas	electronic mail with IL re edits to KS preliminary approval papers	0.22	\$	325.00	\$	70.42
Marissa Nardi	7/13/2020	Kansas	electronic mail with IL and NT re operative drafts of preliminary approval motion papers including IL affidavit	0.27	\$	325.00	\$	86.67
Marissa Nardi	7/13/2020	Kansas	review proposed edits to IL declaration re CR ISO preliminary approval motion	0.32	\$	325.00	\$	102.92
Marissa Nardi	7/13/2020	Kansas	discuss with NT and IL re updates to IL draft decl	0.35	\$	325.00	\$	113.75
Marissa Nardi	7/13/2020	Kansas	edit CR declaration for preliminary approval motion	0.40	\$	325.00	\$	130.00
Marissa Nardi	7/13/2020	Kansas	edit preliminary approval motion brief	0.45	\$	325.00	\$	146.25
Marissa Nardi	7/14/2020	Kansas	electronic mail with external KS co-counsel team re response to Amerigroup letter re subpoena	0.10	\$	325.00	\$	32.50
Marissa Nardi	7/15/2020	Kansas	electronic mail with NCYL re strategy re class counsel in preliminary approval papers	0.33	\$	325.00	\$	108.33
Marissa Nardi	7/15/2020	Kansas	edit draft CR declaration ISO preliminary approval	0.70	\$	325.00	\$	227.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Marissa Nardi	7/15/2020	Kansas	attend portion of meeting with external co-counsel team re settlement and preliminary	0.75	\$	325.00	\$	243.75
Marissa Nardi	7/16/2020	Kansas	finalize drafts of preliminary approval papers to be shared with Defendants for their approval prior to filing	0.28	\$	325.00	\$	92.08
Marissa Nardi	7/16/2020	Kansas	electronic mail with NCYL and IL re class counsel designations in re preliminary approval motion	0.32	\$	325.00	\$	102.92
Marissa Nardi	7/16/2020	Kansas	edit IL declaration for preliminary approval motion	0.33	\$	325.00	\$	108.33
Marissa Nardi	7/16/2020	Kansas	edit preliminary approval proposed order	0.33	\$	325.00	\$	108.33
Marissa Nardi	7/16/2020	Kansas	electronic mail with IL LW and PJ re class counsel designations for preliminary approval motion and related appearances needed	0.47	\$	325.00	\$	151.67
Marissa Nardi	7/16/2020	Kansas	meeting with IL re settlement preliminary approval	0.50	\$	325.00	\$	162.50
Marissa Nardi	7/21/2020	Kansas	electronic mail with external co-counsel team re proposed edits to preliminary approval papers	0.17	\$	325.00	\$	54.17
Nicole Taykhman	1/28/2020	Kansas	Review current draft opposition to motion to dismiss	0.53	\$	300.00	\$	160.00
Nicole Taykhman	1/29/2020	Kansas	Review current draft settlement	0.28	\$	300.00	\$	85.00
Nicole Taykhman	1/29/2020	Kansas	Call with SD re strategy for experts	0.45	\$	300.00	\$	135.00
Nicole Taykhman	1/30/2020	Kansas	Reviewed key document from defense production concerning overnight office stays.	0.15	\$	300.00	\$	45.00
Nicole Taykhman	1/30/2020	Kansas	Discuss NP file review with DA and CC.	0.35	\$	300.00	\$	105.00
Nicole Taykhman	2/5/2020	Kansas	Discuss motion to seal sample documents with CC.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	2/5/2020	Kansas	Email with MN, DA, and CC re defendant's responses and objections to first set of RFPs.	0.15	\$	300.00	\$	45.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Nicole Taykhman	2/5/2020	Kansas	Draft motion to seal exhibits in support of opposition to motion to dismiss.	1.32	\$	300.00	\$	395.00
Nicole Taykhman	2/6/2020	Kansas	Discuss status of exhibits for purpose of motion to seal and opposition to motion to dismiss with DA.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	2/6/2020	Kansas	Draft transmittal declaration for opposition to motion to dismiss.	0.43	\$	300.00	\$	130.00
Nicole Taykhman	2/7/2020	Kansas	Email with DA and MN re draft transmittal declaration and motion to seal filings for opposition to motion to dismiss.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	2/7/2020	Kansas	Discuss transmittal declaration and sealing documents for opposition to motion to dismiss with DA.	0.15	\$	300.00	\$	45.00
Nicole Taykhman	2/7/2020	Kansas	Work on declaration for exhibits to opposition to motion to dismiss and motion to seal exhibits	0.93	\$	300.00	\$	280.00
Nicole Taykhman	2/7/2020	Kansas	Draft response to defendants' responses and objections to first set of requests for production.	2.98	\$	300.00	\$	895.00
Nicole Taykhman	2/10/2020	Kansas	Review general discovery documents recently produced by defendants to identify their relevance to claims asserted here.	1.95	\$	300.00	\$	585.00
Nicole Taykhman	2/11/2020	Kansas	Revise motion to seal in light of cite-checked brief and updated exhibits.	0.22	\$	300.00	\$	65.00
Nicole Taykhman	2/12/2020	Kansas	Email with co-counsel, IL, and MN re updated filing for opposition to motion to dismiss.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	2/12/2020	Kansas	Review local rules re declarations re declaration to be submitted with opposition to Defs' motion to dismiss	0.08	\$	300.00	\$	25.00
Nicole Taykhman	2/12/2020	Kansas	Discuss with MN status of opposition to motion to dismiss, motion to seal, declaration, and golden rule letter.	0.17	\$	300.00	\$	50.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Nicole Taykhman	2/12/2020	Kansas	Further revise motion to seal exhibits in support of opposition to motion to dismiss.	0.23	\$	300.00	\$	70.00
Nicole Taykhman	2/12/2020	Kansas	Meet with MN, CG, JK, and CC to discuss updates to opposition to motion to dismiss and discovery.	0.23	\$	300.00	\$	70.00
Nicole Taykhman	2/12/2020	Kansas	Email with DA and MN re draft declaration and motion to seal corresponding to opposition to motion to dismiss.	0.33	\$	300.00	\$	100.00
Nicole Taykhman	2/12/2020	Kansas	Continue reviewing while taking notes on defendants' responses and objections to first set of requests for production for purpose of golden rule letter.	4.88	\$	300.00	\$	1,465.00
Nicole Taykhman	2/13/2020	Kansas	Discuss plan for finalizing brief and exhibits with MN, JK, DA, and CC.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	2/13/2020	Kansas	Review correspondence with co-counsel re timelines for discovery.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	2/13/2020	Kansas	Email with MN re updates to opposition to motion to dismiss.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	2/13/2020	Kansas	Edit transmittal declaration with list of exhibits for opposition to motion to dismiss.	0.73	\$	300.00	\$	220.00
Nicole Taykhman	2/13/2020	Kansas	Proofread and propose final edits to opposition to motion to dismiss for finalizing.	2.00	\$	300.00	\$	600.00
Nicole Taykhman	2/14/2020	Kansas	Discuss strategy for golden rule letter with MN.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	2/14/2020	Kansas	Continue to analyze and take notes on Defendants' responses and objections to first set of requests for production for purpose of Golden Rule letter.	0.92	\$	300.00	\$	275.00
Nicole Taykhman	2/18/2020	Kansas	Email with MN re opposition to motion to dismiss.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	2/18/2020	Kansas	Email with MN re issue tags for documents produced by Defendants.	0.25	\$	300.00	\$	75.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Nicole Taykhman	2/19/2020	Kansas	Email with DA re co-counsel discovery meeting.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	2/19/2020	Kansas	Review notes from co-counsel strategy meeting.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	2/19/2020	Kansas	Continue to analyze and draft responses to defendants' responses and objections to first set of requests for production.	0.75	\$	300.00	\$	225.00
Nicole Taykhman	2/19/2020	Kansas	Review documents produced by defendants for relevance and issue tags.	2.50	\$	300.00	\$	750.00
Nicole Taykhman	2/20/2020	Kansas	Continue to analyze and draft responses to defendants' responses and objections to first set of requests for production.	1.00	\$	300.00	\$	300.00
Nicole Taykhman	2/21/2020	Kansas	Continue to analyze and draft responses to Defendants' responses to first set of requests for production.	4.67	\$	300.00	\$	1,400.00
Nicole Taykhman	2/22/2020	Kansas	Continue to research and draft responses to Defendants' responses and objections to first set of requests for production.	1.67	\$	300.00	\$	500.00
Nicole Taykhman	2/24/2020	Kansas	Email with MN and IL re draft responses to defendants' responses and objections to first set of requests for production.	0.12	\$	300.00	\$	35.00
Nicole Taykhman	2/24/2020	Kansas	Continue to research and draft responses to defendants' responses and objections to plaintiffs' first set of requests for production.	8.12	\$	300.00	\$	2,435.00
Nicole Taykhman	2/25/2020	Kansas	Continue to review documents produced by Defendants for relevance to particular issues.	0.67	\$	300.00	\$	200.00
Nicole Taykhman	2/25/2020	Kansas	Continue to revise draft responses to defendants' responses and objections to plaintiffs' first set of requests for production for purpose of golden rule letter.	3.22	\$	300.00	\$	965.00
Nicole Taykhman	2/26/2020	Kansas	Email with MN and IL re draft responses to responses and objections to RFPs.	0.03	\$	300.00	\$	10.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Nicole Taykhman	2/26/2020	Kansas	Continue to review documents produced by defendants for relevance to particular issues and summarize key documents located.	3.20	\$	300.00	\$	960.00
Nicole Taykhman	2/27/2020	Kansas	Discuss status of document review with DA and CC.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	2/27/2020	Kansas	Meet with case team to discuss status of mediation and discovery and next steps.	0.50	\$	300.00	\$	150.00
Nicole Taykhman	2/27/2020	Kansas	Continue to review documents produced by Defendants for issue relevance.	0.73	\$	300.00	\$	220.00
Nicole Taykhman	2/27/2020	Kansas	Revise letter response to responses and objections to first set of requests for production.	1.55	\$	300.00	\$	465.00
Nicole Taykhman	2/28/2020	Kansas	Email with MN re proof of responses to defendants' responses and objections.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	2/28/2020	Kansas	Review settlement correspondence.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	2/28/2020	Kansas	Email with CC and DA re cite-checking response letter.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	2/28/2020	Kansas	Discuss cite-checking of letter with DA and CC.	0.10	\$	300.00	\$	30.00
Nicole Taykhman	2/28/2020	Kansas	Discuss plan for finalizing response to defendants' responses and objections with M. Nardi.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	2/28/2020	Kansas	Email internal CR team written summary of hot docs reviewed by self.	0.22	\$	300.00	\$	65.00
Nicole Taykhman	2/28/2020	Kansas	Email with MN re draft responses to defendants' responses and objections to requests for production.	0.25	\$	300.00	\$	75.00
Nicole Taykhman	2/28/2020	Kansas	Proof and revise responses to defendants' responses and objections.	1.73	\$	300.00	\$	520.00
Nicole Taykhman	2/28/2020	Kansas	Continue reviewing documents produced by defendants for issue relevance.	2.32	\$	300.00	\$	695.00
Nicole Taykhman	3/2/2020	Kansas	Review pro hac vice application.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	3/2/2020	Kansas	Email with MN re edits to letter re defendants' responses and objections.	0.10	\$	300.00	\$	30.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Nicole Taykhman	3/2/2020	Kansas	Review co-counsel edits to letter re responses and objections and correspondence re same.	0.13	\$	300.00	\$	40.00
Nicole Taykhman	3/2/2020	Kansas	Discuss status of discovery letters, RFPs, and interrogatories with MN.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	3/4/2020	Kansas	Discuss policy documents relevant to third party document requests with DA.	0.07	\$	300.00	\$	20.00
Nicole Taykhman	3/4/2020	Kansas	Annotate letter response re Defendants' responses and objections to first set of RFPs for planning for meet and confer.	0.12	\$	300.00	\$	35.00
Nicole Taykhman	3/4/2020	Kansas	Review and provide edits to co-counsel on draft third party document requests.	1.50	\$	300.00	\$	450.00
Nicole Taykhman	3/5/2020	Kansas	Communicate with CG, DA, and CC re protective order acknowledgement.	0.12	\$	300.00	\$	35.00
Nicole Taykhman	3/5/2020	Kansas	Communicate with CC and DA re edits to third-party document requests.	0.13	\$	300.00	\$	40.00
Nicole Taykhman	3/5/2020	Kansas	Email with IL re comments on draft third party document requests.	0.28	\$	300.00	\$	85.00
Nicole Taykhman	3/5/2020	Kansas	Continue to review and provide edits on third party subpoena circulated by co-counsel.	1.73	\$	300.00	\$	520.00
Nicole Taykhman	3/6/2020	Kansas	Email with co-counsel re comments on draft third-party requests to MCOs.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	3/6/2020	Kansas	Email with CC re edits to third-party document requests.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	3/6/2020	Kansas	Communicate with CG re definitions in draft requests for production.	0.12	\$	300.00	\$	35.00
Nicole Taykhman	3/6/2020	Kansas	Revise comments on third-party document requests.	0.20	\$	300.00	\$	60.00
Nicole Taykhman	3/10/2020	Kansas	Email with MN re status of third-party subpoenas and letter re production deficiencies.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	3/11/2020	Kansas	Prepare written analysis of issue re medical releases for purpose of third-party subpoenas for MN and IL.	1.10	\$	300.00	\$	330.00
Nicole Taykhman	3/12/2020	Kansas	Review ADR report drafted by defendants.	0.02	\$	300.00	\$	5.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Nicole Taykhman	3/12/2020	Kansas	Review reply filed by defendants in further support of motion to dismiss.	0.18	\$	300.00	\$	55.00
Nicole Taykhman	3/12/2020	Kansas	Communicate with CC and DA re discovery correspondence and deficiencies.	0.22	\$	300.00	\$	65.00
Nicole Taykhman	3/12/2020	Kansas	Continue to analyze medical release issue under protective order and email with MN and IL re same.	0.52	\$	300.00	\$	155.00
Nicole Taykhman	3/12/2020	Kansas	Work on letter re defendants' document production deficiencies.	0.67	\$	300.00	\$	200.00
Nicole Taykhman	3/13/2020	Kansas	Communicate with DA and CC re coding of documents marked technical issues in defense production.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	3/13/2020	Kansas	Review email correspondence re KVC.	0.13	\$	300.00	\$	40.00
Nicole Taykhman	3/13/2020	Kansas	Email with discovery team re issues to raise in deficiency letter.	0.13	\$	300.00	\$	40.00
Nicole Taykhman	3/13/2020	Kansas	Communicate with DA re factual materials for purposes of drafting discovery deficiency letter.	0.23	\$	300.00	\$	70.00
Nicole Taykhman	3/13/2020	Kansas	Review discovery requests and responses circulated by co-counsel for purpose of deficiency letter.	0.27	\$	300.00	\$	80.00
Nicole Taykhman	3/13/2020	Kansas	Review and analyze evidentiary arguments made in reply brief in further support of motion to dismiss.	0.93	\$	300.00	\$	280.00
Nicole Taykhman	3/13/2020	Kansas	Continue to draft letter re defendants' document production deficiencies.	3.50	\$	300.00	\$	1,050.00
Nicole Taykhman	3/16/2020	Kansas	Review discovery correspondence to incorporate into deficiency letter.	1.18	\$	300.00	\$	355.00
Nicole Taykhman	3/17/2020	Kansas	Work on deficiency letter by reviewing and incorporating discovery correspondence and documents re technical problems and redactions.	3.40	\$	300.00	\$	1,020.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Nicole Taykhman	3/18/2020	Kansas	Review internal documents and correspondence regarding potential expert witnesses in advance of team call.	0.32	\$	300.00	\$	95.00
Nicole Taykhman	3/18/2020	Kansas	Participate in internal team call re ESI, document review.	0.50	\$	300.00	\$	150.00
Nicole Taykhman	3/18/2020	Kansas	Continue to work on letter re discovery deficiencies by reviewing defendants' ESI issues in other cases, correspondence on discovery issues, and documents with technical issues and redactions.	4.40	\$	300.00	\$	1,320.00
Nicole Taykhman	3/19/2020	Kansas	Work on drafting letter re discovery deficiencies.	2.10	\$	300.00	\$	630.00
Nicole Taykhman	3/20/2020	Kansas	Email with DA and CC re key discovery correspondence.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	3/20/2020	Kansas	Continue to draft letter re deficiencies in document production.	4.78	\$	300.00	\$	1,435.00
Nicole Taykhman	3/24/2020	Kansas	Email with MN re draft deficiency letter.	0.07	\$	300.00	\$	20.00
Nicole Taykhman	3/24/2020	Kansas	Review team correspondence re discovery strategy with respect to mental health and placements in light of public health emergency.	0.33	\$	300.00	\$	100.00
Nicole Taykhman	3/25/2020	Kansas	Email with MN and IL re edits and strategy on deficiency letter.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	3/25/2020	Kansas	Review MN comments to draft deficiency letter.	0.07	\$	300.00	\$	20.00
Nicole Taykhman	3/25/2020	Kansas	Review team correspondence re letter on COVID response.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	3/25/2020	Kansas	Review circulated hot documents for potential inclusion in deficiency letter.	0.18	\$	300.00	\$	55.00
Nicole Taykhman	3/26/2020	Kansas	Email with MN and IL re updated draft of deficiency letter.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	3/26/2020	Kansas	Email with co-counsel re document production issues for inclusion in deficiency letter.	0.05	\$	300.00	\$	15.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Nicole Taykhman	3/26/2020	Kansas	Email with DA re examples of documents for deficiency letter.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	3/26/2020	Kansas	Review and analyze defendants' response letter to golden rule letter.	0.18	\$	300.00	\$	55.00
Nicole Taykhman	3/26/2020	Kansas	Work on deficiency letter re defendants' document productions.	3.72	\$	300.00	\$	1,115.00
Nicole Taykhman	3/27/2020	Kansas	Review correspondence with defendants and co-counsel re discovery and COVID protocols.	0.18	\$	300.00	\$	55.00
Nicole Taykhman	3/27/2020	Kansas	Review MN comments to draft deficiency letter for discussion with MN.	0.67	\$	300.00	\$	200.00
Nicole Taykhman	3/29/2020	Kansas	Revise letter re deficiencies in Defendants' document production.	1.15	\$	300.00	\$	345.00
Nicole Taykhman	3/30/2020	Kansas	Email with MN and IL re deficiency letter.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	3/30/2020	Kansas	Email with DA re factual questions for deficiency letter.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	3/30/2020	Kansas	Continue to revise letter re deficiencies in defendants' productions.	1.75	\$	300.00	\$	525.00
Nicole Taykhman	4/1/2020	Kansas	Email with MN re status of deficiency letter.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	4/1/2020	Kansas	Review team correspondence re outstanding discovery projects.	0.13	\$	300.00	\$	40.00
Nicole Taykhman	4/1/2020	Kansas	Circulate draft deficiency letter to co-counsel for comments.	0.22	\$	300.00	\$	65.00
Nicole Taykhman	4/2/2020	Kansas	Email with MN re edits to deficiency letter.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	4/2/2020	Kansas	Email with DA re co-counsel correspondence re deficiency letter.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	4/2/2020	Kansas	Review correspondence with co-counsel re status of foster care contacts.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	4/2/2020	Kansas	Communicate with PJ re edits to deficiency letter.	0.18	\$	300.00	\$	55.00
Nicole Taykhman	4/6/2020	Kansas	Email with MN and CG re deficiency letter.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	4/6/2020	Kansas	Review relevant press on response to COVID-19 by defendants.	0.10	\$	300.00	\$	30.00
Nicole Taykhman	4/6/2020	Kansas	Review co-counsel correspondence re discovery strategy amid COVID-19.	0.63	\$	300.00	\$	190.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Nicole Taykhman	4/8/2020	Kansas	Email with MN re discovery letter strategy.	0.07	\$	300.00	\$	20.00
Nicole Taykhman	4/8/2020	Kansas	Review draft schedule circulated by co-counsel in advance of team meeting.	0.07	\$	300.00	\$	20.00
Nicole Taykhman	4/8/2020	Kansas	Email with co-counsel re status of discovery letter.	0.15	\$	300.00	\$	45.00
Nicole Taykhman	4/9/2020	Kansas	Review correspondence with opposing counsel re meet and confer.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	4/13/2020	Kansas	Email with MN re outline for meet and confer.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	4/13/2020	Kansas	Review team correspondence re named plaintiffs and upcoming meet and confers.	0.18	\$	300.00	\$	55.00
Nicole Taykhman	4/13/2020	Kansas	Work on response to defendants' 3/25 letter re discovery deficiencies.	3.35	\$	300.00	\$	1,005.00
Nicole Taykhman	4/14/2020	Kansas	Email with MN re outline of responses for meet and confer.	0.22	\$	300.00	\$	65.00
Nicole Taykhman	4/14/2020	Kansas	Continue to draft outline response to March 25 letter on responses and objections for meet and confer.	2.72	\$	300.00	\$	815.00
Nicole Taykhman	4/15/2020	Kansas	Email with MN and IL re process to identify child welfare expert.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	4/15/2020	Kansas	Continue to work on outline response to defendants' letters re responses and objections and document productions.	1.30	\$	300.00	\$	390.00
Nicole Taykhman	4/16/2020	Kansas	Email with MN re outline for meet and confer.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	4/16/2020	Kansas	Review correspondence with opposing counsel and Judge Crabtree order re discovery timeline.	0.25	\$	300.00	\$	75.00
Nicole Taykhman	4/16/2020	Kansas	Continue to draft outline of response to defendants' letters re discovery.	0.58	\$	300.00	\$	175.00
Nicole Taykhman	4/17/2020	Kansas	Communicate with MN re prep for meet and confer on discovery issues.	0.12	\$	300.00	\$	35.00
Nicole Taykhman	4/17/2020	Kansas	Discuss law on timeline for responding to 30(b)(6) deposition notices with CG.	0.33	\$	300.00	\$	100.00
Nicole Taykhman	4/17/2020	Kansas	Draft talking points on specific discovery issues in preparation for meet and confer.	1.08	\$	300.00	\$	325.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Nicole Taykhman	4/20/2020	Kansas	Review correspondence with team and opposing counsel re discovery and defendants' responses to fourth set of requests for production.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	4/21/2020	Kansas	Review correspondence among team re discovery and meet and confers.	0.20	\$	300.00	\$	60.00
Nicole Taykhman	4/21/2020	Kansas	Review expert materials in preparation for meeting with potential child welfare expert.	0.33	\$	300.00	\$	100.00
Nicole Taykhman	4/22/2020	Kansas	Review correspondence re experts in advance of call with MN and IL re experts.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	4/22/2020	Kansas	Email with MN re meeting re experts.	0.07	\$	300.00	\$	20.00
Nicole Taykhman	4/22/2020	Kansas	Review and analyze litigation holds correspondence from defendants for follow-up.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	4/22/2020	Kansas	Email with CG, MN, CC, and DA re native redaction issue.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	4/23/2020	Kansas	Review correspondence from defendants re issue logs.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	4/23/2020	Kansas	Work on response to litigation hold issue.	1.05	\$	300.00	\$	315.00
Nicole Taykhman	4/24/2020	Kansas	Email with DA and CC re document preservation policies.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	4/24/2020	Kansas	Email with EPG re potential child welfare experts.	0.10	\$	300.00	\$	30.00
Nicole Taykhman	4/24/2020	Kansas	Research and review materials from child welfare and placement array experts.	1.08	\$	300.00	\$	325.00
Nicole Taykhman	4/24/2020	Kansas	Continue working on response re defendants' litigation holds and document preservation.	1.35	\$	300.00	\$	405.00
Nicole Taykhman	4/27/2020	Kansas	Email with DA and CC re litigation hold.	0.07	\$	300.00	\$	20.00
Nicole Taykhman	4/27/2020	Kansas	Email with MN re response on litigation holds issues.	0.13	\$	300.00	\$	40.00
Nicole Taykhman	4/27/2020	Kansas	Continue working on litigation hold issue response.	0.28	\$	300.00	\$	85.00
Nicole Taykhman	4/28/2020	Kansas	Email with EPG re discussing possible placement experts.	0.03	\$	300.00	\$	10.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Nicole Taykhman	4/28/2020	Kansas	Review team correspondence re discovery and document productions.	0.12	\$	300.00	\$	35.00
Nicole Taykhman	4/29/2020	Kansas	Revise table on potential child welfare experts.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	4/29/2020	Kansas	Email with MN and IL re strategy on litigation hold issues.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	4/29/2020	Kansas	Email with CG re discovery requests on preservation policies.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	4/29/2020	Kansas	Email with IL and MN re litigation hold issue talking points.	0.13	\$	300.00	\$	40.00
Nicole Taykhman	4/29/2020	Kansas	Review correspondence re redaction issues and privilege log.	0.20	\$	300.00	\$	60.00
Nicole Taykhman	4/29/2020	Kansas	Draft talking points on litigation hold and edit draft response re same.	1.25	\$	300.00	\$	375.00
Nicole Taykhman	4/30/2020	Kansas	Email with IL, MN, and EPG re identification of potential child welfare expert..	0.10	\$	300.00	\$	30.00
Nicole Taykhman	4/30/2020	Kansas	Email with MN re meet and confer prep session and litigation hold issue.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	4/30/2020	Kansas	Meet with MN, EPG, and IL to discuss process for vetting and choosing child welfare expert.	1.00	\$	300.00	\$	300.00
Nicole Taykhman	5/1/2020	Kansas	Email with DA, CC, JK, and CG re deadline to respond to discovery requests.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	5/1/2020	Kansas	Review and calculate deadlines for defendants' requests for production and interrogatories based on federal rules.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	5/1/2020	Kansas	Review discovery correspondence and summary of COVID-19 related document production in preparation for meet and confer.	0.22	\$	300.00	\$	65.00
Nicole Taykhman	5/1/2020	Kansas	Continue research on potential child welfare experts.	0.33	\$	300.00	\$	100.00
Nicole Taykhman	5/4/2020	Kansas	Communicate with EPG re prep for call with potential expert.	0.15	\$	300.00	\$	45.00
Nicole Taykhman	5/4/2020	Kansas	Discuss status of discovery with CG.	0.17	\$	300.00	\$	50.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Nicole Taykhman	5/4/2020	Kansas	Debrief call with potential expert with EPG.	0.22	\$	300.00	\$	65.00
Nicole Taykhman	5/4/2020	Kansas	Email with MN, IL, and EPG re summary of call with potential child welfare expert.	0.43	\$	300.00	\$	130.00
Nicole Taykhman	5/4/2020	Kansas	Review correspondence with defendants and within team re discovery and settlement offer.	0.58	\$	300.00	\$	175.00
Nicole Taykhman	5/4/2020	Kansas	Participate in call with potential expert on child welfare and EPG.	0.67	\$	300.00	\$	200.00
Nicole Taykhman	5/4/2020	Kansas	Prepare for call with potential expert on child welfare by drafting talking points.	1.07	\$	300.00	\$	320.00
Nicole Taykhman	5/5/2020	Kansas	Review team correspondence re discovery and settlement.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	5/6/2020	Kansas	Email with CG re research on next friend responses to discovery.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	5/6/2020	Kansas	Communicate with SB re experts used in similar child welfare litigation for purposes of selecting potential child welfare expert in this litigation.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	5/6/2020	Kansas	Email with IL, MN, and EG re search for child welfare expert.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	5/6/2020	Kansas	Communicate with potential child welfare expert re interest in expert role.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	5/6/2020	Kansas	Review files for ideas re potential deponents.	0.18	\$	300.00	\$	55.00
Nicole Taykhman	5/6/2020	Kansas	Email with DA and CC re communications with potential experts.	0.20	\$	300.00	\$	60.00
Nicole Taykhman	5/6/2020	Kansas	Communicate with EPG re follow-up call with potential child welfare expert	0.20	\$	300.00	\$	60.00
Nicole Taykhman	5/6/2020	Kansas	Prepare for call with potential child welfare expert by reviewing communications protocol and outlining talking points.	0.58	\$	300.00	\$	175.00
Nicole Taykhman	5/7/2020	Kansas	Communicate with EPG re status of child welfare expert search in KS.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	5/7/2020	Kansas	Research applicability of Rule 17 on discovery served on named plaintiffs.	1.15	\$	300.00	\$	345.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Nicole Taykhman	5/8/2020	Kansas	Review correspondence with opposing counsel and internal team re discovery.	0.02	\$ 300.00	\$ 5.00
Nicole Taykhman	5/8/2020	Kansas	Email with MN re analysis of discovery directed at minors.	0.05	\$ 300.00	\$ 15.00
Nicole Taykhman	5/8/2020	Kansas	Discuss status of discovery and next friend updates with SD.	0.08	\$ 300.00	\$ 25.00
Nicole Taykhman	5/8/2020	Kansas	Communicate with EPG re status of child welfare expert search.	0.22	\$ 300.00	\$ 65.00
Nicole Taykhman	5/8/2020	Kansas	Revise draft letter on litigation hold issues to account for updates from meet and confers with opposing counsel.	0.22	\$ 300.00	\$ 65.00
Nicole Taykhman	5/8/2020	Kansas	Email with IL, EPG, and MN re plan for searching for child welfare experts.	0.28	\$ 300.00	\$ 85.00
Nicole Taykhman	5/8/2020	Kansas	Continue legal research on discovery directed at minor named plaintiffs.	1.25	\$ 300.00	\$ 375.00
Nicole Taykhman	5/11/2020	Kansas	Email with IL, MN, and EG re names of potential child welfare experts.	0.02	\$ 300.00	\$ 5.00
Nicole Taykhman	5/11/2020	Kansas	Review team correspondence re settlement proposals, experts, and impact of coronavirus in Kansas.	0.18	\$ 300.00	\$ 55.00
Nicole Taykhman	5/11/2020	Kansas	Email with ET and EG re potential child welfare expert and recommendations.	0.32	\$ 300.00	\$ 95.00
Nicole Taykhman	5/11/2020	Kansas	Attend team strategy call re settlement proposal.	1.00	\$ 300.00	\$ 300.00
Nicole Taykhman	5/11/2020	Kansas	Continue researching and summarizing law on impact of Rule 17 on minor named plaintiff responses to interrogatories and requests for production.	2.17	\$ 300.00	\$ 650.00
Nicole Taykhman	5/12/2020	Kansas	Email with IL re outreach to potential experts.	0.02	\$ 300.00	\$ 5.00
Nicole Taykhman	5/12/2020	Kansas	Review team correspondence re settlement proposals and discovery.	0.17	\$ 300.00	\$ 50.00
Nicole Taykhman	5/12/2020	Kansas	Continue researching potential child welfare experts and updating chart re same.	1.10	\$ 300.00	\$ 330.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Nicole Taykhman	5/13/2020	Kansas	Email with IL, MN, and EG on child welfare expert outreach.	0.12	\$	300.00	\$	35.00
Nicole Taykhman	5/13/2020	Kansas	Review correspondence among team and with opposing counsel re settlement and discovery issues.	0.25	\$	300.00	\$	75.00
Nicole Taykhman	5/14/2020	Kansas	Email with MN re discovery status and prep for meet and confer.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	5/14/2020	Kansas	Email with EPG re expert outreach.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	5/14/2020	Kansas	Communicate with JK re case schedule and prep for meet and confer.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	5/14/2020	Kansas	Email with MN, IL, and SD re research on discovery responses by minors.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	5/14/2020	Kansas	Circulate research on discovery directed at minors to co-counsel team.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	5/14/2020	Kansas	Review team correspondence re settlement proposals and discovery.	0.15	\$	300.00	\$	45.00
Nicole Taykhman	5/14/2020	Kansas	Compile notes on litigation holds to prepare for meet and confer and email with MN, JK, and CG re same.	0.50	\$	300.00	\$	150.00
Nicole Taykhman	5/14/2020	Kansas	Participate in meeting with IL, EM, EGH, and CG to brainstorm provisions for settlement proposal.	0.75	\$	300.00	\$	225.00
Nicole Taykhman	5/15/2020	Kansas	Review correspondence from defendants on custodians.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	5/15/2020	Kansas	Email with IL re child welfare expert outreach.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	5/15/2020	Kansas	Communicate with potential expert re initial discussion and update expert chart re same.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	5/15/2020	Kansas	Email with CC re contact info for potential expert.	0.25	\$	300.00	\$	75.00
Nicole Taykhman	5/15/2020	Kansas	Email with IL, MN, JK, CG, CC, and DA re summary of meet and confer.	0.25	\$	300.00	\$	75.00
Nicole Taykhman	5/15/2020	Kansas	Prepare for meet and confer by reviewing outstanding discovery issues.	0.27	\$	300.00	\$	80.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Nicole Taykhman	5/15/2020	Kansas	Attend meet and confer with defendants re discovery and schedule updates.	0.43	\$	300.00	\$	130.00
Nicole Taykhman	5/15/2020	Kansas	Draft summary email to recap meet and confer with defendants.	0.73	\$	300.00	\$	220.00
Nicole Taykhman	5/18/2020	Kansas	Email with co-counsel re recap email from meet and confer.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	5/20/2020	Kansas	Email with CC re expert research.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	5/20/2020	Kansas	Email with potential experts re initial discussion.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	5/20/2020	Kansas	Email with MN and co-counsel re documents on retention policies.	0.07	\$	300.00	\$	20.00
Nicole Taykhman	5/20/2020	Kansas	Email with MN and IL re deposition prep for 30(b)(6) witness.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	5/20/2020	Kansas	Email with EG re expert outreach.	0.13	\$	300.00	\$	40.00
Nicole Taykhman	5/20/2020	Kansas	Review team correspondence re discovery updates and next steps.	0.20	\$	300.00	\$	60.00
Nicole Taykhman	5/20/2020	Kansas	Work on deposition prep for scheduled 30(b)(6) deposition deponent M. Kline.	0.35	\$	300.00	\$	105.00
Nicole Taykhman	5/20/2020	Kansas	Review documents with defendants' retention policies.	0.53	\$	300.00	\$	160.00
Nicole Taykhman	5/21/2020	Kansas	Update recommendation on child welfare expert outreach.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	5/21/2020	Kansas	Communicate with EPG re next steps on expert outreach.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	5/21/2020	Kansas	Review team correspondence re discovery strategy.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	5/21/2020	Kansas	Discuss preparing factual materials for M. Kline deposition with DA.	0.13	\$	300.00	\$	40.00
Nicole Taykhman	5/21/2020	Kansas	Continue to research child welfare system expert.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	5/21/2020	Kansas	Meet with IL and MN re deposition prep.	0.50	\$	300.00	\$	150.00
Nicole Taykhman	5/21/2020	Kansas	Work on outline for 30b6 deposition on placement issues.	1.60	\$	300.00	\$	480.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Nicole Taykhman	5/26/2020	Kansas	Review rough transcript of 30b6 deposition on IT issues.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	5/26/2020	Kansas	Email with CC re materials on potential experts.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	5/26/2020	Kansas	Communicate with EPG re status of expert outreach.	0.12	\$	300.00	\$	35.00
Nicole Taykhman	5/26/2020	Kansas	Review draft settlement agreement and team correspondence re same.	0.18	\$	300.00	\$	55.00
Nicole Taykhman	5/26/2020	Kansas	Work on 30(b)(6) deposition outline for M. Kline on placement issues by reviewing and incorporating public sources on witness.	1.58	\$	300.00	\$	475.00
Nicole Taykhman	5/26/2020	Kansas	Continue working on 30b6 deposition outline for M. Kline by reviewing hot documents re placement issues.	4.10	\$	300.00	\$	1,230.00
Nicole Taykhman	5/27/2020	Kansas	Email with CC re research on child welfare experts.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	5/27/2020	Kansas	Email with co-counsel group re potential child welfare experts.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	5/27/2020	Kansas	Email with legal intern MH re legal research question on class membership and discovery.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	5/27/2020	Kansas	Communicate with DA and CC re review of policy manual for deposition outline.	0.22	\$	300.00	\$	65.00
Nicole Taykhman	5/27/2020	Kansas	Communicate with EPG re status of expert outreach.	0.33	\$	300.00	\$	100.00
Nicole Taykhman	5/27/2020	Kansas	Review and follow-up re materials on potential experts on child welfare systems collected by CC.	0.55	\$	300.00	\$	165.00
Nicole Taykhman	5/27/2020	Kansas	Communicate with IL, MN, and EPG re status of expert outreach.	0.60	\$	300.00	\$	180.00
Nicole Taykhman	5/27/2020	Kansas	Continue reviewing key documents related to placement issues and drafting deposition outline for M. Kline re same.	4.15	\$	300.00	\$	1,245.00
Nicole Taykhman	5/28/2020	Kansas	Email with DA and CC re data on placements.	0.02	\$	300.00	\$	5.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Nicole Taykhman	5/28/2020	Kansas	Communicate with MN and IL re research on class membership, discovery, and status of 30b6 deposition outline.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	5/28/2020	Kansas	Communicate with JK re dep prep for M. Kline deposition.	0.13	\$	300.00	\$	40.00
Nicole Taykhman	5/28/2020	Kansas	Email with MN re research on class membership and discovery.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	5/28/2020	Kansas	Review existing caselaw on class membership, mootness, and discovery.	0.22	\$	300.00	\$	65.00
Nicole Taykhman	5/28/2020	Kansas	Review team correspondence re settlement positions.	0.25	\$	300.00	\$	75.00
Nicole Taykhman	5/28/2020	Kansas	Communicate with legal intern MH re research on class membership and discovery.	0.60	\$	300.00	\$	180.00
Nicole Taykhman	5/28/2020	Kansas	Continue working on deposition outline for 30b6 witness M. Kline.	7.17	\$	300.00	\$	2,150.00
Nicole Taykhman	5/29/2020	Kansas	Email with DA re deposition outline and policy manual excerpts for use in deposition.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	5/29/2020	Kansas	Email with MN and intern MH re research on class membership and discovery.	0.32	\$	300.00	\$	95.00
Nicole Taykhman	5/29/2020	Kansas	Email with IL and MN re draft deposition outline and documents.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	5/29/2020	Kansas	Continue to draft deposition outline for M. Kline.	2.98	\$	300.00	\$	895.00
Nicole Taykhman	5/31/2020	Kansas	Continue to review key documents and draft deposition outline for M. Kline.	4.55	\$	300.00	\$	1,365.00
Nicole Taykhman	6/1/2020	Kansas	Email with MN re 30b6 outline.	0.12	\$	300.00	\$	35.00
Nicole Taykhman	6/1/2020	Kansas	Email with IL and MN re status of deposition outline.	0.13	\$	300.00	\$	40.00
Nicole Taykhman	6/1/2020	Kansas	Email with DA and CC re tasks for 30b6 deposition prep.	0.25	\$	300.00	\$	75.00
Nicole Taykhman	6/1/2020	Kansas	Continue outreach to contacts re potential experts and update chart to reflect same.	0.32	\$	300.00	\$	95.00
Nicole Taykhman	6/1/2020	Kansas	Continue drafting and revising deposition outline for M. Kline.	2.17	\$	300.00	\$	650.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Nicole Taykhman	6/2/2020	Kansas	Email with IL and MN re status of draft deposition outline.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	6/2/2020	Kansas	Email with MN re draft deposition outline.	0.07	\$	300.00	\$	20.00
Nicole Taykhman	6/2/2020	Kansas	Email with CC re factual research on potential child welfare experts.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	6/2/2020	Kansas	Email with DA and CC re factual research projects for deposition outline.	0.18	\$	300.00	\$	55.00
Nicole Taykhman	6/2/2020	Kansas	Read team correspondence re settlement positions and new information on foster care issues in Kansas.	0.27	\$	300.00	\$	80.00
Nicole Taykhman	6/2/2020	Kansas	Email with EPG re update on expert outreach.	0.33	\$	300.00	\$	100.00
Nicole Taykhman	6/2/2020	Kansas	Continue to research potential child welfare management experts.	0.38	\$	300.00	\$	115.00
Nicole Taykhman	6/2/2020	Kansas	Discuss research on class membership and discovery directed at named plaintiff with legal intern MH.	0.53	\$	300.00	\$	160.00
Nicole Taykhman	6/2/2020	Kansas	Participate in call with potential child welfare expert.	0.47	\$	300.00	\$	140.00
Nicole Taykhman	6/2/2020	Kansas	Revise outline based on review of comments and edits to deposition outline for M. Kline.	2.47	\$	300.00	\$	740.00
Nicole Taykhman	6/3/2020	Kansas	Email with EPG re expert outreach.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	6/3/2020	Kansas	Email with MN re revisions to draft deposition outline.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	6/3/2020	Kansas	Communicate with DA re deposition outline tasks.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	6/3/2020	Kansas	Continue revising deposition outline for M. Kline.	5.88	\$	300.00	\$	1,765.00
Nicole Taykhman	6/4/2020	Kansas	Email with EPG and potential experts re scheduling initial call.	0.12	\$	300.00	\$	35.00
Nicole Taykhman	6/4/2020	Kansas	Communicate with DA re review of policy manuals and ongoing factual research for deposition prep for M. Kline depositions.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	6/5/2020	Kansas	Communicate with JK re status of mediation.	0.03	\$	300.00	\$	10.00

