

**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.

DECLARATION OF LEECIA WELCH

I, Leecia Welch, do hereby declare:

1. I am the Senior Director of Legal Advocacy and Child Welfare at the National Center for Youth Law (NCYL). I represent Plaintiffs in the above-titled action. I submit this declaration in support of Plaintiffs’ motion for attorneys’ fees and expenses. I have personal knowledge of the facts stated in this declaration and, if called to testify, would testify competently to these facts.

Qualifications of NCYL Attorneys

2. Founded in 1970, NCYL is a non-profit organization that regularly represents plaintiffs in complex class action lawsuits intended to benefit large numbers of children and adolescents.

NCYL attorneys are experts in the various areas of law that affect low-income children and are among the most experienced, knowledgeable, and respected children's lawyers in the country.

3. One of NCYL's primary substantive areas of expertise is advocating for children in child welfare systems. NCYL has worked to reform child-serving systems through litigation and implementation of settlement agreements in various states, including Washington, Utah, California, and Missouri. For example, in *Braam v. Washington*, No. 98-2-01570-1 (Whatcom Cnty. Super. Ct., filed Nov. 3, 1998), we represent thousands of Washington foster children and have played a key role in the monitoring and enforcement of the settlement agreement. In *David C. v. Leavitt*, No. 93-C-206W (D. Utah, filed Feb. 25, 1993), we successfully represented a class of foster children and children reported to be abused or neglected. Both of these lawsuits resulted in significant improvements to the child welfare systems in those states. Most recently, we entered a settlement with Missouri on behalf of a class of foster youth in order to ensure safe administration and appropriate prescription of psychotropic medications. *M.B. v. Tidball*, No. 2:17-cv-04102-NKL (W.D. Mo., filed June 12, 2017). NCYL has also spearheaded reform of child welfare systems in Arkansas (*Angela R. v. Clinton*, No. 4:91-cv-415-GH (E.D. Ark., filed July 8, 1991)) and Maryland (*L.J. v. Massinga*, No. 1:84-cv-4409 (D. Md., filed Dec. 5, 1984)).

4. The core team at NCYL working on *M.B. v. Howard* currently includes Poonam Juneja, Freya Pitts, Jean Strout, and me. At various points, we have also received support from our past law fellows, Amanda Grill and Jacqueline Stolzenberg; our past paralegal, Kira Setren; our litigation assistant, Soraya Morales Nuñez; and a number of law clerks.

5. I have been an attorney at NCYL since 2004. I earned my J.D. Magna Cum Laude from Loyola University Chicago School of Law in 1996 and have spent most of my career representing children and youth in cases focused on enforcing their statutory and constitutional rights. I have been lead or co-counsel in multiple federal court class action lawsuits and other individual cases on behalf of children in need. Some of the cases I have worked on while at NCYL include:

- a) *David C. v. Leavitt*, No. 93-C-206W (D. Utah): I was lead counsel representing a statewide class of children in foster care in Utah from 2004 until 2007, when the case successfully concluded. I led the implementation of a settlement that resulted in substantial improvements to Utah's foster care system, including tripling the amount of funding allocated to foster care and improving key outcomes for youth in care.
- b) *T.R. v. Quigley*, No. 2:09-cv-1677 (W.D. Wash.): I am currently co-lead counsel representing a statewide class of low-income children in need of intensive mental health services in the state of Washington. The court has referred to our settlement in the *T.R.* case as a "resounding success" and "nothing less than a landmark reform." Verbatim Report of Proceedings at 25, *T.R. v. Quigley*, No. 2:09-cv-1677 (W.D. Wash. Dec. 19, 2013). The settlement agreement resulted in the funding and development of community-based intensive mental health services, called Wraparound with Intensive Services, for Medicaid-eligible children in Washington statewide.
- c) *Henry A. v. Willden*, No. 2:10-cv-00528 (D. Nev.): I was co-counsel in a lawsuit on behalf of seven foster youth who were subjected to physical and mental harm while in foster care in Clark County, Nevada. The lawsuit resulted in a \$2 million settlement.

- d) *Lucas R. v. Azar*, No. 18-cv-5741-DMG-PLA (C.D. Cal.): I am co-counsel representing a nationwide class of immigrant children held in government custody, including a subclass of children with behavioral, mental health, intellectual, and/or developmental disabilities whom the government places in more restrictive settings solely by reason of their disabilities.
- e) *Flores v. Barr*, No. 85-cv-04544-DMG-AGR (C.D. Cal.): I am co-counsel representing a nationwide class of detained immigrant children enforcing a settlement that governs their release and treatment in federal immigration custody.
- f) *Duchitanga v. Hayes*, No. 18-cv-10332-PAC (S.D.N.Y): I am co-counsel representing a putative class of immigrant children whose release from government custody has been delayed due to unlawful fingerprinting policies and practices.
- g) *M.B. v. Tidball*, No. 2:17-cv-04102-NKL (D. Mo.): I am co-counsel representing a class of foster youth in Missouri who were at risk of unsafe administration and over-prescription of psychotropic medications. Our settlement agreement created a comprehensive system to oversee and monitor the prescription of psychotropic medications to youth in foster care.
- h) *Emma C. v. Thurmond*, No. 3:96-cv-04179-VC (N.D. Cal.): I am co-counsel representing a class of children with disabilities entitled to special education services in the Ravenswood City School District. With our co-counsel, NCYL works to implement a settlement agreement requiring California to oversee and monitor school districts across the state for compliance with the Individuals with Disabilities Education Act (IDEA).

6. Prior to joining NCYL, I was a senior associate with the law firm of Morrison & Foerster LLP, where I spent three years focusing nearly exclusively on *Williams v. State of California*, No. 312236 (Cal. Super. Ct., filed May 17, 2000), a class action that resulted in key reforms to California's public school system. This high-profile case concluded in 2004 with a landmark settlement agreement that resulted in the state allocating \$138 million in additional funding for standards-aligned instructional materials, \$50 million for enhanced oversight of low performing schools, and \$800 million for critical repairs to school facilities. The *Williams* team at Morrison & Foerster received numerous awards for our work on behalf of California students, and the case was discussed at length in a book by Peter Schrag entitled Final Test: The Battle for Adequacy in America's Schools (2003). My work has also been recognized by the American Bar Association, the California State Bar, and the Impact Fund.

7. Poonam Juneja is a Senior Attorney with NCYL. She graduated from Yale Law School in 2009, where she received the Florence M. Kelly '37 Family Law Prize for exceptional achievement. Ms. Juneja focuses on class action litigation on behalf of children and youth. Cases at NCYL that Ms. Juneja works on currently include *M.B. v. Tidball*, *Flores v. Barr*, and *Lucas R. v. Azar*. Ms. Juneja previously worked at Public Counsel and the Southern Poverty Law Center. In each of her positions, she fought to protect the rights of young people through impact litigation. While at those firms, she served as co-counsel on a number of state and federal class action cases addressing the constitutional rights of young people, including: *E.W. v. Lauderdale County, Mississippi*, No. 09-137 TSL (S.D. Miss.), and *G.F. v. Contra Costa County*, No. 14-cv-03667-MEJ (N.D. Cal.), both of which addressed unconstitutional and abusive conditions of confinement in juvenile detention centers; *Cruz v. California*, Alameda Super. Ct. Case No. RG1472139, which involved the State of California's failure to ensure all

students have access to meaningful learning time; and *A.M. v. Jackson Public Schools Board of Trustees*, No. 11-344 TSL (S.D. Miss.), challenging punitive, unlawful school discipline practices. Ms. Juneja has also clerked for the Honorable Marsha S. Berzon of the Ninth Circuit Court of Appeals and the Honorable Claudia Wilken of the United States District Court for the Northern District of California.

8. Freya Pitts is a Senior Attorney at NCYL focusing on class action litigation on behalf of children and youth. Ms. Pitts was promoted to Senior Attorney from Staff Attorney in 2020, during the course of this litigation. She graduated from Yale Law School in 2013, where she received the Khosla Memorial Fund for Human Dignity Prize. Cases at NCYL that Ms. Pitts currently works on include *M.B. v. Tidball*, *Flores v. Barr*, *Lucas R. v. Azar*, and *Emma C. v. Thurmond*. Ms. Pitts previously worked at Disability Rights Advocates, first as an Arthur Liman Public Interest Fellow, and then as a staff attorney. In these roles, she worked to advance the rights of children and youth with disabilities through impact litigation. For example, as a member of the legal teams working on *G.F. v. Contra Costa County*, No. 14-cv-03667-MEJ (N.D. Cal.), and *T.G. v. Kern County*, 18-cv-00257-DAD (E.D. Cal.), she advocated for the rights of young people with disabilities detained in California juvenile halls, including by seeking to enforce their rights under the Americans with Disabilities Act (ADA) and the IDEA. Before working at Disability Rights Advocates, Ms. Pitts clerked for the Honorable Judith W. Rogers of the United States Court of Appeals for the District of Columbia Circuit and for the Honorable Jon S. Tigar of the United States District Court for the Northern District of California.

9. Jean Strout is a Staff Attorney at NCYL on the Child Welfare and Legal Advocacy teams. She graduated from Harvard Law School in 2014. Ms. Strout is currently working on multiple cases related to child welfare placement and mental health services at the investigation

stage. Ms. Strout previously worked at Support Center for Child Advocates as guardian ad litem for youth in Philadelphia's child welfare system, first as an Equal Justice Works Fellow and later as a Staff Attorney. Ms. Strout was also selected as a Zubrow Fellow in Children's Law at Juvenile Law Center, where she served as co-counsel for Henry Montgomery in the United States Supreme Court case *Montgomery v. Louisiana*, 577 U.S. ____ (2016), which made retroactive the ban on mandatory life without parole sentences for juveniles. She clerked for the Honorable Judge Carmen C. Cerezo of the United States District Court for the District of Puerto Rico.

10. Amanda Grill served as the Fiza Quraishi Youth Law Fellow at NCYL from 2017 to 2018. She graduated from the University of Michigan Law School in 2017. While in law school, Ms. Grill participated in the Child Advocacy Law Clinic as an Advanced Student Attorney, representing parents and youth, as a guardian ad litem, in Child Protective Services cases. Prior to attending law school, Ms. Grill taught mathematics at a high school for several years through Teach for America.

11. Jacqueline Stolzenberg was the Fiza Quraishi Youth Law Fellow at NCYL from 2018 to 2019. Ms. Stolzenberg graduated from the University of Michigan Law School in 2018, where she was a Bergstrom Child Welfare Law Fellow and a Dean's Public Service Fellow. During law school, Ms. Stolzenberg participated in several clinics focused on protecting the rights of children and families, including the Child Advocacy Law Clinic, Juvenile Justice Clinic, Pediatric Advocacy Clinic, and Child Welfare Appellate Clinic.

12. Kira Setren was a Paralegal at NCYL from 2018 to 2020. Her work focused on impact litigation on behalf of vulnerable children, including immigrant children in federal custody, as well as youth in the child welfare and juvenile justice systems. Prior to joining NCYL, Ms.

Setren worked as a Litigation Paralegal at Cleary Gottlieb Steen & Hamilton LLP, where her work centered primarily on class action suits and pro bono advocacy focused on immigrants' rights, human trafficking, and the unlawful use of sealed records. Ms. Setren has also worked with various nonprofits, government agencies, and volunteer organizations to provide aid and direct service to underserved communities.

13. Joshua Nomkin was a Summer Law Clerk at NCYL from May through August of 2019. He is currently a law student at the University of California, Berkeley, School of Law. As a law student, Mr. Nomkin has also interned at the Education Advocacy Clinic at East Bay Community Law Center and at the East Bay Children's Law Offices, advocating for the educational rights of children in various settings. Prior to starting law school, Mr. Nomkin served as an AmeriCorps VISTA volunteer serving families at public schools in the Washington, D.C. area.

14. Resumes for Ms. Juneja, Ms. Pitts, Ms. Strout, Ms. Grill, Ms. Stolzenberg, Ms. Setren, Mr. Nomkin, and myself are attached as Exhibit A.

Overview of NCYL's Work in the Litigation

15. NCYL has devoted significant resources to this case from pre-filing research through finalization of the parties' settlement agreement. NCYL's work has included substantial investigations; conducting extensive legal research on the underlying claims; drafting portions of the complaint, amended complaint, and other legal documents for filing; drafting discovery requests and reviewing documents and responses; working with Plaintiffs' consulting experts; engaging in intensive settlement negotiations; and playing an active role in all aspects of the litigation.

16. Beginning in 2017, Plaintiffs' counsel, including NCYL, conducted an intensive year-long investigation. This inquiry included a close examination of Kansas's child welfare system, the placement of children in that system, their access to required mental health services, and the state's oversight and monitoring of the private contractors who perform case management services for foster children in the state's custody. During this investigation, counsel interviewed dozens of stakeholders across the state and spent hundreds of hours obtaining, compiling, and analyzing data, reports, and other relevant information.

17. After the lawsuit was filed, Plaintiffs' counsel obtained significant additional information about the Kansas child welfare system and placements of and mental health care available for children within that system through intensive discovery. Plaintiffs have propounded more than 160 document requests and have received and reviewed more than 75,000 pages in discovery from Defendants. The parties have also propounded several sets of interrogatories to each other. In addition, Plaintiffs have issued third party subpoenas and have received initial productions in response from third parties. Plaintiffs have taken a Rule 30(b)(6) deposition of DCF. Plaintiffs have also consulted with experts in the fields of mental health care, child welfare systems, trauma, and statistics, among others, and have continued to collect information from stakeholders in the state.

18. The parties engaged in lengthy, arms-length negotiations, which were at times contentious. In May 2019, Plaintiffs served Defendants with their initial settlement terms sheet. In July 2019, Defendants responded with their settlement counter proposal. The parties later agreed to retain a skilled neutral subject matter expert, Kevin Ryan of Public Catalyst, as a mediator to assist them in exploring the potential for settlement. After submitting confidential mediation statements to the mediator, the parties met in person in Kansas City for mediation

sessions supervised by Mr. Ryan on November 12, 2019, December 15 and 16, 2019, February 7, 2020, and February 25 and 26, 2020. In order to focus on mediation, the parties agreed to a forty-five day stay of general discovery during this time period. The parties made substantial progress in negotiating a settlement during these sessions. However, the parties were unable to reach an agreement as of late February 2020 and returned to intensive discovery. In May of 2020, the parties re-engaged in settlement negotiations, exchanged multiple settlement drafts, and held videoconference settlement meetings on June 4, 10, 11, and 18, 2020.

19. NCYL's substantial time investment in this case significantly limited our ability to take on and litigate large systemic reform cases in other jurisdictions during the pendency of this case.

ALLOCATION OF WORK AND COORDINATION AMONG CO-COUNSEL TEAM

20. I was responsible for managing and coordinating the work and staffing in this case and made every effort to litigate the case efficiently. Throughout this litigation, I was in close communication with co-counsel to coordinate work between the different firms. During certain phases of the litigation where it was necessary, we held weekly team meetings with members of all co-counsel teams to coordinate the efforts of each organization and to reduce duplication of effort and increase efficiency.

21. To further prevent unnecessary duplication of effort, each organization in the co-counsel team led certain tasks and activities during the course of the litigation, while all organizations partnered 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 legal research and drafting. DLA Piper took the lead on handling discovery productions and e-discovery efforts 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 case given their deep familiarity with Kansas state government and its child welfare and Medicaid delivery systems. They also served as local experts on litigation practice and court rules and procedures.

22. In my professional judgment, based on my extensive experience litigating child welfare class action cases, all co-counsel's involvement was necessary to adequately and effectively represent Plaintiffs in this complex case. Over the course of the case, our team worked with fourteen Named Plaintiffs representing the interests of a Plaintiff Class with over 7,000 members.

23. As lead counsel of the NCYL team, I managed NCYL's participation in the litigation. This work included developing and investigating legal claims; identifying and communicating with named plaintiffs, next friends, experts, and witnesses; directing litigation and settlement strategy; coordinating strategy with lead counsel from our co-counsel firms; editing and providing final approval for filings, correspondence, and settlement drafts; and ultimately supervising NCYL's team.

24. Senior Attorneys Poonam Juneja and Freya Pitts were integral to the litigation team. Ms. Juneja was initially engaged in NCYL's investigation leading to the lawsuit and provided day-to-day supervision of many of the junior members of NCYL's team. After filing, Ms. Juneja managed the discovery process for NCYL's team, including coordinating efforts across co-counsel teams, meeting and conferring with Defendants to resolve discovery disputes, and overseeing document review and discovery requests and responses. Ms. Juneja also played a major role in drafting, reviewing, and editing filings, correspondence, and the parties' settlement agreement.

25. Ms. Pitts played a primary role in the drafting and filing of the Complaint. She also drafted and edited subsequent filings and correspondence, and worked heavily on discovery, including document review and discovery requests and responses. Ms. Pitts was also a key part of the mediation and settlement negotiation teams, participating in all settlement conferences and in the drafting and editing of the settlement agreement throughout the negotiations.

26. Attorney Jean Strout's responsibilities included conducting document review, drafting discovery requests and responses, conducting legal research, and drafting and editing settlement-related filings. Legal fellows Amanda Grill and Jacqueline Stolzenberg assisted in the litigation primarily through legal and factual research and document review, as well as drafting and editing filings. Paralegal Kira Setren provided crucial litigation support to our team through document management, document review, and administrative tasks. Finally, law clerk Joshua Nomkin contributed significantly to review of the Named Plaintiffs' child welfare case files, work that would otherwise have been done by an attorney at a higher billing rate.

NCYL Attorneys' Lodestar on the Case

27. NCYL has expended substantial resources in the development and prosecution of this case. NCYL has incurred \$34,292.69 in expenses for which it seeks to recover. A true and correct itemization of our expenses is attached as Exhibit B. In an exercise of billing judgment, NCYL has eliminated significant categories of expenses for which we are not seeking reimbursement, including: all meal expenses, including those incurred for necessary travel, and any expenses that counsel has deemed overhead, such as copying, mailing, research, and equipment costs. NCYL has advanced these expenses out of its own funds and will not seek reimbursement of these expenses from the clients.

28. NCYL has also devoted significant attorney time to this case. From November 2017 to July 2020, NCYL is seeking compensation for 3,135.7 of the hours that its staff has expended on this case. A true and correct itemization of the time for which we seek to recover is attached as

Exhibit C. I have personally reviewed these time entries to ensure accuracy, validity, and compensability under the law. We have removed any time entries that were potentially duplicative, vague, or otherwise not necessary to the litigation. As part of a rigorous exercise to ensure billing judgment, NCYL has also waived the time of all staff who were not central to the litigation, including all but one of our law clerks. As to law clerk Joshua Nomkin's time, NCYL is only seeking compensation for time spent doing necessary review of the child welfare case files of one of the Named Plaintiffs.

29. In addition, NCYL and our co-counsel are waiving time billed from July 27, 2020, when Plaintiffs filed the motion for preliminary approval of the settlement agreement, through final approval of the parties' settlement agreement. This includes time spent preparing the instant motion for fees and seeking final approval of the parties' settlement agreement.

30. On top of these deductions, our co-counsel team has further limited the hours for which we seek compensation, using the following general guidelines:

- (a) for depositions, no more than two attorneys in attendance per witness;
- (b) for court hearings, no more than one attorney in attendance per firm;
- (c) for telephonic or video conferences with Defendants, including for meet and confers, no more than four attorneys in attendance across NCYL, Children's Rights, Kansas Appleseed, and Ms. Burns-Bucklew;
- (d) for regularly scheduled co-counsel meetings, no more than two attorneys in attendance for each of NCYL, Children's Rights, and Kansas Appleseed; and
- (e) for other internal conferences among co-counsel to discuss strategic decisions and reach consensus on important legal issues, no more than one attorney in attendance for each of NCYL, Children's Rights, and Kansas Appleseed.

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

31. Applying these guidelines resulted in a significant reduction in the time for which NCYL seeks compensation. The services for which fees have been charged are reasonable and were actually and necessarily performed.

32. NCYL attorneys, paralegals, and other staff are trained on how to maintain contemporaneous attorney fee logs, billed to the one-tenth of an hour, to keep track of their time. All of NCYL's attorneys on this case maintained contemporaneous attorney fee logs on an electronic system NCYL uses for this purpose. Our fee logs are recorded contemporaneously in excel spreadsheets or using timekeeping software and exported into excel spreadsheets. All of these logs are reviewed quarterly to ensure that records have been accurately maintained.

33. NCYL attorneys bill for their time based on their respective levels of experience. We have spoken with local practitioners to understand the local billing rates and reviewed the 2019 Missouri Lawyers' Weekly Billing Rates survey information, including the summary level and detailed hourly rates. NCYL has calculated its lodestar based on reasonable rates for the Kansas City and Kansas legal market. These rates are well within the prevailing market billing rates in the geographic area of this case. A summary of NCYL's billing for which it seeks compensation in this matter is as follows:

Name	Law School Grad. Year	Rate	Hours	Lodestar
Leecia Welch	1996	\$500	951.1	\$475,550.00
Poonam Juneja	2009	\$395	729.5	\$288,152.50
Freya Pitts	2013	\$365	750.5	\$273,932.50
Jean Strout	2014	\$325	88.9	\$28,892.50
Amanda Grill	2017	\$270	123.0	\$33,210.00
Jacqueline Stolzenberg	2018	\$250	264.7	\$66,175.00
Kira Setren	N/A	\$200	95.8	\$19,160.00
Joshua Nomkin	N/A	\$200	132.2	\$26,440.00
TOTAL			3,135.7	\$1,211,512.50

NCYL Attorneys' Billable Rates Awarded in Prior Cases

34. NCYL attorneys have regularly been awarded hourly rates for our work representing youth in impact litigation and class actions that take into account our specialized expertise and experience. If NCYL were seeking its regular rates for the time that its attorneys devoted to this litigation, which are based on the Bay Area market, it would be seeking rates significantly higher than those sought here. *See, e.g., Flores v. Barr*, No. 85-4544 (C.D. Cal. April 19, 2019), Dkt. No. 535-4, Ex. 17 ¶ 16 (expert declaration submitted in an immigration Equal Access to Justice Act case attesting to the reasonableness of a 2019 rate of \$690 per hour for my work, based on my specialized expertise).

35. In *Emma C. v. Thurmond*, a federal class action in the Northern District of California implicating access to special education services for children with disabilities statewide, I have received attorneys' fees for monitoring work at the rate of \$630 per hour. In the same case, Ms. Pitts has received fees at an hourly rate of \$385. A true and correct copy of the court's September 15, 2020, Stipulated Order approving NCYL's fees for work performed from January 1, 2020, through June 30, 2020, is attached to this declaration as Exhibit D, and a true and correct copy of the invoice submitted to the State of California, including the stipulated billing rates, is attached as Exhibit E.

36. In addition, for the past five years we have received court-approved legal fees for our work on *T.R. v. Quigley*, a federal class action case filed in the United States District Court for the Western District of Washington on behalf of low-income children in need of intensive mental health services. My awarded rate in that case for 2019-20 was \$595.¹ A true and correct copy of the court's September 14, 2020 Order approving class counsel's fees and rate structure is attached to my declaration as Exhibit F. A true and correct copy of the parties' stipulation addressing fees between July 1, 2019 and June 30, 2020 is attached to my declaration as Exhibit

¹ NCYL agreed to lower rates than our standard "specialist" rates based on an arrangement with class co-counsel. Since 2015, we have also agreed not to seek annual award adjustments to this rate.

G. In the same case, Ms. Juneja was also previously awarded an hourly rate of \$425 for work performed between July 1, 2015 and June 30, 2016.

37. Recently, a judge in the Central District of California considered what rates were reasonable for my NCYL colleagues, Michael Harris (admitted in 1985) and Hannah Benton (admitted in 2008) for their work in a civil rights class action case, *Sigma Beta Xi, Inc. v. County of Riverside*, Case No. 18-1399 JGB (JEMx). That lawsuit alleged that Riverside County, California, through its Probation office, violated children's constitutional rights by sweeping tens of thousands of youth into punitive probation supervision through their Youth Accountability Team (YAT) Program for normal, childish behavior and funneling them into the criminal justice system. In approving the class action settlement and awarding fees, the court considered the experience of Mr. Harris and Ms. Benton, and awarded them hourly rates of \$875 and \$600, respectively. The court's order is attached here as Exhibit H.

38. In certain cases, we have decided to seek rates local to the jurisdiction in which we were litigating, rather than Bay Area rates, even where we were entitled to such rates. For example, earlier this year, after a contested motion for attorneys' fees and expenses, a judge in the Western District of Missouri awarded NCYL fees for our work in *M.B. v. Tidball*, Case No. 2:17-cv-4102-NKL. The decision is attached as Exhibit I. We filed *M.B. v. Tidball* against the state of Missouri for failing to properly oversee the system by which psychotropic medications were prescribed and administered to children in foster care. In that case, NCYL sought local Missouri rates for the work that we performed. After considering counsel's expertise and experience, and over the vigorous opposition of the defendants, the court awarded hourly rates based on the Missouri market of \$450 for me, \$350 for Ms. Juneja, \$300 for Ms. Pitts, \$200 for Ms. Grill and Ms. Stolzenberg, and \$150 for Ms. Setren.

NCYL's Entitlement to Bay Area Rates

39. NCYL is not seeking Bay Area rates in this motion and is instead seeking rates in line with the Kansas market. However, NCYL would be entitled to seek the billing rates charged and awarded in the San Francisco Bay Area, where its main office is located, particularly given

NCYL's expertise in the subject matter of this case and in litigating civil rights issues on behalf of youth in foster care.² As child welfare specialists, NCYL attorneys have regularly been awarded rates based on the billing rates in the geographic location of our Bay Area office. NCYL has extensive expertise regarding the treatment of youth in government custody, especially children in foster care custody. In particular, NCYL attorneys have a unique combination of experience developing legal theories on these issues, litigating systemic claims on behalf of children in foster care, spearheading related legislative reforms, and working intensely to implement our settlement agreements and legislative reforms. To my knowledge, few attorneys in the country have comparable expertise.

40. Prior to filing the case, my colleagues and I reached out to firms in the Kansas area to determine whether there were other local attorneys who were willing to take this case on a contingency fee or pro bono basis. As a nonprofit, we have limited resources and capacity to take on cases, even where we have identified meritorious claims. In order to maximize our ability to improve the lives of children that we serve, we often seek to partner with private law firms who can devote additional time and resources to litigate the case. The substantial time investment that we devote to litigating cases, and to this case in particular, limits our ability to take on and litigate additional systemic reform cases in other jurisdictions at the same time.

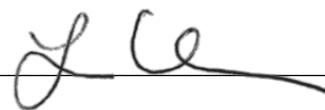
² The rates requested by NCYL attorneys here are well within or under the range of rates awarded in Kansas courts, and are substantially lower than rates awarded by Bay Area courts for reasonably comparable services in recent years. In *Kaku v. City of Santa Clara*, Case No. 17CV319862, Fee Order filed January 22, 2019, reported at 2019 WL 331053 (Cal. Super. 2019), a voting rights action under the California Voting Rights Act, the court found 2018 hourly rates of up to \$975 reasonable, before applying a 1.4 multiplier. In *In re Anthem, Inc. Data Breach Litig.*, 2018 U.S. Dist. LEXIS 140137, at *121 (N.D. Cal. Aug. 17, 2018), a class action settlement resulting from a data breach, the court, as part of its lodestar cross-check, found rates up to \$860 reasonable. In *Huynh v. Hous. Auth. of Santa Clara*, 2017 WL 1050539, at *5-6 (N.D. Cal. 2017), a tenant class action challenging the Housing Authority's policy regarding the accommodation of households including members with disabilities, the court found 2017 hourly rates of up to \$862.07 reasonable. In *G.F. v. Contra Costa County*, No. 13-CV-03667-MEJ, 2015 WL 7571789, at *14 (N.D. Cal. Nov. 25, 2015), a civil rights class action addressing the rights of children in a juvenile detention center, the court found 2015 rates of up to \$895 reasonable.

Partnering with a private law firm reduces the time and resources we need to devote to a particular case and increases the number of cases we are able to handle. Other than our co-counsel at Kansas Appleseed and the Law Offices of Loretta Burns-Bucklew, we were not able to identify other Kansas area attorneys who were willing to partner on this case. Through the process of seeking additional local co-counsel, we were also unable to identify other attorneys in Kansas with comparable expertise in litigating cases involving the constitutional and statutory rights of youth in foster care or particular expertise in systemic remedies to address the mental health or placement needs of children in foster care. We subsequently partnered with DLA Piper, a national firm with considerable class action expertise, to ensure we had adequate staffing and resources to successfully litigate this complex, time-intensive case.

41. As has been NCYL's practice for forty years, Plaintiffs' counsel will not be seeking payment of attorneys' fees or expenses from the individual Plaintiffs. NCYL undertook this case without any payment from the clients and with the knowledge that it might not recover its attorneys' fees or out-of-pocket expenditures. Moreover, any fees NCYL ultimately recovers will be used to support our on-going and future work advocating for other youth whose rights have been violated.

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

Executed this 30th day of November 2020 in San Francisco, California.

A handwritten signature in black ink, appearing to read 'Leecia Welch', is written over a horizontal line.

Leecia Welch

Exhibit A

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Oakland, California
94612

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Leecia Welch

Professional Experience

National Center for Youth Law

Oakland, CA

Senior Director, Legal Advocacy and Child Welfare

August 2016-present

Senior Attorney,

November 2004–August 2016

- Senior Director, Legal Advocacy and Child Welfare specializing in complex litigation, civil rights class action cases, and policy initiatives related to improving the lives of children in foster care.
- Lead Counsel in *David C. v. Leavitt*, a federal statewide class action resulting in significant improvements to Utah’s foster care system, *T.R. v. Quigley*, a federal statewide class action to improve access to community-based children’s mental health services for Medicaid-eligible children in Washington, and multiple California state court cases focusing on adoption subsidies, foster youth access to reproductive health care, and foster youth education rights.
- Co-counsel on class action and putative class action cases in Missouri, Kansas, New York and California focused on protecting the constitutional rights of children and improving state and federal foster care systems, access to children’s mental health services, and special education systems.
- Policy and training expertise in child-serving system reform, foster youth education issues, and sibling rights.

Morrison & Foerster LLP

San Francisco, CA

Senior Associate, Litigation Department

September 2000- November 2004

- Provided full range of litigation services on complex litigation disputes, including acting as senior associate on class action aimed at reforming the State of California’s public school system.
- Conducted and defended depositions of expert and lay witnesses; argued various motions; and prepared numerous briefs, including 400-page California education system liability disclosure statement.
- Participated on trial team of a habeas corpus case, including drafting portions of trial brief and post-trial brief and cross-examining witnesses

in federal court.

Perkins Coie LLP

Seattle, WA

Associate, Litigation Department

October 1996-October 1997, January 1999-June 2000

- Provided full range of litigation services on class action lawsuits, cases involving complex contract and technology disputes and intellectual property matters.
- Conducted and defended depositions of expert and lay witnesses and worked extensively with experts focusing on technology and intellectual property issues.
- Focused extensive pro bono efforts on representation of juveniles in criminal cases, grandparents in custody cases, parents in adoptions, and guardians *ad litem* in suits on behalf of children.

CIVITAS Initiative

Chicago, IL

Children's Law Fellow

November 1997- November 1998

- Responsible for the development and implementation of all programs and initiatives related to children's legal issues.
- Represented children and families in a variety of legal matters.
- Participated in the development of materials, curriculum and training for professionals and caregivers interfacing with the court system.

Education

Loyola University Chicago School of Law

Chicago, IL

J.D. awarded May 1996, *Magna Cum Laude*

Cumulative GPA: 3.79/4.00 Class Rank: 4 out of 184

Academic Honors and Activities

Eve Jacobs CIVITAS ChildLaw Fellowship Recipient

Editor, Loyola University Chicago Law Journal and Children's Legal Rights Journal

Williams Fellow Research Assistant and Children's Law Legal Writing Teaching Assistant

Northwestern University

B.A with Distinction and Honors in English, June 1992

Evanston, IL

Cumulative GPA: 3.78/4.00; Phi Beta Kappa

**Professional
Activities and
Honors**

- 2005 California State Bar President's Pro Bono Services Award (*Williams v. State of California* team), 2007 Recipient of the American Bar Association Young Lawyers Division Child Advocacy Award, 2014 Impact Fund Award (*T.R. v. Quigley* team)
- Occasional Adjunct Professor at University of California, Berkeley School of Law teaching course entitled Child Welfare Reform Litigation and Co-Supervisor for Foster Education Project student-led clinic

POONAM JUNEJA

1212 Broadway, #600, Oakland, CA 94612 • pjuneja@youthlaw.org • (510) 899-6576

EDUCATION

Yale Law School, J.D., 2009

Selected Activities: Immigration Legal Services Clinic; Advocacy for Children and Youth Clinic; Pro bono research for the Brennan Center for Justice and Human Rights First; Senior editor, *Yale Law and Policy Review*

Selected Honors: Florence M. Kelly '37 Family Law Prize for exceptional achievement in family law

University of Cambridge, M.Phil in Criminology, 2006

Thesis: *Ideas about children in the juvenile justice system: The use of transfer in the United States and the abolition of the presumption of doli incapax in England and Wales*

University of California, Berkeley, B.A. in Sociology and Legal Studies, 2005

Thesis: *Cultural versus structural explanations for delinquency among immigrant groups: An examination of Asian and Pacific Islander youth in Oakland, California* (Advisor: Franklin Zimring)

Selected Honors: Highest Distinction in General Scholarship (*summa cum laude*)
Departmental Citation in Legal Studies (awarded to the top graduating student)

WORK EXPERIENCE

National Center for Youth Law, Oakland, CA, Senior Staff Attorney 2015-present
Work as part of a team to develop and litigate class action and other impact cases on behalf of children in need, with a focus on reforming child welfare systems and protecting children in immigration detention.

Public Counsel, Berkeley, CA, Staff Attorney 2014-2015
Assisted school districts and community leaders across the state to implement research-based alternatives to punitive school discipline practices. Worked on class action litigation to reform education in the juvenile justice system and end the school-to-prison pipeline. Helped lead state legislative and policy reform efforts around these areas.

Honorable Marsha S. Berzon, Ninth Circuit Court of Appeals, Law Clerk 2013-2014

Honorable Claudia Wilken, Northern District of California, Law Clerk 2011-2013

Southern Poverty Law Center, Jackson, MS, Law Fellow 2009-2011
Designed and implemented legal and policy strategies to reform Mississippi's juvenile justice system and to reduce the criminalization and imprisonment of children. Represented children in federal class action lawsuits challenging conditions of confinement in juvenile facilities and abusive school discipline practices.

Office of the State Public Defender, San Francisco, CA, Legal Intern Summer 2008
Researched and drafted memoranda regarding possible state habeas corpus claims related to newly discovered evidence and mitigating factors in a death penalty case.

United States Attorney's Office, New Haven, CT, Legal Extern Fall 2007

Federal Bureau of Investigation, Washington, DC, Honors Intern Summer 2007

National Council on Crime and Delinquency, Oakland, CA, Intern, Research Assistant, Research Associate 2002-2005
Co-authored multiple reports using quantitative research methods to analyze the well-being of minority youth populations in Northern California on a number of dimensions, including education, juvenile justice, and health.

BAR ADMISSIONS

Admitted to practice in California and Mississippi (inactive).

FREYA E. K. PITTS

Senior Attorney, Legal Advocacy ▪ National Center for Youth Law
1212 Broadway, Suite 600 ▪ Oakland, CA 94612 ▪ (510) 899-6572 ▪ fpitts@youthlaw.org

EDUCATION

YALE LAW SCHOOL, J.D., 2013

Khosla Memorial Fund for Human Dignity Prize

YALE UNIVERSITY, B.A., 2008

summa cum laude, with Distinction in History and International Studies

EXPERIENCE

NATIONAL CENTER FOR YOUTH LAW, Oakland, California

Senior Attorney, Legal Advocacy

July 2020 – present

Attorney, Legal Advocacy

Aug. 2018 – June 2020

- Develop and litigate impact cases on behalf of marginalized children and youth nationwide, including in cases related to child welfare, mental health, immigration, and education.
- Draft complaints, motions, briefs, and research memoranda; collaborate with clients, co-counsel, and expert witnesses; engage in discovery; pursue alternative dispute resolution; monitor compliance with post-litigation settlement agreements.

DISABILITY RIGHTS ADVOCATES, Berkeley, California

Staff Attorney

Sept. 2017 – Aug. 2018

Arthur Liman Public Interest Fellow

Sept. 2015 – Sept. 2017

- Developed and litigated impact cases in California and New York, focusing on the needs of youth with disabilities, including young people in juvenile halls, in schools, on college campuses, and in childcare programs.
- As a fellow, represented individual youth in expulsion defense proceedings as a member of the Legal Services for Children Pro Bono Panel.

HON. JON S. TIGAR, U.S. District Court for the Northern District of California

Sept. 2014 – Sept. 2015

Law Clerk

HON. JUDITH W. ROGERS, U.S. Court of Appeals for the D.C. Circuit

Aug. 2013 – Aug. 2014

Law Clerk

LOWENSTEIN INTERNATIONAL HUMAN RIGHTS CLINIC, Yale Law School

Jan. 2011 – May 2013

Student Director and Law Student Intern

- Pursued sentencing reform in Connecticut state legislature for prisoners convicted as minors.
- Developed recommendations for protection and support of survivors of sexual violence testifying in international criminal trials.
- Prepared amicus brief for Bangladesh International Crimes Tribunal discussing crimes against humanity.

IMMIGRATION LEGAL SERVICES CLINIC, Yale Law School

Jan. 2012 – May 2013

Student Director and Law Student Intern

- Obtained relief for client in removal proceedings advancing domestic violence-based asylum claim.
- Assisted clients with post-asylum immigration matters, including family reunification.

ADVOCACY FOR CHILDREN AND YOUTH CLINIC, Yale Law School Jan. 2013 – May 2013
Law Student Intern

- Represented child clients in child protection proceedings in the New Haven Superior Court for Juvenile Matters.

TAHIRIH JUSTICE CENTER, Falls Church, Virginia May 2012 – Aug. 2012
Immigration Law Intern

- Provided trauma-informed legal services to women fleeing gender-based harm, including domestic violence, sexual assault, forced marriage, and female genital cutting.
- Conducted client and intake interviews; drafted filings in asylum, Violence Against Women Act, T-visa, and U-visa cases; conducted country conditions research; coordinated supporting documentation from expert witnesses; and provided support to pro bono counsel.

DOUGHTY STREET CHAMBERS & DEATH PENALTY PROJECT, London, U.K. June 2011 – Aug. 2011
Human Rights Research Fellow

- Researched and wrote litigation memoranda for immigration, extradition, criminal, and prisoners' rights cases in British, foreign, and international courts.

RENAISSANCE MIDDLE SCHOOL / TEACH FOR AMERICA, Fairburn, Georgia July 2008 – June 2010
Social Studies Teacher

- Led classroom instruction and extracurricular enrichment for middle school students in a low-income urban community.
- Developed original global studies curriculum based on revised state standards.

PUBLICATIONS

The Power to Detain: Detention of Terrorism Suspects After 9/11, 38 YALE J. INT'L L. 123 (2013) (with Oona Hathaway, Samuel Adelsberg, Spencer Amdur, Philip Levitz, and Sirine Shebaya).

The Chilling Effect of the 'Material Support' Law on Humanitarian Aid: Causes, Consequences, and Proposed Reforms, 4 HARV. NAT'L SEC. J. 282 (2013) (with Samuel Adelsberg and Sirine Shebaya).

OTHER SKILLS AND QUALIFICATIONS

Languages: Proficient French (written and spoken).

Bar Memberships: State of California; U.S. Court of Appeals for the D.C. Circuit; U.S. Court of Appeals for the Ninth Circuit; U.S. District Court for the Northern District of California; U.S. District Court for the Eastern District of California; U.S. District Court for the Central District of California.

JEAN WELLES STROUT
jstrout@youthlaw.org

EXPERIENCE

- NATIONAL CENTER FOR YOUTH LAW** Oakland, CA
Attorney, Child Welfare & Legal Advocacy, 2020 – present
- Litigate class action and impact cases to reform child welfare systems.
 - Lead policy advocacy and training to end overmedication of youth in foster care.
- UNITED STATES DISTRICT COURT OF PUERTO RICO** San Juan, PR
Judicial Law Clerk to the Honorable Judge Carmen C. Cerezo, 2019 – 2020
- SUPPORT CENTER FOR CHILD ADVOCATES** Philadelphia, PA
Equal Justice Works Fellow, 2016 – 2018; *Staff Attorney*, 2018 – 2019
- Represented current and former foster youth in dependency and civil legal matters.
 - Advocated for policy and legislative change affecting system-involved youth.
 - Developed and implemented trainings for child advocates on representing youth.
- JUVENILE LAW CENTER** Philadelphia, PA
Zubrow Fellow in Children’s Law, 2014 – 2016
- Served as co-counsel in U.S. Supreme Court case *Montgomery v. Louisiana*.
 - Engaged in research and policy advocacy on foster care and juvenile justice issues.
 - Authored state and federal amicus briefs.
- HARVARD LEGAL AID BUREAU** Cambridge, MA
Student Counsel, 2012 – 2014; *Outreach Director*, 2013 – 2014
- Represented indigent clients in divorce, child custody, and restraining order actions.
 - Member of elected student Board of Directors.
- WOMEN’S LINK WORLDWIDE** Bogotá, Colombia
Ford Foundation Law School Public Interest Fellow, Summer 2013
- Researched human trafficking and sexual and reproductive rights in Latin America.
- PROFESSOR MINDY ROSEMAN, HARVARD LAW SCHOOL** Cambridge, MA
Research Assistant, Fall 2012; *Teaching Assistant*, Spring 2013
- Assisted in development and teaching of law school’s reproductive rights seminar.
- COMMITTEE FOR PUBLIC COUNSEL SERVICES** Boston, MA
Bergstrom Child Welfare Law Summer Fellow, Summer 2012
- Drafted memoranda on topics in child welfare law.

EDUCATION

HARVARD LAW SCHOOL, J.D., May 2014

Honors: *Cum Laude*
Dean's Award for Community Leadership

Activities: American Civil Liberties Union - HLS Chapter / Outreach Director
Harvard Journal of Law & Gender / Executive Online Content Editor
Harvard Law Students for Reproductive Justice / Secretary
Harvard Defenders / Student Attorney
Professor Laura Rosenbury / Research Assistant

SWARTHMORE COLLEGE, B.A., Gender & Sexuality Studies, May 2010

Capstone Project: *Defining, Denying & Disciplining Offenders: Seeing Child Sex Abuse*

Minors: Educational Studies; English Literature

HAMILTON COLLEGE ACADEMIC SEMESTER IN MADRID, SPAIN, Fall 2009

PUBLICATIONS

Protecting Youth From Themselves: The Overcriminalization of Consensual Sexual Behavior Between Adolescents (with Riya Saha Shah), CHILD. LEGAL RTS. J. (forthcoming).

Future Interrupted: The Collateral Damage Caused by the Proliferation of Juvenile Records (with Riya Saha Shah), Juvenile Law Center (February 2016), <https://juvenilerecords.jlc.org/juvenilerecords/documents/publications/future-interrupted.pdf>.

Dads and Dicta: The Values of Acknowledging Fathers' Interests, 21 CARDOZO J. L. & GENDER 135 (2015).

Comment, *The Massachusetts Transgender Equal Rights Bill: Formal Legal Equality in a Transphobic System*, 35 HARV. J.L. & GENDER 515 (2012).

BAR ADMISSIONS

- California Multijurisdictional Practice Program (application pending)
- Pennsylvania, 2016
- New York, Third Department, 2015

LANGUAGE SKILLS & INTERESTS

- Proficient in Spanish
- Animal rescue; a cappella; science fiction; banjo; snorkeling

AMANDA GRILL

EXPERIENCE

NATIONAL CENTER FOR YOUTH LAW

Oakland, CA

Fiza Quraishi Youth Law Fellow, Legal Advocacy Team

2017-2018

- Investigate, develop, and litigate class action and impact cases on behalf of foster youth to drive child welfare system reform
- Established new constitutional precedent in federal challenge to unsafe psychotropic medication practices
- Performed fifty-state legislative review of “sibling” definitions and shared with stakeholders
- Analyzed and presented state public data to determine merit and strategy of potential new lawsuit

CHILD ADVOCACY LAW CLINIC

Ann Arbor, MI

Advanced Student Attorney

2015 – 2017

- Represented parents and youth, as guardian ad litem, in Child Protective Services cases
- Conducted two termination of parental rights trials as lead attorney; reunited parent-clients with infant son after successful oral argument against prohibitive foster care agency policy
- Drafted Answer to Motion for Placement Change and Motion in Opposition to Suspend Parenting Time
- Negotiated multi-party, best interest of the child transition plan over state lines

SAN DIEGO COUNTY DISTRICT ATTORNEY’S OFFICE

San Diego, CA

Certified Legal Intern, Superior Court Division

2016

- Appeared on the record in all aspects of felony matters, including: arraignment, pre-trial conference, trial, sentencing, restitution, probation revocation, and evidentiary hearings
- Managed caseload of 18 probable cause hearings, including 4 conducted and bound over for trial
- Authored and argued 8 motions on the dismissal of counts or convictions, 4 motions on evidence suppression
- Researched and drafted 6 briefs and memoranda, including a brief on the California ECPA and probationers’ Fourth Amendment waivers, and a memorandum on solicitation of murder over social media

LOS ANGELES COUNTY DISTRICT ATTORNEY’S OFFICE

Los Angeles, CA

Law Clerk, Family Violence Division

2015

- Drafted motion to exclude third-party culpability evidence, jail call transcriptions, and witness statements
- Prepared research memorandum on proximate cause and involuntary manslaughter charges

TEACH FOR AMERICA

Jacksonville, FL

Mathematics Instructor, Varsity Volleyball Head Coach, Terry Parker High School

2012 – 2014

- Facilitated a 26-point increase (from 43% to 69%) in geometry students’ state exam passage rate through new instructional strategies and data analysis, driving the school’s comprehensive rank from 13th to 1st in the district
- Guided creation of new Leaders of Teacher Leadership and Development program; managed first-year teachers by reviewing instruction and leading professional development sessions

TEEN COURT JUVENILE DIVERSION PROGRAM

San Diego, CA

Case Manager, San Diego Advocates for Youth

2010

- Conducted intake evaluations, managed completion of all sentence requirements, and facilitated restorative justice discussions through mediation of high school student jury

STUDENT FOUNDATION

La Jolla, CA

Trustee, Dance Marathon Chair, Executive Historian, UC San Diego

2008 – 2011

- Cultivated donor support around the value of education and philanthropy, planned fundraising and stewardship events, voted on investment strategies, interviewed trustee applicants, and managed \$165,000 endowment fund

AMANDA GRILL

EDUCATION

UNIVERSITY OF MICHIGAN LAW SCHOOL, J.D. 2017

Honors: *Legal Practice*: presented to top 20% of students in legal research, writing, and oral argument course
Senior Judge: selected to serve as legal writing teaching assistant for two sections of first-year students

Papers: *Initiatives in Child Poverty*; *Linked Fate: Two case studies on the interest convergence theory*;
Dignity Through Discourse: An examination of Forst's right to justification in human rights practice

Activities: Michigan Journal of Race & Law, *Symposium Coordinator* and *Contributing Editor*
Civil Rights Litigation Clearinghouse, *Pro Bono Researcher*
Combatting Human Trafficking within the Child Welfare System pilot problem-solving initiative

UNIVERSITY OF CALIFORNIA SAN DIEGO (Revelle College), B.A. 2011

Major: Human Development

Minors: Human Rights; Public Service

Honors: *Provost Academic Honors*: Winter 2009, Spring 2009, & Fall 2011

Theses: *A Qualitative Study of Communication in Positive Behavior Support*
Ugandan Girl Soldiers: The Plight for Reintegration

ADDITIONAL

BAR ADMISSION

Admitted to the California Bar.

AWARDS & CERTIFICATES

Teacher of the Month – November 2012

Peer Health Education Trainer, Sexual Health Specialist – June 2010

UCSD Emerging Leader – June 2008

Jacqueline Stolzenberg

EDUCATION

University of Michigan Law School	Ann Arbor, MI
<i>Juris Doctor</i>	May 2018
Activities:	Michigan Journal of Gender & Law, <i>Selections Editor (Fall 2017), Associate Editor (2016-2017)</i> Organization of Public Interest Students, <i>Co-Chair</i>
Honors:	Student Funded Fellowship Public Interest Grant; Bergstrom Child Welfare Law Fellow; Dean's Public Service Fellow
Wellesley College	Wellesley, MA
<i>Bachelor of Arts in Philosophy and Political Science</i>	May 2010
Activities:	D.C. Superior Court, <i>Judicial Intern for Judges Zoe Bush and Fern Flanagan Saddler (summer 2009)</i>

EXPERIENCE

National Center for Youth Law, Oakland, CA	September 2018 – 2019
<i>Fiza Quraishi Youth Law Fellow</i>	
•	Work as part of multi-organization attorney teams prosecuting class action impact litigation on behalf of foster youth to reform systems serving those youth, including: administration of psychotropic medication to foster youth in Missouri; placement array and provision of mental health screening and services in Kansas.
•	Research and write memos for litigation team about specific legal questions affecting litigation strategy.
•	Review agency documents and policies, foster youth files, and other documents produced during discovery to find useful evidence, assist with deposition preparation, create document log.
Child Welfare Appellate Clinic, Ann Arbor, MI	Fall 2017
<i>Student Attorney</i>	
•	Researched and wrote appellate brief appealing termination of incarcerated client's parental rights.
•	Prepared for argument before the Michigan Court of Appeals.
Children's Law Center, Washington, DC	Summer 2017
<i>Summer Law Clerk, Guardian ad Litem Special Education Project</i>	
•	Researched and reported on FAPE and truancy, ALJ decisions on private placements for students with IEPs, alternative education resources for clients with learning disabilities; cite-checked education law practice kit.
•	Performed and reported on solo field observations of child clients in summer school programs; attended IEP meetings, permanency planning conferences, and various court hearings for child welfare and truancy cases.
Pediatric Advocacy Clinic, Ann Arbor, MI	Fall 2016
<i>Student Attorney</i>	
•	Advocated on behalf of low-income children and their families through a medical-legal partnership multidisciplinary model to improve child health.
•	Negotiated with school and district officials to obtain medical accommodations at school for client's daughter.
•	Represented client's son at fair hearing to appeal Medicaid denial of speech generating device.
Child Advocacy Law Clinic & Juvenile Justice Clinic, Ann Arbor, MI	Summer – Fall 2016
<i>Student Attorney</i>	
•	Advocated on behalf of children and parents in child protective and juvenile delinquency proceedings.
•	Conducted home visits, observed supervised parenting time, interviewed witnesses to establish best interests position.
•	Researched and wrote various court filings, including: motion to dismiss a paternity suit; motion and brief to allow hearsay evidence under "tender years" exception.

KIRA SETREN

EDUCATION

- Brandeis University**, Waltham, MA January 2012-May 2015
- Bachelor of Arts, International and Global Studies; Minors: Business, Hispanic Studies
 - Honors: *Magna cum laude*, Dean's List every semester; Gold medal in community service
- City University**, London, UK September-December 2011
- International Institute**, Madrid, Spain January-May 2014
-

RELEVANT EXPERIENCE

National Center for Youth Law, Oakland, CA January 2018-July 2020

Paralegal

- Assist with impact litigation aimed at reforming the systems that serve vulnerable children and youth
- Perform factual and legal research; gather and analyze evidence to bolster legal claims
- Prepare court filings: edit, bluebook, cite-check, review court rules, and ECF file legal documents
- Draft case declarations, filings, and correspondence; conceptualize, author, and publish media communications
- Create and implement internal programs and systems; prepare guides and lead trainings
- Collaborate across campaigns to develop and further organizational goals; assist with nonprofit growth

Cleary Gottlieb Steen & Hamilton LLP, New York, NY July 2015-January 2018

Litigation Paralegal

- Provided litigation assistance for robust caseload of high-profile and pro bono matters
- Worked on all aspects of case development from engagement through discovery, settlement, and trial
- Interacted extensively with clients; prepared, participated in, and memorialized client interviews
- Conducted, organized, and analyzed legal, internet, factual, social science, and field research
- Drafted, edited, and managed court documents; developed and maintained databases and case materials
- Oversaw paralegal teams; liaised with counsel, internal and external departments, and vendors

United States Agency for International Development, Washington, DC June-September 2014

Intern, Bureau for Policy, Planning and Learning

- Assisted in the planning and implementation of the Frontiers in Development Forum: multi-day event that brought together global leaders and the public to further goal of ending extreme poverty by 2030
- Staffed forum, interacted with visiting leaders and attendees in a professional manner

ILP Abogados, Madrid, Spain February-May 2014

Legal Intern

- Researched and distilled Spanish and U.S. civil procedure for use in international law digest
- Translated documents from Spanish to English and proofread materials

WorldBoston, Boston, MA July-August 2013

Program Assistant

- Planned, executed, and oversaw private meetings with international and local leaders
- Researched and drafted proposals for U.S. State Department; created original blog and social media content

Community Art Center, Cambridge, MA June-August 2013

Administrative and Marketing Intern

- Provided marketing and operational support for enrichment program that served low-income youth
 - Wrote, edited, and designed publications that were delivered to 2,000+ subscribers
-

PERSONAL

- Language: Proficient in Spanish

Joshua Nomkin

EDUCATION

University of California, Berkeley, School of Law, Berkeley, CA

J.D. Candidate, May 2021

Honors: Prosser Prize (2nd in Class), Evidence

Activities: La Raza Workers' & Tenants' Rights Clinic, Director; *California Law Review*, Articles Editor; Research Assistant to Professor David Oppenheimer; Youth Advocacy Project, 1L Volunteer

Pomona College, Claremont, CA

B.A., *cum laude*, in History, May 2013

Honors: John Hayes Beaver History Prize; Strauss Fellow; Community Cornerstone Award; Pomona College Scholar (Fall '09, Fall '10); National Merit Scholar

Activities: Draper Center for Community Partnerships, Student Coordinator; Sponsor (Mentor of First-Year Students); English Teaching Intern (Buenos Aires, Argentina)

EXPERIENCE

East Bay Children's Law Offices, Oakland, CA

May–Aug. 2020

Summer Intern

Assisted attorneys who represent children in foster care, focusing on educational rights and youth with contact with juvenile legal system. Wrote memos on advocacy strategy for hearings of nonminor dependents facing benefit termination and on rights of youth in short-term residential therapeutic placements.

East Bay Community Law Center, Education Advocacy Clinic, Berkeley, CA

Aug. 2019–May 2020

Law Student Intern

Advocated for young people in expulsion proceedings and special education hearings. Conducted legal research on the California Education Code, Individuals with Disabilities Education Act, and Section 504 of the Rehabilitation Act of 1973. Liaised with clients' families, presented at clients' court hearings, and coordinated among service providers. Drafted complaint alleging violation of Title VI of the Civil Rights Act of 1964.

National Center for Youth Law, Oakland, CA

May–Aug. 2019

Summer Law Clerk

Supported two class action cases brought by NCYL on behalf of foster youth. Bolstered litigation strategy by researching and writing memos on procedural and substantive legal questions. Contributed to case theory by conducting document review, elevating key documents to my attorney-supervisor.

Arabella Advisors, Washington, DC

Compliance Associate

Jan. 2017–May 2018

Compliance Assistant

July 2015–Jan. 2017

Provided financial and operational management to five multimillion-dollar social welfare and charitable organizations. Prepared and filed corporate, charitable, lobbying, and sales/use tax registrations and reports. With technology team, built Salesforce system to operationalize compliance triage process. Conducted internal audit to verify documentation and highlight team learning opportunities and business process improvements.

Turning the Page, Washington, DC

Feb. 2014–June 2015

AmeriCorps VISTA Volunteer

Performed in-person outreach for parent engagement programs at six Title I D.C. Public Schools. Ensured smooth execution of 35+ family engagement events. Co-facilitated workshops and organized on-site volunteers. Connected families to resources in their city by planning eight field trips to educational sites and local universities. Developed ongoing trainings about power and privilege for peer VISTA volunteers.

Donald A. Strauss Foundation, Pomona, CA

Aug. 2012–May 2013

Strauss Scholar

Created college access program at a Title I high school. Led a cohort of dedicated college student mentors, wrote lessons, and facilitated activities during weekly after-school meetings.