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Nicole Taykhman	6/5/2020	Kansas	Email with MN and MH re research on named plaintiff discovery.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	6/5/2020	Kansas	Continue to review defendant policies for inclusion in deposition outline.	0.33	\$	300.00	\$	100.00
Nicole Taykhman	6/5/2020	Kansas	Meet with IL and MN to discuss strategy for 30b6 deposition.	0.48	\$	300.00	\$	145.00
Nicole Taykhman	6/5/2020	Kansas	Read order on motion to dismiss.	0.53	\$	300.00	\$	160.00
Nicole Taykhman	6/5/2020	Kansas	Review and take notes on DCF policies for inclusion in deposition outline.	0.75	\$	300.00	\$	225.00
Nicole Taykhman	6/8/2020	Kansas	Email with intern MH re discussing comments on legal research memo.	0.10	\$	300.00	\$	30.00
Nicole Taykhman	6/8/2020	Kansas	Review emails with opposing counsel re 30b6 deposition.	0.12	\$	300.00	\$	35.00
Nicole Taykhman	6/8/2020	Kansas	Email with MN re legal research on discovery of former named plaintiffs.	0.12	\$	300.00	\$	35.00
Nicole Taykhman	6/8/2020	Kansas	Review and provide comments on research memo on named plaintiffs aging out.	2.90	\$	300.00	\$	870.00
Nicole Taykhman	6/9/2020	Kansas	Email with DA and CC re tasks for deposition prep.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	6/9/2020	Kansas	Email with potential expert re initial call.	0.07	\$	300.00	\$	20.00
Nicole Taykhman	6/9/2020	Kansas	Email with IL and MN re deposition prep tasks and outline.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	6/9/2020	Kansas	Review team correspondence re document productions, foster care issues in Kansas, and settlement discussions.	0.10	\$	300.00	\$	30.00
Nicole Taykhman	6/9/2020	Kansas	Prep for meeting with intern MH re feedback on legal research memo on discovery of former plaintiffs and meet with MH re same.	0.75	\$	300.00	\$	225.00
Nicole Taykhman	6/9/2020	Kansas	Continue to review and take notes on DCF manual for deposition outline.	1.28	\$	300.00	\$	385.00
Nicole Taykhman	6/10/2020	Kansas	Communicate with potential child welfare experts re initial calls.	0.12	\$	300.00	\$	35.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Nicole Taykhman	6/10/2020	Kansas	Communicate with team re settlement negotiations and case status.	0.42	\$	300.00	\$	125.00
Nicole Taykhman	6/10/2020	Kansas	Review draft settlement agreement and email with MN, IL, and JK re defined term.	1.02	\$	300.00	\$	305.00
Nicole Taykhman	6/16/2020	Kansas	Review team correspondence and drafts re monitoring and dismissal of named plaintiffs.	1.10	\$	300.00	\$	330.00
Nicole Taykhman	6/18/2020	Kansas	Email with MN and MH re legal research on notice to class members.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	6/18/2020	Kansas	Email with IL re deposition schedule and settlement update.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	6/18/2020	Kansas	Communicate with MN re research on Rule 23(h) notice to class members.	0.20	\$	300.00	\$	60.00
Nicole Taykhman	6/18/2020	Kansas	Communicate with legal intern MH re research on Rule 23(h) notice to class members.	0.28	\$	300.00	\$	85.00
Nicole Taykhman	6/23/2020	Kansas	Email with MH re additional case law on notice to class members.	0.02	\$	300.00	\$	5.00
Nicole Taykhman	6/23/2020	Kansas	Email with co-counsel re applicability of Kansas Tort Claims Act to settlement.	0.07	\$	300.00	\$	20.00
Nicole Taykhman	6/23/2020	Kansas	Review correspondence with co-counsel re case status, call with court, and approval of settlement.	0.33	\$	300.00	\$	100.00
Nicole Taykhman	6/23/2020	Kansas	Research applicability of Kansas Tort Claims Act to settlement.	0.85	\$	300.00	\$	255.00
Nicole Taykhman	6/24/2020	Kansas	Email with SD re applicability of Kansas Tort Claims Act to settlement.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	6/24/2020	Kansas	Review correspondence among team re settlement proposals and legislative committee meeting.	0.37	\$	300.00	\$	110.00
Nicole Taykhman	6/25/2020	Kansas	Review team correspondence re settlement process.	0.03	\$	300.00	\$	10.00
Nicole Taykhman	6/25/2020	Kansas	Research impact of state law on settlement process.	0.13	\$	300.00	\$	40.00
Nicole Taykhman	6/29/2020	Kansas	Review co-counsel correspondence re third-party subpoenas and status of settlement.	0.18	\$	300.00	\$	55.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Nicole Taykhman	6/30/2020	Kansas	Read co-counsel emails re settlement strategy.	0.13	\$	300.00	\$	40.00
Nicole Taykhman	7/1/2020	Kansas	Email with MN re preparing attorney declaration for class certification.	0.07	\$	300.00	\$	20.00
Nicole Taykhman	7/1/2020	Kansas	Draft attorney declaration in support of motion for class certification.	1.37	\$	300.00	\$	410.00
Nicole Taykhman	7/2/2020	Kansas	Email with IL and MN re draft declaration for preliminary approval of settlement.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	7/2/2020	Kansas	Review team correspondence re settlement process.	0.08	\$	300.00	\$	25.00
Nicole Taykhman	7/2/2020	Kansas	Email with MN and DA re draft attorney declaration for class certification.	0.22	\$	300.00	\$	65.00
Nicole Taykhman	7/2/2020	Kansas	Revise attorney declaration in support of motion for class certification.	1.00	\$	300.00	\$	300.00
Nicole Taykhman	7/10/2020	Kansas	Communicate with MN and EPG re updating potential experts re status of settlement.	0.07	\$	300.00	\$	20.00
Nicole Taykhman	7/10/2020	Kansas	Communicate with potential experts re status of settlement.	0.12	\$	300.00	\$	35.00
Nicole Taykhman	7/10/2020	Kansas	Review draft preliminary approval motion and team correspondence re edits to same.	0.30	\$	300.00	\$	90.00
Nicole Taykhman	7/13/2020	Kansas	Email with IL and MN re review of preliminary approval motion and draft declaration.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	7/13/2020	Kansas	Revise declaration in support of motion for preliminary approval of settlement.	0.75	\$	300.00	\$	225.00
Nicole Taykhman	7/15/2020	Kansas	Email with MN and IL re updates to declaration for motion for preliminary approval.	0.17	\$	300.00	\$	50.00
Nicole Taykhman	7/22/2020	Kansas	Read co-counsel correspondence re stakeholder information and motion for preliminary approval.	0.05	\$	300.00	\$	15.00
Nicole Taykhman	7/23/2020	Kansas	Email with MN re updates to declaration in support of motion for preliminary approval and rules for fee application.	0.13	\$	300.00	\$	40.00
Nicole Taykhman	7/23/2020	Kansas	Revise and finalize IL declaration in support of motion for preliminary approval.	0.50	\$	300.00	\$	150.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Stephen Dixon	12/10/2017	Kansas	Electronic mail with co-counsel team re investigation strategy	0.08	\$	375.00	\$	31.25
Stephen Dixon	1/12/2018	Kansas	Electronic mail to co-counsel team re points of factual inquiry for investigation	0.10	\$	375.00	\$	37.50
Stephen Dixon	1/17/2018	Kansas	Electronic mail to P. Juneja re investigation outreach	0.03	\$	375.00	\$	12.50
Stephen Dixon	1/23/2018	Kansas	Call with NCYL and potential co-counsel re potential advocates to talk to in investigation	1.20	\$	375.00	\$	450.00
Stephen Dixon	2/5/2018	Kansas	Telephone call with confidential Kansas children's advocate re current child welfare environment in Kansas	0.40	\$	375.00	\$	150.00
Stephen Dixon	2/9/2018	Kansas	Electronic mail with IL re investigation strategy	0.08	\$	375.00	\$	31.25
Stephen Dixon	2/16/2018	Kansas	Electronic mails with co-counsel re main point of factual inquiry for investigation	0.13	\$	375.00	\$	50.00
Stephen Dixon	2/20/2018	Kansas	Electronic mail re key child welfare contacts in Kansas	0.05	\$	375.00	\$	18.75
Stephen Dixon	2/22/2018	Kansas	Electronic mail to co-counsel re investigation strategy	0.03	\$	375.00	\$	12.50
Stephen Dixon	2/23/2018	Kansas	Telephone call with local Kansas contact re placement array challenges	0.18	\$	375.00	\$	68.75
Stephen Dixon	2/23/2018	Kansas	Electronic mail with confidential local Kansas contact re foster care contractors, placement array challenges	0.33	\$	375.00	\$	125.00
Stephen Dixon	2/26/2018	Kansas	Electronic mail with confidential local Kansas contact re foster care contractors, placement array challenges	0.33	\$	375.00	\$	125.00
Stephen Dixon	2/27/2018	Kansas	Electronic mail with confidential local Kansas contact re mental health care problems for Kansas foster children	0.03	\$	375.00	\$	12.50
Stephen Dixon	2/27/2018	Kansas	Telephone call with confidential local Kansas contact re mental health care problems for Kansas foster children	0.37	\$	375.00	\$	137.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	2/28/2018	Kansas	Meeting with confidential local Kansas contact re problems facing Kansas child welfare system	1.00	\$	375.00	\$	375.00
Stephen Dixon	3/1/2018	Kansas	Electronic mail to confidential Kansas contact re clarification on facts discussed in meeting	0.08	\$	375.00	\$	31.25
Stephen Dixon	3/1/2018	Kansas	Meetings with confidential local Kansas contacts re problems facing Kansas child welfare system	4.50	\$	375.00	\$	1,687.50
Stephen Dixon	3/2/2018	Kansas	Meeting with confidential local Kansas contact re problems facing Kansas child welfare system	1.25	\$	375.00	\$	468.75
Stephen Dixon	3/5/2018	Kansas	Electronic mail to co-counsel team re major factual discoveries during investigation trip and interviews	0.13	\$	375.00	\$	50.00
Stephen Dixon	3/5/2018	Kansas	Draft memos re recent interviews with Kansas child advocates during last trip to Kansas	0.50	\$	375.00	\$	187.50
Stephen Dixon	3/5/2018	Kansas	Telephone call with Kansas GAL re problems facing child welfare system	0.80	\$	375.00	\$	300.00
Stephen Dixon	3/7/2018	Kansas	Telephone call with potential client re problems facing Kansas child welfare system's mental health delivery system	0.88	\$	375.00	\$	331.25
Stephen Dixon	3/9/2018	Kansas	Electronic mail with potential client re placement array problems for Kansas foster children	0.43	\$	375.00	\$	162.50
Stephen Dixon	3/10/2018	Kansas	Electronic mails with client re investigation updates	0.07	\$	375.00	\$	25.00
Stephen Dixon	3/10/2018	Kansas	Electronic mail with potential client re placement array problems for Kansas foster children	0.25	\$	375.00	\$	93.75
Stephen Dixon	3/10/2018	Kansas	Draft memos re recent interviews with Kansas child advocates with key facts important to investigation	0.50	\$	375.00	\$	187.50
Stephen Dixon	3/11/2018	Kansas	Electronic mail to co-counsel team re legal strategy	0.03	\$	375.00	\$	12.50

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Stephen Dixon	3/11/2018	Kansas	Draft memo re recent interviews with Kansas child advocates with key facts important to investigation	0.58	\$	375.00	\$	218.75
Stephen Dixon	3/11/2018	Kansas	Draft memo re recent interviews with Kansas child advocates with key facts important to investigation (cont'd)	0.67	\$	375.00	\$	250.00
Stephen Dixon	3/12/2018	Kansas	Electronic mail with IL re vetting potential client	0.03	\$	375.00	\$	12.50
Stephen Dixon	3/12/2018	Kansas	Electronic mail with paralegal re retainer for client	0.08	\$	375.00	\$	31.25
Stephen Dixon	3/12/2018	Kansas	Draft memo re recent meeting with potential client with key facts important to investigation	0.67	\$	375.00	\$	250.00
Stephen Dixon	3/12/2018	Kansas	Draft memo re recent meeting with potential client with key facts important to investigation (cont'd)	1.12	\$	375.00	\$	418.75
Stephen Dixon	3/13/2018	Kansas	Telephone call with GAL re placement moves for children in DCF custody	0.80	\$	375.00	\$	300.00
Stephen Dixon	3/14/2018	Kansas	Electronic mails with potential clients re Kansas foster care system deficiencies	0.25	\$	375.00	\$	93.75
Stephen Dixon	3/15/2018	Kansas	Electronic mail to potential client re Kansas foster care system deficiencies	0.03	\$	375.00	\$	12.50
Stephen Dixon	3/15/2018	Kansas	Telephone call with potential client re child they may potentially be next friend for	1.07	\$	375.00	\$	400.00
Stephen Dixon	3/16/2018	Kansas	Telephone call with potential client re child they may potentially be next friend for	0.10	\$	375.00	\$	37.50
Stephen Dixon	3/16/2018	Kansas	Telephone call with potential client re next friend legal theory	0.18	\$	375.00	\$	68.75
Stephen Dixon	3/17/2018	Kansas	Electronic mail to KS confidential contact/child advocate re problems facing Kansas child welfare system	0.17	\$	375.00	\$	62.50
Stephen Dixon	3/18/2018	Kansas	Electronic mail with co-counsel re recent factual findings in investigation	0.75	\$	375.00	\$	281.25

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	3/18/2018	Kansas	Meeting with co-counsel re investigation strategy for trip.	1.00	\$	375.00	\$	375.00
Stephen Dixon	3/18/2018	Kansas	Meeting with confidential contact re ongoing investigation, their impressions of problems with foster care contractor oversight	1.25	\$	375.00	\$	468.75
Stephen Dixon	3/18/2018	Kansas Travel	Travel to Kansas City for meetings with potential clients, foster care advocates.	2.00	\$	375.00	\$	750.00
Stephen Dixon	3/19/2018	Kansas	Electronic mail with confident contact re more information on foster care contractor oversight	0.10	\$	375.00	\$	37.50
Stephen Dixon	3/19/2018	Kansas	Meeting with Kansas foster care organization re major problems in placement instability, mental health screening in foster care system	2.00	\$	375.00	\$	750.00
Stephen Dixon	3/19/2018	Kansas	Meeting with recently aged out former foster youth re placement changes in Kansas	2.50	\$	375.00	\$	937.50
Stephen Dixon	3/19/2018	Kansas	Travel to meeting in Kansas.	0.38	\$	375.00	\$	143.75
Stephen Dixon	3/19/2018	Kansas	Travel to meeting in Kansas.	1.50	\$	375.00	\$	562.50
Stephen Dixon	3/20/2018	Kansas	Electronic mail with potential client re further questions re DCF operations problems.	0.03	\$	375.00	\$	12.50
Stephen Dixon	3/20/2018	Kansas	Meeting with confidential contact/child advocate re problems facing Kansas child welfare system, specifically for those in the Wichita area	3.50	\$	375.00	\$	1,312.50
Stephen Dixon	3/20/2018	Kansas	Travel to meeting in Kansas.	1.50	\$	375.00	\$	562.50
Stephen Dixon	3/21/2018	Kansas	Electronic mail with potential client re problems in Kansas foster care system	0.07	\$	375.00	\$	25.00
Stephen Dixon	3/21/2018	Kansas	Electronic mail to co-counsel re new facts useful for investigation	0.13	\$	375.00	\$	50.00
Stephen Dixon	3/21/2018	Kansas	Meeting with Kansas foster care advocate and co-counsel re major problems in placement instability, mental health screening in foster care system	1.00	\$	375.00	\$	375.00
Stephen Dixon	3/21/2018	Kansas	Travel to meeting in Kansas.	2.00	\$	375.00	\$	750.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	3/22/2018	Kansas	Electronic mail to co-counsel re new facts useful for investigation	0.03	\$	375.00	\$	12.50
Stephen Dixon	3/26/2018	Kansas	Electronic mail to co-counsel re new facts useful for investigation	0.20	\$	375.00	\$	75.00
Stephen Dixon	3/27/2018	Kansas	Electronic mail to co-counsel re new facts useful for investigation	0.03	\$	375.00	\$	12.50
Stephen Dixon	3/27/2018	Kansas	Electronic mail to co-counsel re new facts useful for investigation	0.08	\$	375.00	\$	31.25
Stephen Dixon	3/28/2018	Kansas	Electronic mail to paralegal re new important factual document	0.03	\$	375.00	\$	12.50
Stephen Dixon	3/28/2018	Kansas	Telephone call with co-counsel re investigation strategy, factual findings	1.07	\$	375.00	\$	400.00
Stephen Dixon	3/29/2018	Kansas	Electronic mail to co-counsel re new facts useful for investigation	0.10	\$	375.00	\$	37.50
Stephen Dixon	4/4/2018	Kansas	Draft memo re recent meeting with potential client with key facts important to investigation	0.37	\$	375.00	\$	137.50
Stephen Dixon	4/4/2018	Kansas	Draft memo re recent meeting with Kansas foster system advocate with key facts important to investigation	0.47	\$	375.00	\$	175.00
Stephen Dixon	4/5/2018	Kansas	Draft memo re recent meeting with potential client with key facts important to investigation	1.42	\$	375.00	\$	531.25
Stephen Dixon	4/11/2018	Kansas	Telephone call with Kansas social worker re problems in foster care system	0.50	\$	375.00	\$	187.50
Stephen Dixon	4/13/2018	Kansas	Electronic mail to co-counsel team re fact analysis	0.25	\$	375.00	\$	93.75
Stephen Dixon	4/17/2018	Kansas	Electronic mails with confidential contact/child advocate re problems facing Kansas child welfare system	0.30	\$	375.00	\$	112.50
Stephen Dixon	4/17/2018	Kansas	Telephone call with potential client re problems in Kansas foster care system	0.35	\$	375.00	\$	131.25
Stephen Dixon	4/17/2018	Kansas	Electronic mail to co-counsel re potential client	0.43	\$	375.00	\$	162.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Stephen Dixon	4/17/2018	Kansas	Electronic mail with potential fact witness re problems in Kansas foster care system	0.50	\$	375.00	\$	187.50
Stephen Dixon	4/19/2018	Kansas	Electronic mail with confidential contact/child advocate re problems facing Kansas child welfare system	0.33	\$	375.00	\$	125.00
Stephen Dixon	4/19/2018	Kansas	Electronic mail with potential fact witness re problems in Kansas foster care system	0.50	\$	375.00	\$	187.50
Stephen Dixon	4/22/2018	Kansas	Electronic mail to co-counsel re call with potential fact witness	0.03	\$	375.00	\$	12.50
Stephen Dixon	5/1/2018	Kansas	Electronic mail to IL re call with potential fact witness	0.02	\$	375.00	\$	6.25
Stephen Dixon	5/2/2018	Kansas	Electronic mail to co-counsel team re new factual developments	0.05	\$	375.00	\$	18.75
Stephen Dixon	5/2/2018	Kansas	Electronic mail with MN re status of investigation in Kansas	0.50	\$	375.00	\$	187.50
Stephen Dixon	5/3/2018	Kansas	Electronic mail with potential fact witness re problems in Kansas foster care system	0.08	\$	375.00	\$	31.25
Stephen Dixon	5/9/2018	Kansas	Electronic mail with potential client re upcoming meeting	0.13	\$	375.00	\$	50.00
Stephen Dixon	5/9/2018	Kansas	Telephone call with team re strategy for next investigation trip (left early)	0.57	\$	375.00	\$	212.50
Stephen Dixon	5/10/2018	Kansas	Electronic mail with confidential Kansas contact re factual developments with client	0.25	\$	375.00	\$	93.75
Stephen Dixon	5/10/2018	Kansas	Telephone call with potential fact witness re mental health screens for Kansas foster children	0.83	\$	375.00	\$	312.50
Stephen Dixon	5/14/2018	Travel	Travel to Kansas City for meetings with potential clients, foster care advocates.	2.00	\$	375.00	\$	750.00
Stephen Dixon	5/15/2018	Kansas	Meetings with several potential fact witnesses re foster care system deficiencies	4.50	\$	375.00	\$	1,687.50
Stephen Dixon	5/15/2018	Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	1.72	\$	375.00	\$	643.75
Stephen Dixon	5/16/2018	Kansas	Emails to potential fact witness re follow-up on foster care facts from meeting	0.08	\$	375.00	\$	31.25

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Stephen Dixon	5/16/2018	Kansas	Electronic mail to co-counsel team re new factual developments	0.33	\$	375.00	\$	125.00
Stephen Dixon	5/16/2018	Kansas	Meetings with several potential fact witnesses re foster care system deficiencies	3.58	\$	375.00	\$	1,343.75
Stephen Dixon	5/16/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	2.45	\$	375.00	\$	918.75
Stephen Dixon	5/21/2018	Kansas	Electronic mail to co-counsel re new factual developments	0.03	\$	375.00	\$	12.50
Stephen Dixon	5/21/2018	Kansas	Electronic mail with MN re fact pattern of potential client	0.03	\$	375.00	\$	12.50
Stephen Dixon	5/21/2018	Kansas	Electronic mail to team re fact pattern of potential client	0.03	\$	375.00	\$	12.50
Stephen Dixon	5/21/2018	Kansas	Draft memo re recent meeting with potential client with key facts important to investigation	0.58	\$	375.00	\$	218.75
Stephen Dixon	5/21/2018	Kansas	Draft memo re recent meeting with potential client with key facts important to investigation (cont'd)	0.67	\$	375.00	\$	250.00
Stephen Dixon	5/21/2018	Kansas	Draft memos re recent meetings with potential clients with key facts important to investigation	2.50	\$	375.00	\$	937.50
Stephen Dixon	5/22/2018	Kansas	Electronic mail to co-counsel re recent contact memos	0.03	\$	375.00	\$	12.50
Stephen Dixon	5/22/2018	Kansas	Electronic mail with potential client re new factual developments	0.08	\$	375.00	\$	31.25
Stephen Dixon	5/22/2018	Kansas	Electronic mail with potential fact witness re new factual developments	0.08	\$	375.00	\$	31.25
Stephen Dixon	5/22/2018	Kansas	Draft memo re recent meeting with potential client with key facts important to investigation	0.53	\$	375.00	\$	200.00
Stephen Dixon	5/22/2018	Kansas	Draft memo re recent meeting with potential client with key facts important to investigation (cont'd)	1.00	\$	375.00	\$	375.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	5/23/2018	Kansas	Electronic mail with potential fact witness re question re mental health screenings	0.13	\$	375.00	\$	50.00
Stephen Dixon	5/23/2018	Kansas	Telephone call with team to discuss investigation strategy, potential clients.	0.88	\$	375.00	\$	331.25
Stephen Dixon	5/30/2018	Kansas	Electronic mail to co-counsel re mental health screens for youth in care	0.03	\$	375.00	\$	12.50
Stephen Dixon	5/31/2018	Kansas	Electronic mail with client re investigation update	0.07	\$	375.00	\$	25.00
Stephen Dixon	6/4/2018	Kansas	Electronic mail to team re factual developments	0.03	\$	375.00	\$	12.50
Stephen Dixon	6/4/2018	Kansas	Electronic mail with potential client re investigation update	0.08	\$	375.00	\$	31.25
Stephen Dixon	6/5/2018	Kansas	Electronic mail to co-counsel team re factual developments	0.28	\$	375.00	\$	106.25
Stephen Dixon	6/6/2018	Kansas	Electronic mail to co-counsel team re factual developments	0.17	\$	375.00	\$	62.50
Stephen Dixon	6/6/2018	Kansas	Electronic mail with potential client re investigation update	0.20	\$	375.00	\$	75.00
Stephen Dixon	6/8/2018	Kansas	Electronic mail with potential fact witnesses re placement array challenges in Kansas	0.33	\$	375.00	\$	125.00
Stephen Dixon	6/13/2018	Kansas	Electronic mail with potential fact witnesses re placement array challenges in Kansas	0.17	\$	375.00	\$	62.50
Stephen Dixon	6/13/2018	Kansas	Electronic mail with potential fact witnesses re placement array challenges in Kansas (cont'd)	0.20	\$	375.00	\$	75.00
Stephen Dixon	6/13/2018	Kansas	Review and analyze findings of fact	0.83	\$	375.00	\$	312.50
Stephen Dixon	6/14/2018	Kansas	Electronic mail with IL and MN re status of potential named plaintiffs	0.03	\$	375.00	\$	12.50
Stephen Dixon	6/14/2018	Kansas	Electronic mail with potential fact witnesses re problems in Kansas foster care system	0.83	\$	375.00	\$	312.50
Stephen Dixon	6/15/2018	Kansas	Electronic mail with potential fact witnesses re problems in Kansas foster care system	0.65	\$	375.00	\$	243.75
Stephen Dixon	6/16/2018	Kansas	Electronic mail with potential fact witnesses re problems in Kansas foster care system	0.12	\$	375.00	\$	43.75

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	6/16/2018	Kansas	Electronic mail with co-counsel team re gaps in findings of fact	0.47	\$	375.00	\$	175.00
Stephen Dixon	6/17/2018	Kansas Travel	Travel to Kansas City for meetings with potential clients, foster care advocates.	1.25	\$	375.00	\$	468.75
Stephen Dixon	6/18/2018	Kansas	Meetings with potential fact witnesses and clients in Kansas re placement array issues in Kansas foster care system	3.50	\$	375.00	\$	1,312.50
Stephen Dixon	6/18/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.62	\$	375.00	\$	231.25
Stephen Dixon	6/19/2018	Kansas	Electronic mail to co-counsel group re factual developments	0.13	\$	375.00	\$	50.00
Stephen Dixon	6/19/2018	Kansas	Meetings with potential fact witnesses and clients in Kansas re placement array issues in Kansas foster care system	3.92	\$	375.00	\$	1,468.75
Stephen Dixon	6/19/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.67	\$	375.00	\$	250.00
Stephen Dixon	6/20/2018	Kansas	Electronic mail to co-counsel group re factual developments	0.73	\$	375.00	\$	275.00
Stephen Dixon	6/20/2018	Kansas Travel	Travel home from Kansas.	1.25	\$	375.00	\$	468.75
Stephen Dixon	6/21/2018	Kansas	Electronic mail to IL and MN re potential clients' fact patterns	0.13	\$	375.00	\$	50.00
Stephen Dixon	6/24/2018	Kansas	Electronic mail to co-counsel re legal analysis of placement array problems	0.07	\$	375.00	\$	25.00
Stephen Dixon	6/28/2018	Kansas	Electronic mail to co-counsel re factual developments	0.05	\$	375.00	\$	18.75
Stephen Dixon	6/28/2018	Kansas	Electronic mail with potential fact witness re problems in Kansas foster care system	0.08	\$	375.00	\$	31.25
Stephen Dixon	6/28/2018	Kansas	Telephone call with confidential foster care system advocate re placement moves for foster children	0.22	\$	375.00	\$	81.25
Stephen Dixon	7/5/2018	Kansas	Electronic mail to co-counsel re conversation with advocate	0.05	\$	375.00	\$	18.75

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	7/5/2018	Kansas	Electronic mail with potential fact witness re placement array challenges in Kansas	0.13	\$	375.00	\$	50.00
Stephen Dixon	7/5/2018	Kansas	Electronic mail with potential fact witness re placement array challenges in Kansas (cont'd)	0.33	\$	375.00	\$	125.00
Stephen Dixon	7/5/2018	Kansas	Draft memo re recent conversion with confidential Kansas foster care advocate with key facts important to investigation	0.42	\$	375.00	\$	156.25
Stephen Dixon	7/5/2018	Kansas	Draft memo re recent conversion with confidential Kansas foster care advocate with key facts important to investigation (cont'd)	0.75	\$	375.00	\$	281.25
Stephen Dixon	7/5/2018	Kansas	Draft memo re recent conversion with confidential Kansas foster care advocate with key facts important to investigation (cont'd)	0.92	\$	375.00	\$	343.75
Stephen Dixon	7/6/2018	Kansas	Electronic mail to co-counsel re investigation strategy	0.03	\$	375.00	\$	12.50
Stephen Dixon	7/6/2018	Kansas	Electronic mail to potential client re Kansas foster care system deficiencies	0.05	\$	375.00	\$	18.75
Stephen Dixon	7/6/2018	Kansas	Electronic mail to potential client re Kansas foster care system deficiencies (cont'd)	0.25	\$	375.00	\$	93.75
Stephen Dixon	7/6/2018	Kansas	Draft memo re recent conversion with potential client with key facts important to investigation (cont'd)	1.53	\$	375.00	\$	575.00
Stephen Dixon	7/9/2018	Kansas	Electronic mail to MN re investigation strategy	0.03	\$	375.00	\$	12.50
Stephen Dixon	7/11/2018	Kansas	Electronic mail to co-counsel re factual gaps in findings of fact	0.03	\$	375.00	\$	12.50
Stephen Dixon	7/11/2018	Kansas	Electronic mails to potential client re foster care rates	0.17	\$	375.00	\$	62.50
Stephen Dixon	7/11/2018	Kansas	Telephone call with co-counsel team re EPSDT claims; Medicaid legal expert joined the call about 35 minutes into the call	1.23	\$	375.00	\$	462.50
Stephen Dixon	7/18/2018	Kansas	Electronic mail to confidential Kansas contact re respite care rates	0.05	\$	375.00	\$	18.75
Stephen Dixon	7/18/2018	Kansas	Electronic mail to confidential Kansas contact re respite care rates (different contact)	0.08	\$	375.00	\$	31.25

***M.B. v. Howard***  
**Children's Rights Itemized Time Entries**

Stephen Dixon	7/18/2018	Kansas	Electronic mail to co-counsel team respite care rates	0.15	\$	375.00	\$	56.25
Stephen Dixon	7/18/2018	Kansas	Electronic mail to co-counsel team respite care rates (cont'd)	0.17	\$	375.00	\$	62.50
Stephen Dixon	7/19/2018	Kansas	Electronic mail to confidential Kansas guardian ad litem re Kids Zone	0.08	\$	375.00	\$	31.25
Stephen Dixon	7/24/2018	Kansas	Electronic mails to confidential Kansas guardian ad litem re Kids Zone	0.08	\$	375.00	\$	31.25
Stephen Dixon	7/24/2018	Kansas	Prepare to present facts re Kids Zone for co-counsel call	0.13	\$	375.00	\$	50.00
Stephen Dixon	7/26/2018	Kansas	Electronic mail with confidential foster parents re short-term placements	0.13	\$	375.00	\$	50.00
Stephen Dixon	7/27/2018	Kansas	Electronic mail with IL re investigation strategy	0.20	\$	375.00	\$	75.00
Stephen Dixon	7/27/2018	Kansas	Electronic mail to group of foster care advocates re factual gaps in our findings of fact	0.37	\$	375.00	\$	137.50
Stephen Dixon	7/30/2018	Kansas	Electronic mail with IL re investigation strategy	0.10	\$	375.00	\$	37.50
Stephen Dixon	7/30/2018	Kansas	Telephone call with potential next friend re night-to-night placements, screening problems	0.37	\$	375.00	\$	137.50
Stephen Dixon	7/30/2018	Kansas	Electronic mails with potential next friends re follow-up on conversation re night-to-night placements, screening problems	0.67	\$	375.00	\$	250.00
Stephen Dixon	7/31/2018	Kansas	Electronic mail with potential next friend re night-to-night placements	0.05	\$	375.00	\$	18.75
Stephen Dixon	7/31/2018	Kansas	Electronic mail with co-counsel team re conversation with potential next friend	0.08	\$	375.00	\$	31.25
Stephen Dixon	7/31/2018	Kansas Travel	Travel to Kansas City for meetings with potential clients, foster care advocates.	2.00	\$	375.00	\$	750.00
Stephen Dixon	8/1/2018	Kansas	Electronic mail with Kansas foster parent re mental health screenings	0.22	\$	375.00	\$	81.25

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Stephen Dixon	8/1/2018	Kansas	Meetings in Kansas with foster care advocates re deficiencies in foster care system	4.75	\$	375.00	\$	1,781.25
Stephen Dixon	8/1/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	1.53	\$	375.00	\$	575.00
Stephen Dixon	8/2/2018	Kansas	Meetings in Kansas with foster care advocates re deficiencies in foster care system	4.33	\$	375.00	\$	1,625.00
Stephen Dixon	8/2/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	1.25	\$	375.00	\$	468.75
Stephen Dixon	8/3/2018	Kansas	Electronic mail to confidential foster care advocate re factual follow-up from meeting yesterday	0.08	\$	375.00	\$	31.25
Stephen Dixon	8/3/2018	Kansas	Electronic mail to co-counsel team re potential clients	0.25	\$	375.00	\$	93.75
Stephen Dixon	8/3/2018	Kansas	Draft memo re recent meeting with foster care advocate in Kansas and circulate to team	0.33	\$	375.00	\$	125.00
Stephen Dixon	8/3/2018	Kansas Travel	Travel home from Kansas.	2.00	\$	375.00	\$	750.00
Stephen Dixon	8/4/2018	Kansas	Draft memo re recent meeting with foster care advocate in Kansas and circulate to team	0.37	\$	375.00	\$	137.50
Stephen Dixon	8/4/2018	Kansas	Draft memo re recent meeting with foster care advocate in Kansas and circulate to team (cont'd)	0.58	\$	375.00	\$	218.75
Stephen Dixon	8/6/2018	Kansas	Electronic mail to foster care advocate re factual clarification for memo	0.03	\$	375.00	\$	12.50
Stephen Dixon	8/6/2018	Kansas	Draft memo re recent meeting with foster care advocate in Kansas and circulate to team	0.33	\$	375.00	\$	125.00
Stephen Dixon	8/6/2018	Kansas	Draft memo re recent meeting with foster care advocate in Kansas and circulate to team (cont'd)	0.63	\$	375.00	\$	237.50
Stephen Dixon	8/7/2018	Kansas	Electronic mail with EM re potential client	0.03	\$	375.00	\$	12.50
Stephen Dixon	8/7/2018	Kansas	Electronic mail to foster care advocate re foster care contractors	0.17	\$	375.00	\$	62.50
Stephen Dixon	8/7/2018	Kansas	Draft memo re recent meeting with foster care advocate in Kansas and circulate to team	0.50	\$	375.00	\$	187.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	8/8/2018	Kansas	Electronic mail to foster care advocate re foster care contractors	0.03	\$	375.00	\$	12.50
Stephen Dixon	8/8/2018	Kansas	Electronic mail with team re new facts re foster care contractors	0.07	\$	375.00	\$	25.00
Stephen Dixon	8/8/2018	Kansas	Draft memo re recent meeting with foster care advocate in Kansas and circulate to team	0.92	\$	375.00	\$	343.75
Stephen Dixon	8/10/2018	Kansas	Electronic mail to potential client re caseworker problems	0.25	\$	375.00	\$	93.75
Stephen Dixon	8/11/2018	Kansas	Electronic mail to co-counsel team re new factual developments for findings of fact	0.08	\$	375.00	\$	31.25
Stephen Dixon	8/13/2018	Kansas	Electronic mail to MN re investigation strategy	0.05	\$	375.00	\$	18.75
Stephen Dixon	8/13/2018	Kansas	Electronic mail with L. Welch re investigation strategy	0.05	\$	375.00	\$	18.75
Stephen Dixon	8/14/2018	Kansas	Electronic mail with paralegal re findings of fact evidence gaps	0.03	\$	375.00	\$	12.50
Stephen Dixon	8/16/2018	Kansas	Electronic mail to foster care advocate re drop-off process for foster children	0.13	\$	375.00	\$	50.00
Stephen Dixon	8/20/2018	Kansas	Electronic mail to co-counsel team re process for new placements	0.05	\$	375.00	\$	18.75
Stephen Dixon	8/20/2018	Kansas	Electronic mails with foster care advocates in Kansas re night-to-night placements and emergency placements	0.75	\$	375.00	\$	281.25
Stephen Dixon	8/20/2018	Kansas	Telephone calls with foster care advocate re PRTFs and foster youth	0.78	\$	375.00	\$	293.75
Stephen Dixon	8/21/2018	Kansas	Telephone calls with foster care advocate re PRTFs and foster youth	0.08	\$	375.00	\$	31.25
Stephen Dixon	8/21/2018	Kansas	Electronic mail with foster care advocates re night-to-night placements	0.97	\$	375.00	\$	362.50
Stephen Dixon	8/22/2018	Kansas	Electronic mail with foster care advocate re night-to-night placements	0.08	\$	375.00	\$	31.25
Stephen Dixon	8/22/2018	Kansas	Telephone call with team re complaint drafting, investigation strategy (came late to meeting)	0.35	\$	375.00	\$	131.25

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	8/22/2018	Kansas	Telephone call with Kansas GAL re potentially wanting to join lawsuit	0.50	\$	375.00	\$	187.50
Stephen Dixon	8/22/2018	Kansas	Electronic mail to team re factual developments in investigation	0.55	\$	375.00	\$	206.25
Stephen Dixon	8/23/2018	Kansas	Telephone call with client re investigation status	0.05	\$	375.00	\$	18.75
Stephen Dixon	8/23/2018	Kansas	Electronic mail to foster parent re experience fostering	0.27	\$	375.00	\$	100.00
Stephen Dixon	8/24/2018	Kansas	Telephone call to GAL re night-to-night placements	0.03	\$	375.00	\$	12.50
Stephen Dixon	8/25/2018	Kansas	Telephone call to GAL re night-to-night placements	0.03	\$	375.00	\$	12.50
Stephen Dixon	8/26/2018	Kansas	Electronic mail with foster care advocate re Child Welfare System Task Force	0.03	\$	375.00	\$	12.50
Stephen Dixon	8/27/2018	Kansas	Electronic mail with foster care advocate re Child Welfare System Task Force	0.03	\$	375.00	\$	12.50
Stephen Dixon	8/27/2018	Kansas	Electronic mail to paralegal re Child Welfare Systems task force report	0.05	\$	375.00	\$	18.75
Stephen Dixon	8/28/2018	Kansas	Electronic mail with foster care advocate re Child Welfare System Task Force	0.08	\$	375.00	\$	31.25
Stephen Dixon	8/28/2018	Kansas	Electronic mail with paralegal re Child Welfare System task force report	0.10	\$	375.00	\$	37.50
Stephen Dixon	8/28/2018	Kansas	Telephone call with client re status of investigation, questions re factual allegations	0.22	\$	375.00	\$	81.25
Stephen Dixon	8/28/2018	Kansas	Meeting with GAL re problems in Kansas foster care system	1.25	\$	375.00	\$	468.75
Stephen Dixon	8/28/2018	Kansas Travel	Travel to Wichita for meetings with potential clients, foster care advocates.	2.00	\$	375.00	\$	750.00
Stephen Dixon	8/29/2018	Kansas	Electronic mail to co-counsel re meeting with GAL	0.03	\$	375.00	\$	12.50
Stephen Dixon	8/29/2018	Kansas	Electronic mail to paralegal re additional facts to add to finding of facts	0.05	\$	375.00	\$	18.75
Stephen Dixon	8/29/2018	Kansas	Electronic mails to child advocates in Kansas re foster care placement instability	0.37	\$	375.00	\$	137.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	8/29/2018	Kansas	Telephone call with Kansas child advocate re placement instability	0.53	\$	375.00	\$	200.00
Stephen Dixon	8/29/2018	Kansas	Meetings with foster care advocates re deficiencies in foster care system	5.00	\$	375.00	\$	1,875.00
Stephen Dixon	8/29/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.17	\$	375.00	\$	62.50
Stephen Dixon	8/29/2018	Kansas Travel	Travel from Wichita to Kansas City for several meetings with potential clients, foster care advocates.	1.50	\$	375.00	\$	562.50
Stephen Dixon	8/30/2018	Kansas	Meetings with foster care advocates re deficiencies in foster care system	5.00	\$	375.00	\$	1,875.00
Stephen Dixon	8/31/2018	Kansas	Meetings with foster care advocates re deficiencies in foster care system	5.08	\$	375.00	\$	1,906.25
Stephen Dixon	8/31/2018	Kansas Travel	Travel from Kansas City to Topeka for meetings with potential client.	0.50	\$	375.00	\$	187.50
Stephen Dixon	8/31/2018	Kansas Travel	Travel from Topeka to Kansas City for meetings with potential clients.	0.50	\$	375.00	\$	187.50
Stephen Dixon	9/1/2018	Kansas	Electronic mail to co-counsel team re new facts learned from stakeholder meetings	0.30	\$	375.00	\$	112.50
Stephen Dixon	9/1/2018	Kansas	Electronic mail to child advocates following up on facts from recent meetings	0.80	\$	375.00	\$	300.00
Stephen Dixon	9/1/2018	Kansas Travel	Travel home from Kansas.	2.00	\$	375.00	\$	750.00
Stephen Dixon	9/4/2018	Kansas	Electronic mail to co-counsel re new factual developments	0.12	\$	375.00	\$	43.75
Stephen Dixon	9/4/2018	Kansas	Electronic mail to child advocates following up on facts from recent meetings	1.17	\$	375.00	\$	437.50
Stephen Dixon	9/5/2018	Kansas	Electronic mail to client re investigation update	0.03	\$	375.00	\$	12.50
Stephen Dixon	9/5/2018	Kansas	Electronic mail with potential client re potential EPSDT claim	0.03	\$	375.00	\$	12.50
Stephen Dixon	9/5/2018	Kansas	Electronic mail to co-counsel facts supporting EPSDT claim	0.05	\$	375.00	\$	18.75

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	9/5/2018	Kansas	Telephone call with co-counsel team re complaint, investigation strategy	1.50	\$	375.00	\$	562.50
Stephen Dixon	9/6/2018	Kansas	Electronic mail to co-counsel re potential EPSDT claim facts	0.03	\$	375.00	\$	12.50
Stephen Dixon	9/6/2018	Kansas	Electronic mail to team re framing EPSDT claim	0.13	\$	375.00	\$	50.00
Stephen Dixon	9/6/2018	Kansas	Electronic mail with IL re investigation update, strategy	0.17	\$	375.00	\$	62.50
Stephen Dixon	9/7/2018	Kansas	Electronic mail to EM re fact pattern of potential next friend	0.03	\$	375.00	\$	12.50
Stephen Dixon	9/7/2018	Kansas	Electronic mail to EM re fact pattern of potential next friend	0.17	\$	375.00	\$	62.50
Stephen Dixon	9/7/2018	Kansas	Telephone call with IL re update on potential next friend	0.17	\$	375.00	\$	62.50
Stephen Dixon	9/14/2018	Kansas	Draft memo re potential next friend and circulate to team	0.42	\$	375.00	\$	156.25
Stephen Dixon	9/14/2018	Kansas	Draft memo re potential next friend and circulate to team (cont'd)	0.50	\$	375.00	\$	187.50
Stephen Dixon	9/15/2018	Kansas	Draft memo re potential next friend and circulate to team	1.42	\$	375.00	\$	531.25
Stephen Dixon	9/18/2018	Kansas	Electronic mail to foster parent re lack of trauma screens, assessments	0.08	\$	375.00	\$	31.25
Stephen Dixon	9/18/2018	Kansas	Electronic mail to team re conversation with foster parent re screens	0.08	\$	375.00	\$	31.25
Stephen Dixon	9/19/2018	Kansas	Telephone call re status of complaint drafting, investigation strategy	0.78	\$	375.00	\$	293.75
Stephen Dixon	9/20/2018	Kansas	Electronic mails to co-counsel team re factual update	0.13	\$	375.00	\$	50.00
Stephen Dixon	9/20/2018	Kansas	Telephone call with GAL re Kansas foster care system placement array issues	0.93	\$	375.00	\$	350.00
Stephen Dixon	9/24/2018	Kansas	Electronic mail with co-counsel re conversation with GAL	0.13	\$	375.00	\$	50.00
Stephen Dixon	9/26/2018	Kansas	Telephone call re investigation strategy	1.00	\$	375.00	\$	375.00
Stephen Dixon	9/28/2018	Kansas	Electronic mail to team re analysis of potential legal argument	0.25	\$	375.00	\$	93.75

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	10/1/2018	Kansas	Electronic mails to Kansas mental health advocate re trauma screens for foster children	0.10	\$	375.00	\$	37.50
Stephen Dixon	10/1/2018	Kansas	Telephone call with Kansas mental health advocate re trauma screens for foster children	0.25	\$	375.00	\$	93.75
Stephen Dixon	10/1/2018	Kansas	Electronic mail to team re analysis of potential legal argument	0.58	\$	375.00	\$	218.75
Stephen Dixon	10/2/2018	Kansas	Electronic mail to co-counsel re conversation with mental health advocate re trauma screens	0.33	\$	375.00	\$	125.00
Stephen Dixon	10/2/2018	Kansas	Telephone call with Kansas mental health advocate re trauma screens for foster children	0.42	\$	375.00	\$	156.25
Stephen Dixon	10/3/2018	Kansas	Electronic mail to team re potential clients' fact patterns	0.20	\$	375.00	\$	75.00
Stephen Dixon	10/3/2018	Kansas	Electronic mails to child advocates in Kansas re foster care placement instability factual questions	0.25	\$	375.00	\$	93.75
Stephen Dixon	10/4/2018	Kansas	Electronic mail to co-counsel re fact patterns of potential next friends	0.27	\$	375.00	\$	100.00
Stephen Dixon	10/4/2018	Kansas	Telephone call with potential next friend re night-to-night placements, screening problems	0.40	\$	375.00	\$	150.00
Stephen Dixon	10/4/2018	Kansas	Electronic mail with client re investigation update	1.53	\$	375.00	\$	575.00
Stephen Dixon	10/5/2018	Kansas	Telephone call with client re investigation update	0.03	\$	375.00	\$	12.50
Stephen Dixon	10/5/2018	Kansas	Electronic mails to child advocates in Kansas re filling in factual gaps about the child welfare system in Kansas	0.83	\$	375.00	\$	312.50
Stephen Dixon	10/6/2018	Kansas	Electronic mail to child advocate re night-to-night placements	0.07	\$	375.00	\$	25.00
Stephen Dixon	10/6/2018	Kansas	Review evidence gaps in findings of fact to prepare targeted questions for meetings with Kansas child advocates, GALs	0.83	\$	375.00	\$	312.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Stephen Dixon	10/7/2018	Kansas	Electronic mail to Kansas GAL re mental health screenings	0.08	\$	375.00	\$	31.25
Stephen Dixon	10/7/2018	Kansas	Electronic mail to co-counsel re upcoming meetings	0.25	\$	375.00	\$	93.75
Stephen Dixon	10/7/2018	Kansas	Review evidence gaps in findings of fact to prepare targeted questions for meetings with Kansas child advocates, GALs	0.83	\$	375.00	\$	312.50
Stephen Dixon	10/7/2018	Kansas Travel	Travel to Kansas for meetings with potential clients, foster care advocates.	2.00	\$	375.00	\$	750.00
Stephen Dixon	10/8/2018	Kansas	Telephone calls to foster care advocate re follow-up questions from meeting early re Kansas foster care system	0.13	\$	375.00	\$	50.00
Stephen Dixon	10/8/2018	Kansas	Meetings with foster care advocates re deficiencies in foster care system	4.50	\$	375.00	\$	1,687.50
Stephen Dixon	10/8/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	1.00	\$	375.00	\$	375.00
Stephen Dixon	10/9/2018	Kansas	Electronic mail to co-counsel re factual updates from meetings with local contacts	0.33	\$	375.00	\$	125.00
Stephen Dixon	10/9/2018	Kansas	Electronic mail to foster care advocate re follow-up questions from meeting early re Kansas foster care system	0.42	\$	375.00	\$	156.25
Stephen Dixon	10/9/2018	Kansas	Meetings with foster care advocates re deficiencies in foster care system	2.25	\$	375.00	\$	843.75
Stephen Dixon	10/9/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	1.00	\$	375.00	\$	375.00
Stephen Dixon	10/10/2018	Kansas	Telephone call with foster care advocate re follow-up questions from meeting early re Kansas foster care system	0.05	\$	375.00	\$	18.75
Stephen Dixon	10/10/2018	Kansas	Electronic mail to foster care advocate re follow-up questions from meeting early re Kansas foster care system	0.20	\$	375.00	\$	75.00
Stephen Dixon	10/10/2018	Kansas	Electronic mails to co-counsel re key facts from meetings with child advocates in Kansas	0.25	\$	375.00	\$	93.75

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	10/10/2018	Kansas	Meetings with foster care advocates re deficiencies in foster care system	4.00	\$	375.00	\$	1,500.00
Stephen Dixon	10/10/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	1.62	\$	375.00	\$	606.25
Stephen Dixon	10/11/2018	Kansas	Electronic mail to confidential child advocate re connecting with potential client	0.15	\$	375.00	\$	56.25
Stephen Dixon	10/11/2018	Kansas	Electronic mail to potential client re fact pattern	0.17	\$	375.00	\$	62.50
Stephen Dixon	10/11/2018	Kansas	Telephone call with potential client re their perspective on foster care deficiencies in Kansas	0.45	\$	375.00	\$	168.75
Stephen Dixon	10/11/2018	Kansas	Meetings with foster care advocates re deficiencies in foster care system	4.00	\$	375.00	\$	1,500.00
Stephen Dixon	10/11/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.50	\$	375.00	\$	187.50
Stephen Dixon	10/12/2018	Kansas	Electronic mail with IL re investigation update	0.03	\$	375.00	\$	12.50
Stephen Dixon	10/12/2018	Kansas	Electronic mail with potential client re new factual developments	0.12	\$	375.00	\$	43.75
Stephen Dixon	10/12/2018	Kansas	Meetings with foster care advocate re deficiencies in foster care system	1.50	\$	375.00	\$	562.50
Stephen Dixon	10/12/2018	Kansas Travel	Travel home from Kansas.	2.00	\$	375.00	\$	750.00
Stephen Dixon	10/13/2018	Kansas	Electronic mail with potential client re new factual developments	0.17	\$	375.00	\$	62.50
Stephen Dixon	10/13/2018	Kansas	Electronic mail to team re legal analysis for potential claims	0.25	\$	375.00	\$	93.75
Stephen Dixon	10/15/2018	Kansas	Draft memo re recent meeting with foster care advocate in Kansas and circulate to team	1.83	\$	375.00	\$	687.50
Stephen Dixon	10/17/2018	Kansas	Electronic mail with potential client re investigation update	0.08	\$	375.00	\$	31.25
Stephen Dixon	10/17/2018	Kansas	Draft memo re recent meeting with foster care advocate in Kansas and circulate to team	1.03	\$	375.00	\$	387.50
Stephen Dixon	10/18/2018	Kansas	Electronic mail with potential client re investigation update	0.03	\$	375.00	\$	12.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Stephen Dixon	10/19/2018	Kansas	Electronic mail with potential client re investigation update	0.08	\$	375.00	\$	31.25
Stephen Dixon	10/19/2018	Kansas	Electronic mail to co-counsel re legal analysis of placement array problems	0.17	\$	375.00	\$	62.50
Stephen Dixon	10/21/2018	Kansas	Electronic mail to co-counsel re legal analysis of placement array problems	0.22	\$	375.00	\$	81.25
Stephen Dixon	10/22/2018	Kansas	Electronic mail to co-counsel re legal analysis of placement array problems	0.17	\$	375.00	\$	62.50
Stephen Dixon	10/22/2018	Kansas	Electronic mails with GAL in Kansas re screening problems	0.58	\$	375.00	\$	218.75
Stephen Dixon	10/23/2018	Kansas	Electronic mails with GAL in Kansas re screening problems	0.03	\$	375.00	\$	12.50
Stephen Dixon	10/24/2018	Kansas	Electronic mail to co-counsel re legal analysis of potential claim	0.08	\$	375.00	\$	31.25
Stephen Dixon	10/24/2018	Kansas	Electronic mails with GAL in Kansas re screening problems	0.13	\$	375.00	\$	50.00
Stephen Dixon	10/24/2018	Kansas	Telephone call re client updates and complaint strategy	0.85	\$	375.00	\$	318.75
Stephen Dixon	10/26/2018	Kansas	Telephone call with potential client re fact pattern, potentially joining lawsuit	0.25	\$	375.00	\$	93.75
Stephen Dixon	10/26/2018	Kansas	Electronic mail with potential client re fact pattern, potentially joining lawsuit	0.47	\$	375.00	\$	175.00
Stephen Dixon	10/27/2018	Kansas	Electronic mail with co-counsel re update on potential client	0.07	\$	375.00	\$	25.00
Stephen Dixon	10/27/2018	Kansas	Electronic mails with potential client re potentially joining lawsuit	0.67	\$	375.00	\$	250.00
Stephen Dixon	10/27/2018	Kansas	Draft memo re fact pattern of potential client, circulate to team	0.75	\$	375.00	\$	281.25
Stephen Dixon	10/29/2018	Kansas	Electronic mail with co-counsel re potential client	0.03	\$	375.00	\$	12.50
Stephen Dixon	10/29/2018	Kansas	Electronic mail to foster parents re potentially being fact witness	1.25	\$	375.00	\$	468.75
Stephen Dixon	10/30/2018	Kansas	Electronic mail to potential fact witness re investigation update, factual gaps	0.17	\$	375.00	\$	62.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Stephen Dixon	10/30/2018	Kansas	Electronic mail to potential fact witness re investigation update, factual gaps	0.92	\$	375.00	\$	343.75
Stephen Dixon	10/30/2018	Kansas	Telephone call with potential fact witness re late-night placements	1.43	\$	375.00	\$	537.50
Stephen Dixon	10/31/2018	Kansas	Electronic mail to client re investigation update	0.17	\$	375.00	\$	62.50
Stephen Dixon	10/31/2018	Kansas	Electronic mail to client re investigation update (different client)	0.17	\$	375.00	\$	62.50
Stephen Dixon	10/31/2018	Kansas	Electronic mail to co-counsel re recent client interaction	0.20	\$	375.00	\$	75.00
Stephen Dixon	10/31/2018	Kansas	Telephone call with co-counsel re complaint strategy, clients' facts	0.77	\$	375.00	\$	287.50
Stephen Dixon	11/1/2018	Kansas	Telephone calls with potential next friend re factual question	0.07	\$	375.00	\$	25.00
Stephen Dixon	11/1/2018	Kansas	Electronic mail to co-counsel re potential next friend	0.25	\$	375.00	\$	93.75
Stephen Dixon	11/1/2018	Kansas	Electronic mail to potential next friend	0.75	\$	375.00	\$	281.25
Stephen Dixon	11/2/2018	Kansas	Telephone call with potential friend re investigation status	0.05	\$	375.00	\$	18.75
Stephen Dixon	11/2/2018	Kansas	Electronic mail to co-counsel re conversation with potential next friend	0.07	\$	375.00	\$	25.00
Stephen Dixon	11/2/2018	Kansas	Electronic mail with child advocates in Kansas re finding more clients	0.17	\$	375.00	\$	62.50
Stephen Dixon	11/4/2018	Kansas	Electronic mail to co-counsel re analysis of draft complaint	0.08	\$	375.00	\$	31.25
Stephen Dixon	11/4/2018	Kansas	Electronic mail to next friend re clarifying facts for complaint	0.75	\$	375.00	\$	281.25
Stephen Dixon	11/5/2018	Kansas	Electronic mail to child advocate re sourcing for complaint	0.03	\$	375.00	\$	12.50
Stephen Dixon	11/5/2018	Kansas	Electronic mail to team re additional fact for complaint	0.07	\$	375.00	\$	25.00
Stephen Dixon	11/5/2018	Kansas	Electronic mail to co-counsel re feedback on draft complaint	0.17	\$	375.00	\$	62.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	11/5/2018	Kansas	Electronic mail to GAL re being potential fact witness	0.50	\$	375.00	\$	187.50
Stephen Dixon	11/5/2018	Kansas Travel	Travel to Kansas for meetings with potential clients, foster care advocates.	2.00	\$	375.00	\$	750.00
Stephen Dixon	11/6/2018	Kansas	Electronic mail to team re conversation with GAL	0.27	\$	375.00	\$	100.00
Stephen Dixon	11/6/2018	Kansas	Electronic mail with foster care advocate from meeting earlier re factual follow-up	0.42	\$	375.00	\$	156.25
Stephen Dixon	11/6/2018	Kansas	Meetings with foster care advocates re deficiencies in foster care system	3.50	\$	375.00	\$	1,312.50
Stephen Dixon	11/6/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.25	\$	375.00	\$	93.75
Stephen Dixon	11/6/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.25	\$	375.00	\$	93.75
Stephen Dixon	11/7/2018	Kansas	Electronic mail with foster care advocate from meeting earlier re factual follow-up	0.03	\$	375.00	\$	12.50
Stephen Dixon	11/7/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.62	\$	375.00	\$	231.25
Stephen Dixon	11/7/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.62	\$	375.00	\$	231.25
Stephen Dixon	11/8/2018	Kansas	Electronic mail with foster care advocate from meeting yesterday re factual follow-up	0.20	\$	375.00	\$	75.00
Stephen Dixon	11/8/2018	Kansas	Electronic mail with co-counsel team re major factual findings from stakeholder meetings	0.37	\$	375.00	\$	137.50
Stephen Dixon	11/8/2018	Kansas Travel	Travel home from Kansas.	2.00	\$	375.00	\$	750.00
Stephen Dixon	11/9/2018	Kansas	Electronic mail to foster care advocate about potentially becoming client	0.03	\$	375.00	\$	12.50
Stephen Dixon	11/9/2018	Kansas	Draft memo re recent meeting with foster care advocate in Kansas and circulate to team	1.50	\$	375.00	\$	562.50
Stephen Dixon	11/10/2018	Kansas	Electronic mail with co-counsel re vetting potential client	0.08	\$	375.00	\$	31.25
Stephen Dixon	11/10/2018	Kansas	Telephone call with co-counsel re vetting potential client	0.35	\$	375.00	\$	131.25

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	11/11/2018	Kansas	Electronic mail to child advocate re fact needed for complaint	0.03	\$	375.00	\$	12.50
Stephen Dixon	11/11/2018	Kansas	Electronic mail to client re complaint status	0.17	\$	375.00	\$	62.50
Stephen Dixon	11/11/2018	Kansas	Electronic mail with co-counsel re vetting potential clients, fit to be class representatives	0.58	\$	375.00	\$	218.75
Stephen Dixon	11/11/2018	Kansas	Draft memo re recent meeting with foster care advocate in Kansas and circulate to team	1.42	\$	375.00	\$	531.25
Stephen Dixon	11/12/2018	Kansas	Telephone call with client reviewing draft complaint	0.15	\$	375.00	\$	56.25
Stephen Dixon	11/12/2018	Kansas	Emails with clients re confirming complaint allegations	2.50	\$	375.00	\$	937.50
Stephen Dixon	11/12/2018	Kansas	Emails with foster care advocates, co-counsel confirming facts in draft complaint	3.47	\$	375.00	\$	1,300.00
Stephen Dixon	11/14/2018	Kansas	Electronic mail to foster care advocate re KDADS, DCF structure	0.03	\$	375.00	\$	12.50
Stephen Dixon	11/14/2018	Kansas	Emails with co-counsel re client update	0.47	\$	375.00	\$	175.00
Stephen Dixon	11/14/2018	Kansas	Telephone call with team re complaint edits	0.58	\$	375.00	\$	218.75
Stephen Dixon	11/14/2018	Kansas Travel	Travel to Kansas for meetings with potential clients, foster care advocates.	2.00	\$	375.00	\$	750.00
Stephen Dixon	11/15/2018	Kansas	Electronic mail with client re status of complaint	0.03	\$	375.00	\$	12.50
Stephen Dixon	11/15/2018	Kansas	Electronic mail with potential client re status of complaint	0.13	\$	375.00	\$	50.00
Stephen Dixon	11/15/2018	Kansas	Electronic mail with co-counsel team re filling in evidentiary gaps in complaint	0.17	\$	375.00	\$	62.50
Stephen Dixon	11/15/2018	Kansas	Telephone calls with foster care advocates re getting help clarifying factual point to incorporate into complaint	0.33	\$	375.00	\$	125.00
Stephen Dixon	11/15/2018	Kansas	Electronic mail with co-counsel re prospective clients	0.33	\$	375.00	\$	125.00
Stephen Dixon	11/15/2018	Kansas	Meeting with potential client re potentially joining lawsuit, fact patterns	0.42	\$	375.00	\$	156.25

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	11/15/2018	Kansas	Meeting with client re new facts, investigation/complaint status	0.75	\$	375.00	\$	281.25
Stephen Dixon	11/15/2018	Kansas	Meeting with another potential client re potentially joining lawsuit, fact patterns	1.00	\$	375.00	\$	375.00
Stephen Dixon	11/15/2018	Kansas	Meeting with another client re new facts, investigation/complaint status	1.25	\$	375.00	\$	468.75
Stephen Dixon	11/15/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.12	\$	375.00	\$	43.75
Stephen Dixon	11/15/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.12	\$	375.00	\$	43.75
Stephen Dixon	11/15/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.33	\$	375.00	\$	125.00
Stephen Dixon	11/15/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.33	\$	375.00	\$	125.00
Stephen Dixon	11/16/2018	Kansas	Telephone call with client re filing complaint	0.12	\$	375.00	\$	43.75
Stephen Dixon	11/16/2018	Kansas	Electronic mail with clients re filing complaint	0.42	\$	375.00	\$	156.25
Stephen Dixon	11/16/2018	Kansas	Do final review of complaint	0.75	\$	375.00	\$	281.25
Stephen Dixon	11/16/2018	Kansas	Meeting with client re final draft of complaint	1.25	\$	375.00	\$	468.75
Stephen Dixon	11/16/2018	Kansas	Electronic mail with clients re final factual edits to complaint	1.57	\$	375.00	\$	587.50
Stephen Dixon	11/16/2018	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.50	\$	375.00	\$	187.50
Stephen Dixon	11/17/2018	Kansas	Electronic mail to team re update from client	0.08	\$	375.00	\$	31.25
Stephen Dixon	11/17/2018	Kansas	Emails to client re complaint filing	0.08	\$	375.00	\$	31.25
Stephen Dixon	11/17/2018	Kansas Travel	Travel home from Kansas.	2.00	\$	375.00	\$	750.00
Stephen Dixon	11/18/2018	Kansas	Research factual question for potential complaint amendment	0.75	\$	375.00	\$	281.25
Stephen Dixon	11/19/2018	Kansas	Electronic mail to clients re litigation hold	0.42	\$	375.00	\$	156.25
Stephen Dixon	11/19/2018	Kansas	Research factual question for potential complaint amendment	0.92	\$	375.00	\$	343.75
Stephen Dixon	11/21/2018	Kansas	Electronic mail to team re potential complaint amendment	0.17	\$	375.00	\$	62.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	11/21/2018	Kansas	Telephone call with foster care advocate re complaint filing	0.22	\$	375.00	\$	81.25
Stephen Dixon	11/21/2018	Kansas	Telephone call with team re litigation strategy after complaint filing	0.83	\$	375.00	\$	312.50
Stephen Dixon	11/28/2018	Kansas	Electronic mail with co-counsel re factual update	0.05	\$	375.00	\$	18.75
Stephen Dixon	11/28/2018	Kansas	Draft memo re recent meeting with foster care advocate in Kansas and circulate to team	0.42	\$	375.00	\$	156.25
Stephen Dixon	11/28/2018	Kansas	Telephone call with team re witness outreach	1.08	\$	375.00	\$	406.25
Stephen Dixon	11/29/2018	Kansas	Electronic mail with child advocates in Kansas re finding more clients	0.05	\$	375.00	\$	18.75
Stephen Dixon	11/29/2018	Kansas	Electronic mail with co-counsel re future discovery items	0.33	\$	375.00	\$	125.00
Stephen Dixon	12/1/2018	Kansas	Review documents sent to me by Kansas care advocate	0.17	\$	375.00	\$	62.50
Stephen Dixon	12/5/2018	Kansas	Electronic mail to co-counsel re reaching out to opposing counsel	0.20	\$	375.00	\$	75.00
Stephen Dixon	12/8/2018	Kansas	Electronic mail with counsel re litigation strategy	0.17	\$	375.00	\$	62.50
Stephen Dixon	12/10/2018	Kansas	Electronic mail with co-counsel	0.03	\$	375.00	\$	12.50
Stephen Dixon	12/11/2018	Kansas	Electronic mail with foster care advocates re new facts for potential complaint amendment	0.13	\$	375.00	\$	50.00
Stephen Dixon	12/19/2018	Kansas	Electronic mail to co-counsel re outreach strategy to defendants	0.05	\$	375.00	\$	18.75
Stephen Dixon	12/31/2018	Kansas	Electronic mail to clients re defendants' motion for an extension to answer complaint	0.50	\$	375.00	\$	187.50
Stephen Dixon	1/3/2019	Kansas	Electronic mail to client re opposition to extension of time to answer	0.07	\$	375.00	\$	25.00
Stephen Dixon	1/9/2019	Kansas	Electronic mail with foster care advocate re status conference	0.08	\$	375.00	\$	31.25
Stephen Dixon	1/9/2019	Kansas	Electronic mail to client re status conference	0.17	\$	375.00	\$	62.50
Stephen Dixon	1/10/2019	Kansas	Electronic mails to clients re status conference	0.28	\$	375.00	\$	106.25
Stephen Dixon	1/11/2019	Kansas	Electronic mail to counsel team re status of clients	0.13	\$	375.00	\$	50.00

***M.B. v. Howard***  
**Children's Rights Itemized Time Entries**

Stephen Dixon	1/18/2019	Kansas	Electronic mail to co-counsel re discovery strategy	0.08	\$	375.00	\$	31.25
Stephen Dixon	1/22/2019	Kansas	Electronic mail to clients updating them re status conference, discovery strategy	0.25	\$	375.00	\$	93.75
Stephen Dixon	1/23/2019	Kansas	Electronic mail to team re conversations with clients	0.03	\$	375.00	\$	12.50
Stephen Dixon	1/23/2019	Kansas	Electronic mail to co-counsel re case facts, potential experts	0.35	\$	375.00	\$	131.25
Stephen Dixon	1/23/2019	Kansas	Telephone call with team re protective order	0.42	\$	375.00	\$	156.25
Stephen Dixon	1/30/2019	Kansas	Telephone call with team re strategy for discovery	0.38	\$	375.00	\$	143.75
Stephen Dixon	2/1/2019	Kansas	Electronic mail to paralegal re potential expert	0.05	\$	375.00	\$	18.75
Stephen Dixon	2/7/2019	Kansas	Electronic mail to contact re potential expert	0.03	\$	375.00	\$	12.50
Stephen Dixon	2/11/2019	Kansas	Electronic mail to team re potential expert	0.05	\$	375.00	\$	18.75
Stephen Dixon	2/11/2019	Kansas	Telephone call with internal team re terms sheet	1.50	\$	375.00	\$	562.50
Stephen Dixon	2/13/2019	Kansas	Electronic mail with co-counsel re fact update	0.03	\$	375.00	\$	12.50
Stephen Dixon	2/13/2019	Kansas	Electronic mail to clients re litigation update and facts	0.23	\$	375.00	\$	87.50
Stephen Dixon	2/13/2019	Kansas	Telephone call with team re investigation updates	1.38	\$	375.00	\$	518.75
Stephen Dixon	2/15/2019	Kansas	Electronic mail with Kansas foster care advocate re factual question	0.03	\$	375.00	\$	12.50
Stephen Dixon	2/15/2019	Kansas	Electronic mail with client re litigation and factual update	0.05	\$	375.00	\$	18.75
Stephen Dixon	2/19/2019	Kansas	Electronic mail with Kansas foster care advocate re factual question	0.03	\$	375.00	\$	12.50
Stephen Dixon	2/19/2019	Kansas	Electronic mail with team re factual update	0.13	\$	375.00	\$	50.00
Stephen Dixon	2/20/2019	Kansas	Electronic mail to counsel re case strategy	0.03	\$	375.00	\$	12.50
Stephen Dixon	2/20/2019	Kansas	Electronic mail to paralegal re case facts	0.03	\$	375.00	\$	12.50
Stephen Dixon	2/20/2019	Kansas	Electronic mail to paralegal re case facts (cont'd)	0.03	\$	375.00	\$	12.50
Stephen Dixon	2/22/2019	Kansas	Electronic mail to GAL re changes under Kelly administration	0.07	\$	375.00	\$	25.00