Exhibit B

Date	Name	Expense Type	Vendor	Description	Amount
2/8/18	Leecia Welch	Flights	United Airlines	Flights to and from Kansas City 2/26-3/2 to meet with local individuals connected to foster care system	\$296.60
2/16/18	Poonam Juneja	Flights	Southwest Airlines	Flights to and from Kansas City 2/26-3/2 to meet with local individuals connected to foster care system	\$496.96
2/23/18	Poonam Juneja	Flights	Southwest Airlines	Change date of flight to Kansas City to 2/28	\$109.00
2/28/18	Poonam Juneja	Taxi	Lyft	Travel to OAK airport from home traveling to Kansas for interviews with various stakeholders involved in foster care system	\$23.61
2/28/18	Poonam Juneja	Taxi	Lyft	Travel from KC airport to hotel arriving in Kansas for interviews with various stakeholders involved in foster care system	\$30.90
3/2/18	Poonam Juneja	Hotel	HOTEL INDIGO	Hotel for 2/28-3/2/18 for meetings with local individuals connected to foster care system	\$385.80
3/2/18	Poonam Juneja	Taxi	LYFT	Travel from hotel to KC airport returning home from meetings with local stakeholders	\$28.66
3/2/18	Poonam Juneja	Taxi	LYFT	Travel from OAK airport to office returning from meetings with Kansas stakeholders	\$19.21
3/2/18	Leecia Welch	Hotel	HOTEL INDIGO	Hotel for 2/28-3/2/18 for meetings with local individuals connected to foster care system	\$354.56
3/4/18	Leecia Welch	Flights	United Airlines	Flights to and from Kansas for 3/18-3/21 for meetings with various local stakeholders	\$499.60
3/18/18	Leecia Welch	Hotel	HOTEL INDIGO	Hotel for 3/18-21 for meetings with various local stakeholders	\$405.34

3/21/18	Leecia Welch	Taxi	SQ * YELLOW CO OP	Taxi from airport to home returning from Kansas for meetings with various local stakeholders	\$51.90
4/20/18	Leecia Welch	Flights	United Airlines	Flights to and from Kansas for 5/14-5/16/18 for meetings with individuals connected to foster care system	\$355.40
5/14/18	Leecia Welch	Hotel	HOTEL INDIGO KANSAS CITY	Hotel for 5/14-5/16/18 for meetings with individuals connected to foster care system	\$329.47
5/16/18	Leecia Welch	Taxi	YELLOW CAB SF 415- 8394600 CA	Taxi from airport to home returning from Kansas meetings with local individuals connected to foster care system	\$49.90
6/10/18	Leecia Welch	Flights	United Airlines	Flight to Kansas on 6/17/18 for meetings with local individuals involved in child welfare system	\$552.20
6/3/18	Leecia Welch	Flights	United Airlines	Flight from Kansas for 6/20/18 returning from meetings with local individuals involved in child welfare system	\$209.20
6/19/18	Leecia Welch	Taxi	UBER	Uber from client meeting	\$23.98
6/20/18	Leecia Welch	Taxi		Taxi from airport returning home from meetings with local individuals involved in child welfare system	\$50.37
6/20/18	Leecia Welch	Hotel	HOTEL INDIGO	Hotel for 6/17-6/20/18 for meetings with local individuals involved in child welfare system	\$769.12
6/20/18	Leecia Welch	Taxi	UBER	6/20/18 Uber from hotel to airport	\$33.10
7/13/18	Leecia Welch	Flights	United	Flight from SFO to/from Kansas for 7/31-8/4/18 for meetings with local individuals involved in child welfare system	\$490.40
7/31/18	Leecia Welch	Taxi	UBER (\$31.90 + \$7)	Uber from home to airport	\$38.90

8/2/18	Leecia Welch	Taxi	UBER	8/2/18 Uber from stakeholder meeting to hotel	\$21.18
8/3/18	Leecia Welch	Taxi	UBER	8/2/18 Uber tip from stakeholder meeting to hotel	\$2.00
8/4/18	Leecia Welch	Taxi	UBER	Uber to airport (\$30.51 + \$6) returning home from meetings with local individuals involved in child welfare system	\$36.51
8/4/18	Leecia Welch	Hotel	21 C MUSEUM HOTEL KANSAS CITY MO	Hotel for 7/31-8/4/18 for meetings with local individuals involved in child welfare system	\$922.85
8/3/18	Leecia Welch	Flights	United Airlines	Flights to and from Kansas for 8/29-9/2/18 for meetings with potential client and other local individuals connected with child welfare system	\$302.40
8/29/18	Leecia Welch	Taxi	UBER	Uber from home to airport	\$46.80
9/1/18	Leecia Welch	Hotel	21 C MUSEUM HOTEL KANSAS CITY MO	Hotel for 8/29-9/2/18 Meetings with potential client and other local individuals connected with child welfare system	\$592.70
9/3/18	Leecia Welch	Taxi	SQ*NATIONAL CAB. VETERAN	Taxi from airport to home returning from Kansas for meetings with potential client and other local stakeholders	\$56.52
9/10/18	Leecia Welch	Flights	United	Flights to/from Kansas City for 10/6-10/11 for meetings with local foster care advocates and other stakeholders (total charge was \$246.40; 50% charged to MB)	\$123.20
9/28/18	Freya Pitts	Flights	Southwest Airlines	Flight from Oak-Kansas City on 10/6-10/11 for meetings with local foster care advocates and other stakeholders (total charge was \$524.28; 50% charged to MB)	\$262.14
10/6/18	Leecia Welch	Flights	UNITED	Flights to and from Kansas on 11/4-11/8 for meetings with local foster care advocates and potential clients	\$296.40

10/6/18	Leecia Welch	Taxi	UBER	Uber to SFO tip traveling to Kansas for meetings with local foster care advocates and co-counsel	\$8.00
10/6/18	Leecia Welch	Taxi	UBER	Uber to SFO traveling to Kansas for meetings with local foster care advocates and co-counsel	\$54.53
10/9/18	Freya Pitts	Hotel	HOLIDAY INN EXPRESS	Independence, Missouri Hotel for 10/9-10/12 (total charge was \$368.68; 50% charged to MB) for meetings with local foster care advocates and co-counsel	\$184.34
10/10/18	Leecia Welch	Taxi	UBER	Uber to co-counsel meeting	\$17.94
10/11/18	Leecia Welch	Hotel	21C MUSEUM HOTEL	Hotel for 10/7-11 (total charge was \$1,473.10; 50% charged to MB) for meetings with local foster care advocates and co-counsel	\$736.55
10/12/18	Leecia Welch	Taxi	CITYWIDE TAXI	Cab from SFO returning from Kansas meetings with local foster care advocates and co-counsel (total charge was \$51; 50% charged to MB)	\$25.50
10/12/18	Freya Pitts	Car Rental	ALAMO RENT-A-CAR	Car rental - for transportation for Freya and Leecia for meetings with local foster care advocates and co-counsel (total charge was \$185.17; 50% charged to MB)	\$92.59
10/11/18	Freya Pitts	Gas	PILOT_00443	Gas for Kansas City trip for cocounsel mtg and mtgs with local advocates (total charge was \$24.80; 50% charged to MB)	\$12.40
10/12/18	Freya Pitts	Gas	KCI KWIK SHOP	Gas for Kansas City trip for cocounsel mtg and mtgs with local advocates (total charge was \$8.96; 50% charged to MB)	\$4.48
11/8/18	Leecia Welch	Taxi	FLYWHEEL	Cab from SFO to home	\$56.50

11/11/18	Leecia Welch	Flights	United Airlines	Flights to and from Kansas for 11/15-11/16/18 for client meetings	\$1,136.40
11/19/18	Leecia Welch	Parking	SFO Parkingcen	Parking at SFO for 11/15-11/16 travel for client meetings	\$72.00
11/26/18	Kira Setren	Mailing	United States Postal Service	Kansas PHV service for Leecia and Freya	\$25.08
11/26/18	Kira Setren	Court Fees	COURTS/USDC-NY-S	Pro Hac Vice Application Fees for Leecia and Freya (\$50 each)	\$100.00
11/13/18	Leecia Welch	Flights	United Airlines	Flights to and from Kansas for 11/27-12/1/18 for meetings with various stakeholders re foster care issues	\$327.40
11/30/18	Leecia Welch	Taxi	UBER	Tip for uber to stakeholder meeting	\$4.00
11/30/18	Leecia Welch	Taxi	UBER	Uber to stakeholder meeting	\$61.29
12/5/18	Leecia Welch	Flights	UNITED	Flights to and from Kansas for 12/16-12/19/18 for meetings with various stakeholders re foster care issues	\$266.40
12/14/18	Leecia Welch	Flights	UNITED	Flight to/from Kansas for 1/3-1/6/19 for meetings with foster care advocates and potential clients	\$296.40
12/16/18	Leecia Welch	Taxi	UBER	Uber to airport traveling to Kansas for meetings with various stakeholders re foster care issues	\$36.00
12/17/18	Leecia Welch	Rental car	ENTERPRISE	Rental car for meetings with various stakeholders re foster care issues	\$30.35
12/17/18	Leecia Welch	Taxi	Expedia	Car rental additional charge for meetings with various stakeholders re foster care issues	\$10.00
12/18/18	Leecia Welch	Taxi	UBER	Uber to stakeholder meeting	\$20.08
12/19/18	Leecia Welch	Taxi	UBER	Uber from stakeholder meeting	\$18.47

12/19/18	Leecia Welch	Taxi	FLYWHEEL	Taxi from airport to home returning from Kansas for meetings with various stakeholders re foster care issues	\$50.80
1/4/19	Leecia Welch	Taxi	Uber	Travel to client meetings	\$35.67
1/29/19	Leecia Welch	Flights	United Airlines	Flight from Kansas for 2/14/19 for client meetings and meetings with families involved in foster care system	\$128.30
2/12/19	Leecia Welch	Taxi	UBER	Travel from Kansas stakeholder meetings	\$9.06
2/13/19	Leecia Welch	Taxi	LYFT	Travel back and forth to Topeka for client meetings	\$107.41
2/16/19	Leecia Welch	Flights	United Airlines	Flights to and from Kansas on 3/4-3/7/19 for meetings with clients and potential clients	\$542.60
3/6/19	Leecia Welch	Taxi	UBER	Travel to Topeka for stakeholder meetings	\$84.36
3/6/19	Leecia Welch	Taxi	UBER	Travel from Topeka for client meetings	\$131.06
3/20/19	Leecia Welch	Flights	United Airlines	Flights to and from Kansas on 4/17-4/20/19 for meetings with stakeholders and meeting with Defendants	\$286.60
4/18/19	Leecia Welch	Car Rental	PHILLIPS 66 - 49 FASTL	Gas for rental car for meetings with stakeholders and meeting with Defendants	\$29.29
4/19/19	Leecia Welch	Car Rental	Enterprise	Car rental for meetings with stakeholders and meeting with Defendants	\$57.55
4/20/19	Leecia Welch	Parking	60776 - SFO PARKINGCEN	Parking at SFO for 4/17-4/20 during travel to Kansas for meetings with stakeholders and meeting with Defendants	\$108.00
4/26/19	Kira Setren	Court Fees	COURTS/USDC-KS-PG	Filing fee for Poonam's PHV Motion	\$50.00
5/8/19	Leecia Welch	Flights	United Airlines	Flights to and from Kansas on 5/16-5/19/19 for client meetings and meetings with other stakeholders	\$836.60

5/19/19	Leecia Welch	Parking	60776 - SFO PARKINGCEN	Parking at SFO for 5/15-5/19 during travel to Kansas for meetings with clients and other stakeholders	\$108.00
5/25/19	Leecia Welch	Flights	United Airlines	Flights to and from Kansas on 6/8-6/11 for client and stakeholder meetings	\$523.60
6/1/19	Leecia Welch	Flights	United Airlines	Flights to and from Kansas on 7/7-7/9/19 for hearing and client meetings	\$615.60
6/10/19	Leecia Welch	Taxi	UBER	local travel to Kansas client meeting	\$9.61
6/11/19	Leecia Welch	Car Rental	Avis	Car rental for client and stakeholder meetings	\$93.70
6/11/19	Leecia Welch	Car Rental	PHILLIPS 66 - TIFFANY	Gas for car rental for client and stakeholder meetings	\$17.76
6/11/19	Leecia Welch	Hotel	CROSSROADS HOTEL	6/10-6/11/19 Hotel for client meetings (one night)	\$243.10
6/11/19	Leecia Welch	Parking	60776 - SFO PARKINGCEN	Parking at SFO while traveling to Kansas for 6/8-6/11 meetings with clients and other stakeholders	\$108.00
6/16/19	Leecia Welch	Flights	United Airlines	Flights to and from Kansas on 7/16-18/19 for client meetings	\$486.60
7/7/19	Leecia Welch	Taxi	UBER	Uber from home to airport for Kansas status conference	\$31.05
7/8/19	Leecia Welch	Taxi	UBER	Uber from status conference to stakeholder meeting	\$7.73
7/17/19	Leecia Welch	Car Rental	Hertz	Car rental for transportation to/from client meetings	\$201.22
7/18/19	Leecia Welch	Parking	60776 - SFO PARKINGCEN	Parking at SFO for 7/16-7/18 travel for client meetings	\$108.00
8/2/19	Leecia Welch	Flights	United Airlines	Flights to and from Kansas 8/14-8/17 for client meetings	\$520.30
8/2/19	Leecia Welch	Hotel	EXPEDIA 745993683680 4	Hotel for 8/14-17 Kansas client meetings	\$570.23
8/14/19	Leecia Welch	Taxi	UBER	Taxi for client meetings	\$30.56
8/17/19	Leecia Welch	Taxi	UBER	Taxi for client meetings	\$34.80
9/5/19	Leecia Welch	Flights	United Airlines	Flight to Kansas on 10/22/19 for expert meeting	\$367.30

9/18/19	Leecia Welch	Hotel	EXPEDIA 747606822181 8	10/22-25 Hotel in KC for expert meetings (3 nights)	\$591.46
9/19/19	Leecia Welch	Flights	United Airlines	Flights to and from Kansas for 11/18-11/21/19 for stakeholder meetings (split 50% with another case; original charge was \$376.60)	\$188.30
10/7/19	Leecia Welch	Flights	United Airlines	Flight returning from Kansas City to SFO on 11/13/19	\$451.60
10/11/19	Leecia Welch	Flights	United Airlines	Flight from Kansas to SFO on 10/24/19 returning from expert meeting (split 50% with another case; original charge was \$550.80)	\$275.40
10/16/19	Freya Pitts	Flights	Southwest Airlines	Flights OAK-MCI-OAK on Nov. 11-13 for Nov. 12 mediation	\$420.96
10/21/19	Leecia Welch	Hotel	EXPEDIA 748679000867 1	Hotel for 11/11-13/19 Mediation session and expert meeting	\$381.76
10/22/19	Leecia Welch	Taxi	UBER	Uber from airport for expert and client meetings	\$38.41
10/23/19	Leecia Welch	Taxi	UBER	Uber to client meeting	\$43.54
11/5/19	Freya Pitts	Hotel	HOTELSCOM92 10162398607	Hotel 11/11-11/13 for 11/12/19 Kansas mediation	\$370.83
11/11/19	Freya Pitts	Taxi	LYFT	Travel from airport to hotel - 11/11 trip for 11/12/19 mediation	\$32.63
11/11/19	Freya Pitts	Taxi	LYFT	Travel from home to airport for 11/11 trip to 11/12/19 mediation	\$24.42
11/11/19	Leecia Welch	Taxi	UBER	Uber to airport for mediation	\$35.46
11/12/19	Leecia Welch	Taxi	UBER	Uber from airport	\$34.98
11/12/19	Leecia Welch	Taxi	UBER	Uber to team meeting	\$11.24
11/13/19	Leecia Welch	Flights	United Airlines	Change of flights for 11/18-11/21/19 trip (split 50% with another case; original charge was \$348.70)	\$174.35
11/13/19	Freya Pitts	Taxi	BART-OAC QPS	Travel from Airport on 11/13 following 11/12/19 mediation	\$9.00
11/13/19	Freya Pitts	Taxi	LYFT	Local travel including for co-counsel to 11/12/19 meal with team	\$8.10

11/13/19	Freya Pitts	Taxi	LYFT	Travel from hotel to airport on 11/13 for 11/12 mediation	\$30.59
11/13/19	Leecia Welch	Taxi	UBER	Uber from team meeting	\$9.20
11/13/19	Leecia Welch	Taxi	UBER	Uber to team meeting	\$16.85
11/14/19	Leecia Welch	Taxi	SQ *SAN FRANCISCO Y	Taxi from airport returning from mediation	\$51.90
11/16/19	Freya Pitts	Hotel	Sheraton	Partial refund - 11/12 mediation hotel	-\$17.60
11/7/19	Leecia Welch	Hotel	21 C MUSEUM HOTEL	Hotel in Kansas for 11/17-11/20	\$511.12
11/18/19	Leecia Welch	Taxi	UBER	Uber to stakeholder meeting	\$20.98
11/21/19	Leecia Welch	Rental car	Enterprise	Rental car for Topeka stakeholder meetings	\$132.64
12/3/19	Leecia Welch	Hotel	21 C MUSEUM HOTEL	Hotel in Kansas for 12/14-12/17	\$316.45
11/22/19	Leecia Welch	Flights	United Airlines	Flights to and from Kansas 12/14-12/17 for mediation	\$361.30
11/25/19	Freya Pitts	Flights	Southwest Airlines	12/14-12/17/19 travel for 12/15-12/16/19 mediation	\$395.98
12/14/19	Freya Pitts	Taxi	LYFT	12/14 ride to airport for travel to 12/15-12/16 mediation	\$23.66
12/14/19	Leecia Welch	Taxi	LYFT	Taxi to SFO - KS mediation	\$44.47
12/15/19	Freya Pitts	Taxi	LYFT	12/14 ride from airport to hotel for 12/15-12/16 mediation	\$29.65
12/15/19	Freya Pitts	Taxi	LYFT	Lyft to 12/15 mediation	\$7.36
12/17/19	Freya Pitts	Hotel	21 C MUSEUM HOTEL	Hotel from 12/14-12/17 for 12/15-12/16 mediation	\$430.62
12/17/19	Freya Pitts	Taxi	LYFT	12/17 Lyft from airport to home after 12/15-12/16 mediation	\$23.40
12/17/19	Freya Pitts	Taxi	UBER	12/17 travel from hotel to airport after 12/15-12/16 mediation	\$35.62
12/17/19	Leecia Welch	Taxi	SQ *SULAIMAN	12.17.19 taxi home from SFO - mediation	\$51.24
12/18/19	Leecia Welch	Taxi	UBER	12.17.19 Uber to MCI airport - mediation	\$28.70
1/18/20	Leecia Welch	Flights	United Airlines	Flights to and from Kansas for 2/6-2/8 for mediation	\$411.60
1/22/20	Freya Pitts	Flights	Southwest Airlines	Flight for 2/7/20 KS mediation	\$396.96

1/22/20	Freya Pitts	Flights	Southwest Airlines	Flights to and from Kansas for mediation on 2/25-2/26	\$336.96
2/6/20	Freya Pitts	Taxi	LYFT	2/6/20 ride home-OAK for 2/7/20 mediation	\$21.66
2/7/20	Freya Pitts	Taxi	LYFT	2/6/20 ride from airport to hotel for 2/7/20 mediation	\$28.99
2/8/20	Freya Pitts	Taxi	UBER	2/8/20 OAK-home for 2/7/20 med. - also used 5.50 no show refund	\$16.48
2/8/20	Freya Pitts	Taxi	UBER	2/8/20 cancel fee; credited back (no-show); used for 2/8 airport	\$5.50
2/8/20	Leecia Welch	Parking	60776 - SFO PARKINGCEN	Parking for mediation	\$72.00
2/8/20	Leecia Welch	Taxi	UBER	Uber to airport	\$30.79
2/9/20	Freya Pitts	Hotel	21C MUSEUM KANSAS CITY	2/6/20-2/8/20 stay for 2/7/20 mediation	\$372.01
2/9/20	Freya Pitts	Taxi	LYFT	2/8/20 ride from hotel to airport after 2/7/20 mediation	\$24.71
2/9/20	Leecia Welch	Hotel	21C MUSEUM KANSAS CITY	Hotel for mediation	\$387.49
2/10/20	Leecia Welch	Flights	United Airlines	Flight to and from Kansas for 2/24/20-2/27/20 trip (total charge was \$1,071.60; 50% charged to MB)	\$535.80
2/12/20	Leecia Welch	Hotel	EXPEDIA 752038890717 9	Hotel for 2/25-26 Mediation	\$354.80
2/13/20		Mediation		Payment to DLA Piper for 25% of mediation fee due for Kevin Ryan	\$4,664.39
2/16/20	Freya Pitts	Flights	Southwest Airlines	2/27/20 MCI-OAK after 2/25-2/26/20 mediation	\$204.00
2/25/20	Freya Pitts	Taxi	UBER	2/24/20 ride from airport to hotel for 2/25-2/26/20 mediation	\$30.47
2/25/20	Freya Pitts	Taxi	UBER	Ride from hotel to 2/25/20 mediation	\$7.59
2/26/20	Leecia Welch	Flights	United Airlines	Flight to KC for on 3/9/20 for 3/10 clients meetings	\$330.20
2/26/20	Leecia Welch	Hotel	EXPEDIA 710075821786 74	Hotel for 3/9-3/12 for client meetings	\$552.68

2/26/20	Leecia Welch	Parking	60776 - SFO PARKINGCEN	Parking at SFO for mediation	\$108.00
2/26/20	Leecia Welch	Taxi	UBER	Uber from mediation	\$7.84
2/26/20	Leecia Welch	Taxi	UBER	Uber to airport	\$35.71
2/27/20	Freya Pitts	Hotel	21C MUSEUM KANSAS CITY	Hotel 2/24/20-2/27/20 for 2/25 and 2/26 mediation	\$528.39
2/27/20	Freya Pitts	Taxi	LYFT	2/27/20 ride OAK-home following 2/25-26/20 mediation	\$22.82
2/27/20	Freya Pitts	Taxi	LYFT	2/27/20 ride from hotel to MCI following 2/25-26/20 mediation	\$26.52
3/5/20	Leecia Welch	Flights	United Airlines	Flight returning from KC to SFO for 3/12/20	\$517.20
3/10/20	Leecia Welch	Taxi	UBER	Uber from airport	\$30.09
3/10/20	Leecia Welch	Taxi	UBER	Uber from airport tip	\$6.50
3/11/20	Leecia Welch	Car Rental	Enterprise	Car rental for client meetings	\$116.45
3/11/20	Leecia Welch	Car Rental	PHILLIPS 66 - GRAND SL	Gas for car rental	\$19.09
3/11/20	Leecia Welch	Taxi	UBER	Uber to client meeting	\$9.48
3/12/20	Leecia Welch	Taxi	SQ *S.F TAXI CAB CO.	Cab from SFO	\$51.24
3/12/20	Leecia Welch	Taxi	UBER	Uber to airport	\$33.67
				TOTAL	\$34,292.69

Exhibit C

Name	Total Time	Law School graduation year	Rate	Total
Leecia Welch	951.1	1996	\$ 500	\$ 475,550.00
Poonam Juneja	729.5	2009	\$ 395	\$ 288,152.50
Freya Pitts	750.5	2013	\$ 365	\$ 273,932.50
Jean Strout	88.9	2014	\$ 325	\$ 28,892.50
Amanda Grill	123.0	2017	\$ 270	\$ 33,210.00
Jackie Stolzenberg	264.7	2018	\$ 250	\$ 66,175.00
Josh Nomkin	132.2	Law student	\$ 200	\$ 26,440.00
Kira Setren	95.8	Paralegal	\$ 200	\$ 19,160.00
TOTAL	3,135.7			\$ 1,211,512.50

Date	Name	Description	Time Billed	With Travel at 50%
11/22/17	Leecia Welch	Call with CR re next steps on potential KS litigation	0.5	0.5
12/8/17	Leecia Welch	Review KS background materials from CR	2.3	2.3
12/15/17	Leecia Welch	Co-counsel call re issues in Kansas and case development strategy	1.0	1.0
12/21/17	Leecia Welch	Co-counsel call re investigation	1.0	1.0
12/21/17	Leecia Welch	Review documents re Kansas DCF	1.2	1.2
12/21/17	Leecia Welch	Call with PJ re issues spreadsheet	0.3	0.3
12/21/17	Leecia Welch	Research data issues re Kansas child welfare system	0.6	0.6
1/5/18	Leecia Welch	Conversation with PJ re next steps in investigation	0.4	0.4
1/10/18	Leecia Welch	Review KS reports on child welfare system problems	0.5	0.5
1/10/18	Leecia Welch	Update spreadsheet re data needs	0.3	0.3
1/12/18	Leecia Welch	Emails with KS local advocates re time to talk on investigation	0.2	0.2
1/19/18	Leecia Welch	Call with co-counsel re issues in KS foster care system	1.5	1.5
1/23/18	Leecia Welch	Call with co-counsel and KS local advocates re issues in KS foster care system	1.0	1.0
1/23/18	Leecia Welch	Review and analyze data re KS foster care	1.2	1.2
2/1/18	Leecia Welch	Emails re scheduling call with KS local advocates	0.2	0.2
2/5/18	Leecia Welch	Review KS length of stay and other placement data	1.2	1.2
2/5/18	Leecia Welch	Phone call with KS local advocates re problems in Kansas foster care system	0.9	0.9
2/16/18	Leecia Welch	Phone call with co-counsel re problems in Kansas foster care system	0.8	0.8
2/20/18	Leecia Welch	Review reports, data on KS foster care system	0.8	0.8
2/21/18	Leecia Welch	Review news articles re foster care issues in KS	0.3	0.3
2/22/18	Leecia Welch	Emails with KS local advocates and co-counsel re setting up interviews	0.3	0.3
2/23/18	Leecia Welch	Emails with co-counsel regarding travel to KS for interviews with local advocates and people involved in foster care system	0.2	0.2
2/24/18	Leecia Welch	Review KS background materials in prep for KS meetings with local individuals involved in foster care system	1.5	1.5
2/28/18	Leecia Welch	Travel from SF to Kansas City for meeting with local individuals involved in foster care system	5.5	2.25
2/28/18	Leecia Welch	Travel from hotel to meeting with local advocates	0.4	0.2
2/28/18	Leecia Welch	Travel back to hotel from meeting with local advocates	0.4	0.2

Date	Name	Description	Time Billed	With Travel at 50%
2/28/18	Leecia Welch	Meeting with co-counsel re investigation and upcoming interviews - LW, SD, LBB, PJ	1.0	1.0
2/28/18	Leecia Welch	Meeting with local advocates over dinner re issues in foster care system	1.9	1.9
3/1/18	Leecia Welch	Travel back to hotel from interviews	0.5	0.25
3/1/18	Leecia Welch	Travel between stakeholder meetings	0.6	0.3
3/1/18	Leecia Welch	Travel between stakeholder meetings	0.5	0.25
3/1/18	Leecia Welch	Travel between stakeholder meetings	0.5	0.25
3/1/18	Leecia Welch	Travel from hotel to stakeholder interview	0.2	0.1
3/1/18	Leecia Welch	Meeting with stakeholder - former GAL	1.8	1.8
3/1/18	Leecia Welch	Stakeholder interview - meeting with former DCF employee	3.0	3.0
3/1/18	Leecia Welch	Meeting with ACLU and KS Appleseed re issues in child welfare system and possible remedies	1.6	1.6
3/1/18	Leecia Welch	Meeting with GAL for investigatory interview	1.5	1.5
3/1/18	Leecia Welch	Meeting with stakeholder relative caregiver for interview	1.5	1.5
3/2/18	Leecia Welch	Travel from hotel to stakeholder interview	0.1	0.05
3/2/18	Leecia Welch	Travel from Kansas City to SF	5.5	2.75
3/2/18	Leecia Welch	Meeting with stakeholder for interview - local attorney and social worker	1.3	1.3
3/5/18	Leecia Welch	Email to team re follow-up from in-person meetings	0.3	0.3
3/7/18	Leecia Welch	TC with co-counsel re KS next steps	1.0	1.0
3/7/18	Leecia Welch	TC with LBB re co-counsel role in KS case	0.7	0.7
3/7/18	Leecia Welch	Review media and reports re child deaths in KS	0.3	0.3
3/9/18	Leecia Welch	Emails re scheduling co-counsel call	0.2	0.2
3/9/18	Leecia Welch	Emails re scheduling meetings with stakeholders	0.2	0.2
3/11/18	Leecia Welch	Review contact memos re stakeholder interviews, including relative caregiver, former DCF employee, former GAL, local atty, social worker	0.2	0.2
3/13/18	Leecia Welch	Emails with co-counsel regarding travel to KS for stakeholder interviews	0.2	0.2
3/13/18	Leecia Welch	Review media re DCF systemic problems	0.3	0.3
3/15/18	Leecia Welch	Co-counsel call re investigation	1.1	1.1
3/18/18	Leecia Welch	Travel from SF to Kansas City	5.5	2.75
3/18/18	Leecia Welch	Review materials in prep for KS investigation	2.2	2.2