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Stephen Dixon	2/26/2019	Kansas	Electronic mail with confidential informant re Medicaid delivery system	0.07	\$	375.00	\$	25.00
Stephen Dixon	2/27/2019	Kansas	Electronic mail to client re status update	0.03	\$	375.00	\$	12.50
Stephen Dixon	2/27/2019	Kansas	Electronic mail re document review and legal analysis	0.25	\$	375.00	\$	93.75
Stephen Dixon	2/28/2019	Kansas	Electronic mail to foster parent re factual question on placement shortage	0.03	\$	375.00	\$	12.50
Stephen Dixon	3/18/2019	Kansas	Email to co-counsel re factual research on placement shortage	0.03	\$	375.00	\$	12.50
Stephen Dixon	3/20/2019	Kansas	Email and draft legal analysis on placement array claims to co-counsel	0.25	\$	375.00	\$	93.75
Stephen Dixon	3/20/2019	Kansas	Research and email re venue issues	0.63	\$	375.00	\$	237.50
Stephen Dixon	3/21/2019	Kansas	Email team re venue issues	0.08	\$	375.00	\$	31.25
Stephen Dixon	3/22/2019	Kansas	Analyze and email team re venue issues	0.25	\$	375.00	\$	93.75
Stephen Dixon	3/27/2019	Kansas	Telephone call with team, settlement strategy	0.90	\$	375.00	\$	337.50
Stephen Dixon	4/3/2019	Kansas	Emails to co-counsel team re venue research	0.07	\$	375.00	\$	25.00
Stephen Dixon	4/3/2019	Kansas	Telephone call with team, settlement strategy	0.98	\$	375.00	\$	368.75
Stephen Dixon	4/4/2019	Kansas	Email to KS co-counsel re factual update on client	0.10	\$	375.00	\$	37.50
Stephen Dixon	4/9/2019	Kansas	Electronic mail with co-counsel re venue and factual update	0.20	\$	375.00	\$	75.00
Stephen Dixon	4/10/2019	Kansas	Electronic mail with team re update on client	0.08	\$	375.00	\$	31.25
Stephen Dixon	4/11/2019	Kansas	Electronic mail to team re client update	0.03	\$	375.00	\$	12.50
Stephen Dixon	4/11/2019	Kansas	Electronic mail to client re case update	0.08	\$	375.00	\$	31.25
Stephen Dixon	4/11/2019	Kansas	Electronic mail to co-counsel re litigation strategy	0.17	\$	375.00	\$	62.50
Stephen Dixon	4/14/2019	Kansas	Electronic mail with co-counsel re factual update on client	0.08	\$	375.00	\$	31.25
Stephen Dixon	4/16/2019	Kansas	Electronic mail to KS co-counsel re case facts and litigation strategy	0.13	\$	375.00	\$	50.00
Stephen Dixon	4/18/2019	Kansas	Electronic mail with co-counsel re litigation strategy	0.10	\$	375.00	\$	37.50
Stephen Dixon	4/18/2019	Kansas	Electronic mail to co-counsel re briefing dates strategy	0.25	\$	375.00	\$	93.75

*M.B. v. Howard*

## Children's Rights Itemized Time Entries

Stephen Dixon	4/19/2019	Kansas	Electronic mail with co-counsel re litigation strategy	0.10	\$	375.00	\$	37.50
Stephen Dixon	4/24/2019	Kansas	Telephone call with team re case strategy	0.50	\$	375.00	\$	187.50
Stephen Dixon	5/2/2019	Kansas	Electronic mail with co-counsel re client update	0.03	\$	375.00	\$	12.50
Stephen Dixon	5/8/2019	Kansas	Telephone call with team re litigation strategy	0.92	\$	375.00	\$	343.75
Stephen Dixon	5/9/2019	Kansas	Electronic mail with client re factual updates	0.08	\$	375.00	\$	31.25
Stephen Dixon	5/9/2019	Kansas	Electronic mails with Kansas child advocate re potential discovery	0.17	\$	375.00	\$	62.50
Stephen Dixon	5/9/2019	Kansas	Telephone call with Leecia Welch re client questions	0.22	\$	375.00	\$	81.25
Stephen Dixon	5/10/2019	Kansas	Electronic mail with client re case updates	0.08	\$	375.00	\$	31.25
Stephen Dixon	5/11/2019	Kansas	Electronic mail with client re case updates	0.13	\$	375.00	\$	50.00
Stephen Dixon	5/12/2019	Kansas	Electronic mail with client re case updates	0.08	\$	375.00	\$	31.25
Stephen Dixon	5/13/2019	Kansas	Electronic mail with client re case updates	0.33	\$	375.00	\$	125.00
Stephen Dixon	5/14/2019	Kansas	Electronic mail to co-counsel re clients' updates	0.03	\$	375.00	\$	12.50
Stephen Dixon	5/14/2019	Kansas	Electronic mail to team re factual research	0.07	\$	375.00	\$	25.00
Stephen Dixon	5/14/2019	Kansas	Electronic mail with client re case updates	0.37	\$	375.00	\$	137.50
Stephen Dixon	5/15/2019	Kansas	Electronic mail with Kansas child advocates re potential client	0.13	\$	375.00	\$	50.00
Stephen Dixon	5/15/2019	Kansas	Electronic mail with client re case updates	0.17	\$	375.00	\$	62.50
Stephen Dixon	5/15/2019	Kansas	Meeting with client and potential client in Wichita re problems in foster care system, potentially joining case	1.67	\$	375.00	\$	625.00
Stephen Dixon	5/15/2019	Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	2.00	\$	375.00	\$	750.00
Stephen Dixon	5/16/2019	Kansas	Electronic mail with potential client following up on meeting, asking remaining questions	0.13	\$	375.00	\$	50.00
Stephen Dixon	5/16/2019	Kansas	Electronic mail with client re case updates	0.17	\$	375.00	\$	62.50
Stephen Dixon	5/16/2019	Kansas	Electronic mail with co-counsel re strategy for adding new plaintiffs	0.50	\$	375.00	\$	187.50

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Stephen Dixon	5/16/2019	Kansas	Meeting with foster care advocate in Witchita re factual updates on Kansas foster care system	1.00	\$	375.00	\$	375.00
Stephen Dixon	5/16/2019	Kansas	Meeting with client and potential client in Topeka re problems in foster care system, potentially joining case	1.50	\$	375.00	\$	562.50
Stephen Dixon	5/17/2019	Kansas	Electronic mail to KS team re initial disclosures strategy	0.07	\$	375.00	\$	25.00
Stephen Dixon	5/17/2019	Kansas	Electronic mail to KS co-counsel re clients and factual updates	0.23	\$	375.00	\$	87.50
Stephen Dixon	5/17/2019	Kansas	Electronic mail with KS clients re initial disclosures	0.30	\$	375.00	\$	112.50
Stephen Dixon	5/17/2019	Kansas	Meeting with foster care advocate re potential discovery items	1.25	\$	375.00	\$	468.75
Stephen Dixon	5/17/2019	Kansas	Meeting with GAL re problems in Kansas foster care system	1.33	\$	375.00	\$	500.00
Stephen Dixon	5/18/2019	Kansas	Electronic mail to co-counsel re initial disclosures	0.03	\$	375.00	\$	12.50
Stephen Dixon	5/18/2019	Kansas	Electronic mail to team re factual development	0.05	\$	375.00	\$	18.75
Stephen Dixon	5/19/2019	Kansas	Electronic mail to client re case status	0.03	\$	375.00	\$	12.50
Stephen Dixon	5/19/2019	Kansas	Electronic mail to co-counsel team about potential new named plaintiff	0.33	\$	375.00	\$	125.00
Stephen Dixon	5/20/2019	Kansas	Electronic mail with KS co-counsel re potential new named plaintiff	0.13	\$	375.00	\$	50.00
Stephen Dixon	5/20/2019	Travel	Travel home from Kansas.	2.00	\$	375.00	\$	750.00
Stephen Dixon	5/21/2019	Kansas	Telephone call with next friend re potential new named plaintiff	0.30	\$	375.00	\$	112.50
Stephen Dixon	5/22/2019	Kansas	Electronic mail to KS co-counsel re named plaintiff strategy	0.17	\$	375.00	\$	62.50
Stephen Dixon	5/22/2019	Kansas	Conference call with KS team re settlement, factual updates	1.05	\$	375.00	\$	393.75

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	5/24/2019	Kansas	Electronic mail with KS co-counsel re gaps in current clients' facts	0.17	\$	375.00	\$	62.50
Stephen Dixon	5/24/2019	Kansas	Electronic mail to clients initial disclosures	0.20	\$	375.00	\$	75.00
Stephen Dixon	5/26/2019	Kansas	Electronic mail with co-counsel re initial disclosures	0.13	\$	375.00	\$	50.00
Stephen Dixon	5/29/2019	Kansas	Electronic mail to client re initial disclosures	0.08	\$	375.00	\$	31.25
Stephen Dixon	5/29/2019	Kansas	Electronic mail with co-counsel re clients' initial disclosures preparation	0.12	\$	375.00	\$	43.75
Stephen Dixon	5/29/2019	Kansas	Conference call with team KS call re discovery	0.72	\$	375.00	\$	268.75
Stephen Dixon	5/30/2019	Kansas	Electronic mail with co-counsel re document preparation for clients	0.05	\$	375.00	\$	18.75
Stephen Dixon	6/5/2019	Kansas	Electronic mail with co-counsel team re clients' document collection	0.08	\$	375.00	\$	31.25
Stephen Dixon	6/5/2019	Kansas	Telephone call with team KS team re discovery	0.28	\$	375.00	\$	106.25
Stephen Dixon	6/11/2019	Kansas	Electronic mail with co-counsel re thoughts on settlement strategy	0.03	\$	375.00	\$	12.50
Stephen Dixon	6/11/2019	Kansas	Electronic mail to client re case updates	0.13	\$	375.00	\$	50.00
Stephen Dixon	6/12/2019	Kansas	Electronic mail with client re case updates	0.13	\$	375.00	\$	50.00
Stephen Dixon	6/12/2019	Kansas	Electronic mail with co-counsel re litigation strategy	0.17	\$	375.00	\$	62.50
Stephen Dixon	6/12/2019	Kansas	Conference call with KS team re named plaintiff files, other discovery	0.67	\$	375.00	\$	250.00
Stephen Dixon	6/18/2019	Kansas	Electronic mail to co-counsel re: new case facts	0.07	\$	375.00	\$	25.00
Stephen Dixon	6/18/2019	Kansas	Electronic mail to co-counsel re: document collection	0.07	\$	375.00	\$	25.00
Stephen Dixon	6/18/2019	Kansas	Telephone call with client re document collection	0.50	\$	375.00	\$	187.50
Stephen Dixon	6/19/2019	Kansas	Electronic mail with client re document collection	0.03	\$	375.00	\$	12.50
Stephen Dixon	6/19/2019	Kansas	Electronic mail with counsel re: analysis of procedural rule.	0.07	\$	375.00	\$	25.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	6/19/2019	Kansas	Electronic mail with confidential Kansas child advocate re: case facts	0.07	\$	375.00	\$	25.00
Stephen Dixon	6/19/2019	Kansas	Telephone call with KS team re settlement and discovery strategy	0.67	\$	375.00	\$	250.00
Stephen Dixon	6/27/2019	Kansas	Electronic mail to clients re: case update	1.33	\$	375.00	\$	500.00
Stephen Dixon	6/28/2019	Kansas	Electronic mail to clients re: case update	0.20	\$	375.00	\$	75.00
Stephen Dixon	7/1/2019	Kansas	Telephone call with client re case update	0.12	\$	375.00	\$	43.75
Stephen Dixon	7/15/2019	Kansas	Electronic mail to co-counsel re potential new client facts	0.03	\$	375.00	\$	12.50
Stephen Dixon	7/19/2019	Kansas	Electronic mail with client re settlement strategy	0.08	\$	375.00	\$	31.25
Stephen Dixon	7/24/2019	Kansas	Conference call with KS team re discovery review and motion to dismiss	0.72	\$	375.00	\$	268.75
Stephen Dixon	7/31/2019	Kansas	Conference call with KS team re document review, litigation strategy	0.67	\$	375.00	\$	250.00
Stephen Dixon	8/1/2019	Kansas	Electronic mail with client re settlement strategy, potential new named plaintiffs	0.07	\$	375.00	\$	25.00
Stephen Dixon	8/5/2019	Kansas	Electronic mail with foster parent re problems with multiple placement moves	0.17	\$	375.00	\$	62.50
Stephen Dixon	8/7/2019	Kansas	Conference call with KS team re discovery and settlement strategy	0.63	\$	375.00	\$	237.50
Stephen Dixon	8/13/2019	Kansas	Electronic mail with client re settlement strategy	0.10	\$	375.00	\$	37.50
Stephen Dixon	8/13/2019	Kansas	Telephone call with client re settlement strategy	0.17	\$	375.00	\$	62.50
Stephen Dixon	8/13/2019	Kansas	Electronic mail with potential next friend re problems in foster care system	0.45	\$	375.00	\$	168.75
Stephen Dixon	8/13/2019	Kansas	Electronic mail with co-counsel.	0.53	\$	375.00	\$	200.00
Stephen Dixon	8/14/2019	Kansas	Electronic mail with client re settlement	0.03	\$	375.00	\$	12.50
Stephen Dixon	8/14/2019	Kansas	Electronic mail with co-counsel re facts for amending complaint	0.37	\$	375.00	\$	137.50
Stephen Dixon	8/14/2019	Kansas	Meeting with current client re case update, settlement positions	1.50	\$	375.00	\$	562.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	8/14/2019	Kansas Travel	Travel to Kansas for meetings with potential clients, foster care advocates.	2.00	\$	375.00	\$	750.00
Stephen Dixon	8/15/2019	Kansas	Electronic mail with KS client re case updates, views on settlement	0.08	\$	375.00	\$	31.25
Stephen Dixon	8/15/2019	Kansas	Electronic mail with Kansas child advocate re potential expert	0.10	\$	375.00	\$	37.50
Stephen Dixon	8/15/2019	Kansas	Telephone call with Kansas child advocate re potential expert	0.72	\$	375.00	\$	268.75
Stephen Dixon	8/15/2019	Kansas	Meetings with potential fact witness re problems in Kansas foster care system	1.25	\$	375.00	\$	468.75
Stephen Dixon	8/15/2019	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.37	\$	375.00	\$	137.50
Stephen Dixon	8/15/2019	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.37	\$	375.00	\$	137.50
Stephen Dixon	8/16/2019	Kansas	Electronic mail with potential fact witness re problems in Kansas foster care system	0.05	\$	375.00	\$	18.75
Stephen Dixon	8/16/2019	Kansas	Electronic mail to co-counsel team re new facts from potential fact witness	0.08	\$	375.00	\$	31.25
Stephen Dixon	8/16/2019	Kansas	Perform factual research to potentially include in amended complaint	0.37	\$	375.00	\$	137.50
Stephen Dixon	8/16/2019	Kansas	Meeting with potential client re their fact patterns, potential additional allegations	1.25	\$	375.00	\$	468.75
Stephen Dixon	8/16/2019	Kansas	Meetings with foster care advocates re deficiencies in foster care system	2.25	\$	375.00	\$	843.75
Stephen Dixon	8/16/2019	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.50	\$	375.00	\$	187.50
Stephen Dixon	8/16/2019	Kansas Travel	Travel within Kansas for several meetings with potential clients, foster care advocates.	0.50	\$	375.00	\$	187.50
Stephen Dixon	8/17/2019	Kansas	Electronic mail with Kansas child advocate, potential client re joining lawsuit	0.03	\$	375.00	\$	12.50
Stephen Dixon	8/17/2019	Kansas	Electronic mail to co-counsel re strategy for amending complaint	0.08	\$	375.00	\$	31.25
Stephen Dixon	8/17/2019	Kansas Travel	Travel home from Kansas.	2.00	\$	375.00	\$	750.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	8/18/2019	Kansas	Electronic mail to co-counsel re strategy for amending complaint	0.17	\$	375.00	\$	62.50
Stephen Dixon	8/20/2019	Kansas	Electronic mail to Kansas GAL re facts in amended complaint draft	0.03	\$	375.00	\$	12.50
Stephen Dixon	8/20/2019	Kansas	Electronic mail to co-counsel re new facts for amended complaint	0.03	\$	375.00	\$	12.50
Stephen Dixon	8/20/2019	Kansas	Electronic mail with Kansas co-counsel.	0.08	\$	375.00	\$	31.25
Stephen Dixon	8/21/2019	Kansas	Conference call with Kansas team re litigation strategy, mediator	0.75	\$	375.00	\$	281.25
Stephen Dixon	8/22/2019	Kansas	Electronic mail with EM re communicating with KS clients.	0.05	\$	375.00	\$	18.75
Stephen Dixon	8/22/2019	Kansas	Electronic mail with co-counsel re named plaintiff facts for amending complaint	0.08	\$	375.00	\$	31.25
Stephen Dixon	8/23/2019	Kansas	Electronic mail with co-counsel re named plaintiff facts for amending complaint	0.03	\$	375.00	\$	12.50
Stephen Dixon	8/23/2019	Kansas	Electronic mail with Erin re communicating with KS clients.	0.07	\$	375.00	\$	25.00
Stephen Dixon	8/24/2019	Kansas	Electronic mail with co-counsel re named plaintiff facts for amending complaint	0.05	\$	375.00	\$	18.75
Stephen Dixon	8/24/2019	Kansas	Draft memo re Named Plaintiffs facts.	0.83	\$	375.00	\$	312.50
Stephen Dixon	8/25/2019	Kansas	Draft memo re Named Plaintiffs facts.	0.67	\$	375.00	\$	250.00
Stephen Dixon	8/26/2019	Kansas	Electronic mail with co-counsel re named plaintiff facts for amending complaint	0.13	\$	375.00	\$	50.00
Stephen Dixon	8/26/2019	Kansas	Electronic mail with co-counsel re named plaintiff facts for amending complaint	0.50	\$	375.00	\$	187.50
Stephen Dixon	8/26/2019	Kansas	Draft memo re Named Plaintiffs facts.	0.58	\$	375.00	\$	218.75
Stephen Dixon	8/27/2019	Kansas	Draft memo re Named Plaintiffs facts.	1.33	\$	375.00	\$	500.00
Stephen Dixon	8/28/2019	Kansas	Email to Ira and Marissa re Named Plaintiffs	0.25	\$	375.00	\$	93.75
Stephen Dixon	8/28/2019	Kansas	Draft memo re Named Plaintiffs facts.	0.50	\$	375.00	\$	187.50
Stephen Dixon	8/28/2019	Kansas	Conference call with KS team re mediation strategy	0.83	\$	375.00	\$	312.50
Stephen Dixon	9/4/2019	Kansas	Electronic mail to foster care advocate re factual updates	0.03	\$	375.00	\$	12.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	9/5/2019	Kansas	Electronic mail with co-counsel re discovery strategy	0.05	\$	375.00	\$	18.75
Stephen Dixon	9/5/2019	Kansas	Electronic mail to foster care advocate re factual updates	0.10	\$	375.00	\$	37.50
Stephen Dixon	9/5/2019	Kansas	Electronic mail with client re case updates	0.15	\$	375.00	\$	56.25
Stephen Dixon	9/18/2019	Kansas	Electronic mail with KS co-counsel re investigation, discovery, and mediation planning	0.25	\$	375.00	\$	93.75
Stephen Dixon	9/18/2019	Kansas	Telephone call with team re legal strategy	1.00	\$	375.00	\$	375.00
Stephen Dixon	9/25/2019	Kansas	Review and analysis of facts in Kansas case supplied by co-counsel, email to team	0.17	\$	375.00	\$	62.50
Stephen Dixon	9/25/2019	Kansas	Telephone call with team re legal strategy, experts	0.92	\$	375.00	\$	343.75
Stephen Dixon	9/30/2019	Kansas	Electronic mail with co-counsel re factual investigation	0.17	\$	375.00	\$	62.50
Stephen Dixon	10/2/2019	Kansas	Telephone call with team re legal strategy	0.97	\$	375.00	\$	362.50
Stephen Dixon	10/9/2019	Kansas	Legal team call re discovery strategy	0.70	\$	375.00	\$	262.50
Stephen Dixon	10/20/2019	Kansas	Electronic mail discussing new facts with co-counsel	0.08	\$	375.00	\$	31.25
Stephen Dixon	10/23/2019	Kansas	Electronic mail to team re facts and investigation of harm to children in care	0.08	\$	375.00	\$	31.25
Stephen Dixon	10/24/2019	Kansas	Electronic mail to co-counsel re litigation strategy, facts	0.05	\$	375.00	\$	18.75
Stephen Dixon	10/24/2019	Kansas	Electronic mails to team re facts and investigation of harm to children in care	0.08	\$	375.00	\$	31.25
Stephen Dixon	10/26/2019	Kansas	Electronic mail to co-counsel re motion to dismiss	0.03	\$	375.00	\$	12.50
Stephen Dixon	10/28/2019	Kansas	Electronic mails to clients re motion to dismiss	0.58	\$	375.00	\$	218.75
Stephen Dixon	10/30/2019	Kansas	Research and email with person about harm to children in placements	0.25	\$	375.00	\$	93.75
Stephen Dixon	11/6/2019	Kansas	Telephone call with team of attorneys re case strategy	0.50	\$	375.00	\$	187.50
Stephen Dixon	11/8/2019	Kansas	Electronic mail with Kansas child advocates re investigation of harm to foster children	0.08	\$	375.00	\$	31.25

**M.B. v. Howard****Children's Rights Itemized Time Entries**

Stephen Dixon	11/12/2019	Kansas	Electronic mail to contacts re updating facts re harm to children in care	0.25	\$	375.00	\$	93.75
Stephen Dixon	11/13/2019	Kansas	Electronic mail to contacts re investigation updating facts re harm to children in use	0.07	\$	375.00	\$	25.00
Stephen Dixon	11/14/2019	Kansas	Discussion with expert re placement array problems	0.17	\$	375.00	\$	62.50
Stephen Dixon	11/14/2019	Kansas	Electronic mail with co-counsel re expert for harm to children in care	0.25	\$	375.00	\$	93.75
Stephen Dixon	11/15/2019	Kansas	Case analysis and email with co-counsel re harm to children and remedy	0.33	\$	375.00	\$	125.00
Stephen Dixon	11/16/2019	Kansas	Case analysis and emails with co-counsel re harm to children and remedy	0.25	\$	375.00	\$	93.75
Stephen Dixon	11/16/2019	Kansas	Electronic mail with foster care advocate in order to update facts re claims and harm to children	0.78	\$	375.00	\$	293.75
Stephen Dixon	11/17/2019	Kansas	Electronic mail to co-counsel re fact update	0.03	\$	375.00	\$	12.50
Stephen Dixon	11/18/2019	Kansas	Telephone call with client re settlement	0.03	\$	375.00	\$	12.50
Stephen Dixon	11/19/2019	Kansas	Electronic mail with counsel and client re settlement	0.33	\$	375.00	\$	125.00
Stephen Dixon	11/19/2019	Kansas	Meeting with contact re continuing investigation	1.00	\$	375.00	\$	375.00
Stephen Dixon	11/19/2019	Kansas	Meeting with client re settlement	1.00	\$	375.00	\$	375.00
Stephen Dixon	11/19/2019	Kansas	Meeting with contacts re continuing investigation	1.50	\$	375.00	\$	562.50
Stephen Dixon	11/24/2019	Kansas	Electronic mail to team re settlement strategy	0.10	\$	375.00	\$	37.50
Stephen Dixon	12/6/2019	Kansas	Electronic mail with co-counsel re settlement strategy	0.17	\$	375.00	\$	62.50
Stephen Dixon	12/10/2019	Kansas	Electronic mail and memo with co-counsel re facts and settlement strategy	0.58	\$	375.00	\$	218.75
Stephen Dixon	12/13/2019	Kansas	Electronic mail with co-counsel re settlement strategy	0.13	\$	375.00	\$	50.00
Stephen Dixon	12/19/2019	Kansas	Telephone call with client re settlement	0.10	\$	375.00	\$	37.50
Stephen Dixon	1/16/2020	Kansas	Electronic mail to co counsel re motion to dismiss opposition strategy	0.17	\$	375.00	\$	62.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	1/30/2020	Kansas	Research and emails with co-counsel re motion to dismiss opposition strategy	0.08	\$	375.00	\$	31.25
Stephen Dixon	2/28/2020	Kansas	Updating clients on mediation, settlement	0.58	\$	375.00	\$	218.75
Stephen Dixon	3/3/2020	Kansas	Electronic mails to clients giving updates on case	0.25	\$	375.00	\$	93.75
Stephen Dixon	3/4/2020	Kansas	Electronic mail to lead attorneys re client case update	0.07	\$	375.00	\$	25.00
Stephen Dixon	3/20/2020	Kansas	Telephone call with client re settlement	0.33	\$	375.00	\$	125.00
Stephen Dixon	3/20/2020	Kansas	Telephone call with KS client re settlement and email to team with update	0.50	\$	375.00	\$	187.50
Stephen Dixon	3/24/2020	Kansas	Electronic mail to co-counsel re settlement	0.13	\$	375.00	\$	50.00
Stephen Dixon	3/25/2020	Kansas	Electronic mail to all clients re mediation, settlement	0.33	\$	375.00	\$	125.00
Stephen Dixon	4/1/2020	Kansas	Electronic mails to team re clients and fact updates	0.33	\$	375.00	\$	125.00
Stephen Dixon	4/1/2020	Kansas	Telephone call with attorney team re case strategy and fact updates	0.83	\$	375.00	\$	312.50
Stephen Dixon	4/2/2020	Kansas	Electronic mail to co-counsel re client update	0.03	\$	375.00	\$	12.50
Stephen Dixon	4/3/2020	Kansas	Electronic mail with MN re case update as to Next Friends	0.03	\$	375.00	\$	12.50
Stephen Dixon	4/3/2020	Kansas	Electronic mail with internal team re Next Friend updates	0.30	\$	375.00	\$	112.50
Stephen Dixon	4/10/2020	Kansas	Electronic mail to team members re Next Friend substitution	0.28	\$	375.00	\$	106.25
Stephen Dixon	4/13/2020	Kansas	Telephone call with new client re potentially conflicting legal matter	0.43	\$	375.00	\$	162.50
Stephen Dixon	4/15/2020	Kansas	Electronic mail with paralegal re case fact update	0.08	\$	375.00	\$	31.25
Stephen Dixon	4/22/2020	Kansas	Electronic mail with co-counsel re client updates	0.03	\$	375.00	\$	12.50
Stephen Dixon	4/22/2020	Kansas	Electronic mail to clients and counsel re case updates and fact gathering	0.37	\$	375.00	\$	137.50
Stephen Dixon	4/24/2020	Kansas	Electronic mail to Kansas advocate re potential client	0.03	\$	375.00	\$	12.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	4/24/2020	Kansas	Electronic mail to potential witness re facts, experiences with foster care system	0.07	\$	375.00	\$	25.00
Stephen Dixon	4/24/2020	Kansas	Electronic mail with clients and counsel re updating facts	0.25	\$	375.00	\$	93.75
Stephen Dixon	4/26/2020	Kansas	Electronic mail to client re update of case	0.08	\$	375.00	\$	31.25
Stephen Dixon	4/27/2020	Kansas	Electronic mail to client re settlement updates, strategy	0.08	\$	375.00	\$	31.25
Stephen Dixon	4/27/2020	Kansas	Electronic mail to co-counsel re client update	0.08	\$	375.00	\$	31.25
Stephen Dixon	4/27/2020	Kansas	Telephone call with client re litigation, settlement update	0.13	\$	375.00	\$	50.00
Stephen Dixon	4/28/2020	Kansas	Electronic mail and memo to team re client update	0.50	\$	375.00	\$	187.50
Stephen Dixon	4/29/2020	Kansas	Electronic mail to client re litigation, settlement update	0.05	\$	375.00	\$	18.75
Stephen Dixon	4/29/2020	Kansas	Electronic mail with co-counsel team re clients updates	0.20	\$	375.00	\$	75.00
Stephen Dixon	5/1/2020	Kansas	Electronic mail to KS client re litigation, settlement update	0.08	\$	375.00	\$	31.25
Stephen Dixon	5/6/2020	Kansas	Electronic mail with client re settlement update	0.13	\$	375.00	\$	50.00
Stephen Dixon	5/8/2020	Kansas	Electronic mail with client re settlement update	0.08	\$	375.00	\$	31.25
Stephen Dixon	5/8/2020	Kansas	Telephone call with client re case update and discovery issues	0.43	\$	375.00	\$	162.50
Stephen Dixon	5/9/2020	Kansas	Electronic mail to contact re case update and discovery issues	0.08	\$	375.00	\$	31.25
Stephen Dixon	5/10/2020	Kansas	Telephone call with client re case update and discovery issues	0.25	\$	375.00	\$	93.75
Stephen Dixon	5/11/2020	Kansas	Electronic mail and memo to co-counsel team re client and witness update	0.63	\$	375.00	\$	237.50
Stephen Dixon	5/12/2020	Kansas	Telephone call with client re case update and discovery issues	0.12	\$	375.00	\$	43.75

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	5/13/2020	Kansas	Electronic mail to co-counsel updating re witness	0.17	\$	375.00	\$	62.50
Stephen Dixon	5/14/2020	Kansas	Electronic mail with co-counsel re discovery analysis and discovery strategy	0.37	\$	375.00	\$	137.50
Stephen Dixon	5/17/2020	Kansas	Electronic mail with co-counsel re discovery analysis and discovery strategy	0.13	\$	375.00	\$	50.00
Stephen Dixon	5/17/2020	Kansas	Electronic mail to clients re case, settlement updates	0.33	\$	375.00	\$	125.00
Stephen Dixon	5/18/2020	Kansas	Electronic mail to client re settlement updates	0.03	\$	375.00	\$	12.50
Stephen Dixon	5/18/2020	Kansas	Telephone call with client for settlement updates	0.53	\$	375.00	\$	200.00
Stephen Dixon	5/18/2020	Kansas	Electronic mails with team members re client update and memo	0.53	\$	375.00	\$	200.00
Stephen Dixon	5/20/2020	Kansas	Electronic mail to client re settlement update	0.10	\$	375.00	\$	37.50
Stephen Dixon	5/20/2020	Kansas	Electronic mail with case analysis to co-counsel re deliberate indifference and discovery	0.20	\$	375.00	\$	75.00
Stephen Dixon	5/27/2020	Kansas	Internal legal team call re strategy and discovery	0.67	\$	375.00	\$	250.00
Stephen Dixon	5/29/2020	Kansas	Electronic mail to foster care advocate re factual update	0.17	\$	375.00	\$	62.50
Stephen Dixon	5/29/2020	Kansas	Electronic mail with co-counsel re discovery strategy	0.20	\$	375.00	\$	75.00
Stephen Dixon	6/1/2020	Kansas	Electronic mail with co-counsel re discovery strategy	0.03	\$	375.00	\$	12.50
Stephen Dixon	6/3/2020	Kansas	Electronic mail to co-counsel re potential witness and factual analysis	0.07	\$	375.00	\$	25.00
Stephen Dixon	6/4/2020	Kansas	Discuss with co-counsel strategy on client updating for mediation	0.03	\$	375.00	\$	12.50
Stephen Dixon	6/5/2020	Kansas	Electronic mail and contact memo for team re client contact and factual updates	0.50	\$	375.00	\$	187.50
Stephen Dixon	6/5/2020	Kansas	Telephone call with co-counsel and key contact re facts around named plaintiff	0.77	\$	375.00	\$	287.50

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	6/7/2020	Kansas	Electronic mail to clients re named plaintiff update, mental health update	0.03	\$	375.00	\$	12.50
Stephen Dixon	6/7/2020	Kansas	Electronic mail to co-counsel team re named plaintiff	0.05	\$	375.00	\$	18.75
Stephen Dixon	6/7/2020	Kansas	Electronic mail to client re named plaintiff update and mental health update	0.07	\$	375.00	\$	25.00
Stephen Dixon	6/8/2020	Kansas	Electronic mail with co-counsel re client's position on settlement	0.05	\$	375.00	\$	18.75
Stephen Dixon	6/8/2020	Kansas	Telephone call with foster care advocate with information about client	0.73	\$	375.00	\$	275.00
Stephen Dixon	6/9/2020	Kansas	Electronic mail to potential witness re factual update	0.03	\$	375.00	\$	12.50
Stephen Dixon	6/9/2020	Kansas	Electronic mail to team re update on client in crisis	0.30	\$	375.00	\$	112.50
Stephen Dixon	6/9/2020	Kansas	Telephone call with potential client or witness re case update	0.42	\$	375.00	\$	156.25
Stephen Dixon	6/9/2020	Kansas	Electronic mail and draft memo for team re interview of potential witness	0.50	\$	375.00	\$	187.50
Stephen Dixon	6/9/2020	Kansas	Telephone call with client re updating re named plaintiff in crisis and settlement updates	0.50	\$	375.00	\$	187.50
Stephen Dixon	6/9/2020	Kansas	Electronic mail and memo for team re potential witness	0.67	\$	375.00	\$	250.00
Stephen Dixon	6/10/2020	Kansas	Electronic mail with clients and counsel with case update on mediation and fact inquiry	0.75	\$	375.00	\$	281.25
Stephen Dixon	6/11/2020	Kansas	Electronic mail with co-counsel re settlement and client updates and approvals	0.03	\$	375.00	\$	12.50
Stephen Dixon	6/12/2020	Kansas	Electronic mail with co-counsel re settlement and client updates and approvals	0.20	\$	375.00	\$	75.00
Stephen Dixon	6/13/2020	Kansas	Electronic mails with co-counsel re legal procedural issues of standing, Rule 17 and settlement	0.25	\$	375.00	\$	93.75
Stephen Dixon	6/14/2020	Kansas	Electronic mails with clients and co-counsel re discussing proposed settlement	0.58	\$	375.00	\$	218.75

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	6/14/2020	Kansas	Telephone calls with clients and co-counsel re settlement proposals	1.37	\$	375.00	\$	512.50
Stephen Dixon	6/15/2020	Kansas	Electronic mail with KS co-counsel re settlement approval by clients	0.08	\$	375.00	\$	31.25
Stephen Dixon	6/15/2020	Kansas	Telephone call with client re settlement approval	0.50	\$	375.00	\$	187.50
Stephen Dixon	6/16/2020	Kansas	Telephone call with co-counsel re client approval and settlement agreement	0.15	\$	375.00	\$	56.25
Stephen Dixon	6/16/2020	Kansas	Electronic mail with co-counsel re client approval and settlement agreement	0.30	\$	375.00	\$	112.50
Stephen Dixon	6/17/2020	Kansas	Electronic mail to co-counsel re client approval and settlement agreement	0.07	\$	375.00	\$	25.00
Stephen Dixon	6/17/2020	Kansas	Telephone call with client re settlement approval	0.30	\$	375.00	\$	112.50
Stephen Dixon	6/18/2020	Kansas	Electronic mail re settlement approval with co-counsel and client	0.33	\$	375.00	\$	125.00
Stephen Dixon	6/18/2020	Kansas	Telephone call with contact re settlement and communications with client	0.38	\$	375.00	\$	143.75
Stephen Dixon	6/19/2020	Kansas	Electronic mail re strategy for settlement approval with co-counsel	0.03	\$	375.00	\$	12.50
Stephen Dixon	6/20/2020	Kansas	Electronic mail to clients and co-counsel re settlement approval	0.50	\$	375.00	\$	187.50
Stephen Dixon	6/21/2020	Kansas	Electronic mail to legal team re settlement approval updates and planning	0.25	\$	375.00	\$	93.75
Stephen Dixon	6/21/2020	Kansas	Electronic mail to clients re settlement approval	0.92	\$	375.00	\$	343.75
Stephen Dixon	6/22/2020	Kansas	Electronic mail with co-counsel re client updating re settlement	0.08	\$	375.00	\$	31.25
Stephen Dixon	6/22/2020	Kansas	Emails with client re settlement approval	0.30	\$	375.00	\$	112.50
Stephen Dixon	6/23/2020	Kansas	Electronic mail updating co-counsel re clients' settlement approval	0.08	\$	375.00	\$	31.25
Stephen Dixon	6/23/2020	Kansas	Electronic mail and legal analysis with co-counsel re settlement	0.13	\$	375.00	\$	50.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	6/23/2020	Kansas	Telephone call with client re case update and settlement	0.25	\$	375.00	\$	93.75
Stephen Dixon	6/23/2020	Kansas	Electronic mail to Kansas child advocates re case fact updates	0.37	\$	375.00	\$	137.50
Stephen Dixon	6/24/2020	Kansas	Electronic mail with Kansas child advocate re fact update	0.03	\$	375.00	\$	12.50
Stephen Dixon	6/24/2020	Kansas	Electronic mail with co-counsel re settlement analysis	0.30	\$	375.00	\$	112.50
Stephen Dixon	6/25/2020	Kansas	Electronic mail with contact re fact update	0.03	\$	375.00	\$	12.50
Stephen Dixon	6/25/2020	Kansas	Update re client contact to paralegal	0.03	\$	375.00	\$	12.50
Stephen Dixon	6/25/2020	Kansas	Telephone call with confidential Wichita source re factual updates	0.27	\$	375.00	\$	100.00
Stephen Dixon	6/27/2020	Kansas	Electronic mail to client re settlement approval	0.17	\$	375.00	\$	62.50
Stephen Dixon	7/1/2020	Kansas	Electronic mail to legal team and clients re settlement approvals	0.25	\$	375.00	\$	93.75
Stephen Dixon	7/2/2020	Kansas	Electronic mail to team re client updates	0.20	\$	375.00	\$	75.00
Stephen Dixon	7/6/2020	Kansas	Electronic mail to client re settlement agreement	0.17	\$	375.00	\$	62.50
Stephen Dixon	7/7/2020	Kansas	Electronic mail with co-counsel re settlement, for fairness hearing and monitoring fact gathering	0.27	\$	375.00	\$	100.00
Stephen Dixon	7/7/2020	Kansas	Electronic mail with co-counsel re settlement and voluntary dismissals	0.42	\$	375.00	\$	156.25
Stephen Dixon	7/8/2020	Kansas	Telephone call with clients re settlement agreement	0.27	\$	375.00	\$	100.00
Stephen Dixon	7/8/2020	Kansas	Electronic mail with co-counsel and clients re settlement	0.58	\$	375.00	\$	218.75
Stephen Dixon	7/8/2020	Kansas	Legal team call re strategy for preliminary approval	0.83	\$	375.00	\$	312.50
Stephen Dixon	7/9/2020	Kansas	Electronic mail to co-counsel re fairness hearing strategy	0.25	\$	375.00	\$	93.75
Stephen Dixon	7/9/2020	Kansas	Telephone call with contacts re facts for fairness hearing or monitoring	0.27	\$	375.00	\$	100.00

*M.B. v. Howard***Children's Rights Itemized Time Entries**

Stephen Dixon	7/10/2020	Kansas	Electronic mail with co-counsel re monitoring under settlement	0.03	\$	375.00	\$	12.50
Stephen Dixon	7/10/2020	Kansas	Electronic mail to contacts re settlement, preparing for monitoring	0.10	\$	375.00	\$	37.50
Stephen Dixon	7/13/2020	Kansas	Electronic mail to KS potential witness for fairness hearing	0.08	\$	375.00	\$	31.25
Stephen Dixon	7/15/2020	Kansas	Electronic mail to co-counsel re monitoring and fairness hearing	0.03	\$	375.00	\$	12.50
Stephen Dixon	7/15/2020	Kansas	Electronic mail to contacts re fairness hearing and monitoring	0.17	\$	375.00	\$	62.50
Stephen Dixon	7/16/2020	Kansas	Electronic mail to contact re fairness hearing planning	0.05	\$	375.00	\$	18.75
Stephen Dixon	7/16/2020	Kansas	Electronic mail with co-counsel re case planning for fairness hearing	0.07	\$	375.00	\$	25.00
Stephen Dixon	7/16/2020	Kansas	Electronic mail with contacts re case planning for fairness hearing	1.25	\$	375.00	\$	468.75
Stephen Dixon	7/17/2020	Kansas	Electronic mail with contact re fairness hearing and monitoring	0.03	\$	375.00	\$	12.50
Stephen Dixon	7/17/2020	Kansas	Telephone call with contact re monitoring and fairness hearing	0.75	\$	375.00	\$	281.25
Stephen Dixon	7/20/2020	Kansas	Electronic mails with counsel and contact re fairness hearing preparation and monitoring	0.08	\$	375.00	\$	31.25
Stephen Dixon	7/22/2020	Kansas	Telephone call with legal team re preliminary approval strategy	0.58	\$	375.00	\$	218.75
Stephen Dixon	7/24/2020	Kansas	Electronic mail with co-counsel re potential witness for fairness hearing and monitoring	0.37	\$	375.00	\$	137.50
Stephen Dixon	7/24/2020	Kansas	Telephone call with potential witness for fairness hearing and monitoring	0.60	\$	375.00	\$	225.00

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Date	Description	Amount
<b>Mediation Fees</b>		
11/29/2019	Payment to DLA Piper for 25% of mediation fee due for Kevin Ryan - August 20 through Nov. 13, 2019	2,348.51
12/31/2019	Payment to DLA Piper for 25% of mediation fee due for Kevin Ryan - Nov. 14 through Dec. 28, 2019	2,315.88
03/05/2020	Payment to DLA Piper for 25% of mediation fee due for Kevin Ryan - Jan 03 through Feb. 13, 2020	4,344.64
<b>TOTAL Mediation Fees</b>		<b>9,009.03</b>
<b>Case Expenses</b>		
11/16/2018	Legal and Filing Fees: Filing expenses for complaint:COURTS/USDC-KS-PG	400.00
11/26/2018	Legal and Filing Fees: Pro hac vice filing fee for JK:COURTS/USDC-KS-PG	50.00
11/26/2018	Legal and Filing Fees: Pro hac vice filing fee for MN in KS:COURTS/USDC-KS-PG	50.00
11/26/2018	Legal and Filing Fees: Pro hac vice filling fee for SD in KS:COURTS/USDC-KS-PG	50.00
11/26/2018	Legal and Filing Fees: Pro hac vice filing fee for IL in KS:COURTS/USDC-KS-PG	50.00
03/25/2019	Pacer: Jan. through March 2019 Pacer usage	9.10
06/30/2019	Pacer: April through June 2019 Pacer usage	8.90
09/30/2019	Pacer: July through Sept. 2019 Pacer usage	35.90
12/31/2019	Pacer: Oct. through Dec. 2019 Pacer usage	12.70
03/31/2020	Pacer: Jan. through Mar. 2020 Pacer usage	10.50
06/30/2020	Pacer: Apr. through Jun. 2020 Pacer usage	10.40
<b>TOTAL Case Expenses</b>		<b>687.50</b>
<b>Travel Expenses (Airfare, Hotel, Public Transportation &amp; Taxis)</b>		
03/14/2018	Airfare: EM flight from Houston to Kansas City for investigative trip:United Airlines	383.30
03/14/2018	Airfare: EM Flight from Kansas City to NY for investigative trip:Delta Air Lines	327.50
03/19/2018	Taxi: EM Uber from airport to hotel in Kansas for investigative trip 3/18/18:UBER	30.12
03/20/2018	Fuel: EM & SD Gas for Rental Car in Kansas for investigative trip 3/20/18:EASY TRIP 1	29.77
03/21/2018	Hotel: EM Hotel in Kansas City 3/18/18-3/20/18 3 Nights Stay for investigative trip:HOTEL INDIGO	578.15
03/21/2018	Hotel: EM Hotel in Wichita 3/19/18 1 Night Stay for investigative trip:DRURY PLAZA HOTEL BROADWA	165.54
03/21/2018	Fuel: EM, SD Gas for rental car for investigative trip 3/21/18:PHILLIPS 66-CONOCO-76 CAT	22.61
03/22/2018	Airfare: SD-American Airlines flight from LA (hometown) to TX (layover) to KS for investigative trip (RT)	615.00
03/22/2018	Hotel: SD-hotel in Kansas 2/28 2 nights for investigative trip	249.32
03/22/2018	Car Rental: SD-car rental 2/28 2 days for investigative trip	105.92
03/22/2018	Parking: SD-parking at airport 3/2 for investigative trip	6.00
03/29/2018	Airfare: SD-American Airlines flight from LA (hometown) to TX (layover) to KS for investigative trip (RT)	800.99
03/29/2018	Hotel: SD-hotel in Kansas for investigative trip 3/20	217.90
03/29/2018	Hotel: SD-hotel in Kansas for investigative trip 3/19	161.71
03/29/2018	Car Rental: SD-car rental in Kansas for 3 days for investigative trip 3/18	149.88
03/29/2018	Hotel: SD-hotel in Kansas for investigative trip 3/18	141.82
03/29/2018	Taxi: SD-taxi from airport to home 3/21 for investigative trip	40.00
05/04/2018	Airfare: IL travel to/from Kansas with MN for investigative trip 5.15.18 -5.16.18:DELTA AIR LINES	583.08
05/14/2018	Taxi: MN Investigatory trip taxi from home to airport:MALCOLM MANAGEMENT CORP	58.06
05/15/2018	Taxi: MN taxi from KS airport to hotel for investigative trip 5/14/18 :UBER	30.71
05/16/2018	Hotel: MN 2 Nights in hotel room during KS investigatory trip 5/14/18 :HOTEL INDIGO	493.06
05/17/2018	Taxi: MN travel during KS investigatory trip 5/16/18 :UBER	50.88
05/31/2018	Hotel: SD- 2 nights in hotel in Kansas for investigation trip 5/14	343.88
05/31/2018	Airfare: SD-United Airlines flight from LA (hometown) to TX (layover) to KS for investigative trip 5/14	209.80
05/31/2018	Airfare: SD-American Airlines flight from KS to TX (layover) to LA (hometown) for investigative trip 5/16	209.80
05/31/2018	Car Rental: SD-car rental for 2 days for investigative trip 5/14-5/16	140.22
05/31/2018	Fuel: SD-tolls and mileage from Baton Rouge (home) to New Orleans airport for investigative trip 5/16	73.03
05/31/2018	Parking: SD-parking at airport in New Orleans for investigative trip 5/14-5/17	41.31
05/31/2018	Fuel: SD-gas for drive from Baton Rouge (home) to New Orleans airport for investigative trip 5/16	24.64
06/15/2018	Airfare: EM round trip flight from NYC to Kansas City for investigative trip 6/17/2018-6/20/2018.:Delta Air Lines	798.80
06/17/2018	Taxi: EM Lyft to LaGuardia for flight to KC on 6/17/18 for investigative trip.:LYFT.COM	54.13
06/20/2018	Hotel: EM-Hotel for 3 nights 6/17 for investigative trip.:HOTEL INDIGO	751.03
06/20/2018	Taxi: EM taxi home from airport 6/20/2018 for investigative trip:NEW YORK CITY TAXI	48.30
06/30/2018	Hotel: SD-hotel for 3 nights in Kansas for investigative trip 6/17	602.00

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06/30/2018	Airfare: SD-American Airlines from Louisiana to Kansas roundtrip for investigative trip 6/17	470.60
06/30/2018	Car Rental: SD-car rental in Kansas 6/17 for 3 days for investigative trip	157.07
06/30/2018	Parking: SD-parking at airport in Louisiana on 6/17 for 3 days for investigative trip	36.00
06/30/2018	Fuel: SD-gas for rental car in Kansas on 6/20 for travel for investigative trip	26.53
07/30/2018	Airfare: EM Round trip flight to Kansas from NYC 7/31/18-8/3/18 for investigative trip:Delta Air Lines	816.40
07/31/2018	Taxi: EM taxi from office to LaGuardia for flight to Kansas 7/31/18 for investigative trip.:GREEN APPLE MANAGEMENT CO	47.75
08/01/2018	Taxi: EM taxi from airport to hotel in Kansas City on 8/1/18 for investigative trip:KANSAS CITY TAXI	55.66
08/03/2018	Hotel: EM hotel in Kansas City 8/1/18-8/2/18 for investigative trip:21C MUSEUM HOTEL	432.10
08/03/2018	Taxi:EM taxi from airport to office after Kansas trip on 8/3/18 for investigative trip:S&R MEDALLION CORP	47.88
08/03/2018	Fuel:EM gas for rental car in Kansas for investigative trip on 8/3/18.:SINCLAIR OIL CORPORATION	36.83
08/23/2018	Airfare:EM Round trip flight to Kansas from NYC 8/28/18 - 8/31/18 for investigative trip.:American Airlines	992.04
08/28/2018	Taxi:EM Lyft to airport for flight to Kansas for investigative trip 8/28/18.:LYFT.COM	39.65
08/29/2018	Hotel:EM hotel in Wichita for investigative trip 8/28/18:DRURY PLAZA HOTEL BROADWA	123.56
08/30/2018	Hotel: SD 3 Night Hotel Stay in KS for investigative trip 7.31.18: 21C Museum Hotel	648.15
08/30/2018	Airfare: SD Round trip flight to KS from Louisiana for investigative trip - 7.31.18: American Airlines	539.61
08/30/2018	Airfare: SD 3 Day Car Rental in Kansas for investigative trip -7.31.18: Hotwire	203.25
08/30/2018	Parking: SD - 2 Nights Parking in Kansas for investigative trip 7.31.18: 21C Museum Hotel	50.00
08/30/2018	Parking: SD 3 Day Parking at airport for investigative trip 7.31.18 - 8.3.18: Standard Parking	36.00
08/30/2018	Fuel: EM Gas for rental car in Kansas on 8/30/18 for investigative trip.:PHILLIPS 66-CONOCO-76 CAT	16.01
08/31/2018	Hotel: EM hotel in Kansas City from 8/29/18-8/31/18 for investigative trip.:21C MUSEUM HOTEL	377.52
08/31/2018	Taxi: EM Lyft from hotel to airport in Kansas City on 8/31/18 for investigative trip.:LYFT.COM	22.85
09/14/2018	Hotel: SD 3 Nights Stay at Kansas City hotel on 8.29.18 for investigative trip: Kansas City Hotel	645.04
09/14/2018	Car Rental: SD 4 Day car rental in KS for investigative trip	288.46
09/14/2018	Airfare: SD Flight from Baton Rouge to Wichita for investigative trip on 8.28.18 : American Airlines	279.80
09/14/2018	Hotel: SD 1 night hotel stay on 8.28.18 for investigative trip: Drury Hotels	126.24
09/14/2018	Parking: 3 Day Parking: Standard Parking for investigatory trip	45.00
09/14/2018	Fuel: SD - Gas for rental car on 9.1.18 for investigative trip	23.93
09/29/2018	Airfare: IL Round trip flight from NY to Kansas City for 10/9 for investigative trip :Delta Air Lines	494.87
09/29/2018	Airfare :MN Round trip to KS from New York for investigatory trip Oct 9 - 10 2018:Delta Air Lines	494.87
10/04/2018	Airfare: EM round trip flight to Wichita 10/9/18-10/12/18 for investigative trip.:Southwest Airlines	745.60
10/09/2018	Taxi: IL car service from home to airport for investigative trip:DELUX TRANSPORTATION	84.84
10/09/2018	Taxi: MN travel from home to airport for 10/9 for KS investigatory trip:UBER	41.71
10/09/2018	Taxi: EM Lyft to airport for flight to Kansas on 0/9/2018 for investigative trip.:LYFT.COM	35.24
10/09/2018	Taxi: EM taxi from Wichita airport to hotel on 10/9/18 for investigative trip.:ABC TAXI CAB COMPANY INC	19.38
10/10/2018	Hotel: IL hotel stay in Kansas on 10.9.18 - 1 Night for investigative trip :CROSSROADS HOTELS, LLC	410.44
10/10/2018	Hotel: MN hotel in Kansas for KS investigatory trip Oct 9-10 2018 1 Night Stay :CROSSROADS HOTELS, LLC	410.44
10/10/2018	Car Rental: IL 2 Day car rental in Kansas City 10.9.18 for investigative trip:Hertz	217.06
10/10/2018	Taxi: IL car service from airport for investigative trip to home:DELUX TRANSPORTATION	86.35
10/10/2018	Parking: IL-parking at hotel in Kansas for investigative trip 10/9 CROSSROADS HOTELS, LLC	25.00
10/10/2018	Taxi: EM Lyft to coffee shop in Wichita to meet stakeholder for investigative trip on 10/10/18.:LYFT.COM	4.64
10/10/2018	Taxi: EM Lyft to coffee shop in Wichita to meet stakeholder for investigative trip on 10/10/18.:LYFT.COM	3.52
10/11/2018	Taxi: MN travel from airport to home on 10/10 from KS investigatory trip:UBER	31.83
10/12/2018	Hotel: EM hotel in Wichita 10/9/2018-10/12/2018 for investigative trip.:Drury Inn & Suites	558.74
10/12/2018	Taxi: EM taxi home from airport for investigative trip on 10/12/2018:UNITED MGMT GROUP INC	41.00
10/31/2018	Hotel: SD-hotel in Kansas for 3 nights 10/7 - 10/9 for investigative trip	446.02
10/31/2018	Car Rental: SD-car rental in Kansas 10/7 through 10/12 for investigative trip	384.31
10/31/2018	Airfare: SD-American Airlines flights from KS for investigative trip to TX (layover) to LA (hometown) on 10/12	356.80
10/31/2018	Hotel: SD-hotel in Kansas for 2 nights 10/10-10/11 for investigative trip	331.07
10/31/2018	Airfare: SD-United Airlines flight from LA (hometown) to TX (layover) to KS on 10/7 for investigative trip	268.80
10/31/2018	Parking: SD-parking at the airport for investigative trip 10/7-10/12	90.54
10/31/2018	Fuel: SD-milleage for drive from home to airport for investigative trip 10/7-10/12	76.30
10/31/2018	Fuel: SD-gas for rental car in Kansas for investigative trip on 10/11	28.26
10/31/2018	Fuel: SD-gas for rental car in Kansas for investigative trip on 10/9	26.76
10/31/2018	Tolls: SD-tolls 10/8 in Kansas for investigatory trip	4.50
10/31/2018	Tolls: SD-tolls 10/9 in Kansas for investigatory trip	3.50
11/12/2018	Airfare: JK round trip flight from NYC to Kansas City 11/14/18-11/16/18 for investigative trip:Delta Air Lines	959.40
11/12/2018	Airfare: EM round trip flight from NYC to Kansas City 11/14/18-11/16/18 for investigative trip.:Delta Air Lines	959.40
11/14/2018	Taxi: JK taxi to LaGuardia airport for KS investigative trip:CARMELLIMOPASS	55.20
11/14/2018	Taxi: EM Lyft to LaGuardia for flight to Kansas City on 11/14/2018 for investigative trip.:LYFT.COM	33.10

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11/16/2018 Hotel: JK hotel Kansas City (2 nights) 11/14/18-11/16/18 for investigative trip : 21C MUSEUM HOTEL	392.28
11/16/2018 Hotel: EM hotel Kansas City (2 nights) 11/14/18-11/16/18 for investigative trip:21C MUSEUM HOTEL	392.28
11/16/2018 Car Rental: EM & JK car rental in Kansas on 11/14/18-11/16/18 for investigative trip:Hertz	307.19
11/16/2018 Taxi: EM Taxi home from airport on 11/16/18 flight from Kansas for investigative trip:TAXI CREDIT CARD CORP	44.75
11/16/2018 Fuel: JK gas for rental car in Kansas City with EM for investigative trip:SINCLAIR OIL CORPORATION	23.19
11/17/2018 Taxi: JK taxi from LaGuardia Airport after Kansas City investigative trip:UBER	38.64
11/25/2018 Tolls/Road Charges: EM highway tolls for rental car in Kansas for investigative trip 11/14/18-11/15/18.:AMERICAN TRAFFIC...	18.70
11/28/2018 Airfare: SD-American Airlines roundtrip flight from Louisiana to Kansas City for investigative trip 11/14	635.60
11/28/2018 Hotel: SD-Hotel in Kansas for 3 nights starting 11/14-11/17 for investigative trip	588.42
11/28/2018 Hotel: SD-Hotel in Kansas for 3 nights starting 11/5-11/8 for investigative trip	558.55
11/28/2018 Airfare: SD-American Airlines roundtrip flight from Louisiana to Kansas City for investigative trip 11/5-11/8	545.60
11/28/2018 Car Rental: SD-car rental in Kansas for 3 days for investigative trip 11/5-11/8	191.07
11/28/2018 Car Rental: SD-car rental in Kansas for 3 days for investigative trip 11/14-11/17	148.75
11/28/2018 Parking: SD-parking at the airport for investigative trip from 11/5-11/8	29.00
11/28/2018 Parking: SD-parking at the airport for investigative trip from 11/14-11/17	27.00
11/28/2018 Parking: SD-parking overnight at the hotel for investigative trip on 11/16	25.00
11/28/2018 Fuel: SD-gas for rental car in Kansas for investigative trip on 11/8	13.85
11/28/2018 Fuel: SD-gas for rental car in Kansas for investigative trip on 11/17	13.82
06/07/2019 Hotel: SD-hotel in Kansas for 2 nights on 5/16-5/18 for meetings with potential, current clients	490.71
06/07/2019 Airfare: SD-American Airlines flight from Baton Rouge to Kansas on 5/15 for meetings with potential, current clients	387.00
06/07/2019 Airfare: SD-American Airlines flight from Kansas to Baton Rouge on 5/18 for meetings with potential, current clients	294.00
06/07/2019 Hotel: SD-hotel 5/15-5/16 room stay for meetings with potential, current clients in Wichita	236.49
06/07/2019 Hotel: SD-hotel 5/18-5/19 room stay in Kansas City for meetings with potential, current clients	220.12
06/07/2019 Car Rental: SD-car rental in Kansas for 3 days on 5/15-5/18 for meetings with potential, current clients	199.91
06/07/2019 Parking: SD-parking at airport on 5/15 for meetings with potential, current clients	54.00
06/07/2019 Taxi: SD-taxi from airport to hotel onn 5/15 for meetings with potential, current clients	43.75
06/07/2019 Taxi: SD-taxi from hotel to airport on 5/19 for meetings with potential, current clients	28.61
06/07/2019 Car Rental: SD-car rental to airport 5/18 for meetings with potential, current clients	25.63
06/07/2019 Fuel: SD-gas for rental car on 5/18	19.06
06/07/2019 Taxi: SD-uber to hotel on 5/16	17.58
06/07/2019 Taxi: SD-uber to car rental on 5/16	15.94
06/07/2019 Car Rental: SD-car rental 5/20 (due to flight issues-bad weather)	113.88
06/07/2019 Taxi: SD-airport to hotel 5/18 (flight cancelled due to bad weather)	50.98
06/30/2019 Airfare: MN roundtrip flight purchase for NY to KS trip 7/7-7/8 for 26(f) court conference:Delta Air Lines	717.00
07/07/2019 Taxi: MN travel from home to airport for 26(f) court conference trip 7/7-7/8:UBER	59.44
07/07/2019 Taxi: MN travel KS airport to hotel for 26(f) court conference trip 7/7-7/8:UBER	27.20
07/08/2019 Hotel: MN hotel for 26(f) court conference trip:Hilton Hotels	172.59
07/08/2019 Taxi: MN Uber from airport to home from 26(f) court conference trip:UBER	54.63
07/08/2019 Taxi: MN Uber from hotel to airport during 20(f) court conference trip:UBER	28.85
07/08/2019 Taxi: MN Uber from hotel to co-counsel meeting prior to 26(f) court conference:UBER	9.13
09/05/2019 Hotel: SD-hotel in Kasnas for 3 nights on 8/14-8/16 for meetings with potential, current clients	589.92
09/05/2019 Airfare: SD-American Airlines flight from Baton Rouge to Wichita on 8/14 for meetings with potential, current clients	344.99
09/05/2019 Airfare: SD-American Airlines flight from Kansas to Baton Rouge on 8/17 for meetings with potential, current clients	234.00
09/05/2019 Car Rental: SD-car rental for travel between Wichita and Kansas City on 8/14 - 8/17 for meetings with potential, current clients	186.13
09/05/2019 Parking: SD- parking at hotel in Kansas from 8/15-8/16 for meetings with potential, current clients	50.00
09/05/2019 Fuel: SD-gas for rental care on 8/17 for meetings with potential, current clients	10.01
10/11/2019 Airfare: MN roundtrip flight from LGA to KC from Oct.22-23 for meetings with potential experts:Delta Air Lines	570.43
10/22/2019 Hotel: MN hotel night of Oct 22 in Kansas for meetings with potential experts:Indigo Hotels	203.48
10/22/2019 Taxi: MN Uber from home to airport for trip to Kansas for meetings with potential experts:UBER	46.44
10/23/2019 Taxi: MN Uber from meeting to airport for trip to Kansas for meetings with potential experts:UBER	34.64
10/23/2019 Taxi: MN Uber from airport to hotel for trip to Kansas for meetings with potential experts:UBER	31.10
10/24/2019 Taxi: MN Lyft from airport to home from trip to Kansas for meetings with potential experts:LYFT	65.87
11/05/2019 Airfare: MN flight to KS for 11/11-11/13 for mediation:Delta Air Lines	831.40
11/11/2019 Hotel: MN hotel from 11-11 to 11-13 in Kansas for mediation trip:Sheraton	402.72
11/11/2019 Hotel: IL hotel from 11-11 to 11-13 in Kansas for mediation trip:Sheraton	422.05
11/11/2019 Taxi: IL taxi from home to airport for trip to Kansas mediation:DELUX TRANSPORTATION	88.72
11/11/2019 Taxi: MN Uber to meeting with potential witness in Kansas with IL:UBER	18.30
11/11/2019 Taxi: Uber from meeting with potential witness in Kansas to Kansas City with IL:UBER	17.26
11/13/2019 Taxi: IL Car from airport to home when returning back from mediation trip to Kansas:DELUX TRANSPORTATION	88.90

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11/14/2019 Taxi: MN Lyft from airport to home returning from mediation:LYFT	71.86
11/14/2019 Taxi: MN & IL Uber from mediation to airport:UBER	29.12
11/19/2019 Airfare: MN flight on 12/15 to KS for mediation:United Airlines	328.12
11/19/2019 Airfare: IL Flight to Kansas City on 12/15 for mediation:United Airlines	328.12
11/19/2019 Airfare: MN flight from Kansas to NYC on 12/16 for mediation:Delta Air Lines	303.10
11/19/2019 Airfare: IL Flight from Kansas City to LGA on 12/16 for mediation:Delta Air Lines	303.10
12/15/2019 Taxi: IL Car from home to airport for mediation trip:DELUX TRANSPORTATION	227.21
12/15/2019 Taxi: MN Uber from Kansas airport to mediation on 12/15:UBER	72.09
12/15/2019 Taxi: MN Lyft from home to airport on 12/15:LYFT	68.17
12/16/2019 Hotel: IL Hotel in Kansas on 12/15-12/16 for mediation:CROSSROADS HOTELS, LLC	230.66
12/16/2019 Hotel: MN hotel in Kansas on 12/15 for 1 night for mediation trip:CROSSROADS HOTELS, LLC	199.66
12/16/2019 Taxi: IL Car from airport to home from mediation trip:DELUX TRANSPORTATION	88.90
12/17/2019 Taxi: MN & IL taxi from KS mediation to airport on 12/16:UBER	65.62
12/17/2019 Taxi: MN taxi from home to airport on 12/15:LYFT	60.04
12/31/2019 Hotel: SD hotel in Kansas on 11/18-11/19 for meetings with current, potential clients	124.97
12/31/2019 Car Rental: SD-car rental in Kansas on 11/18-11/19 for meetings with current, potential clients	83.60
12/31/2019 Parking: SD-parking at airport for travel to Kansas on 11/18-11/23	45.00
12/31/2019 Fuel: SD-gas for rental car in Kansas on 11/20	9.52
02/04/2020 Airfare: MN roundtrip flight on 2-6 to 2-7 from NYC to Kansas for mediation:Delta Air Lines	822.59
02/06/2020 Taxi: MN Lyft from home to airport on 2/6 for mediation trip:LYFT	62.65
02/08/2020 Hotel: MN hotel in Kansas on 2/6-2/7 for mediation:21C MUSEUM HOTEL	273.40
02/08/2020 Taxi: MN taxi from airport to home on 2/7 from mediation trip:UBER	50.92
02/08/2020 Taxi: MN taxi on 2/7 from mediation to airport:UBER	27.92
02/13/2020 Airfare: MN roundtrip flight on 2-24 to 2-26 for mediation:Delta Air Lines	519.00
02/13/2020 Airfare: IL roundtrip flight on 2-24 to 2-26 for mediation:Delta Air Lines	519.00
02/24/2020 Taxi: IL Taxi from home to airport for mediation trip to Kansas:DELUX TRANSPORTATION	88.72
02/24/2020 Taxi: MN taxi from home to airport for mediation in Kansas:UBER	30.47
02/25/2020 Taxi: MN taxi from home to airport for mediation in Kansas:UBER	66.00
02/25/2020 Taxi: IL Taxi from mediation to hotel in Kansas:UBER	11.76
02/26/2020 Taxi: IL Taxi from airport to home mediation trip:DELUX TRANSPORTATION	88.90
02/26/2020 Taxi: MN travel to airport during mediation trip:UBER	44.38
02/26/2020 Taxi: MN travel from mediation to hotel:UBER	9.79
02/27/2020 Hotel: MN hotel in KS for 2/24-2/26 during mediation trip:21C MUSEUM HOTEL	385.49
02/27/2020 Hotel: IL Hotel for Kansas mediation trip on 2/23-2/25:21C MUSEUM HOTEL	357.84
02/27/2020 Taxi: MN travel from airport to home from mediation trip:UBER	50.11
02/27/2020 Taxi: IL Uber to airport in Kansas during mediation trip:UBER	26.06
<b>TOTAL Travel Expenses</b>	<b>40,422.09</b>
<b>TOTAL Expenses</b>	<b>50,118.62</b>

# **EXHIBIT E**

MISSOURI LAWYERS MEDIA



# BILLING RATES



# Welcome to Billing Rates 2019

This year's edition features an expansive set of data. We found rates for 213 Missouri-based attorneys and 77 Missouri staff members. We also feature rates for 18 lawyers and staff who work at out-of-state offices of Missouri or metro-area firms. For more rates of out-of-state attorneys who did work in Missouri in the last year, please visit us online at [molawyersmedia.com](http://molawyersmedia.com).

A large portion of that data is thanks to a massive class-action settlement with Syngenta regarding its use of genetically modified corn. A federal judge gave final approval late last year to a \$1.51 billion class-wide settlement — the largest Missouri case of 2018 as tracked by Missouri Lawyers Media.

A third of that settlement went to fees for hundreds of lawyers across the country who aided in the litigation. The filings in support of that fee application also reveal the biggest hourly fees in this year's Billing Rates edition — \$865 an hour for the partners at Stueve Siegel Hanson and Gray, Ritter & Graham who led the case.

The median hourly rate for Missouri lawyers as a whole was \$370 an hour, up from the \$318 median rate we reported in 2018. Outside of the state's two metropolitan areas, the median remained at \$250.

In Kansas City, the median rate was \$405 an hour, up from \$350 the prior year. The median partner charged \$475 an hour, while the median associate rate was \$345. In St. Louis, the median rate was \$343, with the median partner charging \$390 and the median associate charging \$298. St. Louis figures were calculated from a pool of 96 attorneys, while the Kansas City figures were from a pool of 178 lawyers.

## METHODOLOGY

Missouri Lawyers Media gathers hourly rates from fee applications filed with courts within the past 12 months. Rate information from courts generally came from bankruptcy cases, class-action lawsuits and cases in which the prevailing side was able to request its legal costs under a fee-shifting statute, such as in employment and civil-rights cases. Some rates also came from agreements with public entities for legal advice on specific projects.

Where possible, we use the attorney's standard or customary rates, rather than the rate the court applied or discounted rates offered to a particular client. Rates can vary according to the case or client, so one listed rate for an attorney might not apply in other cases.

The rates are a sampling only. Though drawn from recent court filings, some fee requests were for work performed in previous years, so rates might have changed in the meantime. Wherever possible, we have used the most recent available rates.

Attorneys are listed with the firm or organization where they worked at the time the fee request was made. They might have changed firms or been promoted since then, or the firm might have changed names or ceased to exist.

Information on titles, practice specialties and office locations comes primarily from fee applications, supplemented with information from firm websites. Practice listings typically describe the type of case for which the fee was incurred, which might not be the attorney's main area of practice.

Attorneys and staff in offices near the metropolitan St. Louis area in Illinois and the metropolitan Kansas City area in Kansas were counted as in-state rates. If it was not clear where staff members were located, we generally list them as being in the location of the firm's headquarters.

Reporters Scott Lauck, Jessica Shumaker and Nicholas Phillips, and freelance researcher Jennie Goodman researched the listings.

## HOURLY RATES FOR

213 Missouri attorneys

77 Missouri staff

18 Out-of-state attorneys

## Lawyer's fees prompt fight under Sunshine Law

By SCOTT LAUCK  
[slauck@molawyersmedia.com](mailto:slauck@molawyersmedia.com)

A media organization in Kansas City is in the midst of a Sunshine Law fight with Clay County after an attempt to see how much an attorney was charging the county resulted in a large legal bill.

"If this is not 'Alice in Wonderland,' I don't know what it is," said Bernie Rhodes of Lathrop Gage, an attorney for The Kansas City Star. "Where does the rabbit hole end?"

Cypress Media LLC, which operates The Star, sued Clay County in May alleging the county had violated the Sunshine Law by trying to charge The Star \$4,200 to fulfill a request for records. A reporter for The Star, curious about the county's contract for outside legal work with Spencer Fane, had requested copies of itemized billing statements and invoices.

W. Joseph Hatley, a Spencer Fane partner representing the county, said in a letter to The Star's attorney that it would take him 15 minutes per page to review the 45 pages of his own bills for any privileged material. The resulting day-and-a-

half job, Hatley estimated, would come to about \$4,200 at \$373.50 per hour, the rate he charged the county. (Hatley's standard rate, according to the court filing, was \$415 an hour.)

Rhodes, in a letter responding to Hatley, called that an "inflated" estimate meant to hide the billing entries from disclosure. To illustrate, Rhodes said he was able to review a similar stack of billing documents "during a single episode of NCIS: New Orleans (including fast-forwarding through the commercials)."

Rhodes charges The Star a rate of \$425 per hour, discounted from his usual \$610, he said. The total cost for his review was \$382.50.

The lawsuit has been delayed in Clay County Circuit Court while the Supreme Court appointed an outside judge to handle the matter. The county hasn't formally responded to the suit. Hatley didn't respond to a request for comment.

If The Star ultimately prevails, it might be able to recover its attorneys' fees. Until recently, actually recovering such fees seemed a dim possibility. But recent rulings have

given some lawyers hope.

In February, Jackson County Circuit Judge S. Margene Burnett ordered the city of Raytown to pay \$4,000 in civil penalties and more than \$38,000 in attorneys' fees after it refused to release records concerning an intersection where a fatal vehicle crash occurred.

The city had cited the information's potential use for litigation against the city, but Burnett found the refusal constituted a knowing and purposeful violation of the Sunshine Law. The city, she wrote, had tried to use the law as a "shield to hide behind rather than shed light on potentially inappropriate government activity."

Plaintiffs who are wrongfully denied access to public records may recover their attorneys' fees at the judge's discretion if the agency denial was "knowing," and the fee award is mandatory if the violation is "purposeful." But in 2016, the Missouri Supreme Court held in *Laut v. City of Arnold* that a knowing violation "requires proof that the public entity knew that its failure to produce the report violated

the Sunshine Law." A dissent in that case said such a stringent definition made a knowing violation the "functional equivalent" of a purposeful violation.

The Jackson County ruling came a month after the Court of Appeals Western District affirmed a different judge's ruling last year that the Cole County Prosecuting Attorney had violated the law by failing to turn over records for a drug task force. That case involved a \$12,000 civil penalty and an award of \$14,000 in attorneys' fees.

Rhodes said despite those victories, he still advises clients to be aware that they might get stuck with the bill. As a result, he said, most are limiting Sunshine Law suits to only those situations that are plainly illegal and serve an important point.

"I'm happy to ask for fees, but they should be prepared to go forward with the lawsuit without assuming they're going to get their fees paid," he said.

The case is *Cypress Media LLC v. Clay County*, 19CY-CV05332.

# Judge: Watch for 'red flags' in fee requests

By SCOTT LAUCK  
slauck@molawyersmedia.com

If you've ever thought submitting an application for attorneys' fee is a tedious and time-consuming job, think of the judge on the receiving end of your request.

"We want to be lawyers, not accountants," said Judge Nanette K. Laughrey.

Laughrey, a senior U.S. district judge for the Western District of Missouri, gave her candid thoughts on awarding attorneys' fees in federal litigation during a May 30 CLE program organized by the National Association of Legal Fee Analysis. Joined by James G. Carr, a senior judge for the Northern District of Ohio, Laughrey stressed the importance of crafting a solid and reasonable fee request.

"It's worth your time and doing a good job in front of the district court if you want to be successful on your fee application or you want to defeat a fee application," she said.

By that, Laughrey didn't necessarily mean that it should be as detailed as possible, nor that it should shoot for the moon in an attempt to get the biggest award possible. As a long-sitting judge in Missouri who often has watched the case unfold from the time it was filed, Laughrey said she typically makes a "gut call" as to whether the fee request makes sense.

"Once there's a red flag, there's much more scrutiny," she said. "For the most part, I look at the fees, I have a gut reaction to them, I compare them to other fees I've awarded in similar kinds of cases, and it's not a complicated process. But when it is a complicated process, it's much more time-consuming."

Carr agreed, saying attorneys should avoid putting the judge in the position of acting like a cost-conscious client demanding to know what every charge was for.

"I'll be quite blunt: It's the one part of my job I don't look forward to a whole lot," Carr said.

Both judges said they dislike challenging lawyers on their fee applications, which can feel like a challenge to the lawyers' integrity and skillfulness. Both also said they prefer to reduce either the hourly rate or the number of hours awarded rather than deny an award outright.

Still, there are some red flags they watch for. Laughrey said she sometimes will see applications in which a lawyer has claimed more than 24 hours of time in a single day. That seemingly impossible outcome can be a product of the lawyers' minimum increment of time — the task took only a minute, but the lawyer tracks his or her time in 10ths of an hour.

"If the judge sees that you're work-

ing more than 24 hours in a day, there's something there going on that doesn't make sense," she said.

Laughrey said she requires fee applications to be submitted in searchable form so her staff can convert the contents to a spreadsheet for easy analysis.

In November 2018, Laughrey presided over a particularly testy fee fight in a Missouri case that went to the U.S. Supreme Court. Trinity Lutheran Church prevailed in a religious-discrimination suit after the state of Missouri refused to let the church's daycare participate in a program to use recycled tire scraps to resurface its playground.

After prevailing in the high court, the attorneys for the church asked for more than \$890,000 in fees. Laughrey approved less half of that, with a final award of about \$434,000.

The church primarily was represented by Alliance Defending Freedom, a Christian organization that handles religious-freedom cases. Laughrey said the attorneys had excessive hours for basic research and case preparation, and that some lawyers asked for fees that were out of line for what was ultimately a Missouri case.