Date	Name	Description	Time Billed	With Travel at 50%
3/19/18	Leecia Welch	Travel to meeting with foster youth alumni stakeholder	0.6	0.3
3/19/18	Leecia Welch	Travel to meeting with foster parent agency stakeholder	0.4	0.2
3/19/18	Leecia Welch	Travel to Wichita from KC for client interviews	3.0	1.5
3/19/18	Leecia Welch	Interview with foster youth alumni stakeholder in Olathe	2.5	2.5
3/19/18	Leecia Welch	Meeting with foster parent agency stakeholder re issues in foster care system	3.0	3.0
3/19/18	Leecia Welch	Meeting with SD and EG re client interviews	0.7	0.7
3/20/18	Leecia Welch	Travel from Wichita to KC for client interviews	3.0	1.5
3/20/18	Leecia Welch	Meeting with foster care system advocates and other stakeholders re placement issues	5.2	5.2
3/20/18	Leecia Welch	Meeting with former child welfare agency stakeholder re issues in foster care system	1.0	1.0
3/20/18	Leecia Welch	Meet with SD and EG re investigation next steps	1.0	1.0
3/21/18	Leecia Welch	Drive to airport from stakeholder meeting	0.5	0.25
3/21/18	Leecia Welch	Travel from Kansas City to SF	5.5	2.75
3/21/18	Leecia Welch	Meeting with social worker stakeholder, CR and LBB re placement and mh issues	1.0	1.0
3/21/18	Leecia Welch	Prepare contact memos for recent meetings	1.5	1.5
3/27/18	Leecia Welch	Review and edits contact memos from KS trip	0.5	0.5
3/27/18	Leecia Welch	Review media re DCF systemic problems	0.3	0.3
3/28/18	Leecia Welch	Co-counsel call re fact investigation, debriefing stakeholder meetings	1.0	1.0
3/28/18	Leecia Welch	Review media re children sleeping in DCF offices	0.5	0.5
3/30/18	Leecia Welch	Review legal memos re 10th circuit private right of action law	0.6	0.6
4/3/18	Leecia Welch	Review media re child deaths in KS foster care system	0.4	0.4
4/11/18	Leecia Welch	co-counsel team meeting re investigation and next steps	1.0	1.0
4/11/18	Leecia Welch	Review email from co-counsel re overview of DCF systemic problems	0.1	0.1
4/17/18	Leecia Welch	Review reports re DCF systemic problems	0.5	0.5
4/18/18	Leecia Welch	Co-counsel call re investigation, including re: PRA, community forums, and stakeholder meetings	0.7	0.7
4/19/18	Leecia Welch	Telephone call with PJ re scheduling next investigatory trip	0.1	0.1
4/25/18	Leecia Welch	Review media re KS DCF	0.1	0.1
5/1/18	Leecia Welch	Review media and reports re placement problems in DCF	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
5/1/18	Leecia Welch	Review contact memos re March visit	0.5	0.5
5/2/18	Leecia Welch	Co-counsel call re investigation and legal research	0.9	0.9
5/4/18	Leecia Welch	Conversation with co-counsel re case communications	0.5	0.5
5/4/18	Leecia Welch	Emails re planning KS trip	0.2	0.2
5/7/18	Leecia Welch	Review trip planning memo	0.2	0.2
5/8/18	Leecia Welch	Review materials re KS mental health and child welfare system in prep for investigation trip	0.6	0.6
5/10/18	Leecia Welch	Emails re planning KS trip	0.4	0.4
5/10/18	Leecia Welch	Review media and reports child deaths	0.1	0.1
5/14/18	Leecia Welch	Travel from SF to Kansas City for meetings with local individuals involved in child welfare system	5.5	2.75
5/14/18	Leecia Welch	Reviewing and revise investigation questions	0.2	0.2
5/15/18	Leecia Welch	Travel to meeting with local expert re foster youth issues	0.6	0.3
5/15/18	Leecia Welch	Travel from meeting with local expert	0.7	0.35
5/15/18	Leecia Welch	Meeting with homeless youth advocate stakeholder re foster youth placement issues	1.5	1.5
5/15/18	Leecia Welch	Meeting with local expert re foster youth issues	1.5	1.5
5/15/18	Leecia Welch	Meeting with foster parent stakeholders re foster care placement and mental health care issues	1.5	1.5
5/16/18	Leecia Welch	Travel to meeting with potential co-counsel	0.5	0.25
5/16/18	Leecia Welch	Travel to MCO from meeting	0.6	0.3
5/16/18	Leecia Welch	Travel from KC to SF returning from meetings with individuals connected to foster care system	5.5	2.75
5/16/18	Leecia Welch	Meeting with foster youth alumni stakeholder re foster care placement and mental health care issues	1.8	1.8
5/16/18	Leecia Welch	Attend meeting with potential co-counsel re filing considerations	1.2	1.2
5/16/18	Leecia Welch	Attend meeting with mental health practitioner re foster youth mental health care issues	1.5	1.5
5/16/18	Leecia Welch	Emails with team re investigation visit debrief	0.1	0.1
5/16/18	Leecia Welch	Call with PJ re investigation and recent interviews with stakeholders	0.6	0.6

Date	Name	Description	Time Billed	With Travel at 50%
5/17/18	Leecia Welch	Emails with team re DCF office stays	0.1	0.1
5/21/18	Leecia Welch	Team phone call re investigation, including strategy and timeline	1.0	1.0
5/21/18	Leecia Welch	Discussion with PJ re next steps in KS investigation	0.4	0.4
5/22/18	Leecia Welch	Review contact memos from May visit	0.2	0.2
5/23/18	Leecia Welch	Team call re investigation	1.0	1.0
5/23/18	Leecia Welch	Conversation with PJ and AG re Kansas investigation and research tasks	0.8	0.8
5/23/18	Leecia Welch	Emails with team re GAL calls	0.2	0.2
5/24/18	Leecia Welch	Research re KS child welfare policies	1.5	1.5
5/24/18	Leecia Welch	Emails with team re local counsel issues	0.2	0.2
5/24/18	Leecia Welch	Emails with team re needed legal research	0.3	0.3
5/24/18	Leecia Welch	Review media accounts of children sleeping in offices	0.2	0.2
5/25/18	Leecia Welch	Emails with team re local co-counsel	0.1	0.1
5/29/18	Leecia Welch	Emails to team re local counsel issues	0.2	0.2
5/29/18	Leecia Welch	Review contact memos from May visit	0.4	0.4
5/30/18	Leecia Welch	Co-counsel call including re: stakeholder updates, local counsel, legal research, and fact development	1.0	1.0
5/30/18	Leecia Welch	Research re children' mental health access in prep for GAL call	1.2	1.2
5/31/18	Leecia Welch	TC with GAL re foster youth issues	1.3	1.3
6/5/18	Leecia Welch	Talking to PJ re research needs re PDP and reviewing related docs	0.2	0.2
6/5/18	Leecia Welch	Edit and revise findings of fact document re KS child welfare system	0.6	0.6
6/5/18	Leecia Welch	Prepare stakeholder memo for local expert meeting	1.6	1.6
6/5/18	Leecia Welch	Prepare stakeholder memo for mental health practitioner meeting	1.2	1.2
6/5/18	Leecia Welch	Edit and revise findings of fact document re KS child welfare system	1.2	1.2
6/6/18	Leecia Welch	Phone call with team re: stakeholder updates, local counsel, legal research, and fact development	0.9	0.9
6/6/18	Leecia Welch	Prepare contact memo for GAL call	1.5	1.5
6/6/18	Leecia Welch	TC with teacher stakeholder re CPS issues in Wyandotte	1.1	1.1
6/6/18	Leecia Welch	Prepare contact memo for TC with Wyandotte teacher	0.8	0.8
6/7/18	Leecia Welch	Finalize memos re recent calls with teacher and GAL	0.6	0.6

Date	Name	Description	Time Billed	With Travel at 50%
6/13/18	Leecia Welch	Phone call with team re investigation, including re: fact development, stakeholder updates, local counsel, and legal research	1.1	1.1
6/13/18	Leecia Welch	Debriefing with PJ re call with foster parent	0.3	0.3
6/13/18	Leecia Welch	Review materials re DCF contractors	0.3	0.3
6/13/18	Leecia Welch	Reviewing media about purported intended changes in practice	0.2	0.2
6/13/18	Leecia Welch	Convo with PJ re findings of fact doc	0.3	0.3
6/13/18	Leecia Welch	TC with school admin stakeholder re CPS issues	1.5	1.5
6/13/18	Leecia Welch	Prepare memo re school admin stakeholder call	0.5	0.5
6/14/18	Leecia Welch	Finalize school admin stakeholder memo re lack of mental health services	0.4	0.4
6/14/18	Leecia Welch	Review materials in prep for KS investigation	2.2	2.2
6/15/18	Leecia Welch	Review and edit findings of fact document	1.2	1.2
6/17/18	Leecia Welch	Travel to KC from SF for meetings with local individuals involved in child welfare system	5.5	2.75
6/18/18	Leecia Welch	Drive to Olathe and back for stakeholder meetings	1.2	0.6
6/18/18	Leecia Welch	Meeting with mental health practitioner stakeholder re issues serving foster youth	1.0	1.0
6/18/18	Leecia Welch	Meeting with potential local counsel re potential litigation	1.5	1.5
6/18/18	Leecia Welch	Meeting with foster youth advocates re issues facing system	2.0	2.0
6/18/18	Leecia Welch	Meeting with homeless youth advocate stakeholder re foster youth placement issues	2.0	2.0
6/19/18	Leecia Welch	Travel to and from meeting with TAY stakeholder	1.2	0.6
6/19/18	Leecia Welch	Meeting with TAY stakeholder re issues in foster care system	1.2	1.2
6/19/18	Leecia Welch	Meeting with foster parent stakeholders re foster care placement and mental health care issues	1.5	1.5
6/19/18	Leecia Welch	Meeting with Kansas Appleseed re issues in foster care system	1.5	1.5
6/20/18	Leecia Welch	Travel from KC to SF	5.5	2.75
6/25/18	Leecia Welch	Co-counsel call, including re: local counsel, Kansas trip, and fact development	1.1	1.1
6/25/18	Leecia Welch	Research re EPSDT issues	0.7	0.7
6/26/18	Leecia Welch	TC with law clerk re research assignment on placement issues	0.4	0.4
6/27/18	Leecia Welch	Co-counsel call, including re: FOF, Kansas trip, stakeholder interviews, and legal research	0.5	0.5

Date	Name	Description	Time Billed	With Travel at 50%
6/27/18	Leecia Welch	Review and edit findings of fact document	1.2	1.2
7/2/18	Leecia Welch	Review memos re 10th Circuit EPSDT case law	0.8	0.8
7/2/18	Leecia Welch	Email to legal expert re EPSDT law in 10th Circuit	0.2	0.2
7/2/18	Leecia Welch	Phone call with PJ re legal research	0.2	0.2
7/3/18	Leecia Welch	Review fact memo re potential local counsel	0.2	0.2
7/6/18	Leecia Welch	Emails with team re EPSDT meeting	0.1	0.1
7/6/18	Leecia Welch	Review SD contact memos re recent interviews with local individuals involved in foster care system	0.4	0.4
7/11/18	Leecia Welch	Team call re investigation, FOF, local counsel, etc	0.8	0.8
7/11/18	Leecia Welch	Team Call with consulting expert re EPSDT	0.7	0.7
7/18/18	Leecia Welch	Emails re planning KS trip	0.2	0.2
7/22/18	Leecia Welch	Review notes from last team call	0.1	0.1
7/27/18	Leecia Welch	Emails with team re meeting Kansas Appleseed	0.2	0.2
7/27/18	Leecia Welch	Review email from MN re Kansas Appleseed meeting	0.2	0.2
7/30/18	Leecia Welch	TC with SD and EG re KS visit	0.5	0.5
7/30/18	Leecia Welch	Emails with team re KS visit	0.2	0.2
7/31/18	Leecia Welch	Travel from SF to Kansas City for meetings with local individuals involved in child welfare system	5.5	2.75
8/1/18	Leecia Welch	Drive to Topeka for meeting with child welfare leader stakeholder	1.0	0.5
8/1/18	Leecia Welch	Drive from Topeka to next stakeholder meeting	0.8	0.4
8/1/18	Leecia Welch	Meeting with potential local counsel re potential litigation	1.2	1.2
8/1/18	Leecia Welch	Meeting with child welfare leader stakeholder re issues in child welfare system and potential named plaintiff	1.2	1.2
8/1/18	Leecia Welch	Meeting with potential local counsel re potential litigation	1.5	1.5
8/3/18	Leecia Welch	Meeting with community advocate stakeholder re placement issues etc	1.4	1.4
8/3/18	Leecia Welch	Meeting with GAL re potential litigation and serving as a next friend	1.5	1.5
8/3/18	leecia Welch	Meeting with foster youth ed advocate re issues in foster care	1.2	1.2
8/4/18	Leecia Welch	Travel from Kansas City to SF	5.5	2.75
8/6/18	Leecia Welch	Review contact memos from August visit	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
8/8/18	Leecia Welch	Co-counsel team meeting re investigation and complaint drafting	1.2	1.2
8/8/18	Leecia Welch	Review reports re access to mental health services in KS	0.9	0.9
8/11/18	Leecia Welch	Review edited findings of fact document	1.1	1.1
8/11/18	Leecia Welch	Review reports re KS mental health system	0.4	0.4
8/14/18	Leecia Welch	TC with Kansas Appleseed ED re co-counseling on case	0.8	0.8
8/14/18	Leecia Welch	Email to team re Kansas Appleseed next steps	0.3	0.3
8/15/18	Leecia Welch	Co-counsel call re factual investigation updates, co-counsel partnerships, and complaint drafting	0.9	0.9
8/20/18	Leecia Welch	Review memo re call with medicaid expert	0.2	0.2
8/20/18	Leecia Welch	Call with FP re: outlining complaint	0.1	0.1
8/22/18	Leecia Welch	Co-counsel team meeting re investigation and complaint drafting	1.1	1.1
8/22/18	Leecia Welch	Emails with team re Kansas Appleseed participation in case	0.1	0.1
8/24/18	Leecia Welch	Convo with FP re CR input on complaint outline	1.1	1.1
8/27/18	Leecia Welch	Confer with FP re: complaint strategy	0.3	0.3
8/28/18	Leecia Welch	Team call with cocounsel re complaint drafting	0.4	0.4
8/28/18	Leecia Welch	Review findings of fact doc in prep for investigation meetings	1.4	1.4
8/29/18	Leecia Welch	Travel to KC from SF for meetings with potential client and other local individuals involved in foster care system	5.5	2.75
8/31/18	Leecia Welch	Travel to/from Topeka for meetings with potential client	2.0	1
8/31/18	Leecia Welch	Meetings with foster youth advocates re systemic problems	5.0	5.0
9/2/18	Leecia Welch	Travel from KC to SF from meetings with potential client and other local individuals involved in foster care system	5.5	2.75
9/4/18	Leecia Welch	Email with foster youth stakeholders re meetings	0.1	0.1
9/5/18	Leecia Welch	Team call with cocounsel re complaint, investigation strategy, etc	1.5	1.5
9/6/18	Leecia Welch	Emails with IL re filing timeline and counsel team strategies	0.2	0.2
9/7/18	Leecia Welch	Review contact memos from KS visit	0.3	0.3
9/12/18	Leecia Welch	Team call with cocounsel re next steps and strategy for complaint and named plaintiffs, and follow up discussion	0.5	0.5
9/12/18	Leecia Welch	Email to BM re settlement exemplars	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
9/14/18	Leecia Welch	Emails with team re Kansas Appleseed participation in case	0.1	0.1
9/15/18	Leecia Welch	Review contact memos from recent KS visit	0.1	0.1
9/18/18	Leecia Welch	Review memo re KS juvenile court authority	0.3	0.3
9/19/18	Leecia Welch	Team call with cocounsel re: complaint, local stakeholders, potential Plaintiffs and Next Friends, call with Kansas Appleseed, and upcoming visit	0.8	0.8
9/19/18	Leecia Welch	Follow up discussion after team call with FP and J. Stolzenberg re: next steps	0.5	0.5
9/21/18	Leecia Welch	Confer with FP re: complaint outline and next steps	0.2	0.2
9/21/18	Leecia Welch	Review and edit complaint outline	2.5	2.5
9/24/18	Leecia Welch	Review and edit updated complaint outline	1.6	1.6
9/25/18	Leecia Welch	Review I. Lustbader feedback on complaint outline; confer with FP re: implementing same	0.3	0.3
9/26/18	Leecia Welch	Team call with cocounsel discussing draft complaint and next Kansas trip	1.0	1.0
9/26/18	Leecia Welch	Edit and review updated complaint outline	0.9	0.9
10/2/18	Leecia Welch	Review CR edits to complaint outline	1.5	1.5
10/2/18	Leecia Welch	Review 10th circuit class cert cases and memo	0.3	0.3
10/3/18	Leecia Welch	Team call, including re: complaint, named plaintiffs, and co-counsel	1.0	1.0
10/3/18	Leecia Welch	Follow up discussion with FP and J. Stolzenberg re: claims in Kansas complaint	0.2	0.2
10/4/18	Leecia Welch	Review materials in prep for KS co-counsel meeting	2.2	2.2
10/5/18	Leecia Welch	Review retainer draft	0.2	0.2
10/6/18	Leecia Welch	Travel from SF to Kansas City for co-counsel meeting and meetings with local foster care advocates	5.5	2.75
10/8/18	Leecia Welch	Travel to meeting with foster care advocates	1.0	0.5
10/8/18	Leecia Welch	Review co-counsel proposed agenda	0.1	0.1
10/8/18	Leecia Welch	Meetings with foster care advocates re systemic problems	4.5	4.5
10/9/18	Leecia Welch	Travel to meeting with foster care advocates	1.0	0.5
10/9/18	Leecia Welch	Meetings with foster care advocates re systemic problems	2.2	2.2
10/10/18	Leecia Welch	Travel to Kansas meeting from hotel	0.5	0.25
10/10/18	Leecia Welch	Travel from Kansas meeting to hotel	0.6	0.3

Date	Name	Description	Time Billed	With Travel at 50%
10/10/18	Leecia Welch	In person meeting with Children's Rights, Kansas Appleseed, and FP re: strategy and timeline for filing complaint	4.5	4.5
10/11/18	Leecia Welch	Travel from Kansas City to SF	5.5	2.75
10/15/18	Leecia Welch	Review contact memos from October visit	0.3	0.3
10/15/18	Leecia Welch	Edit and revise complaint outline based on team meeting	4.9	4.9
10/17/18	Leecia Welch	Draft EPSDT sections of complaint	1.2	1.2
10/18/18	Leecia Welch	Draft EPSDT sections of complaint	2.4	2.4
10/18/18	Leecia Welch	Prepare email to team re complaint filing timeline	0.2	0.2
10/19/18	Leecia Welch	Review revised complaint outline with team assignments	0.2	0.2
10/24/18	Leecia Welch	Team call, including re: plaintiffs and filing planning and logistics	1.0	1.0
10/25/18	Leecia Welch	Draft EPSDT sections of complaint	2.7	2.7
10/26/18	Leecia Welch	Draft background sections of complaint	2.5	2.5
10/27/18	Leecia Welch	Draft background sections of complaint	2.2	2.2
10/28/18	Leecia Welch	Draft background sections of complaint	4.7	4.7
10/30/18	Leecia Welch	Edit and revise Medicaid section of complaint	2.2	2.2
10/30/18	Leecia Welch	Edit and revise background sections of complaint	2.5	2.5
10/30/18	Leecia Welch	Emails with FP re complaint drafting	0.1	0.1
10/31/18	Leecia Welch	Team call re: complaint draft and identifying plaintiffs	0.7	0.7
10/31/18	Leecia Welch	Review Fifth Circuit opinion re: placement array class	0.5	0.5
11/1/18	Leecia Welch	Review and revise updated draft complaint	3.7	3.7
11/2/18	Leecia Welch	Factual research re: KS mental health system issues	0.6	0.6
11/2/18	Leecia Welch	Review and revise complaint	1.8	1.8
11/4/18	Leecia Welch	Travel to KS from SF for meetings with foster care advocates and potential clients	5.5	2.75
11/4/18	Leecia Welch	Review and incorporate team comments in complaint draft	1.5	1.5
11/5/18	Leecia Welch	Emails re team call and complaint status	0.2	0.2
11/6/18	Leecia Welch	Travel to meetings with foster care advocates and potential clients	1.2	0.6
11/6/18	Leecia Welch	Meetings with foster care advocates and potential clients regarding systemic problems	3.5	3.5
11/7/18	Leecia Welch	Travel to/from Topeka for meetings with foster care advocates and potential clients	2.0	1

Date	Name	Description	Time Billed	With Travel at 50%
11/7/18	Leecia Welch	Meetings with foster care advocates and potential clients regarding systemic problems	5.5	5.5
11/7/18	Leecia Welch	Email correspondence with FP re: next steps for finalizing complaint	0.6	0.6
11/8/18	Leecia Welch	Travel from KS to SF returning from meetings with foster care advocates and potential clients	5.5	2.75
11/9/18	Leecia Welch	Team call re: named plaintiffs and logistics for finalizing and filing complaint	1.1	1.1
11/9/18	Leecia Welch	Review contact memos	0.4	0.4
11/9/18	Leecia Welch	Edit and revise factual section of complaint	2.5	2.5
11/9/18	Leecia Welch	Review Fifth Circuit opinion re: placement array class	0.5	0.5
11/10/18	Leecia Welch	Edit fact sections of complaint	1.2	1.2
11/11/18	Leecia Welch	Review and incorporate team edits to draft complaint	3.2	3.2
11/11/18	Leecia Welch	Draft facts section of complaint	1.6	1.6
11/12/18	Leecia Welch	Team call re: complaint draft	1.1	1.1
11/12/18	Leecia Welch	Email correspondence with team re: outstanding factual research for complaint	0.2	0.2
11/12/18	Leecia Welch	Edit fact sections for new named plaintiffs	0.6	0.6
11/13/18	Leecia Welch	Email to FP re: EPSDT claim	0.2	0.2
11/13/18	Leecia Welch	Confer with FP re: revisions to EPSDT claim	0.1	0.1
11/13/18	Leecia Welch	Edit and revise EPSDT section of complaint	2.1	2.1
11/13/18	Leecia Welch	Confer with FP re: revisions to EPSDT screening claim	0.7	0.7
11/13/18	Leecia Welch	Confer w FP JS re complaint, next steps	0.7	0.7
11/13/18	Leecia Welch	Phone conference with FP re: revisions to EPSDT screening claim	0.3	0.3
11/13/18	Leecia Welch	Emails with team re EPSDT issues	1.3	1.3
11/14/18	Leecia Welch	Co-counsel call, including discussion of EPSDT claims	1.0	1.0
11/14/18	Leecia Welch	confer with FP JS re complaint draft	0.3	0.3
11/14/18	Leecia Welch	Edit and revise complaint draft	3.0	3.0
11/14/18	Leecia Welch	Phone conference with FP re: revisions to EPSDT screening claim	0.2	0.2
11/14/18	Leecia Welch	Edit and revise EPSDT claim	1.4	1.4
11/14/18	Leecia Welch	Review cover sheet requirements	0.1	0.1
11/15/18	Leecia Welch	Travel to KC from SF to meet with clients	5.5	2.75

Date	Name	Description	Time Billed	With Travel at 50%
11/15/18	Leecia Welch	Travel to and from meetings	1.5	0.75
11/15/18	Leecia Welch	Meeting with potential client re lawsuit	0.5	0.5
11/15/18	Leecia Welch	Meeting with client re new facts for complaint	0.7	0.7
11/15/18	Leecia Welch	Meeting with client re new facts for complaint	1.2	1.2
11/15/18	Leecia Welch	Meeting with potential client re lawsuit	1.0	1.0
11/15/18	Leecia Welch	Email correspondence with FP and I. Lustbader re: EPSDT screening claim and possible experts	0.1	0.1
11/15/18	Leecia Welch	Review legal memos from J. King re: EPSDT claims; email correspondence with FP re: same	0.8	0.8
11/15/18	Leecia Welch	Email correspondence with FP re: statutory cites for EPSDT screening claim	0.5	0.5
11/15/18	Leecia Welch	Emails with team re pseudonym issues	0.1	0.1
11/15/18	Leecia Welch	Email correspondence re: filing strategy for Kansas complaint	0.3	0.3
11/15/18	Leecia Welch	Edit and revise complaint facts section	1.2	1.2
11/15/18	Leecia Welch	Email correspondence with M. Nardi and FP re: formatting requirements	0.1	0.1
11/15/18	Leecia Welch	Edit draft complaint	5.1	5.1
11/16/18	Leecia Welch	Travel to meeting with client	1.0	0.5
11/16/18	Leecia Welch	Travel from KC to SF returning from meetings with clients	5.5	2.75
11/16/18	Leecia Welch	Edit final draft of complaint	2.2	2.2
11/16/18	Leecia Welch	Review final version of complaint and initial filing documents	1.8	1.8
11/16/18	Leecia Welch	Emails with team re retainer issues	0.1	0.1
11/16/18	Leecia Welch	Meeting with client re new facts for complaint	1.2	1.2
11/16/18	Leecia Welch	Emails with team about filing logistics	0.2	0.2
11/19/18	Leecia Welch	Emails with team about PHV forms; review same	0.2	0.2
11/20/18	Leecia Welch	Emails with team about pseudonym issues	0.1	0.1
11/20/18	Leecia Welch	Review media on complaint and DCF issues	0.3	0.3
11/20/18	Leecia Welch	Email correspondence with FP re: Medicaid statute citations	0.2	0.2
11/21/18	Leecia Welch	Team call re: post-filing logistics, including pro hac applications, pseudonyms, co-counsel, and stakeholder/community connections	1.0	1.0
11/21/18	Leecia Welch	TC with foster youth plaintiff attorney re harm in DCF custody	0.6	0.6

Date	Name	Description	Time Billed	With Travel at 50%
11/21/18	Leecia Welch	Email team re call with foster youth plaintiff attorney	0.2	0.2
11/26/18	Leecia Welch	Emails with team re PHV	0.1	0.1
11/26/18	Leecia Welch	Review draft pro hac paperwork	0.1	0.1
11/27/18	Leecia Welch	Travel to KC from SF for meetings with individuals connected to foster care system and co-counsel	5.5	2.75
11/28/18	Leecia Welch	Team call, including re: stakeholder outreach, media, research, potential co-counsel, potential experts	1.1	1.1
11/28/18	Leecia Welch	Meetings with GAL stakeholder re issues in child welfare system	1.5	1.5
11/28/18	Leecia Welch	Meeting with LBB re case investigation issues	1.5	1.5
11/29/18	Leecia Welch	Meeting with community organizers re child welfare issues	2.0	2.0
11/29/18	Leecia Welch	Email with team re AG communication	0.1	0.1
11/30/18	Leecia Welch	Meeting with children's attorney re foster care issues	2.0	2.0
12/1/18	Leecia Welch	Travel from KS to SF returning from meetings with stakeholders including attorneys of children in foster care	5.5	2.75
12/1/18	Leecia Welch	Emails with team re media and reports re DCF problems; review same	0.2	0.2
12/3/18	Leecia Welch	Email with DCF re service issues	0.1	0.1
12/3/18	Leecia Welch	Emails with team re service issues	0.1	0.1
12/4/18	Leecia Welch	Emails with team re service issues	0.1	0.1
12/4/18	Leecia Welch	Email to team re meeting with children's attorney	0.5	0.5
12/5/18	Leecia Welch	Team call re: local stakeholders and AG's request re: deadlines	1.5	1.5
12/5/18	Leecia Welch	Confer with FP re: timeline for amending complaint	0.2	0.2
12/5/18	Leecia Welch	Email correspondence with FP and M. Nardi re: amending complaint	0.1	0.1
12/5/18	Leecia Welch	TC with MH re case strategy	0.5	0.5
12/5/18	Leecia Welch	Follow up discussion with FP and JS re: deadlines	0.5	0.5
12/6/18	Leecia Welch	Team call re AG request for extension	0.4	0.4
12/6/18	Leecia Welch	Email to C. Scroggins re service issues	0.1	0.1
12/11/18	Leecia Welch	Review memo re possible expert witness	0.2	0.2
12/12/18	Leecia Welch	Team call, including re: community contacts, experts, Defendants' request for extension of time to answer	1.3	1.3