"There's a real relationship between the hourly rate and what's an excessive fee or excessive billing,"

she said. "If you're getting \$500 an hour, and you're doing very, very basic research in an area you should know about, that's probably excessive, given that rate."

In contrast, Laughrey pointed to a groundbreaking class-action lawsuit involving recordkeeping fees charged to a 401(k) plan. The case, which has gone on for more than 12 years, reached a \$55 million preliminary settlement earlier this year.

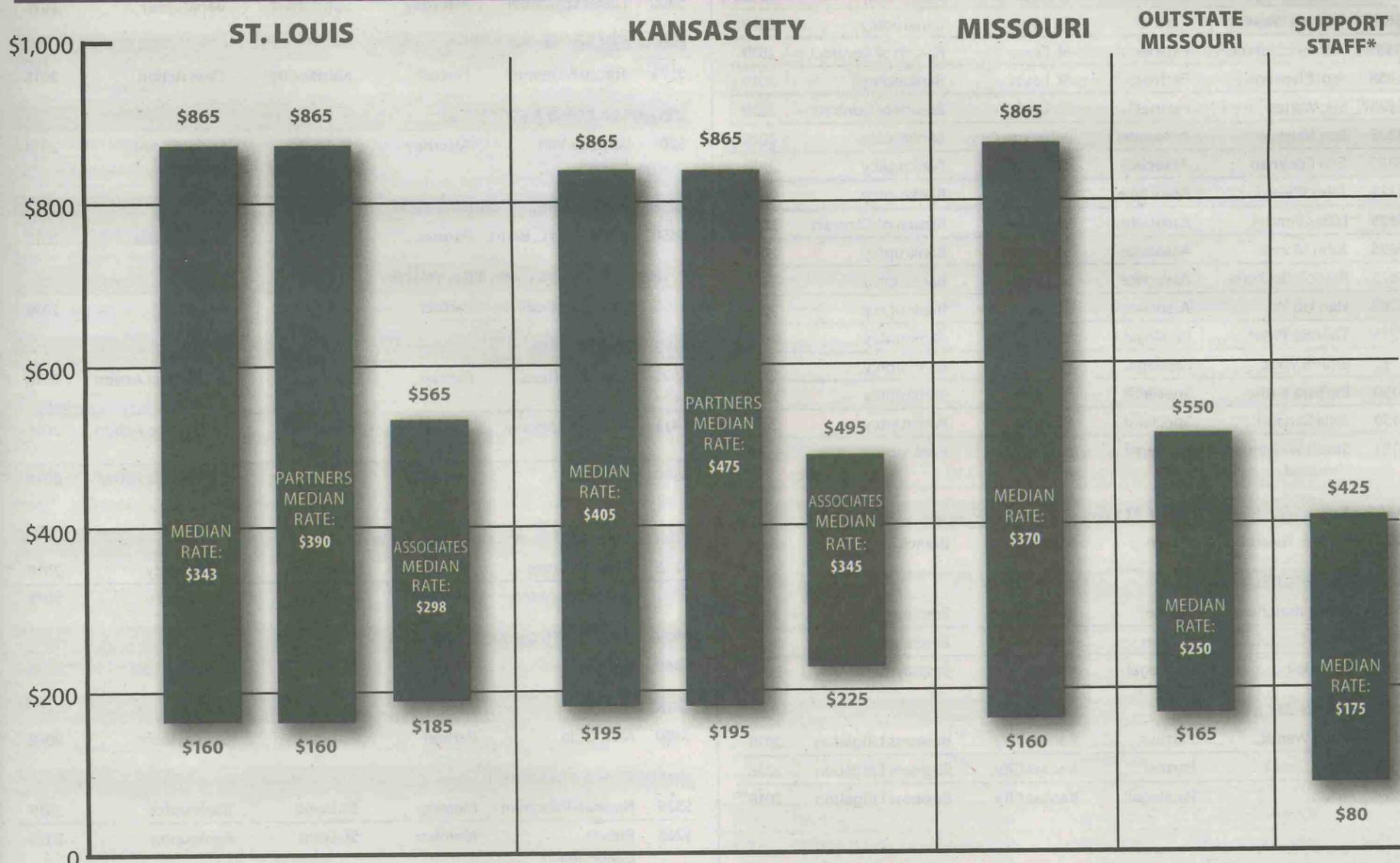
Although the fee applications hadn't been submitted at the time Laughrey spoke, she said she would likely consider such factors as the complexity and longevity of the case, as well as the fact that it was the first case to go to a trial using what was then a little-used provision of the Employee Retirement Income Security Act.

Laughrey noted that, while there are good First Amendment lawyers across the country, the St. Louis law firm of Schlichter Bogard & Denton became national experts in ERISA litigation.

"They certainly seem to have earned their money," she said.

The law firm subsequently has submitted a request for \$18.3 million in fees, constituting a third of the settlement fund. Laughrey is scheduled to consider the application at the settlement's final hearing on Aug. 13.

## ATTORNEY RATE RANGES



\*For Missouri-based firms; may be in other locations

## HIGHEST MISSOURI RATES

RANK	FIRM	HOURLY RATE	NAME	TITLE	CITY	PRACTICE
1	Gray, Ritter & Graham	\$865	Don Downing	Director/Shareholder	St. Louis	Class Action/MDL
1	Stueve Siegel Hanson	\$865	Norman Siegel	Partner	Kansas City	Class Action/MDL
1	Stueve Siegel Hanson	\$865	Patrick Stueve	Partner	Kansas City	Class Action/MDL
4	Holland Law Firm	\$850	Eric D. Holland Sr.	Partner	St. Louis	Class Action/MDL
5	Gray, Ritter & Graham	\$825	Gretchen Garrison	Principal	St. Louis	Class Action/MDL
5	Stueve Siegel Hanson	\$825	Steve Six	Partner	Kansas City	Class Action/MDL
7	Shook, Hardy & Bacon	\$770	Stan Sexton	Partner	Kansas City	Public Interest Class Action
8	Stinson Leonard Street	\$730	Daniel Bukovac	Partner	Kansas City	Class Action/MDL
9	Shamberg, Johnson & Bergman	\$725	Lynn Johnson	Partner	Kansas City	Class Action/MDL
9	Stueve Siegel Hanson	\$725	Rachel Schwartz	Partner	Kansas City	Class Action/MDL
9	Walters Bender Strohbehn & Vaughan	\$725	Thomas Bender	Partner	Kansas City	Class Action/MDL
12	Gray, Ritter & Graham	\$695	Jason Sapp	Partner	St. Louis	Class Action/MDL
12	Stueve Siegel Hanson	\$695	Bradley Wilders	Partner	Kansas City	Class Action/MDL
14	Shook, Hardy & Bacon	\$680	Andrew Carpenter	Partner	Kansas City	Public Interest Class Action
15	Miller Schirger	\$675	John Schirger	Partner	Kansas City	Class Action/MDL
15	Miller Schirger	\$675	Matthew Lytle	Partner	Kansas City	Class Action/MDL
15	Paul LLP	\$675	John Cracken	Of Counsel	Kansas City	Class Action/MDL
18	Paul LLP	\$650	Rick Paul	Partner	Kansas City	Class Action/MDL
19	Armstrong Teasdale	\$645	Scott Hunt	Partner	St. Louis	Bankruptcy
19	Armstrong Teasdale	\$645	William M. Corrigan Jr.	Partner	St. Louis	Breach of Contract
19	Thompson Coburn	\$645	Mark Bossi	Partner	St. Louis	Bankruptcy

## IN-STATE

RATE / HOUR	NAME	TITLE	CITY	PRACTICE AREA	YEAR
<b>ACCESS DISABILITY</b>					
\$202	David D. Camp	Partner	St. Louis	Social Security Disability	2019
<b>AFFINITY LAW GROUP</b>					
\$315	J. Talbot Sant Jr.	Of Counsel	St. Louis	Bankruptcy	2019
<b>ALLIANCE DEFENDING FREEDOM</b>					
\$495	Erik Stanley	Senior Counsel	Leawood, Kansas	First Amendment Litigation	2018
\$450	Joel Oster	Senior Counsel	Leawood, Kansas	First Amendment Litigation	2018
<b>ARMSTRONG TEASDALE</b>					
\$645	Scott Hunt	Partner	St. Louis	Bankruptcy	2019
\$645	William M. Corrigan Jr.	Partner	St. Louis	Breach of Contract	2019
\$605	David Going	Partner	St. Louis	Bankruptcy	2019
\$605	Richard Engel Jr.	Partner	St. Louis	Bankruptcy	2019
\$485	Jeffrey L. Schultz	Partner	St. Louis	Breach of Contract	2019
\$455	Scott Jansen	Partner	St. Louis	Bankruptcy	2019
\$425	Eric Walter	Partner	St. Louis	Breach of Contract	2019
\$325	Ben Musholt	Associate	Jefferson City	Bankruptcy	2019
\$325	Erin Edelman	Associate	St. Louis	Bankruptcy	2019
\$325	John Willard	Associate	St. Louis	Bankruptcy	2019
\$325	Lucas Pendry	Associate	St. Louis	Breach of Contract	2019
\$295	John Moore	Associate	St. Louis	Bankruptcy	2019
\$275	Patricia Beckerle	Associate	St. Louis	Bankruptcy	2019
\$260	Han Liu	Associate	St. Louis	Bankruptcy	2019
\$215	Theresa Ritter	Paralegal	St. Louis	Bankruptcy	2019
\$180	Brandi Vogt	Paralegal	St. Louis	Bankruptcy	2019
\$150	Barbara Bathe	Specialist	St. Louis	Bankruptcy	2019
\$150	Julia Renaud	Specialist	St. Louis	Bankruptcy	2019
\$125	Susan Williams-Umstead	Paralegal	Kansas City	Bankruptcy	2019
<b>BARRY S. GINSBURG, ATTORNEY AT LAW</b>					
\$275	Barry S. Ginsburg	Attorney	St. Louis	Breach of Contract	2018
<b>BRATCHER GOCKEL LAW</b>					
\$500	Lynne Bratcher	Partner	Kansas City	Employment	2018
\$500	Marie Gockel	Partner	Kansas City	Employment	2018
\$150	Mike Bell	Paralegal	Kansas City	Employment	2018
<b>BROWN &amp; RUPRECHT</b>					
\$300	Frank Wendt	Partner	Kansas City	Business Litigation	2018
\$195	Kurt S. Brack	Partner	Kansas City	Business Litigation	2018
\$85	N/A	Paralegal	Kansas City	Business Litigation	2018

## IN-STATE

RATE / HOUR	NAME	TITLE	CITY	PRACTICE AREA	YEAR
<b>BROWN &amp; WATKINS</b>					
\$550	C. Jason Brown	Partner	Gower	Class Action	2019
\$550	Jayson Watkins	Partner	Gower	Class Action	2019
\$100	N/A	Paralegal	Gower	Class Action	2019
<b>CARMODY MACDONALD</b>					
\$395	Robert E. Eggmann	Principal	St. Louis	Bankruptcy	2019
\$385	Spencer Desai	Partner	St. Louis	Bankruptcy	2019
<b>COVER &amp; HILTON</b>					
\$200	Cary V. Cover	Partner	Clinton	Receivership	2019
<b>DANNA MCKITRICK</b>					
\$385	A. Thomas DeWoskin	Principal	St. Louis	Bankruptcy	2019
<b>DAVID SCHROEDER LAW OFFICE</b>					
\$300	David Schroeder	Attorney	Springfield	Bankruptcy	2019
<b>DAVIS GEORGE MOOK</b>					
\$575	Tracey F. George	Partner	Kansas City	Class Action	2019
<b>DENNIS W. FOX &amp; ASSOCIATES</b>					
\$201	Jennifer Van Fossen	Attorney	St. Louis	Social Security Disability	2019
<b>DOBSON, GOLDBERG, BERNIS &amp; RICH</b>					
\$450	Johnathan C. Bernis	Partner	St. Louis	Employment	2018
<b>FISHER PATTERSON SAYLER &amp; SMITH</b>					
\$160	Lawrence Pratt	Partner	St. Louis	Litigation	2019
<b>FOULSTON SIEFKIN</b>					
\$525	Scott Nehrbass	Partner	Kansas City, Kansas	ERISA Class Action	2018
\$415	J. Steven Massoni	Special Counsel	Kansas City, Kansas	ERISA Class Action	2018
\$300	Sara Otto	Associate	Kansas City, Kansas	ERISA Class Action	2018
<b>FREDRICH J. CRUSE, ATTORNEY AT LAW</b>					
\$225	Fredrich Cruse	Attorney	Hannibal	Bankruptcy	2019
\$80	Bobbi Daughtery	Paralegal	Hannibal	Bankruptcy	2019
<b>FREEDOM CENTER OF MISSOURI</b>					
\$340	Dave Roland	Attorney	Mexico	Sunshine Law	2019
<b>GHIO LAW FIRM</b>					
\$400	Matt Ghio	Partner	St. Louis	Employment	2018
<b>GOLDSTEIN &amp; PRESSMAN</b>					
\$325	Norman Pressman	Member	St. Louis	Bankruptcy	2019
\$225	Robert Breidenbach	Member	St. Louis	Bankruptcy	2019

## IN-STATE

RATE / HOUR	NAME	TITLE	CITY	PRACTICE AREA	YEAR
<b>GORNY LAW FIRM</b>					
\$600	Steve Gorny	Founding Member	Kansas City	Sunshine Law	2019
\$350	Chris Dandurand	Attorney	Kansas City	Sunshine Law	2019
<b>GRANT, MILLER &amp; SMITH</b>					
\$350	William Grant	Partner	St. Louis	Family Law	2019
<b>GRAVES GARRETT</b>					
\$575	Todd P. Graves	Partner	Kansas City	Election Law	2018
\$460	Edward D. Greim	Partner	Kansas City	Election Law	2018
\$305	Alan T. Simpson	Associate	Kansas City	Election Law	2018
\$175	Nichole E. Kruger	Paralegal	Kansas City	Election Law	2018
<b>GRAY, RITTER &amp; GRAHAM</b>					
\$865	Don Downing	Director/Shareholder	St. Louis	Class Action/MDL	2019
\$825	Gretchen Garrison	Principal	St. Louis	Class Action/MDL	2019
\$695	Jason Sapp	Partner	St. Louis	Class Action/MDL	2019
\$565	Kaitlin Bridges	Associate	St. Louis	Class Action/MDL	2019
\$400	Cort VanOstran	Associate	St. Louis	Class Action/MDL	2019
\$330	Jack Downing	Associate	St. Louis	Class Action/MDL	2019
\$295	Jackie Statz	Paralegal	St. Louis	Class Action/MDL	2019
\$295	Judy Stinson	Paralegal	St. Louis	Class Action/MDL	2019
\$225	Charles Fasterling	Paralegal	St. Louis	Class Action/MDL	2019
\$175	Cameron Roark	Law Clerk	St. Louis	Class Action/MDL	2019
<b>HARLAN STILL &amp; KOCH</b>					
\$207	Frank Koch	Partner	Columbia	Social Security Disability	2019
<b>HEPLERBROOM</b>					
\$360	Steven M. Wallace	Partner	Edwardsville, Illinois	Bankruptcy	2019
\$200	Amanda R. McQuaid	Associate	Edwardsville, Illinois	Bankruptcy	2019
<b>HERREN, DARE &amp; STRETT</b>					
\$300	David M. Dare	Partner	St. Louis	Bankruptcy	2019
<b>HKM EMPLOYMENT ATTORNEYS</b>					
\$400	S. Cody Reinberg	Attorney	St. Louis	Employment	2019
<b>HOLLAND LAW FIRM</b>					
\$850	Eric D. Holland Sr.	Partner	St. Louis	Class Action/MDL	2019
\$500	R. Seth Crompton	Partner	St. Louis	Class Action/MDL	2019
\$250	Philip Proud	Associate	St. Louis	Class Action/MDL	2019
<b>HOLLINGSHEAD &amp; DUDLEY</b>					
\$400	Jeremy D. Hollingshead	Partner	St. Louis	Employment	2018
\$400	Nicholas Dudley	Partner	Kansas City	Employment	2018
\$300	John Moffitt III	Attorney	St. Louis	Employment	2018
\$300	Katie Rhoten	Associate	St. Louis	Employment	2018
\$200	Ben Coudret	Associate	St. Louis	Employment	2018
\$100	Arriana Hayes	Law Clerk	St. Louis	Employment	2018
\$100	Christopher Sandifer	Law Clerk	St. Louis	Employment	2018
\$100	Emma Wilson	Law Clerk	St. Louis	Employment	2018
\$100	Jessica Rials	Paralegal	St. Louis	Employment	2018
\$100	Melissa Heisner	Paralegal	St. Louis	Employment	2018
<b>HOLMAN SCHIAVONE</b>					
\$375	Ashley Atwell-Soler	Counsel	Kansas City	Employment	2018
<b>HUSCH BLACKWELL</b>					
\$505	Matthew Schelp	Partner	St. Louis	Government Compliance	2018
\$335	Matthew Diehr	Partner	St. Louis	Government Compliance	2018
\$250	Grant Ford	Associate	St. Louis	Government Compliance	2018
<b>JACOBSON PRESS</b>					
\$400	Joe Jacobson	Partner	St. Louis	Missouri Securities Act	2019
\$350	Allen Press	Partner	St. Louis	Missouri Securities Act	2019
\$250	Matt Vianello	Attorney	St. Louis	Missouri Securities Act	2019

## IN-STATE

RATE / HOUR	NAME	TITLE	CITY	PRACTICE AREA	YEAR
<b>JENKINS &amp; KLING</b>					
\$245	Nancy Stokley Martin	Partner	St. Louis	Banking	2019
<b>JOHN LENTELL, ATTORNEY AT LAW</b>					
\$200	John L. Lentell	Partner	Leawood, Kansas	Bankruptcy	2019
<b>JONATHAN STERNBERG ATTORNEY PC</b>					
\$450	Jonathan Sternberg	Partner	Kansas City	Employment	2019
<b>KODNER WATKINS</b>					
\$320	Albert Watkins	Partner	St. Louis	Litigation	2019
<b>LATHROP GAGE</b>					
\$610	Bernard J. Rhodes	Partner	Kansas City	Sunshine Law	2019
<b>LAW OFFICE OF BORIS E. GRAYPEL</b>					
\$300	Boris Graypel	Partner	St. Louis	Consumer Protection	2019
<b>LAW OFFICE OF CHRISTOPHER JONES</b>					
\$300	Christopher Jones	Partner	Lee's Summit	Slander of Title Action	2018
<b>LAW OFFICE OF MARK A. BUCHANAN</b>					
\$450	Mark Buchanan	Partner	Kansas City	Employment	2019
<b>LUNCEFORD LAW FIRM</b>					
\$475	David A. Lunceford	Partner	Lee's Summit	Employment	2018
\$275	Rachel Rutter	Associate	Lee's Summit	Employment	2018
\$275	Taylor Spooner Myers	Associate	Lee's Summit	Employment	2018
\$100	Bailey Wright	Paralegal	Lee's Summit	Employment	2018
\$100	Jasmine Ward	Paralegal	Lee's Summit	Employment	2018
<b>MARTIN LEIGH</b>					
\$350	Amy Ryan	Partner	Kansas City	Real Estate	2019
\$350	Beverly Weber	Shareholder	Kansas City	Real Estate	2019
\$350	Greg Todd	Partner	Kansas City	Real Estate	2019
\$350	Thomas Fritzen	Shareholder	Kansas City	Real Estate	2019
\$350	William Meyer	Partner	Kansas City	Real Estate	2019
\$110	Sherri Ratcliffe	Paralegal	Kansas City	Real Estate	2019
<b>MEDLER &amp; ROITHER</b>					
\$350	Jeffrey Medler	Partner	St. Louis	Litigation	2019
<b>MEYERS LAW FIRM</b>					
\$600	Marty Meyers	Partner	Kansas City	Employment	2019
\$390	Leonard Stephens	Attorney	Kansas City	Employment	2019
\$375	Heather Hardinger	Attorney	Kansas City	Employment	2019
\$300	Candice Johnson	Attorney	Kansas City	Employment	2019
<b>MILLER SCHIRGER</b>					
\$675	John Schirger	Partner	Kansas City	Class Action/MDL	2019
\$675	Matthew Lytle	Partner	Kansas City	Class Action/MDL	2019
\$575	Joseph Feierabend	Partner	Kansas City	Class Action/MDL	2019
<b>NATALIA MCKINSTRY LLC</b>					
\$225	Natalia McKinstry	Partner	St. Louis	Wrongful Death	2019
<b>OGLETREE DEAKINS</b>					
\$285	James M. Paul	Shareholder	St. Louis	Employment	2018
\$230	Meredith A. Lopez	Associate	St. Louis	Employment	2018
<b>PAUL LLP</b>					
\$675	John Cracken	Of Counsel	Kansas City	Class Action/MDL	2019
\$650	Rick Paul	Partner	Kansas City	Class Action/MDL	2019
\$500	Ashlea Schwarz	Of Counsel	Kansas City	Class Action/MDL	2019
\$275	Sue Becker	Associate	Kansas City	Class Action/MDL	2019
\$225	Adam Krause	Associate	Kansas City	Class Action/MDL	2019
\$225	Robert Kinsman	Associate	Kansas City	Class Action/MDL	2019
\$225	Steven Rowe	Paralegal	Kansas City	Class Action/MDL	2019
\$185	Kendra John	Paralegal	Kansas City	Class Action/MDL	2019
\$175	Cam Riemensnider	Paralegal	Kansas City	Class Action/MDL	2019
\$175	Linda Davis	Paralegal	Kansas City	Class Action/MDL	2019
\$175	Melissa Casady	Paralegal	Kansas City	Class Action/MDL	2019
\$175	Pam Williams	Paralegal	Kansas City	Class Action/MDL	2019
\$150	Pat Neal	Paralegal	Kansas City	Class Action/MDL	2019
\$125	Sydney Estell	Paralegal	Kansas City	Class Action/MDL	2019

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## IN-STATE

RATE / HOUR	NAME	TITLE	CITY	PRACTICE AREA	YEAR
<b>PAUL LLP (CONT.)</b>					
\$100	Heather Webb	Paralegal	Kansas City	Class Action/MDL	2019
\$90	Caroline Abbott	Paralegal	Kansas City	Class Action/MDL	2019
<b>PHILLIPS &amp; THOMAS</b>					
\$350	George J. Thomas	Attorney	Prairie Village, Kansas	Bankruptcy	2019
<b>PLAYTER &amp; PLAYTER</b>					
\$300	Chris Playter	Partner	Lee's Summit	Employment	2019
\$300	Eric Playter	Partner	Lee's Summit	Employment	2019
<b>POLSINELLI</b>					
\$505	Matthew S. Layfield	Shareholder	St. Louis	Bankruptcy	2019
\$475	Todd Bartels	Shareholder	Kansas City	Bankruptcy	2018
\$370	Robert Spake	Shareholder	Kansas City	Bankruptcy	2018
\$330	Benton Keatley	Associate	Kansas City	Bankruptcy	2018
\$315	Nicholas A. Griebel	Associate	St. Louis	Bankruptcy	2019
\$225	Jerry Thies	Senior Paralegal	Kansas City	Bankruptcy	2018
<b>POPHAM LAW FIRM</b>					
\$600	Dennis Egan	Partner	Kansas City	Employment	2019
\$450	Bert Braud	Partner	Kansas City	Employment	2019
\$250	Cooper Mach	Attorney	Kansas City	Employment	2019
\$140	Aly Pack	Paralegal	Kansas City	Employment	2019
\$140	Nicole Eaton	Paralegal	Kansas City	Employment	2019
<b>RICE SPAETH SUMMERS &amp; HEISSERER</b>					
\$250	John Heisserer	Partner	Cape Girardeau	Personal Injury	2019
<b>ROSENBLUM GOLDENHERSH</b>					
\$375	Jeffrey B. Hunt	Partner	St. Louis	Breach of Contract	2018
<b>ROSS &amp; VOYTAS</b>					
\$225	Ethan William Gee	Attorney	St. Louis	Personal Injury	2018
\$225	Nathan Ross	Partner	St. Louis	Personal Injury	2018
\$225	Richard A. Voytas Jr.	Partner	St. Louis	Personal Injury	2018
<b>RUNNYMEDE LAW GROUP</b>					
\$425	Stephen R. Clark	Partner	St. Louis	Breach of Contract	2018
\$250	Kristen E. Weinberg	Associate	St. Louis	Breach of Contract	2018
\$100	Chelsea L. Langeneckert	Paralegal	St. Louis	Breach of Contract	2018
<b>SEYFERTH BLUMENTHAL &amp; HARRIS</b>					
\$395	Charlie J. Harris	Partner	Kansas City	Receivership	2019
\$285	Deena Jenab	Partner	Kansas City	Receivership	2019
\$285	Kevin Karpin	Partner	Kansas City	Receivership	2019
\$245	Julie Sims	Associate	Kansas City	Receivership	2019
\$245	Nick Daugherty	Associate	Kansas City	Receivership	2019
\$125	Cheri Diaz	Paralegal	Kansas City	Receivership	2019
\$125	Melissa Miller	Paralegal	Kansas City	Receivership	2019
<b>SHAMBERG, JOHNSON &amp; BERGMAN</b>					
\$725	Lynn Johnson	Partner	Kansas City	Class Action/MDL	2019
<b>SHOOK, HARDY &amp; BACON</b>					
\$770	Stan Sexton	Partner	Kansas City	Public Interest Class Action	2019
\$680	Andrew Carpenter	Partner	Kansas City	Public Interest Class Action	2019
\$465	Brent Dwerlkotte	Associate	Kansas City	Public Interest Class Action	2019
\$465	Russell Shankland	Partner	Kansas City	Public Interest Class Action	2019
\$375	Britta Stamps	Associate	Kansas City	Public Interest Class Action	2019
\$320	Emily Sellers	Associate	Kansas City	Public Interest Class Action	2019
\$125	Patricia Carlson	Legal Analyst	Kansas City	Public Interest Class Action	2019
\$125	Paul Hoffmeyer	Legal Analyst	Kansas City	Public Interest Class Action	2019

## IN-STATE

RATE / HOUR	NAME	TITLE	CITY	PRACTICE AREA	YEAR
<b>SIMMONS HANLY CONROY</b>					
\$400	Sarah Burns	Associate	Alton, Illinois	Class Action/MDL	2019
\$275	Gary Payne	Associate	Alton, Illinois	Class Action/MDL	2019
\$185	Eric Disney	Associate	Alton, Illinois	Class Action/MDL	2019
\$125	Jill Kraus	Paralegal	Alton, Illinois	Class Action/MDL	2019
\$100	Julie Bond	Paralegal	Alton, Illinois	Class Action/MDL	2019
<b>SPENCER FANE</b>					
\$610	Kenneth Mason	Partner	Overland Park, Kansas	Federal Trade Commission Act	2018
\$575	Scott Goldstein	Partner	Kansas City	Bankruptcy	2019
\$510	Leslie Greathouse	Partner	Kansas City	Federal Trade Commission Act	2018
\$480	Eric Peterson	Of Counsel	St. Louis	Bankruptcy	2019
\$455	Beth Miller	Of Counsel	Kansas City	Federal Trade Commission Act	2018
\$455	Eric L. Johnson	Partner	Kansas City	Federal Trade Commission Act	2018
\$415	W. Joseph Hatley	Partner	Kansas City	Sunshine Law	2019
\$370	Paul Satterwhite	Partner	Springfield	Federal Trade Commission Act	2018
\$360	Ryan Hardy	Partner	St. Louis	Bankruptcy	2019
\$350	Casey Murray	Partner	Kansas City	Federal Trade Commission Act	2018
\$330	Crystal Howard	Of Counsel	Overland Park, Kansas	Federal Trade Commission Act	2018
\$325	Bryant Lamer	Partner	Kansas City	Federal Trade Commission Act	2018
\$320	Duval Pierre	Associate	Kansas City	Federal Trade Commission Act	2018
\$295	Zachary Fairlie	Associate	Kansas City	Bankruptcy	2019
\$270	Melissa Hinkle	Paralegal	Kansas City	Federal Trade Commission Act	2018
\$240	Lisa Wright	Paralegal	Kansas City	Bankruptcy	2019
\$230	Kathie Tatman	Paralegal	Kansas City	Federal Trade Commission Act	2018
\$230	Ronald Griffin	Paralegal	Kansas City	Federal Trade Commission Act	2018
\$230	Sarah Estlund	Paralegal	Kansas City	Federal Trade Commission Act	2018
<b>STINSON LEONARD STREET</b>					
\$730	Daniel Bukovac	Partner	Kansas City	Class Action/MDL	2019
\$580	Thomas Lynn	Partner	Kansas City	Class Action/MDL	2019
\$570	Charles Hatfield	Partner	Jefferson City	Election Law	2018
\$565	John Munich	Partner	Jefferson City	Election Law	2018
\$515	Sarah King	Partner	Kansas City	Class Action/MDL	2019
\$455	Colin Turner	Associate	Kansas City	Class Action/MDL	2019
\$405	Ashley Habiger	Associate	Kansas City	Class Action/MDL	2019
\$405	Nicholas Hoffman	Associate	Kansas City	Class Action/MDL	2019
\$380	Jeremy Root	Partner	Jefferson City	Election Law	2018
\$365	Benjamin Woodard	Associate	St. Louis	Class Action/MDL	2019
\$345	Christopher Sevedge	Associate	Kansas City	Class Action/MDL	2019
\$345	James Montgomery	Associate	Kansas City	Class Action/MDL	2019
\$345	Jessica Pixler	Associate	Kansas City	Class Action/MDL	2019
\$345	Katherine Bechina	Associate	Kansas City	Class Action/MDL	2019
\$330	Courtney Harrison	Associate	Kansas City	Class Action/MDL	2019
\$325	Derek Grutsch	Law Clerk	Kansas City	Class Action/MDL	2019
\$325	Nicci Warr	Associate	St. Louis	Election Law	2018
\$305	Steve Froelich	Paralegal	Kansas City	Class Action/MDL	2019
\$305	Tamara Combs	Associate	Kansas City	Class Action/MDL	2019
\$290	Erin Naeger	Associate	Kansas City	Election Law	2018
\$280	Joyce Hart	Paralegal	Kansas City	Class Action/MDL	2019
\$280	Leisa Stevens	Paralegal	Kansas City	Class Action/MDL	2019
\$260	John Benson	Paralegal	Kansas City	Class Action/MDL	2019
\$255	Cheri Diaz	Paralegal	Kansas City	Class Action/MDL	2019
\$255	Cindy Cusimano	Paralegal	Kansas City	Class Action/MDL	2019
\$250	Patsy Whalen	Paralegal	Kansas City	Class Action/MDL	2019
\$195	Marsha Presley	Paralegal	Jefferson City	Election Law	2018
\$165	Renee Henson	Law Clerk	Kansas City	Class Action/MDL	2019

**IN-STATE**

RATE / HOUR	NAME	TITLE	CITY	PRACTICE AREA	YEAR
<b>STUEVE SIEGEL HANSON</b>					
\$865	Norman Siegel	Partner	Kansas City	Class Action/MDL	2019
\$865	Patrick Stueve	Partner	Kansas City	Class Action/MDL	2019
\$825	Steve Six	Partner	Kansas City	Class Action/MDL	2019
\$725	Rachel Schwartz	Partner	Kansas City	Class Action/MDL	2019
\$695	Bradley Wilders	Partner	Kansas City	Class Action/MDL	2019
\$625	Stephanie Walters	e-Discovery Counsel	Kansas City	Class Action/MDL	2019
\$625	Toji Calabro	Of Counsel	Kansas City	Class Action/MDL	2019
\$575	Jeffrey Scurlock	Of Counsel	Kansas City	Class Action/MDL	2019
\$550	Lindsay Perkins	Of Counsel	Kansas City	Class Action/MDL	2019
\$495	Ethan Lange	Associate	Kansas City	Class Action/MDL	2019
\$495	Larkin Walsh	Of Counsel	Kansas City	Class Action/MDL	2019
\$475	Alexander T. Ricke	Associate	Kansas City	Employment and Labor	2019
\$475	Austin Moore	Associate	Kansas City	Class Action/MDL	2019
\$475	Jennifer Carter	Associate	Kansas City	Class Action/MDL	2019
\$450	David Hickey	Associate	Kansas City	Class Action/MDL	2019
\$425	Curtis Shank	Associate	Kansas City	Class Action/MDL	2019
\$425	James Vaglio	Associate	Kansas City	Class Action/MDL	2019
\$425	Peter Rupp	Systems Director	Kansas City	Class Action/MDL	2019
\$425	Searl Cooper	Associate	Kansas City	Class Action/MDL	2019
\$375	Daniel Shaw	Associate	Kansas City	Class Action/MDL	2019
\$350	Ariel Tazkargy	Associate	Kansas City	Class Action/MDL	2019
\$350	John Tompkins	Associate	Kansas City	Class Action/MDL	2019
\$350	Matt Cooper	Associate	Kansas City	Class Action/MDL	2019
\$350	Sam Storrs	Associate	Kansas City	Class Action/MDL	2019
\$295	Cheri Perez	Paralegal	Kansas City	Class Action/MDL	2019
\$295	Mary Rose Marquart	Paralegal	Kansas City	Class Action/MDL	2019
\$295	Michelle Campbell	Paralegal	Kansas City	Class Action/MDL	2019
\$295	Sherry Barry	Paralegal	Kansas City	Class Action/MDL	2019
\$275	Adrian Weiner	IT Manager	Kansas City	Class Action/MDL	2019
\$245	Erika Reyes	Paralegal	Kansas City	Class Action/MDL	2019
\$245	Janet Switzer	Finance/HR Director	Kansas City	Class Action/MDL	2019
\$245	Julie Olivas	Paralegal	Kansas City	Class Action/MDL	2019
\$245	Katrina Cervantes	Paralegal	Kansas City	Class Action/MDL	2019
\$245	Lori DeMoss	Paralegal	Kansas City	Class Action/MDL	2019
\$245	Margaret Smith	Paralegal	Kansas City	Class Action/MDL	2019
\$245	Melissa Warner	Paralegal	Kansas City	Class Action/MDL	2019
\$245	Sheri Williams	Paralegal	Kansas City	Class Action/MDL	2019
\$225	Ben Stueve	Paralegal	Kansas City	Class Action/MDL	2019
\$225	Brendan Marquart	Paralegal	Kansas City	Class Action/MDL	2019

**OUT-OF-STATE**

RATE / HOUR	NAME	TITLE	CITY	PRACTICE AREA	YEAR
<b>FISHER PATTERSON SAYLER &amp; SMITH</b>					
\$135	Katrina Hudson	Associate	Topeka, Kansas	Litigation	2019
\$135	Anne Marie Beckerle	Associate	Topeka, Kansas	Litigation	2019
<b>FOULSTON SIEFKIN</b>					
\$565	Jason Lacey	Partner	Wichita, Kansas	ERISA Class Action	2018
\$500	Boyd Byers	Partner	Wichita, Kansas	ERISA Class Action	2018
\$445	Jeremy Graber	Partner	Topeka, Kansas	ERISA Class Action	2018
\$300	Nicki Rose	Associate	Wichita, Kansas	ERISA Class Action	2018
\$240	Cynthia Voccio	Paralegal	Wichita, Kansas	ERISA Class Action	2018
\$220	Rebekah Haase	Paralegal	Wichita, Kansas	ERISA Class Action	2018
\$220	Christi Ramsey	Paralegal	Wichita, Kansas	ERISA Class Action	2018
\$215	Jeremy Koehler	Summer Associate	Wichita, Kansas	ERISA Class Action	2018
\$215	Elias Underwood	Summer Associate	Wichita, Kansas	ERISA Class Action	2018

**IN-STATE**

RATE / HOUR	NAME	TITLE	CITY	PRACTICE AREA	YEAR
<b>SUMMERS COMPTON WELLS</b>					
\$365	David Sosne	Principal	St. Louis	Bankruptcy	2019
\$350	Bonnie Clair	Principal	St. Louis	Bankruptcy	2019
\$325	Brian J. LaFlamme	Principal	St. Louis	Bankruptcy	2019
\$120	N/A	Paralegal	St. Louis	Bankruptcy	2019
\$100	N/A	Law Clerk	St. Louis	Bankruptcy	2019
<b>THOMPSON COBURN</b>					
\$645	Mark Bossi	Partner	St. Louis	Bankruptcy	2019
\$490	Brian Hockett	Partner	St. Louis	Bankruptcy	2019
<b>TUETH KEENEY</b>					
\$300	James Layton	Of Counsel	St. Louis	First Amendment Litigation	2018
<b>WALTERS BENDER STROHBEHN &amp; VAUGHAN</b>					
\$725	Thomas Bender	Partner	Kansas City	Class Action/MDL	2019
\$525	Dirk Hubbard	Of Counsel	Kansas City	Class Action/MDL	2019
\$400	Brett Milbourn	Partner	Kansas City	Class Action/MDL	2019
\$400	Karen Renwick	Partner	Kansas City	Class Action/MDL	2019
\$250	Brooke Blake	Associate	Kansas City	Class Action/MDL	2019
\$250	Michael Sichter	Associate	Kansas City	Class Action/MDL	2019
\$250	Patrick McAndrews	Associate	Kansas City	Class Action/MDL	2019
\$125	Sarah Stevens	Paralegal	Kansas City	Class Action/MDL	2019
\$125	Sarah Varney	Paralegal	Kansas City	Class Action/MDL	2019
<b>WHITE, GRAHAM, BUCKLEY &amp; CARR</b>					
\$475	Gene Graham	Partner	Independence	Employment	2019
<b>WHITEHEAD LAW FIRM</b>					
\$370	Michael Whitehead	Principal	Lee's Summit	First Amendment Litigation	2018
\$300	Jonathan Whitehead	Partner	Lee's Summit	First Amendment Litigation	2018
<b>WIRKIN LAW FIRM</b>					
\$300	Christopher Wirkin	Partner	Kansas City	Slander of Title Action	2018
<b>WITHERSPOON LAW GROUP</b>					
\$350	Nuru Witherspoon	Partner	St. Louis	Wrongful Death	2019

**OUT-OF-STATE**

RATE / HOUR	NAME	TITLE	CITY	PRACTICE AREA	YEAR
<b>POLSINELLI</b>					
\$420	Brenna A. Dolphin	Associate	Wilmington, Delaware	Bankruptcy	2019
<b>SIMMONS HANLY CONROY</b>					
\$950	Paul Hanly	Partner	New York	Class Action/MDL	2019
\$950	Jayne Conroy	Partner	New York	Class Action/MDL	2019
\$950	Andrea Bierstein	Partner	New York	Class Action/MDL	2019
\$400	Ellyn Hurd	Associate	New York	Class Action/MDL	2019
<b>SPENCER FANE</b>					
\$325	Mary Bacon	Associate	Las Vegas	Federal Trade Commission Act	2018
<b>STINSON LEONARD STREET</b>					
\$670	Scott Roberts	Partner	Decatur, Illinois	Class Action/MDL	2019
\$590	Joel Leviton	Partner	Minneapolis	Class Action/MDL	2019

For more rates of out-of-state attorneys who did work in Missouri in the last year, please visit us online at [molawyersmedia.com](http://molawyersmedia.com).