Date	Name	Description	Time Billed	With Travel at 50%
12/12/18	Leecia Welch	Edit and revise contact list with info re new stakeholders	0.2	0.2
12/16/18	Leecia Welch	Travel from SF to KS for meetings with various stakeholders re foster care issues	5.5	2.75
12/17/18	Leecia Welch	Meetings with families re foster care issues	4.5	4.5
12/18/18	Leecia Welch	Meeting with potential client re foster care issues	1.5	1.5
12/18/18	Leecia Welch	Meeting with children's advocate re foster care issues	2.0	2.0
12/18/18	Leecia Welch	Email to team re stakeholder meetings	0.2	0.2
12/19/18	Leecia Welch	Travel from KS to SF returning from meetings with various stakeholders re foster care issues	5.5	2.75
12/19/18	Leecia Welch	Team call, including re: Defendants' request for extension, local updates, and experts	0.8	0.8
12/19/18	Leecia Welch	TC with MH re case strategy	0.1	0.1
12/20/18	Leecia Welch	Confer with FP re: response to Defendants' request for extension	0.1	0.1
12/21/18	Leecia Welch	Email with team re AG extension request	0.1	0.1
12/21/18	Leecia Welch	Confer with FP re: response to Defendants' request for extension	0.1	0.1
12/21/18	Leecia Welch	Review research re: in camera review of child in need of care records in the District of Kansas	0.5	0.5
12/22/18	Leecia Welch	Review protective order exemplars	0.3	0.3
12/26/18	Leecia Welch	Emails with IL re protective order	0.2	0.2
12/26/18	Leecia Welch	Edit and revise protective order	0.8	0.8
12/27/18	Leecia Welch	TC with D. Depew, LR, and IL re request for extension; team call beforehand	0.8	0.8
12/27/18	Leecia Welch	Email to D. Depew and C. Scroggins re protective order	0.2	0.2
12/30/18	Leecia Welch	Review motion for extension of time	0.1	0.1
1/1/19	Leecia Welch	Prepare opposition to motion for extension of time	1.4	1.4
1/1/19	Leecia Welch	Emails with team re D's request for extension	0.1	0.1
1/2/19	Leecia Welch	Team call, including discussion of opposition to motion for extension of time to answer and potential expert witnesses	1.0	1.0
1/2/19	Leecia Welch	Confer with FP re: agenda for team call and identifying experts	0.2	0.2
1/2/19	Leecia Welch	Review agenda for team call	0.1	0.1
1/2/19	Leecia Welch	Review background factual research re: DCF	0.2	0.2
1/2/19	Leecia Welch	Review draft opposition to motion for extension	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
1/2/19	Leecia Welch	Review chart of potential expert witnesses	0.2	0.2
1/2/19	Leecia Welch	Emails with team re Medicaid experts	0.2	0.2
1/2/19	Leecia Welch	Email correspondence with FP re: team call and follow-up items, including re: experts	0.9	0.9
1/2/19	Leecia Welch	Review J. King research for opposition to motion for extension of time to answer	0.1	0.1
1/3/19	Leecia Welch	Travel from SF to KS for meetings with foster care advocates and potential clients	5.5	2.75
1/3/19	Leecia Welch	Edit and revise opposition to motion for extension	1.2	1.2
1/3/19	Leecia Welch	Email correspondence with FP re: motion for extension opp	0.2	0.2
1/4/19	Leecia Welch	Meetings with foster care advocates and potential clients regarding systemic problems	4.5	4.5
1/4/19	Leecia Welch	Email correspondence with team re: finalizing opposition to motion for extension	0.1	0.1
1/4/19	Leecia Welch	Confer with FP re: finalizing opposition to motion for extension	0.1	0.1
1/4/19	Leecia Welch	Edit opposition to motion for extension for filing	0.8	0.8
1/4/19	Leecia Welch	Finalize opposition to motion	0.5	0.5
1/6/19	Leecia Welch	Travel from KS to SF returning from meetings with foster care advocates and potential clients	5.5	2.75
1/8/19	Leecia Welch	Review memos re possible expert witnesses	0.3	0.3
1/9/19	Leecia Welch	Team call, including discussion of status conference, experts, and co-counsel	0.8	0.8
1/9/19	Leecia Welch	Emails with team re harm in DCF facility	0.2	0.2
1/10/19	Leecia Welch	Prep for status conference	2.2	2.2
1/10/19	Leecia Welch	Prepare motion to use pseudonyms	0.4	0.4
1/10/19	Leecia Welch	TC with D. Depew re motion to use pseudonyms; email team re same	0.9	0.9
1/11/19	Leecia Welch	Team call re: telephonic hearing re: motion for extension and next steps	0.3	0.3
1/11/19	Leecia Welch	Confer with FP re: status conference on motion for extension	0.2	0.2
1/11/19	Leecia Welch	Prep for status conference	1.5	1.5
1/11/19	Leecia Welch	Argue telephonic hearing re: motion for extension	0.5	0.5
1/14/19	Leecia Welch	Confer w FP JS re next tasks	0.3	0.3
1/16/19	Leecia Welch	Team call, including discussion of litigation strategy, protective order, and motion for leave to use pseudonyms	1.0	1.0
1/16/19	Leecia Welch	Review and edit motion for leave to use pseudonyms	1.2	1.2

Date	Name	Description	Time Billed	With Travel at 50%
1/16/19	Leecia Welch	Confer with FP re: motion for leave to use pseudonyms and protective order	0.6	0.6
1/16/19	Leecia Welch	Edit motion for leave to use pseudonyms	0.5	0.5
1/17/19	Leecia Welch	Email correspondence with FP re: revisions to motion for leave to use pseudonyms	0.2	0.2
1/17/19	Leecia Welch	Email to DD and CS re motion to use pseudonyms	0.2	0.2
1/18/19	Leecia Welch	Review final motion for leave to use pseudonyms, including proposed order	0.3	0.3
1/18/19	Leecia Welch	Review draft correspondence re: litigation holds; email correspondence re: proposed edits	0.2	0.2
1/18/19	Leecia Welch	Review Defendants' proposed revisions to draft stipulated protective order	0.5	0.5
1/18/19	Leecia Welch	Email to team re DD revisions and next steps	0.1	0.1
1/21/19	Leecia Welch	Review Defendants' proposed revisions to draft stipulated protective order; email correspondence with team re: same	0.2	0.2
1/22/19	Leecia Welch	Review IL edits to defendants' draft	0.2	0.2
1/25/19	Leecia Welch	Review draft stipulated protective order; email correspondence re: same	0.4	0.4
1/25/19	Leecia Welch	Emails with team re protective order edits	0.2	0.2
1/28/19	Leecia Welch	Confer w FP JS re next tasks	0.1	0.1
1/28/19	Leecia Welch	Revise draft stipulated protective order	0.2	0.2
1/28/19	Leecia Welch	Email to DD and CS re protective order; review attachment	0.2	0.2
1/29/19	Leecia Welch	Telephone conference re: expert witness strategy	1.3	1.3
1/29/19	Leecia Welch	Review draft stipulated protective order; email correspondence re: same	0.2	0.2
1/30/19	Leecia Welch	Team call, including discussion of protective order and co-counsel	0.4	0.4
1/30/19	Leecia Welch	Emails with consultant re potential experts	0.2	0.2
1/31/19	Leecia Welch	Email to team re expert issues	0.5	0.5
1/31/19	Leecia Welch	Confer with FP re: protective order	0.2	0.2
1/31/19	Leecia Welch	Emails with DP re protective; email team re same	0.2	0.2
2/4/19	Leecia Welch	Emails with team re client harm in DCF custody	0.1	0.1
2/4/19	Leecia Welch	Confer with FP re: protective order, litigation hold, and legal research assignments	0.3	0.3
2/5/19	Leecia Welch	Review and edit final draft stipulated protective order	0.4	0.4
2/5/19	Leecia Welch	Emails with team re protective order edits	0.1	0.1
2/5/19	Leecia Welch	Email with DD and CS re protective order; attach draft of same	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
2/6/19	Leecia Welch	Factual research re: EPSDT issues	0.6	0.6
2/6/19	Leecia Welch	Review memo on potential expert re harm of placement instability	0.1	0.1
2/7/19	Leecia Welch	Confer with co-counsel team re: Judge Birzer's proposed edits to protective order	0.2	0.2
2/8/19	Leecia Welch	Emails with team re protective order	0.1	0.1
2/10/19	Leecia Welch	Travel to KS from SF for meetings with families involved in FC system and co-counsel	5.5	2.75
2/12/19	Leecia Welch	Travel to meeting with M. Hodgesmith in Lawrence, KS	1.3	0.65
2/12/19	Leecia Welch	Meeting with M. Hodgesmith, L. Welch, and L. Burns-Bucklew re: EPSDT claim and Medicaid in Kansas	2.0	2.0
2/13/19	Leecia Welch	Team co-counsel call, including re: named plaintiffs, experts, co-counsel, and new witnesses	1.4	1.4
2/13/19	Leecia Welch	Meetings with families re foster care issues	4.5	4.5
2/13/19	Leecia Welch	Review draft protective order acknowledgment form	0.2	0.2
2/14/19	Leecia Welch	Travel from KS to SF returning from meetings with families and co-counsel etc	5.5	2.75
2/14/19	Leecia Welch	Emails with team re protective order issues	0.1	0.1
2/14/19	Leecia Welch	Review DLA Piper's proposed cocounsel agreement	0.3	0.3
2/14/19	Leecia Welch	Edit and revise litigation hold letters to Defendants and Next Friends; email correspondence with FP re: same	0.3	0.3
2/15/19	Leecia Welch	Confer with FP re: Medicaid research	0.2	0.2
2/18/19	Leecia Welch	Emails with team about plaintiff issues	0.1	0.1
2/19/19	Leecia Welch	Email to DD and CS re named plaintiffs	0.1	0.1
2/19/19	Leecia Welch	Confer with FP re: litigation hold, legal research, and expert strategy	0.1	0.1
2/19/19	Leecia Welch	Email correspondence with team re: identifying named Plaintiffs to defendants	0.1	0.1
2/20/19	Leecia Welch	Emails with team re named plaintiffs	0.1	0.1
2/21/19	Leecia Welch	Review settlement terms document	0.2	0.2
2/25/19	Leecia Welch	Confer with FP and JS re: litigation hold, Barber Emerson, DLA Piper, experts, and outstanding legal research	0.5	0.5
2/25/19	Leecia Welch	Memo from LR re opposing counsel	0.1	0.1
2/25/19	Leecia Welch	Email correspondence with FP re: Kansas Medicaid research	0.1	0.1
2/26/19	Leecia Welch	Email correspondence with FP re: litigation holds	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
2/26/19	Leecia Welch	Review legislative materials re DCF	0.7	0.7
2/26/19	Leecia Welch	Email to DD and CS re lit hold	0.1	0.1
2/26/19	Leecia Welch	Emails to clients re lit hold	0.1	0.1
2/27/19	Leecia Welch	Team call, including discussion of staffing, named plaintiffs, and case management	1.0	1.0
2/27/19	Leecia Welch	Email correspondence with FP re: agenda for team meeting	0.1	0.1
2/27/19	Leecia Welch	Review and edit draft settlement terms sheet	1.2	1.2
2/27/19	Leecia Welch	Review named plaintiff pseudonym list	0.1	0.1
2/28/19	Leecia Welch	Emails with team re opposing counsel next steps	0.1	0.1
2/28/19	Leecia Welch	Confer with FP re: staffing and responsibilities	0.1	0.1
3/1/19	Leecia Welch	Review JK memo on substitution of official capacity defendants	0.1	0.1
3/4/19	Leecia Welch	Travel to KS from SF for meetings with clients and potential clients	5.5	2.75
3/4/19	Leecia Welch	Email correspondence with FP re: Medicaid research	0.1	0.1
3/5/19	Leecia Welch	Meetings with clients and potential clients re issues in foster care system	4.0	4.0
3/6/19	Leecia Welch	Email correspondence with FP and I. Lustbader re: team call	0.1	0.1
3/6/19	Leecia Welch	Meetings with local community stakeholders	2.8	2.8
3/6/19	Leecia Welch	Review memo re: potential additions to a First Amended Complaint	0.2	0.2
3/7/19	Leecia Welch	Review class cert strategy memo and cases	1.2	1.2
3/7/19	Leecia Welch	Emails re foster parent concerned about DCF	0.2	0.2
3/8/19	Leecia Welch	Email from opposing counsel re substitution of parties	0.1	0.1
3/8/19	Leecia Welch	Confer with FP re: updates from next friends and local contacts, named plaintiff file reviews	0.7	0.7
3/13/19	Leecia Welch	Team call, including discussion of file management and prospective additional named plaintiffs	0.9	0.9
3/13/19	Leecia Welch	Review legislative materials re DCF	0.5	0.5
3/13/19	Leecia Welch	Confer with FP re: Medicaid research	0.1	0.1
3/14/19	Leecia Welch	Prepare for call with potential expert	1.0	1.0
3/14/19	Leecia Welch	Call with prospective expert re: Medicaid issues	1.1	1.1
3/14/19	Leecia Welch	Confer with P. Juneja and FP re: potential privilege issues related to Next Friends' files	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
3/15/19	Leecia Welch	Review list of outstanding legal research needs; email correspondence with P. Juneja and FP re: same	0.3	0.3
3/18/19	Leecia Welch	Confer with FP and PJ re: agenda for 3/20 strategy meeting, legal research re: privilege, and Medicaid research	0.5	0.5
3/19/19	Leecia Welch	Email correspondence with PJ and FP re: follow up for foster parent K.I.	0.2	0.2
3/20/19	Leecia Welch	Team strategy meeting, including discussion of claims and strategy for complaint amendment, class certification, and discovery	3.0	3.0
3/20/19	Leecia Welch	Confer with PJ and FP re: co-counsel claims summary meeting	0.5	0.5
3/20/19	Leecia Welch	Follow up with P. Juneja and F. Pitts re: strategy meeting, including re: Medicaid claim	0.5	0.5
3/20/19	Leecia Welch	Confer with FP re: staffing	0.1	0.1
3/20/19	Leecia Welch	Review BM withdrawal form	0.1	0.1
3/21/19	Leecia Welch	Review co-counseling agreement	0.4	0.4
3/21/19	Leecia Welch	Review materials re trauma screening	1.2	1.2
3/21/19	Leecia Welch	Emails with team re conflict issues	0.1	0.1
3/24/19	Leecia Welch	Review final cocounsel agreement and proposal for updating clients re: DLA Piper	0.5	0.5
3/25/19	Leecia Welch	Call with PJ FP re next steps in legal research, discussions with opposing counsel	0.7	0.7
3/26/19	Leecia Welch	Email correspondence with team re: follow-up for Named Plaintiff M.L.	0.1	0.1
3/26/19	Leecia Welch	Email correspondence with FP re: correspondence with Named Plaintiffs	0.1	0.1
3/26/19	Leecia Welch	Emails with opposing counsel re substitution of parties	0.1	0.1
3/26/19	Leecia Welch	Phone call with P. Juneja re draft settlement negotiation proposal	0.8	0.8
3/27/19	Leecia Welch	Team call, including discussion of Defendants' proposed stay and client updates	0.9	0.9
3/28/19	Leecia Welch	Phone call with FP and potential expert S.W. re: Kansas Medicaid system	0.5	0.5
3/28/19	Leecia Welch	Prepare for phone call with potential expert S.W. re: Kansas Medicaid system	0.2	0.2
3/29/19	Leecia Welch	Review J. King research memo re: abstention	0.4	0.4
3/29/19	Leecia Welch	Review Defendants' draft stipulation re: extension of time to answer	0.1	0.1
3/29/19	Leecia Welch	Email opposing counsel re extension stip	0.1	0.1
3/29/19	Leecia Welch	Confer with PJ and FP re: legal research re: in camera review	0.2	0.2
3/29/19	Leecia Welch	TC with opposing counsel re joint motion for extension	0.5	0.5

Date	Name	Description	Time Billed	With Travel at 50%
3/29/19	Leecia Welch	Analyze Defs' proposal re extension	1.2	1.2
4/3/19	Leecia Welch	Team call, including re: 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint	1.0	1.0
4/3/19	Leecia Welch	Confer with PJ and FP re: 4/19/19 meeting	0.2	0.2
4/4/19	Leecia Welch	Email correspondence with FP and I. Lustbader re: potential expert Medicaid expert N.S.	0.1	0.1
4/4/19	Leecia Welch	TC with co-counsel re 4/19 meeting and case strategy	0.5	0.5
4/4/19	Leecia Welch	Review J. King memo re: distinguishing Fifth Circuit case	0.4	0.4
4/4/19	Leecia Welch	Review D. Kan materials re: 26(f) conferenc	0.2	0.2
4/5/19	Leecia Welch	TC with opposing counsel re meeting and case logistics; prepare for same	0.7	0.7
4/5/19	Leecia Welch	Email summary to team about call with opposing counsel	0.3	0.3
4/9/19	Leecia Welch	Confer with PJ, FP, and JS re: cocounsel agreement, legal research tasks, and early mediation	0.4	0.4
4/10/19	Leecia Welch	Team call, including discussion of 4/19/19 meeting with defendants, proposed additional substantive due process claim, and document management	1.0	1.0
4/10/19	Leecia Welch	Follow up with FP and PJ re: team call, including discussion of document management and early settlement	0.7	0.7
4/10/19	Leecia Welch	Review draft agreement re: entry into 30 day settlement period	0.5	0.5
4/11/19	Leecia Welch	Confer with PJ re initial terms sheet, good faith negotiation agreement	0.1	0.1
4/12/19	Leecia Welch	Prepare email to opposing counsel re settlement frame	0.5	0.5
4/12/19	Leecia Welch	Edit email to opposing counsel re settlement frame	0.2	0.2
4/12/19	Leecia Welch	Review memo re in-camera review	0.2	0.2
4/15/19	Leecia Welch	Confer with FP and PJ re: 4/19/19 meeting, email correspondence with Defendants re: same, and co-counsel agreement	0.3	0.3
4/15/19	Leecia Welch	Finalize email to opposing counsel re 4/19 meeting and protective order issues	0.2	0.2
4/17/19	Leecia Welch	Travel to SF to KS for settlement discussion with Ds	5.5	2.75
4/17/19	Leecia Welch	Convo with FP re team call	0.2	0.2
4/18/19	Leecia Welch	Confer with FP and PJ re: follow up for Kansas call	0.1	0.1
4/18/19	Leecia Welch	Meeting with Teresa Woody re case strategy issues	2.0	2.0

Date	Name	Description	Time Billed	With Travel at 50%
4/19/19	Leecia Welch	Meeting with team in advance of settlement discussion with Defendants	1.0	1.0
4/19/19	Leecia Welch	Settlement discussion with Defendants	2.0	2.0
4/19/19	Leecia Welch	Debrief meeting with team re next steps	1.5	1.5
4/20/19	Leecia Welch	Travel from KS to SF returning from settlement discussion	5.5	2.75
4/22/19	Leecia Welch	Confer with FP and PJ re: follow up from meeting with Defendants, settlement strategy, and Medicaid research follow-up	0.3	0.3
4/23/19	Leecia Welch	Review letter to clients re case status	0.1	0.1
4/23/19	Leecia Welch	Email correspondence with FP re: Medicaid system research	0.1	0.1
4/24/19	Leecia Welch	Team call, including discussion of local/stakeholder updates	0.6	0.6
4/24/19	Leecia Welch	Confer with FP and PJ re: next steps for term sheet	0.1	0.1
4/25/19	Leecia Welch	Review Defendants' answer to complaint	0.8	0.8
4/30/19	Leecia Welch	Confer with PJ and FP re: answer to complaint	0.1	0.1
5/2/19	Leecia Welch	Team call, including re: Defendants' answer, possible amendments to complaint, and settlement strategy	0.9	0.9
5/2/19	Leecia Welch	Review annotated complaint with Defendants' answers	0.4	0.4
5/3/19	Leecia Welch	Confer with PJ and FP re: terms sheet, complaint amendments, and research needs	0.4	0.4
5/7/19	Leecia Welch	Review scheduling order	0.1	0.1
5/7/19	Leecia Welch	Confer with P. Juneja re key dates and info from scheduling order from Judge Birzer	0.2	0.2
5/7/19	Leecia Welch	Edit and revise term sheet	2.1	2.1
5/8/19	Leecia Welch	Team call re discussion of scheduling order, complaint amendments, terms sheet, etc.	0.9	0.9
5/8/19	Leecia Welch	Review memo re governor as defendant	0.3	0.3
5/8/19	Leecia Welch	Call with opposing counsel; prepare for same	0.8	0.8
5/9/19	Leecia Welch	Email to team re call with opposing counsel	0.4	0.4
5/9/19	Leecia Welch	Review email correspondence re: Medicaid claims	0.1	0.1
5/10/19	Leecia Welch	Review Children's Rights' edits to term sheet	0.3	0.3
5/13/19	Leecia Welch	Confer with PJ and FP re: scheduling conference, term sheet, complaint amendments, and initial disclosures	0.5	0.5
5/13/19	Leecia Welch	Confer with FP and PJ re: scheduling conference and related deadlines	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
5/14/19	Leecia Welch	Email correspondence with FP, JP and I. Lustbader re: rescheduling Rule 26 conference	0.1	0.1
5/14/19	Leecia Welch	Review revised draft term sheet	0.1	0.1
5/14/19	Leecia Welch	Email correspondence with FP re: Medicaid statutory cites	0.1	0.1
5/14/19	Leecia Welch	Review complaint redline for amendment	1.5	1.5
5/14/19	Leecia Welch	Email to opposing counsel re case scheduling issues and case logistics	0.5	0.5
5/15/19	Leecia Welch	Team call, including re: scheduling conference, term sheet, and complaint amendments	1.0	1.0
5/15/19	Leecia Welch	Confer with FP and PJ re: follow-up from team call	0.1	0.1
5/15/19	Leecia Welch	Review memo re: facts relevant to Medicaid claims	0.5	0.5
5/16/19	Leecia Welch	Travel from SF to KS for meetings with various stakeholders re foster care issues	5.5	2.75
5/16/19	Leecia Welch	Travel to and from Topeka to KC	2.0	1
5/16/19	Leecia Welch	Meeting with client and potential client in Topeka	1.5	1.5
5/17/19	Leecia Welch	Meeting with children's advocate re foster care issues	1.5	1.5
5/17/19	Leecia Welch	Meeting with foster care advocate re systemic issues	1.2	1.2
5/17/19	Leecia Welch	Meeting with GAL re foster care systemic issues	1.3	1.3
5/17/19	Leecia Welch	Edit and revise amended complaint	4.5	4.5
5/18/19	Leecia Welch	Edit and revise amended complaint	1.2	1.2
5/19/19	Leecia Welch	Travel from KS to SF returning from stakeholder meetings	5.5	2.75
5/20/19	Leecia Welch	Confer with next friend re plaintiff facts; edit amended complaint	0.5	0.5
5/20/19	Leecia Welch	Confer with FP and PJ re: complaint amendment	1.0	1.0
5/20/19	Leecia Welch	Edit and revise new named plaintiff facts; email team re same	0.7	0.7
5/20/19	Leecia Welch	Email correspondence with team re: amending complaint	0.3	0.3
5/20/19	Leecia Welch	Call with partner organization re: Medicaid claim	0.6	0.6
5/22/19	Leecia Welch	Team call, including discussion of new clients, term sheet, and Medicaid claim	1.0	1.0
5/22/19	Leecia Welch	Confer with PJ and FP re: follow up from team call	0.2	0.2
5/23/19	Leecia Welch	emailing with PJ SD re talking to NFs re terms sheet	0.1	0.1
5/24/19	Leecia Welch	Email correspondence with PJ and FP re: Medicaid cites	0.3	0.3
5/24/19	Leecia Welch	Final review of term sheet	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
5/24/19	Leecia Welch	Edit memo re: Medicaid facts for amended complaint	0.6	0.6
5/28/19	Leecia Welch	Confer with FP and PJ re: terms sheet and E.B. facts	0.1	0.1
5/29/19	Leecia Welch	Team call, including re: case scheduling, adding plaintiffs, and discovery strategy	0.8	0.8
5/29/19	Leecia Welch	Further revise Medicaid facts template	0.2	0.2
5/29/19	Leecia Welch	Review report of 26(f) conference, model scheduling order, and ESI guidelines in preparation for scheduling conference with Judge Birzer	0.8	0.8
5/29/19	Leecia Welch	Prepare email re: interim relief and term sheet	0.6	0.6
5/29/19	Leecia Welch	Email correspondence with FP and PJ re: term sheet	0.1	0.1
5/30/19	Leecia Welch	Email to clients re settlement term sheet	0.3	0.3
5/31/19	Leecia Welch	Email to opposing counsel with settlement term sheet	0.4	0.4
5/31/19	Leecia Welch	emailing with PJ re final edits to cover note for terms sheet	0.1	0.1
6/4/19	Leecia Welch	Review T. Woody draft initial disclosures and P. Juneja proposed edits to same in preparation for strategy call on 6/5	0.3	0.3
6/5/19	Leecia Welch	Confer with PJ and FP re: initial disclosures and RFPs	0.2	0.2
6/6/19	Leecia Welch	TC with opposing counsel re ethical issue and update re settlement response	0.4	0.4
6/8/19	Leecia Welch	Travel to KS from SF for meetings with foster care advocates and potential clients	5.5	2.75
6/9/19	Leecia Welch	Travel to meetings with foster care advocates and potential clients	1.2	0.6
6/9/19	Leecia Welch	Meetings with foster care advocates and potential clients regarding systemic problems	4.5	4.5
6/10/19	Leecia Welch	Travel to and from Topeka to KC for meetings with next friends and potential clients	2.0	1
6/10/19	Leecia Welch	Meetings with next friends and potential clients re foster youth updates	5.5	5.5
6/11/19	Leecia Welch	Travel from KS to SF returning from meetings with foster care advocates and potential clients	5.5	2.75
6/11/19	Leecia Welch	Confer with PJ and FP re: document review protocol for Plaintiff files	0.2	0.2
6/11/19	Leecia Welch	Review information for new named plaintiffs	0.2	0.2
6/12/19	Leecia Welch	Team call re discussion of possible preliminary injunction motion and discovery issues	0.7	0.7
6/12/19	Leecia Welch	Edit and revise initial disclosures	1.3	1.3
6/14/19	Leecia Welch	Email correspondence re: call with local expert stakeholders re: Medicaid system in Kansas	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
6/15/19	Leecia Welch	Call with local expert stakeholders re: Medicaid issues	1.6	1.6
6/17/19	Leecia Welch	Review email correspondence from I. Lustbader re: discovery	0.1	0.1
6/17/19	Leecia Welch	Confer with FP and PJ re: initial disclosures and 30(b)(6) notice	0.2	0.2
6/18/19	Leecia Welch	Email to next friend re plaintiff fact update	0.5	0.5
6/18/19	Leecia Welch	Review J. Nomkin research memo re: multiple 30(b)(6) notices to same entity	0.1	0.1
6/18/19	Leecia Welch	Review P. Juneja draft RFPs re: Named Plaintiffs & general topics	0.2	0.2
6/19/19	Leecia Welch	Team call re: 30(b)(6) notice, RFPs, initial disclosures, case file review, and possible preliminary injunction motion	1.2	1.2
6/19/19	Leecia Welch	Email correspondence re: class certification and bifurcation	0.1	0.1
6/19/19	Leecia Welch	Review case scheduling memo	0.3	0.3
6/19/19	Leecia Welch	Review memo re: proposed case schedule and discovery proposals in preparation for Rule 26(f) conference	0.6	0.6
6/19/19	Leecia Welch	Email correspondence with PJ and FP re: deposition and interrogatory limits	0.1	0.1
6/20/19	Leecia Welch	Confer with FP and PJ re: case schedule, RFPs, initial disclosures, and Relativity	0.7	0.7
6/20/19	Leecia Welch	Email correspondence re: case schedule	0.1	0.1
6/20/19	Leecia Welch	Edit and revise RFPs	1.5	1.5
6/20/19	Leecia Welch	Email correspondence re: 26(f) conference	0.1	0.1
6/21/19	Leecia Welch	Email correspondence re: discovery plan and RFPs	0.2	0.2
6/21/19	Leecia Welch	Review memo re class cert issues	0.3	0.3
6/24/19	Leecia Welch	Email correspondence re: case schedule	0.1	0.1
6/24/19	Leecia Welch	Review revised RFPs	0.3	0.3
6/24/19	Leecia Welch	Email correspondence with T. Woody re: pretrial conferences and local practice	0.4	0.4
6/25/19	Leecia Welch	Edit draft RFPs	0.7	0.7
6/25/19	Leecia Welch	Edit draft report of planning conference	0.8	0.8
6/25/19	Leecia Welch	Review outline for 26(f) conference; email correspondence re: same	0.7	0.7
6/26/19	Leecia Welch	Team call, including re: 26(f) conference and statement, prospective mediators, and discovery	1.2	1.2
6/26/19	Leecia Welch	Review materials for Rule 26 meet and confer	2.2	2.2
6/26/19	Leecia Welch	Internal NCYL follow up discussion after team call re: 26(f) conference logistics	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
6/26/19	Leecia Welch	Email correspondence with FP re: RFPs	0.1	0.1
6/26/19	Leecia Welch	Review revisions to initial disclosures; outline for call discussion; proposed case schedule	0.7	0.7
6/27/19	Leecia Welch	Email with opposing counsel re proposed schedule	0.1	0.1
6/27/19	Leecia Welch	Participate in Rule 26(f) conference	2.2	2.2
6/27/19	Leecia Welch	Review updated Rule 26 docs	0.3	0.3
6/27/19	Leecia Welch	Email to opposing counsel re Rule 26(f) follow up	0.1	0.1
6/28/19	Leecia Welch	Edit and revise KS RFPs	1.5	1.5
6/30/19	Leecia Welch	Edit and revise DCF RFPs	1.2	1.2
6/30/19	Leecia Welch	Edit and revise KDADS RFPs	0.5	0.5
6/30/19	Leecia Welch	Edit and revise 30(b)(6) notice	0.4	0.4
7/1/19	Leecia Welch	Emails with opposing counsel re Rule 26 docs	0.1	0.1
7/1/19	Leecia Welch	Review Defendants Rule 26 docs	0.2	0.2
7/1/19	Leecia Welch	Emails with team re finalizing Rule 26 docs	0.1	0.1
7/7/19	Leecia Welch	Travel from SF to KS for status conference	5.5	2.75
7/7/19	Leecia Welch	Prep for status conference; prepare email re same	2.2	2.2
7/8/19	Leecia Welch	Meeting with team to prep for status conference	0.5	0.5
7/8/19	Leecia Welch	Attend status conference	1.0	1.0
7/8/19	Leecia Welch	Meeting with team to debrief status conference	1.0	1.0
7/8/19	Leecia Welch	Prepare email re summary of status conference	0.8	0.8
7/9/19	Leecia Welch	Travel from KS to SF returning from status conference	5.5	2.75
7/9/19	Leecia Welch	Call with FP re: 30(b)(6) notice and outstanding legal research needs	0.1	0.1
7/10/19	Leecia Welch	Review scheduling order	0.3	0.3
7/11/19	Leecia Welch	Email correspondence re: research needs	0.1	0.1
7/12/19	Leecia Welch	Team call re: scheduling conference & order, complaint amendment, stakeholder interviews	1.3	1.3
7/15/19	Leecia Welch	Review 30(b)(6) notice	0.8	0.8
7/15/19	Leecia Welch	Confer with PJ and FP re: ADR, 30(b)(6) notice, stakeholder conversations, and division of labor with co-counsel	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
7/16/19	Leecia Welch	Travel to KS from SF for meetings with clients and potential clients	5.5	2.75
7/16/19	Leecia Welch	Review Defendants' settlement correspondence	0.2	0.2
7/16/19	Leecia Welch	Revise 30(b)(6) notice	1.2	1.2
7/16/19	Leecia Welch	Confer with FP and PJ re case file productions	0.6	0.6
7/16/19	Leecia Welch	Edit and revise 30(b)(6) notice	0.5	0.5
7/16/19	Leecia Welch	Review Defendants' counter proposal	0.5	0.5
7/17/19	Leecia Welch	Team call, including re: mediation, 30(b)(6) notice, and stakeholder conversations	0.9	0.9
7/17/19	Leecia Welch	Meetings with clients and potential clients re issues in foster care system	3.5	3.5
7/17/19	Leecia Welch	Review CR edits to 30(b)(6) draft	0.2	0.2
7/18/19	Leecia Welch	Revise 30(b)(6) notice	0.8	0.8
7/18/19	Leecia Welch	Emails with team re 30(b)(6) notice	0.1	0.1
7/18/19	Leecia Welch	Revise 30(b)(6) notice; email correspondence re: same	0.6	0.6
7/19/19	Leecia Welch	Confer with PJ and FP re: division of labor, class certification, ADR, and stakeholder conversations	0.6	0.6
7/23/19	Leecia Welch	Confer with PJ and FP re: response to T. Campbell	0.4	0.4
7/24/19	Leecia Welch	Team call, including re: mediation, experts, discovery, and information from stakeholders	0.9	0.9
7/25/19	Leecia Welch	Email with opposing counsel re discovery issues	0.5	0.5
7/25/19	Leecia Welch	Reviewing opposing counsel discovery email	0.1	0.1
7/29/19	Leecia Welch	Confer with PJ and FP re: discovery & mediation	0.2	0.2
7/29/19	Leecia Welch	Review DCF initiatives doc	0.2	0.2
7/31/19	Leecia Welch	Team call, including re: mediation, discovery, and Task Force	0.7	0.7
7/31/19	Leecia Welch	Confer with PJ and FP re: stakeholder updates re: congregate care, named plaintiff file review, and third party subpoenas	0.6	0.6
8/1/19	Leecia Welch	Email with opposing counsel re potential mediators	0.2	0.2
8/6/19	Leecia Welch	Review team work plan; email team re same	0.4	0.4
8/7/19	Leecia Welch	Team call, including re: work plan, ADR, complaint amendment, and discovery	0.7	0.7
8/7/19	Leecia Welch	NCYL follow-up discussion following team call	0.2	0.2
8/7/19	Leecia Welch	Review summary of call with potential neuroscience expert P.F.	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
8/8/19	Leecia Welch	Review modified 30(b)(6) depo notice; send email to team re same	0.3	0.3
8/9/19	Leecia Welch	Review information re: potential mediator	0.2	0.2
8/12/19	Leecia Welch	Confer with PJ and FP re: 30(b)(6) notice, ADR, case file review, search terms, and FAC	0.2	0.2
8/12/19	Leecia Welch	Review letters received from stakeholders; email correspondence re: same	0.2	0.2
8/12/19	Leecia Welch	Receive and review email correspondence re: mediation strategy	0.2	0.2
8/12/19	Leecia Welch	Edit and review new named plaintiff facts section for amended complaint	0.7	0.7
8/13/19	Leecia Welch	Emails with team re settlement issues	0.2	0.2
8/14/19	Leecia Welch	Travel to Wichita from SF for client meetings	6.0	3
8/14/19	Leecia Welch	Travel to KC from Wichita for meetings with individuals with info re child welfare system	3.0	1.5
8/14/19	Leecia Welch	Team call, including re: ADR, discovery, and complaint amendment	0.8	0.8
8/14/19	Leecia Welch	Emails with opposing counsel re settlement issues	0.2	0.2
8/14/19	Leecia Welch	Phone call with opposing counsel re settlement issues; prepare for same	0.5	0.5
8/14/19	Leecia Welch	Meeting with clients re status of case	1.5	1.5
8/15/19	Leecia Welch	Travel for meetings with potential fact witnesses	1.6	0.8
8/15/19	Leecia Welch	Email with team re: ADR strategy and scheduling	0.2	0.2
8/15/19	Leecia Welch	Meetings with potential fact witnesses re problems with foster care system	1.2	1.2
8/15/19	Leecia Welch	Email to opposing counsel re settlement issues	0.4	0.4
8/16/19	Leecia Welch	Travel to and from meeting with foster care advocates	2.0	1
8/16/19	Leecia Welch	Meetings with potential client re amendments to complaint	1.2	1.2
8/16/19	Leecia Welch	Meetings with foster care advocates and potential clients regarding systemic problems	2.2	2.2
8/16/19	Leecia Welch	Email correspondence re: ADR	0.1	0.1
8/16/19	Leecia Welch	Email correspondence re: 30(b)(6) deposition notice	0.1	0.1
8/17/19	Leecia Welch	Travel to SF from KC	5.5	2.75
8/19/19	Leecia Welch	Email correspondence re: Kansas mediation	0.1	0.1
8/19/19	Leecia Welch	Review materials re DCF initiatives	0.5	0.5

Date	Name	Description	Time Billed	With Travel at 50%
8/19/19	Leecia Welch	Confer with P. Juneja and F. Pitts re mediation statement, 30(b)(6) complaint amendment, doc review	0.5	0.5
8/19/19	Leecia Welch	Review mediation notice from opposing counsel	0.1	0.1
8/19/19	Leecia Welch	Confer with F. Pitts re ADR, 30(b)(6), complaint amendment	0.8	0.8
8/19/19	Leecia Welch	Edit and revise plaintiff facts in FAC	2.8	2.8
8/20/19	Leecia Welch	Edit and revise plaintiff facts in FAC	2.2	2.2
8/20/19	Leecia Welch	Email to opposing counsel re FAC	0.1	0.1
8/20/19	Leecia Welch	Confer with PJ re class definition and placement instability	0.1	0.1
8/20/19	Leecia Welch	Confer with FP re: complaint amendment	0.2	0.2
8/21/19	Leecia Welch	Team call, including re: complaint amendment, ADR, communications strategy, and discovery	0.9	0.9
8/21/19	Leecia Welch	Phone call with PJ discussing research on class definition and amendment of complaint and strategy	0.4	0.4
8/21/19	Leecia Welch	Internal NCYL follow-up conversation re: complaint amendment	0.1	0.1
8/23/19	Leecia Welch	Email correspondence with FP re: 30(b)(6) notice	0.1	0.1
8/23/19	Leecia Welch	Confer with PJ and FP re: 30(b)(6) notice	0.3	0.3
8/23/19	Leecia Welch	Revise 30(b)(6) notice	0.2	0.2
8/26/19	Leecia Welch	Confer with FP re: ADR, complaint amendment	0.3	0.3
8/26/19	Leecia Welch	Edit and revise FAC	1.5	1.5
8/26/19	Leecia Welch	Confer with PJ and FP re: complaint amendment	0.2	0.2
8/27/19	Leecia Welch	Review contact memos from recent KS visit	0.5	0.5
8/27/19	Leecia Welch	Edit and revise FAC	1.6	1.6
8/28/19	Leecia Welch	Team call, including re: ADR, amended complaint, local updates	0.9	0.9
8/28/19	Leecia Welch	Edit and revise FAC	1.1	1.1
8/28/19	Leecia Welch	Email to opposing counsel attaching draft FAC	0.1	0.1
8/28/19	Leecia Welch	Debrief with PJ re co-counsel call and motion to amend drafting	0.2	0.2
8/28/19	Leecia Welch	Emails with clients re FAC	0.3	0.3
8/29/19	Leecia Welch	Confer with PJ re motion to amend and amendments to complaint	0.2	0.2
8/29/19	Leecia Welch	Confer with PJ re third party subpoenas and requests for inspection	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
8/29/19	Leecia Welch	debrief with PJ Teresa re call with defs re doc production and next steps	0.2	0.2
8/29/19	Leecia Welch	Phone call with opposing counsel re discovery production issues; prepare for same	0.9	0.9
8/29/19	Leecia Welch	Review FAC supporting documents	1.5	1.5
8/30/19	Leecia Welch	Confer with FP re: amended complaint	0.1	0.1
8/30/19	Leecia Welch	Review and edit draft letter to T. Campbell	0.1	0.1
8/30/19	Leecia Welch	Edit final FAC, motion for leave to file FAC, motion for pseudonyms	1.4	1.4
9/3/19	Leecia Welch	Review discovery stipulation	0.3	0.3
9/3/19	Leecia Welch	Email with team re: discovery stipulation	0.2	0.2
9/3/19	Leecia Welch	confer with PJ FP re defs' request for names, incoming doc production, 30b6 follow up	0.2	0.2
9/3/19	Leecia Welch	Review FAC errata	0.2	0.2
9/4/19	Leecia Welch	Team call, including re: notice of errata for FAC, 30(b)(6), and ADR	1.0	1.0
9/4/19	Leecia Welch	Emails to clients re FAC	0.2	0.2
9/4/19	Leecia Welch	Review email correspondence re: updated foster care data	0.1	0.1
9/9/19	Leecia Welch	Review draft mediation statement	0.5	0.5
9/11/19	Leecia Welch	Team call, including re: mediation statement, discovery, experts	0.8	0.8
9/11/19	Leecia Welch	Confer with PJ FP re draft settlement statement	0.3	0.3
9/11/19	Leecia Welch	Revise mediation statement	0.7	0.7
9/12/19	Leecia Welch	conferring with PJ re revisions to mediation statement	0.1	0.1
9/12/19	Leecia Welch	Call with DLA re case status; prepare for same	0.8	0.8
9/16/19	Leecia Welch	Revise draft mediation statement	0.4	0.4
9/17/19	Leecia Welch	conferring with PJ re doc review	0.3	0.3
9/18/19	Leecia Welch	Confer with FP and PJ re production issues	0.4	0.4
9/18/19	Leecia Welch	Confer with PJ re draft mediation statement	0.1	0.1
9/18/19	Leecia Welch	Review and edit updated mediation draft	1.2	1.2
9/20/19	Leecia Welch	Review final mediation statement	0.4	0.4
9/24/19	Leecia Welch	Review correspondence re: document production and redactions	0.1	0.1
9/24/19	Leecia Welch	Review T. Woody discovery letter draft	0.4	0.4
9/24/19	Leecia Welch	Review Judge Birzer ESI order	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
9/26/19	Leecia Welch	Phone call with PJ re change in opposing counsel	0.3	0.3
9/26/19	Leecia Welch	Meet with PJ re doc production issues	0.3	0.3
9/26/19	Leecia Welch	Email from opposing counsel re new firm involvement	0.1	0.1
9/30/19	Leecia Welch	Confer with FP PJ re new opposing counsel, discovery next steps, 30b6, etc.	0.2	0.2
10/1/19	Leecia Welch	Revise amended 30(b)(6) notice and discovery letter	0.5	0.5
10/1/19	Leecia Welch	Call with Lathrop, new counsel for Defendants, re: discovery and deadlines	1.0	1.0
10/1/19	Leecia Welch	Confer with PJ and FP re: next steps for Kansas discovery	0.2	0.2
10/2/19	Leecia Welch	Team call re: discovery letter, mediation, amended 30(b)(6), and potential experts	1.0	1.0
10/2/19	Leecia Welch	Email with team re: mediation	0.2	0.2
10/2/19	Leecia Welch	Follow-up following team call with PJ and FP	0.2	0.2
10/2/19	Leecia Welch	Email with opposing counsel re mediation issues	0.1	0.1
10/7/19	Leecia Welch	Review email re: mediation strategy for call with monitor	0.2	0.2
10/7/19	Leecia Welch	Review KS hot docs in prep for mediation	0.5	0.5
10/8/19	Leecia Welch	Email correspondence re: mediation call prep	0.2	0.2
10/8/19	Leecia Welch	Plaintiffs-only mediation call with K. Ryan	1.3	1.3
10/9/19	Leecia Welch	Review email re mediation next steps	0.1	0.1
10/10/19	Leecia Welch	Email correspondence with mediator re next steps	0.1	0.1
10/16/19	Leecia Welch	Team call, including re: ADR and stakeholders	0.5	0.5
10/18/19	Leecia Welch	Text message with PJ re defendants' responses and objections	0.1	0.1
10/21/19	Leecia Welch	Prepare for in-person mediation	2.5	2.5
10/22/19	Leecia Welch	Travel to KC from SF for meeting with potential experts	5.5	2.75
10/22/19	Leecia Welch	Prepare for meeting with potential experts	2.1	2.1
10/23/19	Leecia Welch	Meet with co-counsel and potential expert witnesses	5.5	5.5
10/23/19	Leecia Welch	Prep for expert meeting	0.5	0.5
10/24/19	Leecia Welch	Travel from KC to Seattle (for another case meeting)	3.5	1.75
10/24/19	Leecia Welch	Email correspondence re: mediation	0.1	0.1
10/25/19	Leecia Welch	Email with opposing counsel re settlement draft issues	0.1	0.1
10/25/19	Leecia Welch	Confer with PJ re Defs' response to term sheet	0.1	0.1
10/28/19	Leecia Welch	Co-counsel strategy meeting with DLA Piper	1.9	1.9

Date	Name	Description	Time Billed	With Travel at 50%
10/28/19	Leecia Welch	Confer with PJ and FP re: DLA Piper meeting prep, document review, opposition to MTD	0.5	0.5
10/30/19	Leecia Welch	Email correspondence re: targeted discovery	0.1	0.1
11/1/19	Leecia Welch	Prep call for meet and confer re: discovery and motion to dismiss	0.3	0.3
11/1/19	Leecia Welch	Meet and confer call re: motion to dismiss and discovery	1.2	1.2
11/1/19	Leecia Welch	Follow up conversation with FP re: meet and confer	0.2	0.2
11/6/19	Leecia Welch	Team call re: ADR, MTD, discovery, experts	1.0	1.0
11/6/19	Leecia Welch	Plaintiffs' mediation call with K. Ryan	0.6	0.6
11/6/19	Leecia Welch	Call with mediator re prep for mediation	0.2	0.2
11/6/19	Leecia Welch	Review background materials in prep for mediation session	1.4	1.4
11/8/19	Leecia Welch	Attend team call in preparation for mediation	0.9	0.9
11/8/19	Leecia Welch	Attend call with mediator to prepare for mediation	1.0	1.0
11/8/19	Leecia Welch	Review email to Defendants re discovery issues and motion	0.1	0.1
11/8/19	Leecia Welch	Prepare for in-person mediation	1.2	1.2
11/8/19	Leecia Welch	Prepare email to next friends re mediation	0.8	0.8
11/8/19	Leecia Welch	Confer with FP re mediation prep	0.1	0.1
11/11/19	Leecia Welch	Travel to KC from SF for mediation and meeting with potential expert	5.5	2.75
11/12/19	Leecia Welch	Team meeting to prep for mediation	1.0	1.0
11/12/19	Leecia Welch	Participate in mediation session	8.2	8.2
11/12/19	Leecia Welch	Team debrief after mediation session	0.5	0.5
11/13/19	Leecia Welch	Travel from KC to SFO	5.5	2.75
11/13/19	Leecia Welch	Attend meeting with potential expert	2.0	2.0
11/14/19	Leecia Welch	Emails with client re mediation issues	1.2	1.2
11/15/19	Leecia Welch	Team call re: mediation, experts, and media	0.9	0.9
11/15/19	Leecia Welch	Research systemic issues for settlement draft	0.5	0.5
11/18/19	Leecia Welch	Travel to KC from SFO for meetings with individuals connected to foster care system	5.5	2.75
11/19/19	Leecia Welch	Travel to Topeka from KC for meetings with CASA and GAL	1.0	0.5
11/19/19	Leecia Welch	Travel from Topeka to KC returning from meetings with CASA and GAL	1.2	0.6
11/19/19	Leecia Welch	Attend meetings with CASA and GAL re systemic challenges	1.0	1.0

Date	Name	Description	Time Billed	With Travel at 50%
11/19/19	Leecia Welch	TC with PJ re stakeholder meetings and mediation issues	0.5	0.5
11/20/19	Leecia Welch	Travel to Olathe from KC for stakeholder meetings	0.5	0.25
11/20/19	Leecia Welch	Travel from Olathe to KC returning from stakeholder meetings	0.5	0.25
11/20/19	Leecia Welch	Travel from KC to SFO returning from stakeholder meetings	5.5	2.75
11/20/19	Leecia Welch	Attend meeting with SD and GAL re systemic challenges to inform settlement	2.0	2.0
11/20/19	Leecia Welch	Attend meeting with SD and next friend re client status and systemic challenges to inform settlement	1.2	1.2
11/20/19	Leecia Welch	Attend meeting with SD and foster parent re systemic challenges to inform settlement	0.3	0.3
11/20/19	Leecia Welch	Attend meeting with SD and attorney re systemic challenges and DCF databases	0.7	0.7
11/20/19	Leecia Welch	Prepare email to next friends re mediation update	1.2	1.2
11/20/19	Leecia Welch	Texting with FP PJ re co-counsel meeting	0.1	0.1
11/21/19	Leecia Welch	Prepare mediation draft	0.6	0.6
11/21/19	Leecia Welch	Research issues for mediation draft	0.3	0.3
11/21/19	Leecia Welch	Confer with FP re: mediation draft	0.1	0.1
11/22/19	Leecia Welch	Prepare mediation draft	0.5	0.5
11/22/19	Leecia Welch	Research issues for mediation draft	5.5	5.5
11/23/19	Leecia Welch	Prepare mediation draft	2.5	2.5
11/24/19	Leecia Welch	Prepare mediation draft	2.2	2.2
11/25/19	Leecia Welch	Team call re: settlement draft	1.0	1.0
11/25/19	Leecia Welch	Edit and revise mediation draft	1.5	1.5
11/26/19	Leecia Welch	Edit and revise mediation draft	2.5	2.5
11/26/19	Leecia Welch	Prepare email to next friends re mediation update	0.5	0.5
11/26/19	Leecia Welch	Prepare email to mediator re draft	0.4	0.4
11/29/19	Leecia Welch	Revise settlement draft	1.1	1.1
11/30/19	Leecia Welch	Revise settlement draft	3.5	3.5
12/1/19	Leecia Welch	Revise settlement draft	0.5	0.5
12/1/19	Leecia Welch	Review correspondence from mediator	0.5	0.5
12/2/19	Leecia Welch	Call re: settlement draft	1.3	1.3

Date	Name	Description	Time Billed	With Travel at 50%
12/2/19	Leecia Welch	Revise settlement draft	1.2	1.2
12/2/19	Leecia Welch	Email correspondence re: settlement edits	0.2	0.2
12/3/19	Leecia Welch	Call with FP and PJ re: settlement	0.3	0.3
12/3/19	Leecia Welch	Edit and revise settlement	2.4	2.4
12/4/19	Leecia Welch	Confer with PJ re revisions to settlement proposal	0.4	0.4
12/4/19	Leecia Welch	Review and edit settlement draft	1.6	1.6
12/4/19	Leecia Welch	Finalize settlement draft; email to defendants re same	0.5	0.5
12/5/19	Leecia Welch	Review Defendants' mediation proposal	1.7	1.7
12/5/19	Leecia Welch	Emails re Defendants' mediation draft	0.2	0.2
12/5/19	Leecia Welch	Research issues re trauma screens	0.7	0.7
12/8/19	Leecia Welch	Review team comments to Defendants' mediation draft	1.2	1.2
12/8/19	Leecia Welch	Edit and revise mediation draft	1.5	1.5
12/9/19	Leecia Welch	Confer with FP re: settlement draft, document review, experts	0.3	0.3
12/9/19	Leecia Welch	Edit and revise mediation draft	0.9	0.9
12/10/19	Leecia Welch	Review revised mediation draft	0.5	0.5
12/11/19	Leecia Welch	Review material re potential expert	0.7	0.7
12/11/19	Leecia Welch	Email to defendants re mediation draft	0.1	0.1
12/12/19	Leecia Welch	Call with potential expert re: Medicaid system (partial attendance)	1.2	1.2
12/12/19	Leecia Welch	Review Defendants' settlement redline	1.3	1.3
12/13/19	Leecia Welch	Prepare for in-person mediation	1.2	1.2
12/14/19	Leecia Welch	Travel from SF to Kansas City for mediation	5.5	2.75
12/15/19	Leecia Welch	Attend mediation	7.1	7.1
12/15/19	Leecia Welch	Edit and revise mediation draft	1.1	1.1
12/15/19	Leecia Welch	Email to defendants re mediation draft	0.1	0.1
12/16/19	Leecia Welch	Attend mediation	6.3	6.3
12/17/19	Leecia Welch	Travel to SF from KC returning from stakeholder meetings	5.5	2.75
12/17/19	Leecia Welch	Edit and revise mediation draft	2.2	2.2
12/17/19	Leecia Welch	Revisions to settlement draft	2.2	2.2
12/18/19	Leecia Welch	Team call re: mediation, discovery, and motion to stay	0.8	0.8

Date	Name	Description	Time Billed	With Travel at 50%
12/18/19	Leecia Welch	Edit and revise settlement draft; research issues for same	1.4	1.4
12/18/19	Leecia Welch	Call with PJ re settlement proposal revision	0.2	0.2
12/18/19	Leecia Welch	Email to defendants re mediation draft	0.1	0.1
1/3/20	Leecia Welch	Email correspondence with FP re: response to call from stakeholder parent	0.1	0.1
1/3/20	Leecia Welch	Email correspondence with FP re: identifying Kansas neutral and mediator	0.1	0.1
1/5/20	Leecia Welch	Email to J. Meltzer re potential role as neutral	0.2	0.2
1/5/20	Leecia Welch	Review and revise draft integrated settlement agreement	1.2	1.2
1/6/20	Leecia Welch	Call with co-counsel team re: draft integrated settlement agreement	1.4	1.4
1/7/20	Leecia Welch	Emails with team re settlement issues	0.1	0.1
1/7/20	Leecia Welch	Call with CSSP re: potential implementation role as Neutral	0.9	0.9
1/7/20	Leecia Welch	co-counsel call re targeted discovery to governor	0.4	0.4
1/7/20	Leecia Welch	Confer with PJ and FP re: mediation draft and correspondence re: jurisdictional discovery and motion to dismiss	0.4	0.4
1/7/20	Leecia Welch	Email correspondence with Children's Rights re: correspondence re: jurisdictional discovery and motion to dismiss	0.1	0.1
1/7/20	Leecia Welch	Revise settlement draft	0.5	0.5
1/8/20	Leecia Welch	Email with team re: mediation strategy	0.1	0.1
1/9/20	Leecia Welch	Revise email to 12(b)(1) letter	0.5	0.5
1/10/20	Leecia Welch	Confer with PJ re discovery issues	0.2	0.2
1/13/20	Leecia Welch	Confer with FP and PJ re: mediation status	0.1	0.1
1/15/20	Leecia Welch	Team call, including re: mediation strategy, jurisdictional discovery, and discovery planning in advance of stay pending settlement discussions	1.1	1.1
1/15/20	Leecia Welch	Prepare email to opposing counsel re settlement issues	0.3	0.3
1/15/20	Leecia Welch	Follow up discussion re: team call with PJ and FP	0.1	0.1
1/21/20	Leecia Welch	Confer with FP and PJ re: neutrals, mediation, and discovery planning	0.2	0.2
1/23/20	Leecia Welch	Team call re: mediation and discovery planning	1.1	1.1
1/23/20	Leecia Welch	Email correspondence with team re: mediation	0.1	0.1
1/23/20	Leecia Welch	Review email correspondence re: settlement draft and mediation	0.1	0.1
1/24/20	Leecia Welch	Review Defendants' revisions to settlement agreement draft	0.7	0.7