# MISSOURI LAWYERS MEDIA DIVERSITY & INCLUSION

## August 9, 2019

Awards Luncheon | Sheraton Westport Lakeside Chalet

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**Bryan Cave  
Leighton Paisner**

**Charlie Harris Jr.**  
Seyferth Blumenthal & Harris

**Dan Cranshaw**  
Polsinelli

**Dowd Bennett LLP**

**J. Danielle Carr**  
Mound City Bar Association

**Lisa D'Souza**  
Legal Services of Eastern  
Missouri

**Martha Charepoo**  
Baker Sterchi Cowden & Rice

**Mickes O'Toole, LLC**

**Narcisa Przulj**  
Sandberg Phoenix & von  
Gontard

**Patricia Llanos**  
Brown & Crouppen

**Pete Woods**  
Haar & Woods

**Sheena Hamilton**  
Dowd Bennett LLP

**Stephanie Hosler**  
Bryan Cave Leighton Paisner

**Teresa Young**  
Brown & James

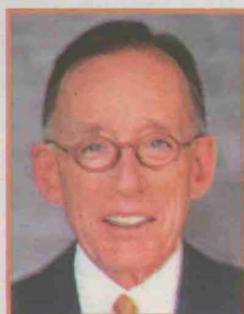
**Vincent D. Reese**  
Mickes O'Toole, LLC

**Polsinelli**

**Pamela Meanes**  
Thompson Coburn

**Luz Maria  
Henriquez**  
Legal Services of Eastern  
Missouri

**Nicole Colbert-  
Botchway**  
22nd Judicial Circuit



**Featured Speaker:**  
**Judge Lawrence  
E. Mooney**

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# **EXHIBIT F**

# ***A Flash Report on the 2017 Economics of Law Practice Survey in Kansas***

## **Summary of Key Findings**

September, 2017

### **INTRODUCTION**

During the spring of 2017, The Kansas Bar Association surveyed the legal community on the economics of law practice considering similar studies undertaken in 2012, 2005 and 1997. The objectives of all studies were to derive and report the following:

- Demographics of practicing attorneys, including views on economic sentiment
- Attorney 2016 taxable income arrayed by practice class, gender, field of law, office location, full- vs. part-time status, years in practice and firm size
- Associate, legal assistant, and secretary 2017 annual compensation by years of experience (tenure) and office location
- Prevailing average 2017 hourly billing rates for attorneys arrayed by a variety of indicators, and for legal assistants by years of experience, firm size and office location
- Attorney time allocated to billable and non-billable professional activities in 2017
- Fixed expense and gross revenues per attorney and overhead rates associated with maintaining a private law practice by office location and firm size in 2016

### ***Methods and Measures***

Results are based on two confidential survey instruments (questionnaires) e-mailed to approximately **10,000 active, in-state attorneys, regardless of KBA membership status.**

The two targeted groups of attorneys are private practitioners (PPs) and non-private practitioners (NPPs). The data obtained from approximately 935 usable returned questionnaires were analyzed and this report produced by the Applied Statistics Laboratory of Ann Arbor, Michigan. Please contact Dr. Lawrence Stiffman at (734) 417-5151 or e-mail him at [aslinfo@aol.com](mailto:aslinfo@aol.com) for assistance in interpreting findings. There is no charge for this service.

To help practitioners interpret the information provided in many exhibits in this report, here is a brief discussion of measures of central tendency (mean and median) and dispersion (spread).

## Measures of Central Tendency

The mean (also called the average or arithmetic average) is calculated by adding the values of all responses, then dividing by the number of responses.

*Example:* Three responses – 1, 2 and 3 – are reported. The average is calculated by adding their values ( $1 + 2 + 3 = 6$ ), then dividing by the number of responses (3). Thus, the average is  $6 \div 3 = 2$ .

The median is the middle value of a series (distribution) of values, which is initially rank-ordered (from low to high or *vice versa*). By definition, half the numbers are greater and half are less than the median. Both mean and median values are used throughout this survey report to denote the measure of central tendency. Use of the median as a statistic for central tendency reduces the effect of “outliers” (extremely high or low values, such as 30), while the average does not.

*Example:* Three responses – 1, 2 and 30 – are reported. The *average* of this same distribution is 33 divided by 3 = 11. The *median* is the middle number of the order of distribution (1, 2, and 30) or 2.

## Measures of Dispersion (Spread)

The dispersion of data around the median (the 50<sup>th</sup> percentile) generally is based on 3 values:

25th percentile (lower quartile) One-fourth of the values are less and three-fourths are more than this value

75th percentile (upper quartile) Three-fourths of the values are less and one-fourth is more than this value

95th percentile Ninety-five percent of the values are less and five percent are more than this value

## An Example

**Exhibit 1** summarizes distributions of 2016 taxable incomes of Kansas private practitioners by nine practice classes reported by 482 survey respondents (denoted by *Valid N*). By convention, this and many subsequent exhibits provide percentile information offering five data points – the 25th, 50th (Median), the mean, the 75th and 95th percentiles – on the variable of interest (taxable income in this case). For example, 25% of all associates report earning less than \$54,000, half earn less than \$66,500, while half earn more than \$66,500 and 25% earn more than \$85,000. Observe that the median values are less than the mean values due to the influence of high income outliers influencing mean (average) values.

**EXHIBIT 1**  
**DISTRIBUTION OF 2016 PRIVATE PRACTITIONER TAXABLE INCOME BY PRACTICE CLASSIFICATION, KANSAS**

<b>Practice Classification</b>	<b>Valid N</b>	<b>25th Percentile</b>	<b>Median</b>	<b>Mean</b>	<b>75th Percentile</b>	<b>95th Percentile</b>
Associate	58	\$54,000	\$66,500	\$73,325	\$85,000	\$136,000
Equity Partner/Shareholder	114	\$115,000	\$179,500	\$237,653	\$275,000	\$600,000
Managing Partner	51	\$83,000	\$166,000	\$199,941	\$235,000	\$600,000
Non-Equity Partner	14	\$100,000	\$156,000	\$174,857	\$215,000	\$450,000
Of Counsel	20	\$62,000	\$90,500	\$100,681	\$137,500	\$225,000
Senior Associate	22	\$61,000	\$81,250	\$81,614	\$100,000	\$130,000
Sole Practitioner sharing space	22	\$60,000	\$80,000	\$135,682	\$157,000	\$300,000
Sole Practitioner, with office outside of home	123	\$60,000	\$100,000	\$155,075	\$140,000	\$400,000
Sole Practitioner, working out of home office	44	\$20,000	\$37,250	\$51,674	\$65,000	\$150,000
<b>Total</b>	<b>482</b>	<b>\$60,000</b>	<b>\$100,000</b>	<b>\$152,746</b>	<b>\$175,000</b>	<b>\$379,890</b>

To denote the “gender gap” of reported attorney incomes, the term “gap” is used as a proportion calculated as the *median value of one group divided by another group*. For example, a reported income of \$75,000 for a group of hypothetical female attorneys divided by \$100,000 for a like group of male attorneys yields the proportion of .75. This could be interpreted in plain English as: *This group of females earns “75 cents on the dollar” compared with their male counterparts.*

This report should be considered and used in its entirety only in order to avoid misconstruing the meaning of individual exhibits. Personnel planning and decision-making include many factors not covered in surveys of this scope or nature. However, this report provides ranges of values that can help in developing sound and equitable hiring and compensation policies

## AN OVERVIEW OF KEY FINDINGS

### Demographics of Survey Respondents

The typical **private practitioner** is 49 years of age and the typical **non-private practitioner** is 47 years old. The average **male** attorney is 53 years of age while the average **female** attorney is 47 years of age. Females represent 33% of private practice respondents while representing 51% of all non-private practitioners. About 86% of private practitioners work full-time, compared with 95% of all non-private practitioners. Private practitioners have been in practice for 23 years and non-private practitioners, 20 years. See **Exhibits 2 and 3**.

**EXHIBIT 2**  
**MEDIAN AND MEAN (AVERAGE) AGE OF KANSAS SURVEY RESPONDENTS BY GENDER AND WORK-STATUS, 2017**

Category	Private Practitioners				Non- Private Practitioners			
	Valid N	% of Total	Median Age	Mean Age	Valid N	% of Total	Median Age	Mean Age
Female, working full-time (>31 hours/week)	138	27.1%	45	45	198	47.6%	46	46
Female, working part-time (<32 hours/week)	29	5.7%	58	57	13	3.1%	53	54
Male, working full-time (>31 hours/week)	302	59.3%	53	51	194	46.6%	50	50
Male, working part-time (<32 hours/week)	40	7.9%	69	65	10	2.4%	55	55
All Females	167	32.8%	46	47	211	50.8%	46	45
All Males	342	67.2%	55	53	204	49.2%	50	50
All Full-time Only	440	86.44%	49	49	392	94.5%	48	47
All Part-time Only	69	13.56%	65	62	23	5.5%	54	54
<b>All Attorneys</b>	<b>509</b>	<b>100%</b>	<b>51</b>	<b>51</b>	<b>415</b>	<b>100.0%</b>	<b>48</b>	<b>48</b>

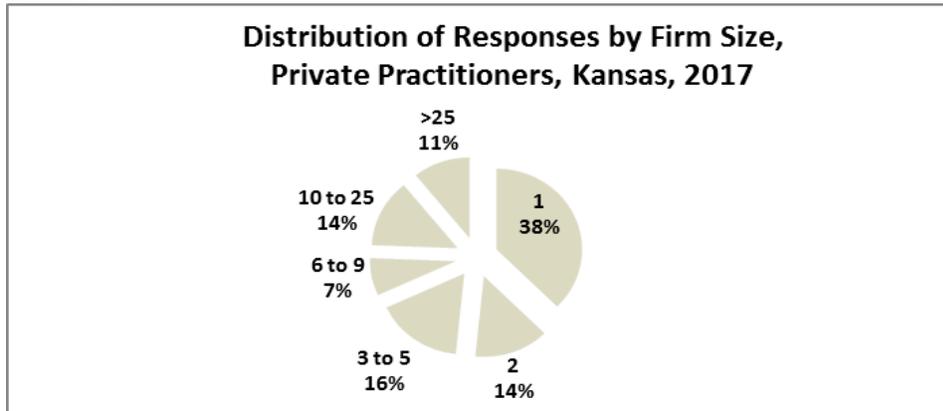
**EXHIBIT 3**

**MEDIAN AND MEAN (AVERAGE) YEARS IN PRACTICE OF KANSAS SURVEY RESPONDENTS BY GENDER AND WORK-STATUS, 2017**

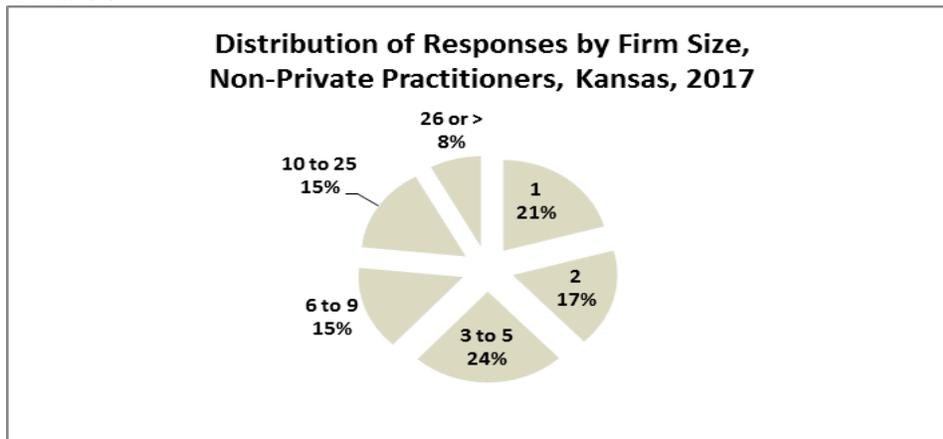
Category	Private Practitioners				Non- Private Practitioners			
	Valid N	% of Total	Median	Mean	Valid N	% of Total	Median	Mean
Female,working full-time (>31 hours	137	26.7%	14	16	198	47.6%	17	16
Female,working part-time (<32 hour	28	5.4%	27	24	13	3.1%	25	28
Male,working full-time (>31 hours/w	301	58.6%	25	24	194	46.6%	22	22
Male,working part-time (<32 hours/	40	7.8%	41	37	10	2.4%	29	31
All Females	165	32.6%	17	17	211	50.8%	18	16
All Males	341	67.4%	27	26	204	49.2%	22	22
All Full-time Only	438	86.6%	22	22	392	94.5%	20	19
All Part-time Only	68	13.4%	34	34	23	5.5%	27	26
<b>All Attorneys</b>	<b>506</b>	<b>100.0%</b>	<b>23</b>	<b>23</b>	<b>415</b>	<b>100.0%</b>	<b>20</b>	<b>19</b>

**Exhibits 4 and 5** distribute survey respondents by firm size groups, measured by number of attorneys. Half of all respondents work as solos or in two-person firms. About 32% of private practitioners and 38% of non-private practitioners work in organizations with 6 or more attorneys.

**Exhibit 4**



**Exhibit 5**



## **Summary of Changes between 2017/2016 and the 2004/2005 Reporting Periods**

The 2017 survey replicates many questions addressed in previous surveys, facilitating analyses of change over time. Reporting periods are represented by two intervals: 2004/2005 to 2011/2012 and 2011/2012 to 2016/2017. Different attorneys responded to the questionnaires for each of the time periods. **Exhibit 6** summarizes changes over time.

### **Demographics**

The attorney population aged slightly between reporting periods, reflected by both age and years-in-practice statistics. More attorneys, primarily males, are delaying retirement even though more young attorneys are entering the field. The proportion of the Bar that is female slowed to 3% during the second period compared with a 10% in the first period.

### **Hours, Income and Billing Rates**

Both total and billable reported hours worked per week decreased during the initial reporting periods, with no change in billable hours /week in the second period. Total hours did increase slightly (4.3%).

Initially, Incomes increased because of an increase in hourly billing rates, not time billed. Considering the first period, for both attorney net income (up 4% per annum) and average hourly billing rates (up 5% per annum), annual percent increases were slightly higher than inflation. In the second period, income dropped considerable to (0.6% per annum) and billing rates to 3% per annum. Associate and legal assistant billing rate increases also ranged from 3.3% to 5% per annum, depending on tenure in the first period and all dropped in the second period, reflecting less pricing power.

### **Revenues and Expenses**

Overhead basically remained constant, With respect to labor expenditures, even as associate, legal assistant and secretary unit labor costs decreased. Prices reflect relative scarcity as both skilled and unskilled support staff are becoming more mobile and can participate in more than one service sector (legal services, financial services, accounting, consulting, etc.) Other fixed expenses dropped in the second period.

**EXHIBIT 6****CHANGES IN ECONOMIC INDICATORS, KANSAS PRIVATE PRACTITIONERS, 1996- 2017**

	2016/17	2011/12	2004/5	% Change 2004-2011	Annual % chg. 2004- 2011	% Change 2011-2016	Annual % chg. 2011- 2016
<b>Respondent Demographics</b>							
Age	52	49	48	2.1%	0.3%	6%	1%
Years in Practice	23	20	18	11.1%	1.6%	15%	3%
% Female	33	32	29	10.3%	1.5%	3%	1%
Attorney Net Income	\$100,000	\$90,000	\$84,000	7.1%	1.0%	11%	2%
<b>Hours Worked</b>							
Billable Hours	35	35	35	0.0%	0.0%	0%	0%
Total Hours	47	48	46	4.3%	0.6%	-2%	0%
CLE Hours/Year	15	15	15	0.0%	0.0%	0%	0%
Pro Bono Hours/Year	20	30	40	-25.0%	-3.6%	-33%	-7%
							0%
<b>Hourly Billing Rate</b>	\$225	\$200	\$150	33.3%	4.8%	13%	3%
<b>Fixed Expenses &amp; Gross Revenues/attorney</b>							
Labor Costs	\$50,000	\$44,500	\$30,000	48.3%	6.9%	12%	2%
Occupancy Costs	\$13,150	\$11,000	\$11,000	0.0%		20%	4%
Other Fixed Costs	\$15,000	\$14,000	\$20,000	-30.0%	-4.3%	7%	1%
Total Expenses	\$63,500	\$60,000	\$59,250	1.3%	0.2%	6%	1%
Gross Revenues	\$190,000	\$180,000	\$150,000	20.0%	2.9%	6%	1%
Overhead Rate ( in %)	40%	40%	40%	0.0%		0%	0%
<b>Private Firm Annual Salaries</b>							
Associates, no Exp	\$56,000	\$55,500	\$45,000	23.3%	3.3%	1%	1%
Associates, 3 yrs	\$70,000	\$68,000	\$55,000	23.6%	3.4%	3%	0%
Associates, 5 yrs	\$76,000	\$75,000	\$65,000	15.4%	2.2%	1%	-3%
Associates, 10 yrs	\$85,000	\$97,500	\$78,500	24.2%	3.5%	-13%	1%
Legal Assistants, no exp	\$30,000	\$28,500	\$25,000	14.0%	2.0%	5%	2%
Legal Assistants, 3 yrs	\$35,000	\$32,250	\$32,000	0.8%	0.1%	9%	3%
Legal Assistants, 5 yrs	\$40,000	\$35,000	\$35,000	0.0%	0.0%	14%	2%
Legal Assistants, 10 yrs	\$48,000	\$43,000	\$40,000	7.5%	1.1%	12%	3%
Secretaries, no Exp	\$25,000	\$22,000	\$21,000	4.8%	0.7%	14%	3%
Secretaries, 3 yrs	\$30,000	\$26,000	\$25,000	4.0%	0.6%	15%	3%
Secretaries, 5 yrs	\$35,000	\$30,000	\$28,800	4.2%	0.6%	17%	3%
Secretaries,10 yrs	\$40,000	\$35,000	\$30,000	16.7%	2.4%	14%	0%
<b>Assoc. &amp; LA Billing Rates</b>							
Associates, no Exp	\$160	\$150	\$125	20.0%	2.9%	7%	1%
Associates, 3 yrs	\$180	\$175	\$150	16.7%	2.4%	3%	1%
Associates, 5 yrs	\$200	\$180	\$165	9.1%	1.3%	11%	2%
Associates, 10 yrs	\$200	\$200	\$160	25.0%	3.6%	0%	0%
Legal Assistants, no exp	\$75	\$75	\$55	36.4%	5.2%	0%	0%
Legal Assistants, 3 yrs	\$85	\$75	\$65	15.4%	2.2%	13%	3%
Legal Assistants, 5 yrs	\$90	\$85	\$65	30.8%	4.4%	6%	1%
Legal Assistants, 10 yrs	\$90	\$85	\$75	13.3%	1.9%	6%	1%

## 2016 Taxable Income of Kansas Attorneys

While many factors affect attorney income, clues to explain variation at a given point in time can be derived from combinations of these seven factors addressed in the survey and summarized in this section of the report:

- Practice classification (class)
- Field of law
- Years in practice
- Gender
- Firm size (number of attorneys in firm/organization)
- Office location
- Work status (full-time vs. part-time)

Selected factors are summarized below. See full report for remaining displays.

### EXHIBIT 7 DISTRIBUTION OF 2016 TAXABLE INCOME, FULL-TIME KANSAS PRIVATE PRACTITIONERS

	Valid N	25th Percentile	Median	Mean	75th Percentile	95th Percentile
Associate	57	\$55,000	\$67,000	\$73,874	\$85,000	\$136,000
Equity Partner/Shareholder	110	\$120,000	\$185,000	\$241,841	\$290,000	\$600,000
Managing Partner	47	\$83,000	\$165,000	\$197,297	\$235,000	\$600,000
Non-Equity Partner	11	\$100,000	\$180,000	\$191,182	\$270,000	\$450,000
Of Counsel	13	\$75,000	\$130,000	\$125,231	\$162,000	\$250,000
Senior Associate	19	\$66,000	\$82,500	\$83,921	\$100,000	\$160,000
Sole Practitioner sharing space	19	\$60,000	\$80,000	\$150,158	\$165,000	\$900,000
Sole Practitioner, with office outside of home	103	\$65,000	\$105,000	\$166,604	\$150,000	\$400,000
Sole Practitioner, working out of home office	17	\$38,000	\$54,000	\$65,647	\$75,000	\$210,000
<b>Total</b>	<b>396</b>	<b>\$68,375</b>	<b>\$110,000</b>	<b>\$166,599</b>	<b>\$185,000</b>	<b>\$400,000</b>

### Exhibit 8 DISTRIBUTION OF 2016 TAXABLE INCOME, FULL-TIME KANSAS NON-PRIVATE PRACTITIONERS

	Valid N	25th Percentile	Median	Mean	75th Percentile	95th Percentile
In-House Counsel (For-profit organization)	117	\$88,000	\$145,000	\$160,494	\$200,000	\$338,000
Corporate Counsel ( Not for profit org.)	24	\$58,500	\$90,500	\$123,570	\$158,000	\$300,000
City/County Agency	56	\$60,000	\$70,000	\$80,895	\$92,500	\$147,000
State Agency	58	\$60,000	\$68,000	\$71,468	\$80,000	\$120,000
Federal Agency	35	\$100,000	\$125,000	\$124,081	\$155,000	\$187,000
Legal Services Agency	13	\$45,000	\$47,500	\$63,731	\$60,000	\$155,000
Court System	22	\$65,000	\$88,500	\$92,818	\$120,000	\$136,000
Not in Practice, but Working	11	\$0	\$5,000	\$37,273	\$80,000	\$125,000
Law Clerk	16	\$53,000	\$79,234	\$83,529	\$105,000	\$150,000
<b>Total</b>	<b>352</b>	<b>\$62,000</b>	<b>\$87,300</b>	<b>\$110,263</b>	<b>\$136,000</b>	<b>\$240,285</b>



**EXHIBIT 10**  
**DISTRIBUTION OF 2016 NON-PRIVATE PRACTITIONER TAXABLE INCOME BY**  
**PRIMARY FIELD OF LAW, RANKED BY FREQUENCY**

	Valid N	25th Percentile	Median	Mean	75th Percentile	95th Percentile
Governmental Law	53	\$63,000	\$80,000	\$90,088	\$114,000	\$174,000
Corporate/Business Law	48	\$80,000	\$118,500	\$146,526	\$198,000	\$325,000
Criminal (Prosecution)	37	\$56,000	\$65,000	\$75,502	\$88,000	\$150,000
Unspecified	35	\$52,000	\$115,000	\$110,886	\$150,000	\$300,000
Administrative Law	33	\$57,200	\$67,000	\$93,837	\$102,000	\$240,000
Insurance	24	\$75,000	\$121,500	\$125,348	\$182,500	\$225,000
Appellate Law	15	\$52,000	\$60,000	\$70,439	\$80,000	\$137,123
Family Law	15	\$43,000	\$50,000	\$53,846	\$65,000	\$92,000
Labor & emp. (Management)	13	\$80,000	\$125,000	\$114,997	\$137,000	\$200,000
General Practice	12	\$66,734	\$135,500	\$172,539	\$188,000	\$700,000
Taxation	11	\$70,000	\$120,000	\$108,364	\$150,000	\$200,000
Criminal (Public Defendant)	10	\$54,000	\$64,000	\$68,200	\$80,000	\$110,000
Real Estate	10	\$125,000	\$181,500	\$197,600	\$300,000	\$338,000
Health and Hospital Law	9	\$70,000	\$158,153	\$175,461	\$230,000	\$530,000
Collections, Creditor	6	\$61,000	\$68,500	\$68,167	\$75,000	\$75,000
Civil Rights	5	\$87,000	\$90,000	\$95,100	\$106,000	\$110,000
Other Civil Law	5	\$56,000	\$60,000	\$65,600	\$100,000	\$112,000
Other Trial Practice (Gen./Civil)	5	\$80,000	\$85,000	\$74,200	\$100,000	\$106,000
Construction Law	4	\$100,000	\$147,500	\$137,500	\$175,000	\$180,000
Oil & Gas	4	\$75,000	\$120,000	\$147,000	\$219,000	\$288,000
Securities	4	\$32,500	\$147,500	\$136,250	\$240,000	\$250,000
Wills, Estates and Probate	4	\$67,000	\$78,500	\$80,116	\$93,233	\$103,465
<b>Total</b>	<b>362</b>	<b>\$60,000</b>	<b>\$85,000</b>	<b>\$108,220</b>	<b>\$135,000</b>	<b>\$250,000</b>
<b>Consolidated Groups of Non-Private Practitioners</b>						
	Valid N	25th Percentile	Median	Mean	75th Percentile	95th Percentile
City/County Agency	59	\$60,000	\$69,000	\$78,709	\$92,000	\$147,000
State Agency	61	\$59,000	\$67,000	\$69,560	\$80,000	\$116,000
Federal Agency	35	\$100,000	\$125,000	\$124,081	\$155,000	\$187,000
In-house Counsel	143	\$78,000	\$128,000	\$153,080	\$200,000	\$325,000
Legal Services Agency	13	\$45,000	\$47,500	\$63,731	\$60,000	\$155,000
Law Clerk	17	\$52,000	\$73,468	\$81,557	\$100,000	\$150,000
Court System	22	\$65,000	\$88,500	\$92,818	\$120,000	\$136,000
Other, unemployed, retired	22	\$0	\$12,500	\$54,364	\$80,000	\$160,000
<b>Total</b>	<b>372</b>	<b>\$60,000</b>	<b>\$85,500</b>	<b>\$109,068</b>	<b>\$135,500</b>	<b>\$250,000</b>

## Taxable Income by Office Location

**Exhibits 11 and 12** display 2016 taxable income of Kansas private and non-private practitioners by office location.

### EXHIBIT 11

#### DISTRIBUTION OF 2016 PRIVATE PRACTITIONER TAXABLE INCOME BY OFFICE LOCATION

Office Location	Valid N	25th Percentile	Median	Mean	75th Percentile	95th Percentile
Central & North Central, KS	32	\$42,500	\$70,000	\$95,375	\$120,000	\$350,000
Kansas City, KS	124	\$69,000	\$112,500	\$168,191	\$158,500	\$375,000
Kansas City, MO	74	\$80,000	\$150,000	\$199,699	\$250,000	\$600,000
Lawrence/Douglas County	22	\$60,000	\$120,000	\$128,557	\$190,000	\$260,000
Northeast KS	16	\$47,500	\$79,000	\$93,500	\$135,000	\$200,000
Out of state licensed in KS	30	\$50,000	\$76,500	\$196,667	\$162,000	\$900,000
Southcentral KS	26	\$40,000	\$67,500	\$100,899	\$175,000	\$240,000
Southeast KS	15	\$72,000	\$85,000	\$136,667	\$175,000	\$400,000
Topeka/Shawnee County	50	\$61,000	\$97,500	\$149,343	\$130,000	\$450,000
West KS	14	\$54,000	\$70,000	\$102,429	\$125,000	\$275,000
Wichita/Sedgwick County	78	\$65,000	\$100,000	\$142,045	\$190,000	\$350,000
<b>Total</b>	<b>482</b>	<b>\$60,000</b>	<b>\$100,000</b>	<b>\$152,746</b>	<b>\$175,000</b>	<b>\$379,890</b>

### EXHIBIT 12

#### Distribution of 2016 Non-Private Practitioner Taxable Income by Office Location

Office Location	Valid N	25th Percentile	Median	Mean	75th Percentile	95th Percentile
Central KS	28	\$66,000	\$80,000	\$92,956	\$113,888	\$144,000
Kansas City, KS	63	\$72,000	\$115,000	\$122,585	\$172,000	\$240,285
Kansas City, Mo	36	\$67,714	\$118,432	\$127,958	\$169,000	\$288,000
Lawrence/Douglas County	11	\$56,000	\$80,000	\$86,574	\$120,000	\$210,000
Northeast KS	19	\$55,000	\$76,000	\$89,474	\$120,000	\$185,000
Out of state licensed in Kansas	43	\$75,000	\$120,000	\$124,702	\$187,000	\$300,000
Southeast KS	7	\$26,000	\$62,000	\$80,269	\$64,500	\$275,000
Topeka/Shawnee County	108	\$58,450	\$71,000	\$84,923	\$94,500	\$175,000
West KS	6	\$55,000	\$60,000	\$61,833	\$61,000	\$90,000
Wichita/Sedgwick County	63	\$60,000	\$92,000	\$132,500	\$150,000	\$450,000
<b>Total</b>	<b>387</b>	<b>\$60,000</b>	<b>\$85,000</b>	<b>\$108,220</b>	<b>\$135,000</b>	<b>\$250,000</b>



## Gender Variations in 2016 Taxable Income

When considering the practice classification of the survey respondents, median income for Male attorney incomes exceed female attorney income. Gaps are narrow for associates (Exhibit 13) and among local and state government workers and the judiciary (Exhibit 14).

EXHIBIT 13

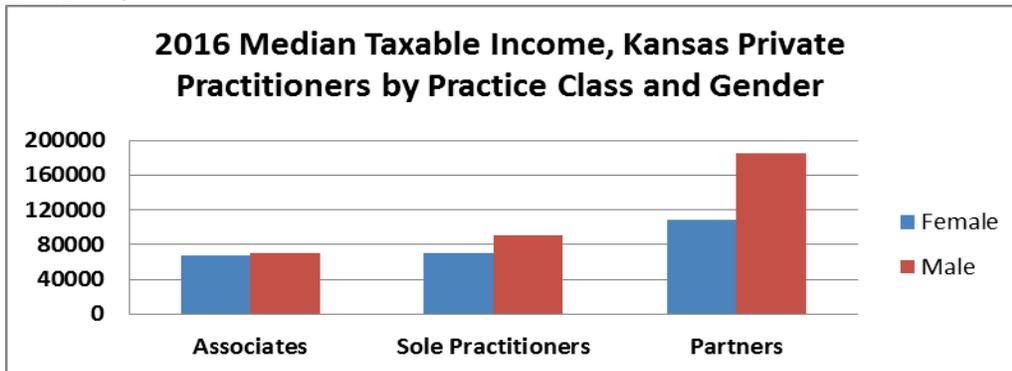
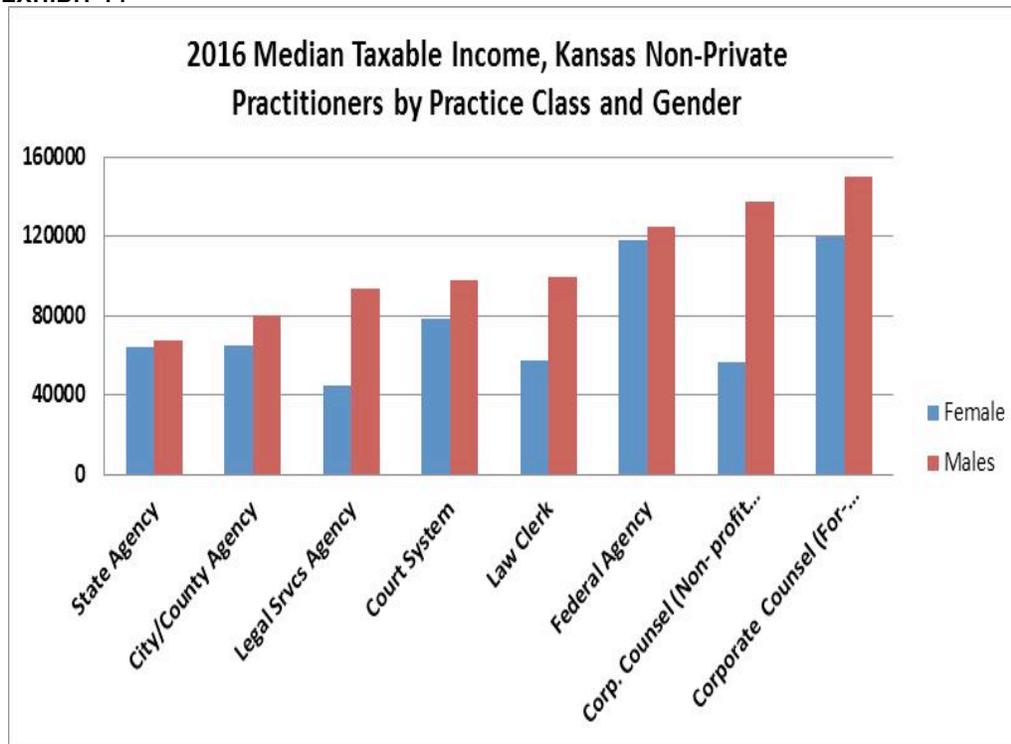
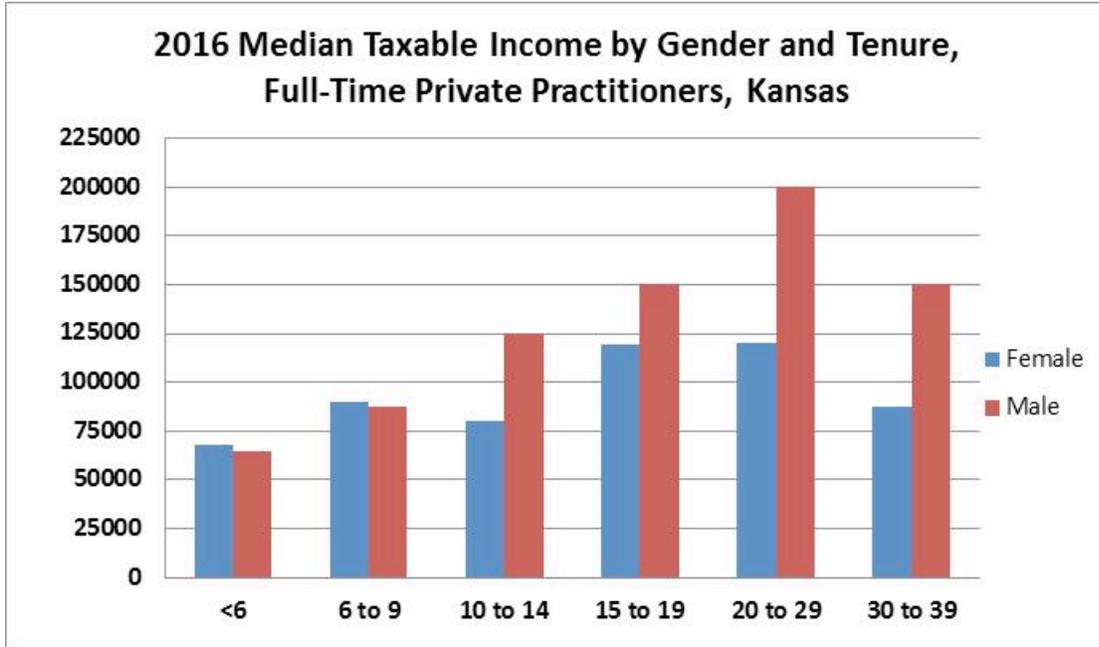


EXHIBIT 14

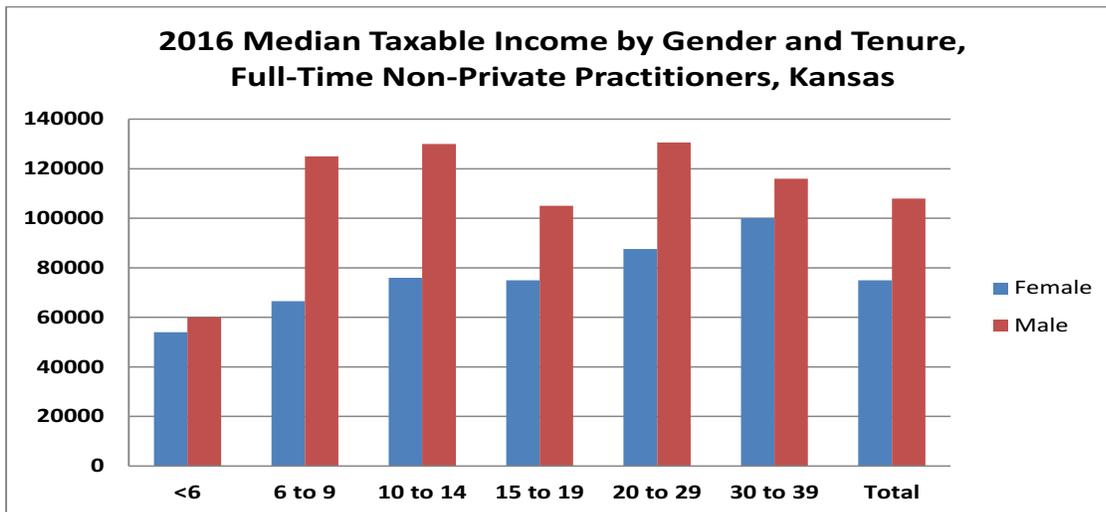


**FULL-TIME PRACTITIONERS BY YEARS IN PRACTICE**

**EXHIBIT 15**



**EXHIBIT 16**



As shown on **Exhibit 17**, the 2016 median net income for female private practitioners (\$75,000) is 63% of the 2016 median net income for male attorneys (\$120,000). **Exhibit 18** reflects the “gap” for full-time private practitioners (65% or \$130,000 for males versus \$85,000 for females).