Date	Name	Description	Time Billed	With Travel at 50%
1/24/20	Leecia Welch	Review 12(b)(1) opposition	0.5	0.5
1/26/20	Leecia Welch	Review Governor's documents re: DCF, KDADS, and new DHS	0.4	0.4
1/27/20	Leecia Welch	Confer with FP and PJ re: MTD opposition and mediation strategy	0.2	0.2
1/29/20	Leecia Welch	Team call, including re: mediation and opposition to motion to dismiss	0.8	0.8
1/29/20	Leecia Welch	Review and edit opposition to motion to dismiss	1.1	1.1
1/29/20	Leecia Welch	Plaintiffs' call with mediator Kevin Ryan	0.4	0.4
1/29/20	Leecia Welch	Review IL mediation strategy memo	0.6	0.6
1/31/20	Leecia Welch	Edit opposition to MTD draft	2.2	2.2
2/1/20	Leecia Welch	Edit opposition to MTD draft	1.2	1.2
2/3/20	Leecia Welch	Confer with PJ and FP re: mediation strategy, opposition to motion to dismiss, and discovery planning	0.5	0.5
2/4/20	Leecia Welch	Review Defendants' mediation guides	0.2	0.2
2/4/20	Leecia Welch	Review settlements from other cases in prep for mediation	1.2	1.2
2/5/20	Leecia Welch	Team call re: mediation, discovery, and oppositon to motion to dismiss	0.7	0.7
2/5/20	Leecia Welch	Email to defendants re mediation issues	0.1	0.1
2/6/20	Leecia Welch	Travel to Kansas City for mediation	5.5	2.75
2/7/20	Leecia Welch	In person mediation	7.5	7.5
2/8/20	Leecia Welch	Travel from Kansas City to SF	5.5	2.75
2/11/20	Leecia Welch	Edit and revise opp to MTD	1.7	1.7
2/13/20	Leecia Welch	Review settlement draft edits and attachments	2.2	2.2
2/13/20	Leecia Welch	Edit opposition to MTD draft	0.7	0.7
2/13/20	Leecia Welch	Edit and revise settlement draft; research issues for same	1.5	1.5
2/14/20	Leecia Welch	Email correspondence with team re: recusal & newly assigned judge	0.1	0.1
2/14/20	Leecia Welch	Edit and revise document requests	0.3	0.3
2/19/20	Leecia Welch	Team call re: mediation, discovery, budget process, and potential witnesses	1.0	1.0
2/20/20	Leecia Welch	Review settlement notes re outstanding issues; research issues re same	1.7	1.7
2/21/20	Leecia Welch	Team call re mediation strategy	1.0	1.0
2/23/20	Leecia Welch	Review email correspondence re: mediation strategy	1.0	1.0
2/24/20	Leecia Welch	Travel from DC to Kansas City for mediation	3.5	1.75

Date	Name	Description	Time Billed	With Travel at 50%
2/24/20	Leecia Welch	Review mediation draft proposal	0.8	0.8
2/25/20	Leecia Welch	Attend mediation	9.5	9.5
2/25/20	Leecia Welch	Review and revise updated settlement draft from M. Nardi	0.6	0.6
2/26/20	Leecia Welch	Travel from KC to SF	5.5	2.75
2/26/20	Leecia Welch	Mediation (partial attendance)	2.5	2.5
2/26/20	Leecia Welch	Review mediation materials from defendants	0.6	0.6
2/26/20	Leecia Welch	Email re mediation provisions; research issues re same	1.1	1.1
2/27/20	Leecia Welch	Edit and revise mediation draft	1.1	1.1
2/27/20	Leecia Welch	Email to defendants re mediation draft	0.1	0.1
2/28/20	Leecia Welch	Review and edit 30(b)(6) letter	0.7	0.7
2/28/20	Leecia Welch	Emails with team re discovery letters	0.1	0.1
3/1/20	Leecia Welch	Edit and revise discovery docs	1.4	1.4
3/1/20	Leecia Welch	Email to team re Crabtree class cert decision; review same	0.4	0.4
3/2/20	Leecia Welch	Review discovery letter	0.4	0.4
3/3/20	Leecia Welch	Telephone call with IP, PJ, and MN re case staffing	1.0	1.0
3/4/20	Leecia Welch	Co-counsel meeting re mediation, ESI, third party discovery, stakeholder/local updates	0.8	0.8
3/9/20	Leecia Welch	Travel to KC from AZ for meetings with stakeholders and clients	5.2	2.6
3/10/20	Leecia Welch	Travel to meetings in Topeka	2.0	1
3/10/20	Leecia Welch	Meetings with stakeholders and clients re issues in foster care system and case status	3.5	3.5
3/10/20	Leecia Welch	Meeting with LB and TW re case strategy issues	1.2	1.2
3/10/20	Leecia Welch	Edit and revise ESI search term letter	0.7	0.7
3/10/20	Leecia Welch	Edit and revise expert chart	0.3	0.3
3/11/20	Leecia Welch	Meeting with children's attorney re foster care issues	2.0	2.0
3/11/20	Leecia Welch	Meeting with stakeholder re foster care issues	1.2	1.2
3/11/20	Leecia Welch	Telephone call with foster parent advocate re DCF issues	1.1	1.1
3/12/20	Leecia Welch	Travel to SF from KC returning from stakeholder meetings	6.0	3
3/12/20	Leecia Welch	Review Defendants' ADR report	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
3/13/20	Leecia Welch	Email to opposing counsel re edit to ADR report	0.1	0.1
3/18/20	Leecia Welch	Co-counsel call re discovery updates, coronavirus issues, experts, local/stakeholder updates	0.9	0.9
3/18/20	Leecia Welch	Confer with PJ re agenda for team call	0.1	0.1
3/20/20	Leecia Welch	Review COVID letter	0.3	0.3
3/25/20	Leecia Welch	Team call, including re: COVID-19 response, discovery disputes, and experts	0.7	0.7
3/25/20	Leecia Welch	Draft letter re: COVID-19 response in Kansas	0.8	0.8
3/30/20	Leecia Welch	Confer with L. Welch and P. Juneja re: COVID-19 response letter, experts, and discovery	0.2	0.2
4/1/20	Leecia Welch	Team call re: COVID-19 response, discovery, experts, and named plaintiffs	0.8	0.8
4/1/20	Leecia Welch	Edit and revise RFP docs	0.7	0.7
4/1/20	Leecia Welch	Review defendants' response re COVID discovery	0.3	0.3
4/2/20	Leecia Welch	Confer with FP re discovery correspondence, document review, and contact with clients	0.2	0.2
4/3/20	Leecia Welch	Team call re: COVID-19 response, discovery, and Next Friend Kathryn Ashburn	1.0	1.0
4/3/20	Leecia Welch	Confer with PJ and FP re: discovery strategy and next steps	0.3	0.3
4/3/20	Leecia Welch	Emails with team re next friend	0.1	0.1
4/3/20	Leecia Welch	Emails with team re discovery issues	0.2	0.2
4/3/20	Leecia Welch	Review Children's Bureau guidance re: COVID-19 and child welfare systems	0.3	0.3
4/3/20	Leecia Welch	Review state guidance re: COVID-19	0.4	0.4
4/3/20	Leecia Welch	Edit and review discovery email	0.4	0.4
4/7/20	Leecia Welch	Confer with FP and PJ re discovery meet and confer	0.1	0.1
4/8/20	Leecia Welch	Co-counsel call re meet and confer with Ds, discovery issues, next friend/client updates, experts, local updates	1.0	1.0
4/8/20	Leecia Welch	Review response to meet and confer email	0.1	0.1
4/9/20	Leecia Welch	Confer with PJ FP re: next steps for discovery, including third party subpoenas and document review	0.1	0.1
4/10/20	Leecia Welch	Confer with PJ FP re: discovery next steps, including third party subpoenas, and meet and confer with Defendants	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
4/13/20	Leecia Welch	Confer with FP and PJ re: next steps, including meet and confer on discovery issues, case schedule, experts, and next friends	0.4	0.4
4/13/20	Leecia Welch	Emails with opposing counsel re mediation draft	0.1	0.1
4/13/20	Leecia Welch	Attend meet and confer with Defs re COVID discovery	0.7	0.7
4/14/20	Leecia Welch	Confer with PJ FP JS re: dismissal of Named Plaintiffs who have turned 18; Named Plaintiff file review; preparing for meet & confer re: discovery disputes; third party subpoena to contractors	0.5	0.5
4/15/20	Leecia Welch	Team call re: discovery meet and confer, Named Plaintiffs aging out, Next Friends, and potential experts	1.2	1.2
4/15/20	Leecia Welch	Telephone call with IL and potential expert	0.5	0.5
4/15/20	Leecia Welch	Review draft email correspondence to J.P. Bradshaw re: discovery deadlines and correspondence re: same; research issues re same	0.8	0.8
4/16/20	Leecia Welch	Confer with FP PJ JS re: case schedule and meet and confer	0.1	0.1
4/21/20	Leecia Welch	Confer with FP and JS re: follow up from last meet and confer; scheduling next meet and confer; and connecting with potential new next friend	0.1	0.1
4/22/20	Leecia Welch	Team call re discovery, experts, next friends, etc.	0.9	0.9
4/22/20	Leecia Welch	Confer re FP, PJ and JS re team call for Kansas	0.1	0.1
4/23/20	Leecia Welch	Confer with FP and JS re: discovery and experts	0.1	0.1
4/27/20	Leecia Welch	Telephone call with child welfare systems expert re potential Medicaid/child welfare experts	0.8	0.8
4/27/20	Leecia Welch	Confer with PJ FP JS re: case file review, ESI meet and confer, and call with Amerigroup re: third party subpoena	0.1	0.1
4/28/20	Leecia Welch	Emails with consultant re potential experts	0.3	0.3
4/28/20	Leecia Welch	Email to IL re potential Medicaid/child welfare experts	0.1	0.1
4/28/20	Leecia Welch	Confer with PJ, FP and JS re: named plaintiff file review, ESI, upcoming deadlines, experts	0.6	0.6
4/28/20	Leecia Welch	Review SD contact memo re next friend	0.1	0.1
4/29/20	Leecia Welch	Team call re: Defendants' productions, third party subpoenas, experts, and Next Friends	1.5	1.5

Date	Name	Description	Time Billed	With Travel at 50%
4/30/20	Leecia Welch	Confer with FP and JS re: document review; prep for meet and confer on 5/1/20; filing motion for extension of time to file motions to compel.	0.2	0.2
4/30/20	Leecia Welch	Review Defendants' discovery	0.5	0.5
4/30/20	Leecia Welch	Confer with PJ and FP re case schedule	0.1	0.1
4/30/20	Leecia Welch	Review meet and confer agenda	0.2	0.2
5/1/20	Leecia Welch	Team call, including re: prep for meet and confer with Defendants and discussion of proposed revisions to case schedule	1.3	1.3
5/1/20	Leecia Welch	Review recap of meet and confer	0.1	0.1
5/1/20	Leecia Welch	Confer with PJ FP and JS re: meet and confer with Defendants and third party subpoena to contractors	0.1	0.1
5/4/20	Leecia Welch	Review Defendants' settlement proposal	0.5	0.5
5/4/20	Leecia Welch	Emails with IL re Defendants' settlement proposal	0.1	0.1
5/4/20	Leecia Welch	Confer with F. Pitts, P. Juneja, and J. Strout re: third party subpoena to contractors, named plaintiff file review, settlement proposal, and case schedule	0.2	0.2
5/4/20	Leecia Welch	Emails with team re Defendants' settlement draft	0.1	0.1
5/5/20	Leecia Welch	Confer with PJ, FP, and JS re: document review, settlement strategy, and potential Medicaid experts	0.2	0.2
5/5/20	Leecia Welch	Review and analyze Defendants' settlement draft; research issues re same	1.2	1.2
5/6/20	Leecia Welch	Team call re: case schedule, meet and confer with Defendants, and settlement strategy	1.2	1.2
5/6/20	Leecia Welch	Confer with PJ FP JS re: settlement strategy, third party discovery, and team meeting	0.2	0.2
5/6/20	Leecia Welch	Telephone call with IL re Defendants' settlement draft	1.0	1.0
5/6/20	Leecia Welch	Review IL email re settlement strategy	0.2	0.2
5/7/20	Leecia Welch	Review proposed case schedule	0.2	0.2
5/8/20	Leecia Welch	Review and analyze third party subpoena	1.1	1.1
5/8/20	Leecia Welch	Emails with potential Medicaid expert re case issues	0.1	0.1
5/8/20	Leecia Welch	Email with opposing counsel re settlement next steps	0.1	0.1
5/8/20	Leecia Welch	Research Medicaid issues for settlement response	0.6	0.6
5/8/20	Leecia Welch	Email with Medicaid expert re case issues	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
5/8/20	Leecia Welch	Emails with team re 30b6 issues	0.3	0.3
5/10/20	Leecia Welch	Review and analyze Defendants' settlement draft; research issues re same	0.9	0.9
5/11/20	Leecia Welch	Team call re: response to settlement proposal from Defendants	2.5	2.5
5/11/20	Leecia Welch	Review memos re next friend meetings	0.3	0.3
5/11/20	Leecia Welch	Review settlement edits and strategy issues	1.2	1.2
5/12/20	Leecia Welch	Phone call with potential Medicaid expert; prep for same	1.5	1.5
5/12/20	Leecia Welch	Review team edits to settlement proposal	0.5	0.5
5/12/20	Leecia Welch	Edit and revise 3rd party subpoena doc	1.2	1.2
5/12/20	Leecia Welch	Confer with PJ, JS and FP re settlement strategy and third party subpoenas	0.4	0.4
5/12/20	Leecia Welch	Review and analyze settlement draft	0.6	0.6
5/13/20	Leecia Welch	Team call, including re: settlement, depositions, and responding to Defendants' discovery requests	1.3	1.3
5/13/20	Leecia Welch	Review IL email re settlement strategy and to-dos	0.1	0.1
5/13/20	Leecia Welch	Confer with PJ, FP, and JS re: response to Defendants' discovery request; settlement strategy; and legal research tasks	0.4	0.4
5/13/20	Leecia Welch	Research crisis services issues for settlement; prepare proposal re same	1.2	1.2
5/14/20	Leecia Welch	Phone call with potential Medicaid expert; prep for same	1.5	1.5
5/14/20	Leecia Welch	Review settlement proposal language	0.7	0.7
5/14/20	Leecia Welch	Review settlement draft with consolidated edits	1.2	1.2
5/14/20	Leecia Welch	Confer with FP JS re: Medicaid experts	0.1	0.1
5/15/20	Leecia Welch	Review community structure language	0.3	0.3
5/15/20	Leecia Welch	Confer with PJ, FP and JS re: depositions, meet and confer, case schedule, settlement strategy, and third party subpoena	0.5	0.5
5/15/20	Leecia Welch	Review modified consolidated settlement draft	0.5	0.5
5/15/20	Leecia Welch	Email to opposing counsel with settlement draft	0.1	0.1
5/19/20	Leecia Welch	Confer with PJ, FP, and JS re: discovery to Named Plaintiffs, Jason Koehn deposition.	0.2	0.2
5/20/20	Leecia Welch	Team call re: discovery, mediation, and experts	1.1	1.1
5/21/20	Leecia Welch	Confer with FP and TW re: response to RFA from community member	0.1	0.1
5/21/20	Leecia Welch	Review Defs' custodian letter	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
5/22/20	Leecia Welch	Initial review of Defendants' settlement response	0.3	0.3
5/25/20	Leecia Welch	Review 30b6 depo outline	0.2	0.2
5/26/20	Leecia Welch	Review materials re DCF withholding funds from contractors	0.1	0.1
5/26/20	Leecia Welch	Review Defendants' settlement proposal; research issues re same	1.2	1.2
5/26/20	Leecia Welch	Review IL email re settlement draft	0.2	0.2
5/27/20	Leecia Welch	Team call re: case schedule, depositions, third party discovery, responding to Defendants' discovery requests, and experts	1.0	1.0
5/28/20	Leecia Welch	Confer with FP and JS re: named plaintiff file review for JP	0.4	0.4
5/28/20	Leecia Welch	Review and analyze Defendants' settlement draft; research issues re same	0.6	0.6
5/28/20	Leecia Welch	Review IL memo re Defendants' settlement draft	0.3	0.3
5/29/20	Leecia Welch	Team call re: response to settlement proposal from Defendants	1.5	1.5
5/29/20	Leecia Welch	Review memo re class rep mootness	0.1	0.1
6/1/20	Leecia Welch	Review settlement draft with consolidated edits	0.5	0.5
6/2/20	Leecia Welch	Confer with FP, PJ and JS re settlement and third party subpoenas	0.2	0.2
6/2/20	Leecia Welch	Confer with FP re: Plaintiffs' response to Defendants' settlement proposal	0.1	0.1
6/2/20	Leecia Welch	Email Opposing counsel re settlement edits	0.1	0.1
6/3/20	Leecia Welch	Team call re: MTD order, settlement prep, and discovery	1.0	1.0
6/3/20	Leecia Welch	Review MTD order	0.3	0.3
6/3/20	Leecia Welch	Review materials and new data in prep for mediation session	2.2	2.2
6/4/20	Leecia Welch	Confer with FP and MN re settlement next steps	0.1	0.1
6/4/20	Leecia Welch	Review settlement materials in prep for mediation	0.4	0.4
6/4/20	Leecia Welch	Attend settlement mediation	5.0	5.0
6/5/20	Leecia Welch	Review settlement counterproposal and comments	0.8	0.8
6/5/20	Leecia Welch	Email opposing counsel attaching plaintiffs' counterproposal	0.1	0.1
6/8/20	Leecia Welch	Review draft settlement; research issues re same	1.2	1.2
6/9/20	Leecia Welch	Prep for mediation session	0.8	0.8
6/10/20	Leecia Welch	Attend mediation session	2.9	2.9
6/10/20	Leecia Welch	Review updated settlement draft	1.2	1.2
6/11/20	Leecia Welch	Review defendants' modified settlement proposal	0.6	0.6

Date	Name	Description	Time Billed	With Travel at 50%
6/11/20	Leecia Welch	Attend mediation session	2.8	2.8
6/12/20	Leecia Welch	Review updated settlement draft	0.5	0.5
6/12/20	Leecia Welch	Review MN talking points re settlement for next friends	0.4	0.4
6/12/20	Leecia Welch	Email opposing counsel re plaintiffs' settlement proposal	0.1	0.1
6/12/20	Leecia Welch	Email next friends re status of settlement and discussion of next steps	0.4	0.4
6/12/20	Leecia Welch	Confer with FP PJ JS re: next steps for settlement, including preliminary/final approval, fees, third party discovery, and notice	0.4	0.4
6/14/20	Leecia Welch	Phone call with next friend re settlement issues	0.5	0.5
6/15/20	Leecia Welch	Phone call with next friend re settlement issues	0.6	0.6
6/16/20	Leecia Welch	Phone call with PJ re outreach to NFs and named plaintiffs	0.3	0.3
6/16/20	Leecia Welch	Phone call with SD re settlement approval next steps	0.2	0.2
6/23/20	Leecia Welch	Phone call with parties and Judge re case status	0.3	0.3
6/23/20	Leecia Welch	Prep for call with judge	0.4	0.4
6/23/20	Leecia Welch	Confer with FP, JS, PJ re preliminary approval, fee motion	0.4	0.4
6/24/20	Leecia Welch	Team call re: AG's proposed settlement revisions	1.6	1.6
6/24/20	Leecia Welch	NCYL debrief call re settlement issues	0.2	0.2
6/25/20	Leecia Welch	Confer with J. Strout and F. Pitts re: preliminary approval papers, next steps for settlement approval, and fee motion	0.5	0.5
6/26/20	Leecia Welch	Confer with PJ, FP, and JS re: settlement next steps, press release, and third party discovery	0.2	0.2
6/29/20	Leecia Welch	Confer with PJ and FP re: third party discovery, press release, preliminary approval papers, and timeline for fee motion	0.3	0.3
6/30/20	Leecia Welch	co-counsel call re next steps in settlement approval/SFC	0.6	0.6
6/30/20	Leecia Welch	Phone call with C. Scroggins re settlement status; email team update re same	0.5	0.5
7/1/20	Leecia Welch	Team call, including re: next steps re: settlement approval, dismissal of aged out Named Plaintiffs, preliminary approval motion, and press strategy	1.1	1.1
7/1/20	Leecia Welch	NCYL debrief call re settlement issues	0.5	0.5
7/1/20	Leecia Welch	Emails with C. Scroggins re settlement status	0.1	0.1
7/3/20	Leecia Welch	Edit and revise preliminary approval motion	2.1	2.1

Date	Name	Description	Time Billed	With Travel at 50%
7/3/20	Leecia Welch	Edit and revise proposed order and notice	0.5	0.5
7/3/20	Leecia Welch	Email to opposing counsel re settlement status issues	0.1	0.1
7/6/20	Leecia Welch	Emails with opposing counsel re settlement issues	0.3	0.3
7/6/20	Leecia Welch	Email to team re C. Scroggins communications	0.1	0.1
7/7/20	Leecia Welch	Confer with PJ re stip for dismissal	0.3	0.3
7/7/20	Leecia Welch	Email from opposing counsel re status of settlement	0.1	0.1
7/7/20	Leecia Welch	Email to next friend re settlement status	0.3	0.3
7/7/20	Leecia Welch	Email to next friend re settlement status	0.1	0.1
7/7/20	Leecia Welch	Email to next friend re settlement status	0.1	0.1
7/7/20	Leecia Welch	Email to next friend re settlement status	0.1	0.1
7/8/20	Leecia Welch	Confer with PJ re council meeting and approval status	0.2	0.2
7/8/20	Leecia Welch	Email to opposing counsel re settlement draft attachment	0.1	0.1
7/8/20	Leecia Welch	Emails with team re settlement status	0.2	0.2
7/8/20	Leecia Welch	Review final settlement document	0.5	0.5
7/8/20	Leecia Welch	Phone call to opposing counsel re filing settlement draft; emails with team re same	0.1	0.1
7/8/20	Leecia Welch	Emails with team re settlement filing and release	0.2	0.2
7/8/20	Leecia Welch	Emails with next friends re settlement filing	0.2	0.2
7/8/20	Leecia Welch	Email with foster care stakeholder in Topeka re settlement filing	0.1	0.1
7/8/20	Leecia Welch	Email with foster care stakeholder in KC re settlement filing	0.1	0.1
7/8/20	Leecia Welch	Telephone call with PJ re finalizing settlement	0.5	0.5
7/9/20	Leecia Welch	Review and edit notice of errata re settlement	0.2	0.2
7/9/20	Leecia Welch	Email to opposing counsel re errata notice	0.1	0.1
7/9/20	Leecia Welch	Review settlement document for filing	0.2	0.2
7/10/20	Leecia Welch	Review revised preliminary approval documents	0.6	0.6
7/13/20	Leecia Welch	Team check in re release of records, motion for prelim approval	0.4	0.4
7/13/20	Leecia Welch	Edit and revise preliminary approval papers	1.3	1.3
7/15/20	Leecia Welch	Review team edits to preliminary approval papers	0.3	0.3
7/15/20	Leecia Welch	Confer with F. Pitts, P. Juneja, and J. Strout re: preliminary approval papers and RR's case file	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
7/16/20	Leecia Welch	Email opposing counsel re preliminary approval papers	0.1	0.1
7/17/20	Leecia Welch	TC with GAL re settlement issues	0.7	0.7
7/22/20	Leecia Welch	Team call, including re: preliminary approval, fee motion, and contact with families and other stakeholders	0.7	0.7
7/22/20	Leecia Welch	Confer with PJ FP JS re: preliminary approval papers and fee distribution	0.3	0.3
7/22/20	Leecia Welch	Review Defendants' edits to preliminary approval papers	0.2	0.2
7/23/20	Leecia Welch	Confer with P. Juneja, F. Pitts, and J. Strout re: motion for preliminary approval and implementation plan	0.3	0.3
7/24/20	Leecia Welch	Confer with PJ FP JS re: filing motion for preliminary approval	0.2	0.2
7/25/20	Leecia Welch	Emails with opposing counsel re notice issues	0.1	0.1
7/26/20	Leecia Welch	Edit and revise declaration for mot for prelim approval	0.7	0.7
12/8/17	Poonam Juneja	reviewing background documents shared by CR	2.1	2.1
12/15/17	Poonam Juneja	co-counsel call re issues in Kansas and case development strategy	1.0	1.0
12/20/17	Poonam Juneja	reviewing documents from agency and noting problems in spreadsheet	1.1	1.1
12/21/17	Poonam Juneja	team co-counsel call re investigation	1.0	1.0
12/21/17	Poonam Juneja	phone call with LW re issues spreadsheet	0.3	0.3
12/21/17	Poonam Juneja	Researching media reports regarding problems in the Kansas child welfare system	0.4	0.4
1/5/18	Poonam Juneja	Conversation with LW re next steps in investigation	0.4	0.4
1/10/18	Poonam Juneja	reviewing KS reports on problems in FC system	0.3	0.3
1/17/18	Poonam Juneja	compiling lists of information that we should get in investigation	0.3	0.3
1/17/18	Poonam Juneja	exchanging emails with KS local advocates re time to talk on investigation	0.2	0.2
1/19/18	Poonam Juneja	call with co-counsel re issues in KS foster care system	1.5	1.5
1/25/18	Poonam Juneja	phone call with LBB re data that we are seeking	0.5	0.5
2/1/18	Poonam Juneja	Emails re scheduling call with KS local advocates	0.3	0.3
2/16/18	Poonam Juneja	Co counsel call re investigation, strategy for outreach to local individuals involved in KS foster care system	0.8	0.8
2/20/18	Poonam Juneja	reviewing news articles re foster care issues in KS	0.4	0.4
2/22/18	Poonam Juneja	emailing with KS local advocates and co-counsel re setting up interviews	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
2/23/18	Poonam Juneja	emailing with co-counsel regarding travel to KS for interviews with local advocates and people involved in foster care system	0.2	0.2
2/24/18	Poonam Juneja	phone call with cocounsel LBB re planning meeting with local advocates and people involved in foster care system	0.6	0.6
2/28/18	Poonam Juneja	travel from Oakland to Kansas City for interviews with local individuals involved in CW system	6.6	3.3
2/28/18	Poonam Juneja	travel from hotel to dinner with local advocates	0.4	0.2
2/28/18	Poonam Juneja	travel back to hotel from dinner with local advocates	0.4	0.2
3/1/18	Poonam Juneja	travel back to hotel from stakeholder interviews	0.5	0.25
3/1/18	Poonam Juneja	travel between stakeholder meetings	0.6	0.3
3/1/18	Poonam Juneja	travel between stakeholder meetings	0.5	0.25
3/1/18	Poonam Juneja	travel between stakeholder meetings	0.5	0.25
3/1/18	Poonam Juneja	Travel from hotel to stakeholder interview	0.2	0.1
3/2/18	Poonam Juneja	Travel from hotel to stakeholder interview	0.1	0.05
3/2/18	Poonam Juneja	Travel from Kansas City to Oakland	7.0	3.5
3/9/18	Poonam Juneja	emails re scheduling co-counsel call	0.2	0.2
3/15/18	Poonam Juneja	Co-counsel call re investigation	1.1	1.1
3/20/18	Poonam Juneja	Writing contact memos regarding stakeholder interviews over prior days	1.6	1.6
3/27/18	Poonam Juneja	creating list of stakeholder outreach efforts and circulating to team	0.8	0.8
3/28/18	Poonam Juneja	Co-counsel call re fact investigation, debriefing stakeholder meetings	1.0	1.0
4/11/18	Poonam Juneja	co-counsel team meeting re investigation and next steps	1.0	1.0
4/18/18	Poonam Juneja	Co-counsel call re investigation, including re: PRA, community forums, and stakeholder meetings	0.7	0.7
4/19/18	Poonam Juneja	Telephone call with LW re scheduling next investigatory trip	0.1	0.1
5/1/18	Poonam Juneja	email to team with agenda for call tomorrow	0.1	0.1
5/2/18	Poonam Juneja	co-counsel call re investigation and legal research	0.9	0.9
5/4/18	Poonam Juneja	conversation with co-counsel re case communications	0.5	0.5
5/14/18	Poonam Juneja	reviewing and revising two pager of investigation questions	0.2	0.2
5/16/18	Poonam Juneja	Call with LW re investigation and recent interviews with stakeholders	0.6	0.6