**EXHIBIT 17****2016 MEDIAN TAXABLE INCOME BY YEARS IN PRACTICE AND GENDER AND RESULTANT “GENDER GAP”, KANSAS PRIVATE PRACTITIONERS**

Years in Practice	Valid N	Female	Valid N	Male	Gap
<6	28	\$67,000	38	\$62,500	1.07
6 to 9	18	\$89,500	25	\$85,000	1.05
10 to 14	22	\$67,500	26	\$127,500	0.53
15 to 19	15	\$101,000	24	\$150,000	0.67
20 to 29	40	\$94,100	66	\$195,000	0.48
30 to 39	23	\$54,000	77	\$150,000	0.36
<b>Total</b>	<b>149</b>	<b>\$75,000</b>	<b>320</b>	<b>\$120,000</b>	<b>0.63</b>

**EXHIBIT 18****2016 MEDIAN TAXABLE INCOME BY YEARS IN PRACTICE AND GENDER AND RESULTANT “GENDER GAP”, KANSAS FULL-TIME PRIVATE PRACTITIONERS**

Years in Practice	Valid N	Female	Valid N	Male	Gap
<6	27	\$68,000	36	\$65,000	1.05
6 to 9	17	\$90,000	24	\$87,500	1.03
10 to 14	18	\$80,000	25	\$125,000	0.64
15 to 19	13	\$119,000	24	\$150,000	0.79
20 to 29	33	\$120,000	57	\$200,000	0.60
30 to 39	16	\$87,500	72	\$150,000	0.58
<b>Total</b>	<b>124</b>	<b>\$85,000</b>	<b>280</b>	<b>\$130,000</b>	<b>0.65</b>

As shown on **Exhibit 19**, the 2016 median net income for female non-private practitioners (\$73,468) is 67% of the 2016 median net income for male non-private (\$109,000). **Exhibit 20** reflects the “gap” for full-time non-private practitioners (69% or \$108,000 for males versus \$75,000 for females).

**EXHIBIT 19****2016 MEDIAN TAXABLE INCOME BY YEARS IN PRACTICE GROUP AND GENDER AND RESULTANT “GENDER GAP”, KANSAS NON-PRIVATE PRACTITIONERS**

Years in Practice	Valid N	Female	Valid N	Male	Gap
<6	34	\$53,500	30	\$60,000	0.89
6 to 9	20	\$66,500	15	\$125,000	0.53
10 to 14	32	\$75,500	19	\$125,000	0.60
15 to 19	25	\$73,468	21	\$105,000	0.70
20 to 29	47	\$85,000	39	\$125,000	0.68
30 to 39	30	\$99,000	44	\$114,500	0.86
<b>Total</b>	<b>191</b>	<b>\$73,468</b>	<b>192</b>	<b>\$109,000</b>	<b>0.67</b>

## EXHIBIT 20

**2016 MEDIAN TAXABLE INCOME BY YEARS IN PRACTICE GROUP AND GENDER AND RESULTANT “GENDER GAP”, KANSAS FULL-TIME NON-PRIVATE PRACTITIONERS**

Years in Practice	Valid N	Female	Valid N	Male	Gap
<6	33	\$54,000	29	\$60,000	0.90
6 to 9	20	\$66,500	15	\$125,000	0.53
10 to 14	31	\$76,000	17	\$130,000	0.58
15 to 19	22	\$75,000	21	\$105,000	0.71
20 to 29	45	\$87,600	38	\$130,568	0.67
30 to 39	27	\$100,000	43	\$116,000	0.86
<b>Total</b>	<b>179</b>	<b>\$75,000</b>	<b>184</b>	<b>\$108,000</b>	<b>0.69</b>

**2017 Law Firm Hours Worked and Billing Rates****Hours worked in Average Work Week**

Attorneys in private practice report a varied workweek as to billable hours and other activities comprising their professional time. **Exhibit 21** shows the range of time spent on nine activities.

## EXHIBIT 21

**DISTRIBUTION OF HOURS IN AVERAGE WORKWEEK & CLE AND PRO BONO WORK (ESTIMATED) IN YEAR, PRIVATE PRACTITIONERS, 2017**

Hours in Average Workweek and Workyear	Valid N	25th Percentile	Median	Mean	75th Percentile	95th Percentile
Hours Based on Hourly Rate	441	15	25	24	35	45
Hours Based on Flat Rates	257	5	10	13	20	40
Hours Based on Contingent Fees	184	5	10	17	30	49
<b>Total Compensable Hours</b>	<b>438</b>	<b>25</b>	<b>35</b>	<b>34</b>	<b>40</b>	<b>55</b>
Office Administration	426	3	5	6	10	15
Marketing	259	1	2	3	5	10
Unbilled Public Service	334	2	4	5	5	10
Non-legal Employment	71	2	5	8	10	25
<b>Total Hours</b>	<b>465</b>	<b>40</b>	<b>47</b>	<b>46</b>	<b>55</b>	<b>69</b>
Pro Bono Hours per Year	450	5	20	40	40	150
CLE Hours per Year	458	14	15	19	20	40

## 2017 Attorney Hourly Billing Rates

The reported 2017 median hourly billing rate is \$225. The mean or average rate is \$244. While several interacting factors affect the setting of hourly billing rates, **Exhibit 22** considers office location. **Exhibit 23** includes three discrete factors: respondents' firm size, years in practice, and practice category, while **Exhibit 24** identifies respondents' primary field of law.

### EXHIBIT 22

#### DISTRIBUTION OF 2017 HOURLY BILLING RATES BY OFFICE LOCATION, KANSAS

	Valid N	25th Percentile	Median	Mean	75th Percentile	95th Percentile
Kansas City, KS	126	\$200	\$250	\$261	\$300	\$425
Wichita/Sedgwick County	79	\$190	\$250	\$240	\$295	\$360
Kansas City, MO	73	\$200	\$265	\$291	\$350	\$500
Topeka/Shawnee County	47	\$200	\$225	\$236	\$250	\$500
Central & North Central, KS	34	\$150	\$183	\$195	\$250	\$350
Out of state licensed in KS	30	\$200	\$255	\$282	\$365	\$475
Southcentral KS	29	\$135	\$185	\$176	\$225	\$250
Lawrence/Douglas County	25	\$200	\$225	\$232	\$280	\$305
West KS	16	\$150	\$200	\$212	\$250	\$550
Northeast KS	15	\$175	\$200	\$187	\$220	\$260
Southeast KS	14	\$150	\$193	\$186	\$250	\$300
<b>Total</b>	<b>489</b>	<b>\$190</b>	<b>\$225</b>	<b>\$244</b>	<b>\$290</b>	<b>\$445</b>

**EXHIBIT 23**  
**DISTRIBUTION OF 2017 HOURLY BILLING RATES BY SIZE OF FIRM, YEARS IN PRACTICE, AND PRACTICE CLASSIFICATION, KANSAS**

	Valid N	25th Percentile	Median	Mean	75th Percentile	95th Percentile
1	179	\$150	\$200	\$209	\$250	\$350
2 to 5	146	\$195	\$225	\$257	\$275	\$500
6 to 14	69	\$175	\$240	\$237	\$280	\$350
15 or more	88	\$228	\$288	\$296	\$350	\$475
<b>Total</b>	<b>482</b>	<b>\$185</b>	<b>\$225</b>	<b>\$243</b>	<b>\$285</b>	<b>\$445</b>
<b>Years in Practice</b>	Valid N	25th Percentile	Median	Mean	75th Percentile	95th Percentile
<6	64	\$150	\$198	\$192	\$240	\$275
6 to 9	40	\$175	\$200	\$212	\$250	\$345
10 to 14	52	\$190	\$225	\$240	\$275	\$400
15 to 19	42	\$200	\$250	\$247	\$300	\$380
20 to 29	112	\$200	\$250	\$259	\$300	\$475
30 to 39	105	\$200	\$250	\$264	\$300	\$500
40 or >	69	\$200	\$250	\$259	\$300	\$500
<b>Total</b>	<b>484</b>	<b>\$188</b>	<b>\$225</b>	<b>\$244</b>	<b>\$293</b>	<b>\$445</b>
<b>Practice Class</b>	Valid N	25th Percentile	Median	Mean	75th Percentile	95th Percentile
Associate	58	\$150	\$198	\$201	\$225	\$300
Equity Partner/Shareholder	117	\$215	\$260	\$289	\$325	\$500
Managing Partner	54	\$200	\$250	\$269	\$300	\$500
Non-Equity Partner	13	\$250	\$300	\$295	\$310	\$475
Of Counsel	23	\$240	\$270	\$284	\$325	\$450
Senior Associate	21	\$200	\$220	\$239	\$260	\$365
Sole Practitioner sharing space	22	\$175	\$200	\$217	\$250	\$500
Sole Practitioner, outside of home	124	\$175	\$205	\$218	\$250	\$350
Sole Practitioner, working at home	47	\$150	\$200	\$196	\$250	\$400
<b>Total</b>	<b>489</b>	<b>\$190</b>	<b>\$225</b>	<b>\$244</b>	<b>\$290</b>	<b>\$445</b>
<b>Consolidated Practice Class</b>	Valid N	25th Percentile	Median	Mean	75th Percentile	95th Percentile
Sole Practitioners	194	\$175	\$200	\$212	\$250	\$400
Associates	80	\$160	\$200	\$213	\$250	\$358
Partners	206	\$215	\$260	\$283	\$315	\$475
<b>Total</b>	<b>480</b>	<b>\$185</b>	<b>\$225</b>	<b>\$243</b>	<b>\$285</b>	<b>\$448</b>

## Exhibit 24

**DISTRIBUTION OF 2017 HOURLY BILLING RATES BY PRIMARY FIELD OF LAW, KANSAS**

<b>Primary Field of Law</b>	<b>Valid N</b>	<b>25th Percentile</b>	<b>Median</b>	<b>Mean</b>	<b>75th Percentile</b>	<b>95th Percentile</b>
Family Law	79	\$185	\$200	\$220	\$250	\$350
Wills, Estates and Probate	56	\$195	\$228	\$233	\$263	\$345
Corporate/Business Law	31	\$215	\$250	\$267	\$300	\$475
General Practice	29	\$175	\$200	\$208	\$250	\$300
Personal Injury (Plaintiff)	27	\$200	\$300	\$368	\$500	\$650
Criminal (Private Defendant)	25	\$200	\$250	\$239	\$275	\$325
Other Trial Practice (Gen./Civ)	25	\$250	\$285	\$297	\$395	\$450
Other Trial Practice (Commer	19	\$250	\$295	\$327	\$400	\$550
Criminal (Public Defendant)	17	\$70	\$70	\$81	\$77	\$200
Labor & emp. (Management)	15	\$215	\$250	\$250	\$295	\$375
Real Estate	14	\$230	\$250	\$240	\$250	\$300
Elder Law	13	\$200	\$225	\$236	\$300	\$400
Personal Injury (Defendant)	11	\$150	\$175	\$180	\$195	\$310
Taxation	11	\$225	\$290	\$298	\$365	\$450
Bankruptcy, Debtor	9	\$200	\$225	\$237	\$300	\$310
Collections, Creditor	9	\$150	\$200	\$178	\$200	\$250
Oil and Gas	7	\$190	\$250	\$253	\$300	\$360
Workers' Compensation, Emp	7	\$130	\$135	\$138	\$150	\$155
Governmental Law	6	\$120	\$168	\$179	\$225	\$300
Insurance	6	\$150	\$190	\$195	\$225	\$275
Labor & emp. (Labor)	6	\$250	\$388	\$404	\$500	\$700
Alternative Dispute Resolutio	5	\$150	\$250	\$255	\$350	\$400
Immigration	5	\$200	\$275	\$279	\$375	\$395
Intellectual Property/Trade Se	5	\$260	\$310	\$279	\$325	\$445
Workers' Compensation, Emp	5	\$200	\$250	\$209	\$250	\$300
Construction Law	4	\$233	\$295	\$288	\$343	\$360
Consumer Law	4	\$150	\$225	\$225	\$300	\$350
Criminal (Prosecution)	4	\$93	\$143	\$129	\$165	\$180
Health and Hospital Law	4	\$243	\$285	\$329	\$415	\$520
Medical Malpractice (Defend	4	\$170	\$185	\$183	\$195	\$200
<b>Total</b>	<b>489</b>	<b>\$190</b>	<b>\$225</b>	<b>\$244</b>	<b>\$290</b>	<b>\$445</b>

**Hourly Billing Rates for Associates and Legal Assistants**

Hourly billing rates for associates and legal assistants are summarized by tenure in **Exhibit 25**.

## EXHIBIT 25

**2017 HOURLY BILLING RATES FOR ASSOCIATES AND LEGAL ASSISTANTS BY TENURE**

<b>Position and Tenure</b>	<b>Valid N</b>	<b>25th Percentile</b>	<b>Median</b>	<b>Mean</b>	<b>75th Percentile</b>	<b>95th Percentile</b>
<b>Associates</b>						
New	64	\$135	\$160	\$162	\$193	\$245
3 yrs exp.	71	\$150	\$180	\$186	\$215	\$275
5 yrs exp.	73	\$175	\$200	\$200	\$233	\$300
10 yrs exp.	66	\$175	\$200	\$215	\$250	\$347
<b>Legal Assistants</b>						
New	53	\$50	\$75	\$76	\$95	\$150
3 yrs exp.	65	\$65	\$85	\$83	\$100	\$150
5 yrs exp.	78	\$75	\$90	\$92	\$103	\$175
10 yrs exp.	103	\$75	\$90	\$102	\$120	\$200

**Attorney and Legal Assistant Billing Rates by Firm Size and Office Location**

Firm size and office location are associated with variations in associate billing rates, with tenure dominating that influence. See **Exhibit 26**.

## EXHIBIT 26

**2017 MEDIAN HOURLY BILLING RATES FOR ASSOCIATES BY FIRM SIZE AND OFFICE LOCATION BY YEARS OF EXPERIENCE**

<b>Size of Firm</b>	<b>New</b>		<b>3 yrs exp.</b>		<b>5 yrs exp.</b>		<b>10 yrs exp.</b>	
	<b>Valid N</b>	<b>Median</b>	<b>Valid N</b>	<b>Median</b>	<b>Valid N</b>	<b>Median</b>	<b>Valid N</b>	<b>Median</b>
1							5	\$175
2 to 5	18	\$150	27	\$200	27	\$200	24	\$200
6 to 14	22	\$150	19	\$160	30	\$183	18	\$200
15 or more	23	\$165	24	\$185	26	\$200	19	\$225
<b>All Firms</b>	<b>64</b>	<b>\$160</b>	<b>70</b>	<b>\$178</b>	<b>73</b>	<b>\$200</b>	<b>65</b>	<b>\$200</b>
<b>Office Location</b>	<b>New</b>		<b>3 yrs exp.</b>		<b>5 yrs exp.</b>		<b>10 yrs exp.</b>	
	<b>Valid N</b>	<b>Median</b>	<b>Valid N</b>	<b>Median</b>	<b>Valid N</b>	<b>Median</b>	<b>Valid N</b>	<b>Median</b>
Central & North Central, KS	4	\$173	2	\$198	3	\$215	5	\$200
Kansas City, KS	13	\$175	13	\$200	13	\$210	15	\$232
Kansas City, MO	9	\$195	11	\$215	14	\$233	8	\$263
Lawrence/Douglas County			4	\$185	5	\$185	3	\$240
Northeast KS	3	\$150	3	\$165	3	\$185	3	\$185
Out of state licensed in KS	6	\$170	8	\$210	10	\$223	6	\$223
Topeka/Shawnee County	8	\$150	9	\$175	7	\$200	11	\$200
Wichita/Sedgwick County	16	\$143	18	\$175	14	\$175	11	\$200
<b>Total</b>	<b>64</b>	<b>\$160</b>	<b>71</b>	<b>\$180</b>	<b>73</b>	<b>\$200</b>	<b>66</b>	<b>\$200</b>

Similarly, firm size and office location are associated with variations in legal assistant hourly billing rates. (**Exhibit 27**)

## EXHIBIT 27

**2017 MEDIAN HOURLY BILLING RATES FOR LEGAL ASSISTANTS BY FIRM SIZE AND OFFICE LOCATION BY YEARS OF EXPERIENCE**

Size of Firm	New		3 yrs exp.		5 yrs exp.		10 yrs exp.	
	Valid N	Median	Valid N	Median	Valid N	Median	Valid N	Median
1	3	\$40	4	\$108	6	\$93	14	\$95
2 to 5	18	\$63	27	\$75	30	\$75	38	\$83
6 to 14	15	\$75	18	\$78	23	\$90	27	\$100
15 or more	17	\$90	16	\$93	19	\$95	23	\$95
<b>Total</b>	<b>53</b>	<b>\$75</b>	<b>65</b>	<b>\$85</b>	<b>78</b>	<b>\$90</b>	<b>102</b>	<b>\$93</b>
Office Location	New		3 yrs exp.		5 yrs exp.		10 yrs exp.	
	Valid N	Median	Valid N	Median	Valid N	Median	Valid N	Median
Kansas City, MO	10	\$98	7	\$100	11	\$101	16	\$107
Lawrence/Douglas County	2	\$58	5	\$40	7	\$75	6	\$78
Northeast KS	3	\$40	3	\$50	3	\$75	3	\$75
Out of state licensed in KS	6	\$68	10	\$70	8	\$75	6	\$75
Southcentral KS					5	\$90	6	\$90
Topeka/Shawnee County	6	\$65	5	\$75	6	\$80	11	\$80
Wichita/Sedgwick County	11	\$75	14	\$90	16	\$90	21	\$100
<b>Total</b>	<b>53</b>	<b>\$75</b>	<b>65</b>	<b>\$85</b>	<b>78</b>	<b>\$90</b>	<b>103</b>	<b>\$90</b>

**2016 Overhead Expenses and Gross Revenues on a *Per Attorney* Basis**

Between 253-300 respondents, representing sole practitioners and firms, provided firm- or practice-level financial information on 2016 operating expenses and gross revenues per attorney.

**Exhibits 28 and 29** summarize four categories of overhead expenses against gross income by office location and firm size. Overhead components are differentially reported; thus, “total expenses” is not the exact sum of components.

Personnel expenses generally correlate directly with firm size, while total expenses are most sensitive to the “all other cost” category, which includes taxes and insurance. Reporting of overhead data is skewed toward smaller firms and solo practitioners.

## EXHIBIT 28

**2016 FIXED EXPENSES AND GROSS RECEIPTS PER ATTORNEY &  
OVERHEAD RATE BY OFFICE LOCATION**

	Kansas City, KS		Kansas City, MO		Topeka/ Shaw. Cty.	Wichita/ Sedgwick Cty.		Lawrence/ Douglas Cty.		Out of state lic. in KS		
	Valid N	Median	Valid N	Median	Valid N	Median	Valid N	Median	Valid N	Median	Valid N	Median
Labor	40	\$45,300	16	\$55,250	16	\$78,000	17	\$50,000	7	\$54,000	6	\$106,950
Occupancy	53	\$15,000	24	\$15,500	22	\$18,000	20	\$12,000	12	\$11,700	11	\$10,200
Library	42	\$1,225	18	\$1,500	14	\$4,750	15	\$2,000	7	\$500	9	\$1,344
Insurance	53	\$3,800	23	\$2,500	20	\$3,500	19	\$4,000	11	\$3,000	10	\$3,250
Tech	54	\$2,000	22	\$2,000	21	\$3,000	18	\$2,000	12	\$2,200	10	\$1,600
Marketing	44	\$5,000	21	\$3,000	16	\$7,500	17	\$7,500	7	\$2,000	9	\$2,400
<b>Total Fixed Expenses/Att.</b>	67	\$53,900	25	\$74,000	32	\$92,000	37	\$86,000	16	\$48,813	14	\$30,150
<b>Gross Revenues/Att.</b>	74	\$183,000	33	\$200,000	32	\$217,500	48	\$250,000	18	\$217,850	15	\$100,000
<b>Office Overhead Rate</b>	71	38%	41	40%	31	40%	46	36%	14	43%	14	27%
	Northeast KS		Southeast KS		Southcen- tral KS	North Cent, KS		West KS		All Locations		
	Valid N	Median	Valid N	Median	Valid N	Median	Valid N	Median	Valid N	Median	Valid N	Median
Labor	6	\$80,000	8	\$52,500	13	\$37,000	9	\$34,000	5	\$40,000	143	\$50,000
Occupancy	7	\$10,000	10	\$13,500	17	\$7,000	9	\$9,500	7	\$13,200	192	\$13,150
Library	7	\$300	9	\$5,000	11	\$1,000	6	\$1,100	4	\$5,000	142	\$1,450
Insurance	6	\$7,500	9	\$4,400	16	\$3,400	9	\$2,500	7	\$3,600	183	\$3,600
Tech	6	\$6,750	8	\$3,500	15	\$2,000	11	\$2,000	5	\$4,500	182	\$2,000
Marketing	5	\$2,500	6	\$2,650	14	\$1,100	9	\$2,000	5	\$4,000	153	\$3,000
<b>Total Fixed Expenses/Att.</b>	9	\$57,300	12	\$65,700	19	\$42,400	14	\$37,300	8	\$63,250	253	\$63,500
<b>Gross Revenues/Attorney</b>	9	\$180,000	12	\$171,500	22	\$150,000	19	\$153,845	9	\$200,000	291	\$190,000
<b>Office Overhead Rate</b>	10	50%	8	46%	11	30%	20	40%	12	40%	278	40%

## EXHIBIT 29

**2016 FIXED EXPENSES AND GROSS RECEIPTS PER ATTORNEY & OVERHEAD RATE BY FIRM SIZE**

Line item Category	Size of Firm									
	1		2 to 5		6 to 14		15 or more		All Firms	
	Valid N	Median	Valid N	Median	Valid N	Median	Valid N	Median	Valid N	Median
Salaries	61	\$35,000	59	\$65,000	13	\$55,000	9	\$50,000	143	\$50,000
Occupancy	101	\$10,000	65	\$18,000	14	\$16,500	10	\$18,750	192	\$13,150
Library	66	\$1,000	51	\$2,300	14	\$2,500	10	\$2,250	142	\$1,450
Insurance	95	\$2,500	64	\$4,000	12	\$5,652	10	\$5,000	183	\$3,600
Tech	95	\$2,000	63	\$4,000	12	\$3,000	10	\$5,000	182	\$2,000
Marketing	72	\$2,500	56	\$5,000	13	\$2,000	10	\$1,000	153	\$3,000
<b>Total Fixed Expenses/Att.</b>	<b>122</b>	<b>\$30,155</b>	<b>83</b>	<b>\$75,000</b>	<b>27</b>	<b>\$100,000</b>	<b>20</b>	<b>\$105,500</b>	<b>253</b>	<b>\$63,500</b>
<b>Gross Revenues/Att.</b>	<b>134</b>	<b>\$141,000</b>	<b>91</b>	<b>\$214,000</b>	<b>33</b>	<b>\$250,000</b>	<b>31</b>	<b>\$350,000</b>	<b>291</b>	<b>\$190,000</b>
<b>Office Overhead Rate</b>	<b>100</b>	<b>40%</b>	<b>91%</b>	<b>36%</b>	<b>36%</b>	<b>35%</b>	<b>45%</b>	<b>40%</b>	<b>278</b>	<b>40%</b>

**Exhibit 30** distributes ranges of 2012 annual salary levels for four categories of associates, legal assistants and secretaries by years of experience.

## EXHIBIT 30

**2016 ANNUAL SALARIES OF ASSOCIATES, LEGAL ASSISTANTS AND SECRETARIES**

Position and Tenure	Valid N	25th Percentile	Median	Mean	75th Percentile	95th Percentile
New Associates	96	\$45,000	\$56,000	\$59,604	\$70,000	\$120,000
Junior Associates ( 3 yrs. Exp.)	92	\$60,000	\$70,000	\$73,525	\$85,000	\$130,000
Senior Associates (5 yrs. Exp.)	78	\$65,000	\$76,000	\$83,764	\$95,000	\$155,000
Senior Attorney ( 10 yrs. Exp.)	54	\$65,000	\$85,000	\$101,102	\$125,000	\$200,000
New Legal Assistant	69	\$24,000	\$30,000	\$30,016	\$35,000	\$50,000
Legal Assistant ( 3 yrs. Exp.)	72	\$30,000	\$35,000	\$38,605	\$41,500	\$65,000
Legal Assistant ( 5 yrs. Exp.)	79	\$35,000	\$40,000	\$41,972	\$45,000	\$65,000
Legal Assistant ( 10 yrs. Exp.)	111	\$42,000	\$48,000	\$49,800	\$56,000	\$75,000
New Secretary	78	\$22,000	\$25,000	\$26,295	\$30,000	\$40,000
Secretary ( 3 yrs. Exp.)	80	\$25,000	\$30,000	\$30,080	\$34,750	\$43,750
Secretary ( 5 yrs. Exp.)	81	\$30,000	\$35,000	\$34,030	\$40,000	\$50,000
Secretary ( 10 yrs. Exp.)	103	\$32,000	\$40,000	\$39,428	\$45,000	\$60,000

# **EXHIBIT G**

## 2017 Survey for NLJ 500 Ranked Law Firms

Year	Firm Name	Largest U.S. Office - City	State	NLJ 500 Rank 2017	Partner Billing Rate Low	Partner Billing Rate High	Partner Billing Rate Avg	Associate Billing Rate Low	Associate Billing Rate High	Associate Billing Rate Avg	Counsel Billing Rate Low	Counsel Billing Rate High	Counsel Billing Rate Average
2017	DLA Piper	New York	NY	2	\$725	\$1,120	\$985	\$265	\$850	\$595	\$720	\$805	\$775
2017	Jones Day	Washington	DC	5	\$700	\$1,050	\$950	\$300	\$800	\$525			\$850*
2017	Greenberg Traurig, LLP	New York	NY	8	\$625	\$1,080	\$790	\$450	\$475	\$475			\$795
2017	Sidley Austin LLP	Chicago	IL	10	\$965	\$1,180	\$1,135						
2017	Kirkland & Ellis LLP	Chicago	IL	12	\$235	\$1,410	\$1,115	\$210	\$955	\$735			
2017	Reed Smith, LLP	New York	NY	15	\$820	\$902	\$880	\$425	\$675	\$528			
2017	Gibson, Dunn & Crutcher LLP	New York	NY	17	\$925	\$1,195	\$1,150	\$250	\$875	\$685			
2017	Cleary Gottlieb Steen & Hamilton LLP	New York	NY	18				\$445	\$490	\$468			
2017	King & Spalding LLP	Atlanta	GA	23	\$775	\$1,435	\$1,000	\$525	\$790	\$525			
2017	Simpson Thacher & Bartlett LLP	New York	NY	27	\$1,340	\$1,360	\$1,350	\$740	\$1,080	\$900	\$1,115	\$1,170	\$1,143
2017	Paul Weiss Rifkind Wharton Garrison LLP	New York	NY	28	\$1,220	\$1,395	\$1,320	\$820	\$1,040	\$995			
2017	Perkins Coie LLP	Seattle	WA	31			\$695*						
2017	Davis Polk & Wardwell LLP	New York	NY	35						\$1025*			
2017	Bryan Cave LLP	St. Louis	MO	37	\$594	\$660	\$627	\$369	\$625	\$487			
2017	Cooley LLP	Palo Alto	CA	39			\$1,100	\$595	\$835	\$735	\$850	\$1,065	\$998
2017	Foley & Lardner LLP	Milwaukee	WI	43			\$795*						\$630*
2017	Winston & Strawn LLP	Chicago	IL	46			\$930*	\$560	\$750	\$655			
2017	Fox Rothschild LLP	Philadelphia	PA	49			\$725*	\$300	\$585	\$450			
2017	Polsinelli PC	Kansas City	MO	51	\$400	\$625	\$513	\$260	\$360	\$310			
2017	Baker, Donelson, Bearman, Caldwell & Berkowitz, PC	Nashville	TN	55			\$405						
2017	Proskauer Rose LLP	New York	NY	57			\$1200*						
2017	Hunton & Williams LLP	Richmond	VA	61	\$625	\$775	\$730	\$350	\$535	\$515			
2017	Sheppard, Mullin, Richter & Hampton LLP	Los Angeles	CA	64			\$760*	\$585	\$630	\$608			
2017	Husch Blackwell LLP	St. Louis	MO	70			\$450*			\$315*	\$395	\$450	\$423
2017	Pillsbury Winthrop Shaw Pittman LLP	Washington	DC	73	\$790	\$1,235	\$830			\$680*			
2017	Willkie Farr & Gallagher LLP	New York	NY	74	\$1,150	\$1,425	\$1,350	\$625	\$965	\$800			
2017	Akerman LLP	Miami	FL	76			\$350*			\$275*			
2017	Blank Rome LLP	Philadelphia	PA	78	\$310	\$725	\$615	\$435	\$470	\$453			
2017	Cozen O'Connor	Philadelphia	PA	79	\$550	\$730	\$710			\$405*			
2017	Haynes and Boone, LLP	Dallas	TX	82	\$500	\$960	\$675	\$288	\$660	\$472			
2017	Ballard Spahr LLP	Washington	DC	85	\$650	\$1,195	\$895	\$395	\$510	\$453			\$505
2017	Nelson Mullins Riley & Scarborough LLP	Atlanta	GA	86	\$410	\$570	\$450	\$300	\$390	\$335			
2017	Dorsey & Whitney LLP	Minneapolis	MN	89	\$555	\$980	\$680	\$410	\$515	\$463	\$480	\$555	\$513
2017	Pepper Hamilton LLP	Philadelphia	PA	92	\$555	\$835	\$765	\$330	\$485	\$475			
2017	Bradley Arant Boult Cummings LLP	Birmingham	AL	93			\$570*						
2017	Womble Carlyle Sandridge & Rice, LLP	Winston-Salem	NC	97			\$525*	\$350	\$400	\$375			\$450
2017	Bracewell LLP	Houston	TX	114	\$1,000	\$1,100	\$1,050	\$550	\$755	\$653			
2017	Jones Walker LLP	New Orleans	LA	117	\$285	\$475	\$388			\$235*			
2017	Jackson Walker LLP	Dallas	TX	124	\$545	\$750	\$695	\$465	\$515	\$490			
2017	Winstead PC	Dallas	TX	130	\$550	\$625	\$588	\$335	\$450	\$375			
2017	Ice Miller LLP	Indianapolis	IN	152	\$477	\$698	\$554			\$324*			

2017 Survey for NLJ 500 Ranked Law Firms													
Year	Firm Name	Largest U.S. Office - City	State	NLJ 500 Rank 2017	Partner Billing Rate Low	Partner Billing Rate High	Partner Billing Rate Avg	Associate Billing Rate Low	Associate Billing Rate High	Associate Billing Rate Avg	Counsel Billing Rate Low	Counsel Billing Rate High	Counsel Billing Rate Average
2017	Thompson & Knight LLP	Dallas	TX	162			\$695*						
2017	Bond, Schoeneck & King, PLLC	Syracuse	NY	164	\$360	\$400	\$380						
2017	Bass Berry & Sims	Nashville	TN	165			\$525*			\$425*			
2017	Saul Ewing LLP	Philadelphia	PA	171	\$695	\$780	\$710			\$395*			
2017	Armstrong Teasdale LLP	St. Louis	MO	181	\$370	\$660	\$590	\$225	\$285	\$250			
2017	Warner Norcross & Judd LLP	Grand Rapids	MI	182	\$410	\$555	\$518	\$285	\$345	\$315			\$550*
2017	Brownstein Hyatt Farber Schreck, LLP	Denver	CO	192			\$655*			\$330*			
2017	Gardere Wynne Sewell LLP	Dallas	TX	194	\$640	\$725	\$640	\$280	\$385	\$360			
2017	Brown Rudnick LLP	Boston	MA	203	\$905	\$1,245	\$1,075			\$515*			
2017	Hodgson Russ LLP	Buffalo	NY	206			\$360*						
2017	Parker Poe Adams & Bernstein LLP	Charlotte	NC	219	\$380	\$475	\$428			\$575*			
2017	McKool Smith PC	Dallas	TX	230	\$620	\$1,200	\$800	\$325	\$345	\$335			\$545*
2017	Kelly Hart Hallman	Fort Worth	TX	252	\$405	\$495	\$450	\$235	\$320	\$265			
2017	Procopio, Cory, Hargreaves & Savitch LLP	San Diego	CA	255			\$525*	\$350	\$525	\$438			
2017	Richards, Layton & Finger, P.A.	Wilmington	DE	256	\$250	\$850	\$738	\$295	\$465	\$360			
2017	Whiteford, Taylor & Preston	Baltimore	MD	265	\$530	\$570	\$550			\$340*			
2017	McDonald Hopkins	Cleveland	OH	292	\$415	\$72	\$720	\$568					
2017	Offit Kurman, PA	Bethesda	MD	308			\$440*						
2017	Sills Cummis & Gross P.C.	Newark	NJ	311	\$695	\$775	\$735			\$495*			\$525*
2017	Robinson, Bradshaw & Hinson, P.A.	Charlotte	NC	320	\$330	\$565	\$425	\$175	\$565	\$310			
2017	Liskow & Lewis	New Orleans	LA	324						\$200*			
2017	Cole Schotz P.C.	Hackensack	NJ	330	\$495	\$915	\$658	\$280	\$445	\$305			
2017	Gray Reed & McGraw LLP	Houston	TX	336			\$685*	\$375	\$455	\$415			\$575*
2017	Miller & Martin PLLC	Chattanooga	TN	353			\$295						
2017	Munsch Hardt Kopf & Harr PC	Dallas	TX	360	\$480	\$650	\$565			\$300*			
2017	Coats Rose	Houston	TX	362	\$475	\$650	\$563			\$325			
2017	Obermayer Rebmann Maxwell & Hoppel LLP	Philadelphia	PA	367						\$350*			
2017	Porter Hedges LLP	Houston	TX	383			\$485*			\$320*			
2017	Young Conaway Stargatt & Taylor, LLP	Wilmington	DE	408	\$520	\$890	\$805	\$285	\$540	\$430			
2017	Moses & Singer	New York	NY	413			\$895*						
2017	Morris, Nichols, Arshat & Tunnell LLP	Wilmington	DE	421	\$650	\$1,050	\$775	\$395	\$625	\$415			\$595*
2017	Dilworth Paxson LLP	Philadelphia	PA	422	\$375	\$895	\$533	\$300	\$330	\$315			
2017	Kane Russell Coleman Logan PC	Dallas	TX	423	\$375	\$575	\$475			\$260*			
2017	Olshan Frome Wolosky LLP	New York	NY	431			\$730*			\$360*			
2017	Carter Ledyard & Milburn LLP	New York	NY	458			\$900*	\$285	\$700	\$493			
2017	Morris, Polich & Purdy, LLP	Los Angeles	CA	472			\$575*			\$575*			
2017	Berger Singerman	Miami	FL	496			\$695*						

\* Not an average - represents one rate/one position.