Date	Name	Description	Time Billed	With Travel at 50%
5/17/18	Poonam Juneja	phone call with LBB re investigation	0.2	0.2
5/21/18	Poonam Juneja	Team phone call re investigation, including strategy and timeline	1.0	1.0
5/21/18	Poonam Juneja	discussion with LW re next steps in KS investigation	0.4	0.4
5/23/18	Poonam Juneja	team phone call re investigation	1.0	1.0
5/23/18	Poonam Juneja	conversation with LW and AG re Kansas investigation and research tasks	0.8	0.8
5/23/18	Poonam Juneja	emailing team re possible local CW advocate to contact for investigation	0.2	0.2
5/24/18	Poonam Juneja	emailing HB re research on education claims	0.2	0.2
5/24/18	Poonam Juneja	research regarding potential stakeholders in KS, including local attorneys and professors with possible expertise, and emailing team re same	1.2	1.2
5/24/18	Poonam Juneja	emailing team re local co-counsel	0.3	0.3
5/24/18	Poonam Juneja	emailing team re needed legal research	0.6	0.6
5/24/18	Poonam Juneja	legal research re education claims	0.9	0.9
5/24/18	Poonam Juneja	reading and circulating article re kids sleeping in offices overnight	0.2	0.2
5/25/18	Poonam Juneja	emailing team re local co-counsel	0.1	0.1
5/29/18	Poonam Juneja	legal research re investigation ethics question	0.5	0.5
5/29/18	Poonam Juneja	talking to law clerk re investigation ethics question	0.4	0.4
5/29/18	Poonam Juneja	reviewing contact memos from MN	0.5	0.5
5/30/18	Poonam Juneja	Co-counsel call including re: stakeholder updates, local counsel, legal research, and fact development	1.0	1.0
6/1/18	Poonam Juneja	Making outline of issues for team	1.1	1.1
6/5/18	Poonam Juneja	Talking to LW re research needs re PDP and emailing LW related docs	0.2	0.2
6/6/18	Poonam Juneja	reviewing contact memos from LW and locating contact information for f/u	0.4	0.4
6/6/18	Poonam Juneja	writing list of legal research questions outstanding	0.4	0.4
6/13/18	Poonam Juneja	Phone call with team re investigation, including re: fact development, stakeholder updates, local counsel, and legal research	1.1	1.1
6/13/18	Poonam Juneja	Debriefing with LW re call with foster parent	0.3	0.3
6/13/18	Poonam Juneja	pulling contractor tax filings, reviewing and circulating to team	0.4	0.4
6/13/18	Poonam Juneja	reviewing news articles about purported intended changes in practice	0.2	0.2
6/13/18	Poonam Juneja	reviewing fact outline and talking to LW about the same	0.5	0.5

Date	Name	Description	Time Billed	With Travel at 50%
6/13/18	Poonam Juneja	reviewing law clerk memo re PDP claim in 10th circuit and emailing LW re same	0.3	0.3
6/18/18	Poonam Juneja	reading LW and SD emails updating on meetings with stakeholders	0.2	0.2
6/20/18	Poonam Juneja	reviewing Dec 2015 letter from GALs re leg audit	0.2	0.2
6/25/18	Poonam Juneja	Co-counsel call, including re: local counsel, Kansas trip, and fact development	1.1	1.1
6/27/18	Poonam Juneja	Co-counsel call, including re: FOF, Kansas trip, stakeholder interviews, and legal research	0.5	0.5
7/2/18	Poonam Juneja	Phone call with LW re legal research	0.2	0.2
7/6/18	Poonam Juneja	email with LW & KS re call on research on EPSDT claims in 8th circuit	0.1	0.1
7/6/18	Poonam Juneja	reviewing contact memos from Stephen re his recent interviews with individuals involved with foster care system	0.4	0.4
7/18/18	Poonam Juneja	Co-counsel meeting, including re: investigation, local counsel, FOF, retainer, Kansas trip, and GAL outreach	0.8	0.8
7/18/18	Poonam Juneja	emailing LW re investigation in Kansas and next steps	0.2	0.2
7/22/18	Poonam Juneja	emailing team re notes from last team call and planning for next investigatory tri	0.5	0.5
7/24/18	Poonam Juneja	phone call with KS Appleseed re investigation and next steps on co-counseling	0.5	0.5
7/26/18	Poonam Juneja	emailing LW re comments on draft one-pager summarizing investigation	0.2	0.2
7/31/18	Poonam Juneja	co-counsel call with LB Childrens Rights NCYL re investigation	0.3	0.3
8/2/18	Poonam Juneja	revising law clerk memo re ethics in investigation and related research	0.6	0.6
8/8/18	Poonam Juneja	Co-counsel team meeting re investigation and complaint drafting	1.2	1.2
8/8/18	Poonam Juneja	emailing team re foster parent stakeholder contact	0.3	0.3
8/14/18	Poonam Juneja	researching pro hac vice rules in D Kansas	0.3	0.3
8/15/18	Poonam Juneja	Co-counsel call re factual investigation updates, co-counsel partnerships, and complaint drafting	0.9	0.9
3/5/19	Poonam Juneja	Confer with F. Pitts re: case planning and staffing	0.6	0.6
3/6/19	Poonam Juneja	Team call, including discussion of: gathering named plaintiff files and litigation timeline/strategy	0.8	0.8
3/6/19	Poonam Juneja	Confer with F. Pitts re: case planning and staffing, named plaintiff status	0.8	0.8
3/6/19	Poonam Juneja	Confer with paralegal team and F. Pitts re: file sharing procedures	0.1	0.1
3/6/19	Poonam Juneja	Email correspondence with F. Pitts re: outstanding legal research tasks	0.1	0.1

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3/7/19	Poonam Juneja	Confer with F. Pitts re: protective order and contact memos	0.2	0.2
3/7/19	Poonam Juneja	Emailing with F. Pitts re: prospective expert witness and protective order	0.1	0.1
3/7/19	Poonam Juneja	Case planning meeting with F. Pitts	1.6	1.6
3/7/19	Poonam Juneja	reviewing and revising PHV forms	0.4	0.4
3/7/19	Poonam Juneja	reviewing local rules	0.5	0.5
3/8/19	Poonam Juneja	Confer with F. Pitts re: case file reviews and staffing	0.2	0.2
3/8/19	Poonam Juneja	Confer with F. Pitts re: EPSDT claims and case planning	0.3	0.3
3/8/19	Poonam Juneja	Confer with F. Pitts re: PHV applications & DLA Piper attorneys	0.2	0.2
3/8/19	Poonam Juneja	reviewing draft settlement terms sheet	0.2	0.2
3/8/19	Poonam Juneja	reviewing memos re class cert standards in the 10th circuit	0.3	0.3
3/8/19	Poonam Juneja	reviewing protective order and emailing LW about requirements	0.1	0.1
3/11/19	Poonam Juneja	updating task list re next steps with named plaintiffs, experts, class cert etc	0.4	0.4
3/11/19	Poonam Juneja	Confer with F. Pitts re: case file reviews	0.1	0.1
3/11/19	Poonam Juneja	Confer with F. Pitts re: priority documents to share with new co-counsel	0.1	0.1
3/11/19	Poonam Juneja	reviewing and revising PHV forms	0.1	0.1
3/11/19	Poonam Juneja	reviewing contact memos from meetings with stakeholders	0.5	0.5
3/12/19	Poonam Juneja	Confer with F. Pitts re: claims and case strategy	0.5	0.5
3/13/19	Poonam Juneja	Team call, including discussion of file management and prospective additional named plaintiffs	0.9	0.9
3/14/19	Poonam Juneja	Confer with L. Welch and F. Pitts re: potential privilege issues related to Next Friends' files	0.2	0.2
3/18/19	Poonam Juneja	With F. Pitts, troubleshoot Relativity access	0.1	0.1
3/18/19	Poonam Juneja	Confer with F. Pitts and L. Welch re: agenda for 3/20 strategy meeting, legal research re: privilege, and Medicaid research	0.5	0.5
3/19/19	Poonam Juneja	Phone conference with F. Pitts, J. Calderon, and P. Chu re: Relativity and document management	0.7	0.7
3/19/19	Poonam Juneja	Follow up with F. Pitts re: Relativity and document management	0.1	0.1
3/20/19	Poonam Juneja	Team strategy meeting, including discussion of claims and strategy for complaint amendment, class certification, and discovery	3.0	3.0

Date	Name	Description	Time Billed	With Travel at 50%
3/20/19	Poonam Juneja	research re recent developments in class cert and EPSDT claims	1.3	1.3
3/20/19	Poonam Juneja	Follow up with L. Welch and F. Pitts re: strategy meeting, including re: Medicaid claim	0.5	0.5
3/21/19	Poonam Juneja	Confer with F. Pitts re: B. Magnuson withdrawal and notifying clients re: same	0.2	0.2
3/22/19	Poonam Juneja	Confer with FP JS re: legal research memo re: Lungstrum's class certification decisions	0.3	0.3
3/22/19	Poonam Juneja	Confer with FP re: class members' entitlement to Medicaid	0.1	0.1
3/25/19	Poonam Juneja	Call with LW FP re next steps in legal research, discussions with opposing counsel	0.7	0.7
3/26/19	Poonam Juneja	Revising proposed initial terms sheet	1.6	1.6
3/26/19	Poonam Juneja	Confer with F. Pitts re: document collection from next friends	0.1	0.1
3/26/19	Poonam Juneja	Phone call with LW re draft settlement negotiation proposal	0.8	0.8
3/27/19	Poonam Juneja	Team call, including discussion of Defendants' proposed stay and client updates	0.9	0.9
3/27/19	Poonam Juneja	revising initial terms sheet and drafting agreement to negotiate in good faith	0.9	0.9
3/27/19	Poonam Juneja	Reviewing and revising memo re KS juvenile court powers	1.2	1.2
3/27/19	Poonam Juneja	reviewing TWoody email and attachments re next steps in discovery	0.2	0.2
3/27/19	Poonam Juneja	drafting possible stay agreement	0.5	0.5
3/28/19	Poonam Juneja	reviewing SDP memo	0.2	0.2
3/29/19	Poonam Juneja	researching KS state laws re confidentiality of case files	0.5	0.5
3/29/19	Poonam Juneja	Confer with LW FP re: legal research re: in camera review	0.2	0.2
3/29/19	Poonam Juneja	Confer with F. Pitts re: Defendants' draft stipulation re: extension of time to answer	0.3	0.3
3/29/19	Poonam Juneja	reviewing opposing counsel's draft motion for additional time to answer and discussing with LW	0.4	0.4
4/2/19	Poonam Juneja	reviewing website of Legislative Post Audit for relevant reports	0.3	0.3
4/3/19	Poonam Juneja	Team call, including re: 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint	1.0	1.0
4/3/19	Poonam Juneja	reviewing draft agenda and emailing FP re same	0.1	0.1
4/3/19	Poonam Juneja	Confer with LW FP re: 4/19/19 meeting	0.2	0.2
4/5/19	Poonam Juneja	reviewing LW email re call with Terry Campbell re meeting, case files, etc	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
4/8/19	Poonam Juneja	reviewing JS memo and compiled research re in camera review of named plaintiff files	2.1	2.1
4/8/19	Poonam Juneja	Confer with FP re: legal research re: in camera review of child in care files	0.1	0.1
4/9/19	Poonam Juneja	reviewing team emails re amendment of complaint	0.1	0.1
4/9/19	Poonam Juneja	legal research for one pager for Ds on case file production	1.2	1.2
4/9/19	Poonam Juneja	Confer with LW FP JS re: cocounsel agreement, legal research tasks, and early mediation	0.4	0.4
4/10/19	Poonam Juneja	Team call, including discussion of 4/19/19 meeting with defendants, proposed additional substantive due process claim, and document management	1.0	1.0
4/10/19	Poonam Juneja	Confer with FP re: proposed additional substantive due process claim	0.1	0.1
4/10/19	Poonam Juneja	Follow up with LW FP re: team call, including discussion of document management and early settlement	0.7	0.7
4/11/19	Poonam Juneja	Confer with LW re initial terms sheet, good faith negotiation agreement	0.1	0.1
4/11/19	Poonam Juneja	review JC email re relativity file structure	0.1	0.1
4/12/19	Poonam Juneja	Confer w JS re foster youth file access, 1-page doc re plaintiffs' position on in camera review to send defendants	1.0	1.0
4/12/19	Poonam Juneja	drafting one pager to Ds re in camera review of named plaintiff files	2.1	2.1
4/12/19	Poonam Juneja	emailing DLA re letters to plaintiffs about DLA joining co-counsel team	0.1	0.1
4/12/19	Poonam Juneja	reviewing JS email re KSA 38-2205 and reviewing statute	0.3	0.3
4/12/19	Poonam Juneja	reviewing LW draft email to T Campbell and team emails re same	0.1	0.1
4/12/19	Poonam Juneja	confer with FP re: cocounsel agreement, memo re: in camera review, and correspondence re: early settlement	0.5	0.5
4/15/19	Poonam Juneja	email correspondence with LW re co-counsel agreement	0.2	0.2
4/15/19	Poonam Juneja	Confer with L.W FP re: 4/19/19 meeting, email correspondence with Defendants re: same, and co-counsel agreement	0.3	0.3
4/17/19	Poonam Juneja	Team call, including discussion of 4/19/19 meeting with defendants and early settlement strategy	0.8	0.8
4/18/19	Poonam Juneja	reviewing SD email re negotiation strategy	0.1	0.1
4/18/19	Poonam Juneja	reviewing T Campbell email re named plaintiff files, answer, negotiation	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
4/18/19	Poonam Juneja	Confer with LW FP re: follow up for Kansas call	0.1	0.1
4/22/19	Poonam Juneja	Confer with LW FP re: follow up from meeting with Defendants, settlement strategy, and Medicaid research follow-up	0.3	0.3
4/23/19	Poonam Juneja	Drafting letter to next friends re DLA joining co-counsel team and emailing to LW DLA for review	1.1	1.1
4/23/19	Poonam Juneja	Confer with FP re: privilege research needs	0.3	0.3
4/24/19	Poonam Juneja	Team call, including discussion of local/stakeholder updates	0.6	0.6
4/24/19	Poonam Juneja	reviewing draft agenda and responding	0.1	0.1
4/24/19	Poonam Juneja	Confer with LW FP re: next steps for term sheet	0.1	0.1
4/24/19	Poonam Juneja	Call with DLA Piper re: class certification draft	0.5	0.5
4/24/19	Poonam Juneja	Follow up with FP re: DLA Piper class certification call	0.3	0.3
4/25/19	Poonam Juneja	emailing DS with materials related to research tasks	0.3	0.3
4/25/19	Poonam Juneja	drafting PHV papers	0.3	0.3
4/25/19	Poonam Juneja	Confer with FP and L. Rute's office re: PHV motions	0.1	0.1
4/25/19	Poonam Juneja	reviewing PHV drafts from DLA and emailing re same	0.2	0.2
4/26/19	Poonam Juneja	email correspondence with team re pro hac vice applications	0.3	0.3
4/27/19	Poonam Juneja	reviewing email from IL re governor as a party	0.1	0.1
4/30/19	Poonam Juneja	reviewing folder structure on Relativity and emailing team re same	0.5	0.5
4/30/19	Poonam Juneja	email correspondence with team re rescheduling team call	0.1	0.1
4/30/19	Poonam Juneja	Confer with LW FP re: answer to complaint	0.1	0.1
5/1/19	Poonam Juneja	full review of Defs' answer and annotating complaint with what is admitted, denied	2.3	2.3
5/1/19	Poonam Juneja	email correspondence with DLA re engagement letters with clients	0.2	0.2
5/2/19	Poonam Juneja	Team call, including re: Defendants' answer, possible amendments to complaint, and settlement strategy	0.9	0.9
5/2/19	Poonam Juneja	reviewing draft agenda and emailing FP re same	0.1	0.1
5/2/19	Poonam Juneja	reviewing materials from consulting expert on children's mental health	0.3	0.3
5/2/19	Poonam Juneja	Confer with FP re: research needs	0.3	0.3
5/2/19	Poonam Juneja	reviewing past MTD briefing in NCYL cases involving governor and circulating to team	0.3	0.3
5/3/19	Poonam Juneja	emailing with DLA re engagement letters	0.2	0.2

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5/3/19	Poonam Juneja	email with LW re connecting with Terry re scheduling conf	0.1	0.1
5/3/19	Poonam Juneja	Confer with LW FP re: terms sheet, complaint amendments, and research needs	0.4	0.4
5/6/19	Poonam Juneja	emailing FP re draft follow up items from team call	0.1	0.1
5/6/19	Poonam Juneja	streamlining initial terms sheet and emailing to LW FP JS for review	1.7	1.7
5/6/19	Poonam Juneja	reviewing KS email re file structure reorganization and conferring with KS re same	0.3	0.3
5/7/19	Poonam Juneja	emailing LW re key dates and info from scheduling order from Judge Birzer	0.2	0.2
5/7/19	Poonam Juneja	Confer with LW re speaking with defs re scheduling conf	0.2	0.2
5/7/19	Poonam Juneja	reviewing JS memo re BK decision and decision itself related to class cert	0.6	0.6
5/7/19	Poonam Juneja	reviewing agenda and messaging FP re same	0.1	0.1
5/7/19	Poonam Juneja	Confer with FP re: scheduling order	0.1	0.1
5/8/19	Poonam Juneja	Team call, including discussion of scheduling order, complaint amendments, and terms sheet	0.9	0.9
5/8/19	Poonam Juneja	reviewing JK memo re potential MTD the governor and possible complaint amendments re same, incl. reviewing cited case	0.3	0.3
5/8/19	Poonam Juneja	reviewing Appleseed, LBB comments on initial terms sheet	0.2	0.2
5/8/19	Poonam Juneja	reviewing IL email re initial disclosures strategy and emailing LW FP re same	0.2	0.2
5/8/19	Poonam Juneja	emailing DLA team re engagement letter for use with new named plaintiffs	0.1	0.1
5/8/19	Poonam Juneja	emailing JS re research on in camera review cases	0.1	0.1
5/8/19	Poonam Juneja	Confer with FP re: initial disclosures	0.1	0.1
5/9/19	Poonam Juneja	reviewing co-counsel call follow up items draft and emailing FP re same	0.1	0.1
5/9/19	Poonam Juneja	reviewing emails from medicaid experts re complaint framing	0.1	0.1
5/9/19	Poonam Juneja	emailing with LW FP re consulting medicaid experts and amendment to complaint	0.2	0.2
5/9/19	Poonam Juneja	reviewing LW email re call with Terry re moving status conference etc, reviewing Judge Birzer calendar online, and replying to LW FP re Judge Birzer schedule	0.4	0.4
5/9/19	Poonam Juneja	reviewing JS current draft memo re in camera review and providing feedback	0.2	0.2
5/9/19	Poonam Juneja	Confer with FP re: Medicaid claims	0.1	0.1
5/10/19	Poonam Juneja	reviewing sample initial disclosures and emailing IL re initial disclosures approach	0.4	0.4
5/10/19	Poonam Juneja	reviewing CR edits on draft terms sheet and email correspondence re same	0.5	0.5
5/10/19	Poonam Juneja	Confer with FP re: scheduling conference and corresponding deadlines	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
5/10/19	Poonam Juneja	Confer with FP re: scheduling conference and corresponding deadlines; term sheet draft	0.7	0.7
5/10/19	Poonam Juneja	phone call to Judge's clerk re availability for scheduling conf, phone appearances; emailing LW FP Re same	0.3	0.3
5/13/19	Poonam Juneja	emailing TW with question regarding initial disclosures approach	0.2	0.2
5/13/19	Poonam Juneja	phone calls with R Lomas, Judge's clerk, re scheduling conf; emailing LW FP re same	0.4	0.4
5/13/19	Poonam Juneja	revising term sheet incorporating edits from team members	0.8	0.8
5/13/19	Poonam Juneja	reviewing email from LW re scheduling conference and case files	0.1	0.1
5/13/19	Poonam Juneja	phone call with EM re complaint revisions/NP updates	0.3	0.3
5/13/19	Poonam Juneja	emailing SD EM re complaint revisions	0.2	0.2
5/13/19	Poonam Juneja	Confer with LW FP re: scheduling conference, term sheet, complaint amendments, and initial disclosures	0.5	0.5
5/13/19	Poonam Juneja	Confer with FP re: complaint amendments and scheduling conference	0.2	0.2
5/13/19	Poonam Juneja	Confer with LW FP re: scheduling conference and related deadlines; email T. Woody re: same	0.3	0.3
5/14/19	Poonam Juneja	reviewing team emails re Defs doc production and responding	0.2	0.2
5/14/19	Poonam Juneja	revising amended complaint and emailing to LW FP JS for review with cover note about changes	2.1	2.1
5/14/19	Poonam Juneja	Email correspondence with LW FP IL re: rescheduling Rule 26 conference	0.1	0.1
5/15/19	Poonam Juneja	Team call, including re: scheduling conference, term sheet, and complaint amendments	1.0	1.0
5/15/19	Poonam Juneja	reviewing draft agenda and emailing FP re same	0.1	0.1
5/15/19	Poonam Juneja	reviewing FP draft medicaid facts sought	0.1	0.1
5/15/19	Poonam Juneja	emailing SD LW with DLA rep letter for new named plaintiffs	0.1	0.1
5/15/19	Poonam Juneja	revising initial terms sheet and circulating to team	1.1	1.1
5/15/19	Poonam Juneja	Confer with LW FP re: follow-up from team call	0.1	0.1
5/15/19	Poonam Juneja	revising amended complaint and circulating to team with cover note for review	0.4	0.4
5/15/19	Poonam Juneja	Confer with FP re: draft term sheet	0.1	0.1
5/16/19	Poonam Juneja	phone call with Judge Birzer's chambers re scheduling conference	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
5/16/19	Poonam Juneja	emailing LW re stip altering case schedule	0.1	0.1
5/16/19	Poonam Juneja	incorporating edit to complaint from DLA	0.1	0.1
5/16/19	Poonam Juneja	reviewing SD emails re visits with next friends, child advocate, nonprofit serving youth	0.2	0.2
5/16/19	Poonam Juneja	reviewing IL email and attachments re KAAP and KS Strong	0.1	0.1
5/16/19	Poonam Juneja	reviewing SD email re fact update from Ashley Thorne	0.1	0.1
5/16/19	Poonam Juneja	reviewing JS memo re in camera review	0.4	0.4
5/17/19	Poonam Juneja	responding to SD email re representation letters for new named plaintiffs	0.1	0.1
5/17/19	Poonam Juneja	reviewing SD LW emails with facts for new possible plaintiffs and related docs	0.5	0.5
5/17/19	Poonam Juneja	revisions to complaint and emailing with team re same	0.8	0.8
5/17/19	Poonam Juneja	emailing LW re timing for amendment of complaint	0.1	0.1
5/17/19	Poonam Juneja	emailing Defs re named plaintiff case file productions, scheduling 26f conference, etc	0.2	0.2
5/18/19	Poonam Juneja	emailing with team re needed edits to amended complaint	0.3	0.3
5/18/19	Poonam Juneja	reviewing LW SD notes and emails re new possible named plaintiffs	0.3	0.3
5/19/19	Poonam Juneja	reviewing SD email re notes for amended complaint	0.1	0.1
5/20/19	Poonam Juneja	emailing LW FP re amended complaint and our prior stip with Ds	0.1	0.1
5/20/19	Poonam Juneja	correspondence with team re new young plaintiff with many placement changes	0.1	0.1
5/20/19	Poonam Juneja	reviewing next friend emails re mental health facts for new potential plaintiff	0.1	0.1
5/20/19	Poonam Juneja	reviewing LW email re conference call with EPSDT expert	0.1	0.1
5/20/19	Poonam Juneja	reviewing team emails re timing of amendment and initial scheduling conference	0.2	0.2
5/20/19	Poonam Juneja	revising draft complaint and correspondence with team re same	1.6	1.6
5/20/19	Poonam Juneja	determining which plaintiffs are with STF v. KVC and emailing with E McGuinness re same	0.2	0.2
5/20/19	Poonam Juneja	reviewing team emails re rule 16 conference and client case files, etc	0.1	0.1
5/20/19	Poonam Juneja	reviewing KDADS draft report on PRTFs and team emails re same	0.5	0.5
5/20/19	Poonam Juneja	reviewing draft facts re new possible plaintiff and responding to LW re same	0.2	0.2
5/20/19	Poonam Juneja	Confer with FP re: amending complaint	0.5	0.5
5/20/19	Poonam Juneja	Confer with LW FP re: complaint amendment	1.0	1.0
5/20/19	Poonam Juneja	Confer with TW FP re: complaint amendment	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
5/21/19	Poonam Juneja	reviewing DS email re settlement proposal strategy	0.1	0.1
5/21/19	Poonam Juneja	reviewing team emails with feedback on draft terms sheet and addressing	0.2	0.2
5/21/19	Poonam Juneja	emailing with LW re 26(f) conference scheduling	0.1	0.1
5/22/19	Poonam Juneja	Team call, including discussion of new clients, term sheet, and Medicaid claim	1.0	1.0
5/22/19	Poonam Juneja	reviewing agenda and responding	0.1	0.1
5/22/19	Poonam Juneja	confer with JS re remedies and class cert, including Shook II and Parsons	0.7	0.7
5/22/19	Poonam Juneja	reviewing IL question re class cert evidence, and responding, inc. re Shook II	0.3	0.3
5/22/19	Poonam Juneja	reviewing FP revisions to terms sheet draft	0.1	0.1
5/22/19	Poonam Juneja	Confer with FP re: next steps	0.3	0.3
5/22/19	Poonam Juneja	Confer with LW FP re: follow up from team call	0.2	0.2
5/23/19	Poonam Juneja	reviewing revised EB draft facts	0.1	0.1
5/23/19	Poonam Juneja	emailing with LW SD re talking to NFs re terms sheet	0.1	0.1
5/23/19	Poonam Juneja	reviewing LW email re status conf scheduling	0.1	0.1
5/24/19	Poonam Juneja	reviewing LW FP emails re EPSDT citations and reviewing cited provisions	0.2	0.2
5/24/19	Poonam Juneja	reviewing and resopnding to SD emails re NF review of draft terms sheet	0.2	0.2
5/24/19	Poonam Juneja	email correspondence with team re targeted discovery related to placements	0.2	0.2
5/24/19	Poonam Juneja	reviewing and responding to emails re retainers with new clients, including reviewing attachments	0.2	0.2
5/27/19	Poonam Juneja	reviewing discovery requests from a similar case for possible use	0.4	0.4
5/28/19	Poonam Juneja	emailing team re conversations with NFs re terms sheet	0.1	0.1
5/28/19	Poonam Juneja	reviewing T Campbell email re 6/27 meeting	0.1	0.1
5/28/19	Poonam Juneja	reviewing TW draft of initial disclosures	0.2	0.2
5/28/19	Poonam Juneja	drafting cover note to Defendants for terms sheet and emailing to LW	0.3	0.3
5/28/19	Poonam Juneja	Confer with LW FP re: terms sheet and E.B. facts	0.1	0.1
5/29/19	Poonam Juneja	Team call, including re: case scheduling, adding plaintiffs, and discovery strategy	0.8	0.8
5/29/19	Poonam Juneja	reviewing draft agenda and emailing FP re same	0.1	0.1
5/29/19	Poonam Juneja	emailing with FP re status of terms sheet and cover email	0.1	0.1
5/29/19	Poonam Juneja	reviewing SD emails re RR and Ed Bigus contact	0.1	0.1
5/29/19	Poonam Juneja	reviewing list of Medicaid/MH fact questions for clients	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
5/29/19	Poonam Juneja	reviewing LW draft cover note for initial terms sheet and team revisions; responding re same	0.3	0.3
5/29/19	Poonam Juneja	revising initial terms sheet and email correspondence with LW FP re same	0.9	0.9
5/29/19	Poonam Juneja	Confer with FP re report of 26(f) conference, model scheduling order, and ESI guidelines in preparation for scheduling conference with Judge Birzer, and review related docs	0.9	0.9
5/29/19	Poonam Juneja	Confer with FP re: 30(b)(6) notice	0.1	0.1
5/30/19	Poonam Juneja	emailing E McGuiness re next friend contacts on terms sheet	0.1	0.1
5/30/19	Poonam Juneja	reviewing emails to Next Friends re settlement terms sheet	0.2	0.2
5/31/19	Poonam Juneja	revising initial disclosure draft and sending to LW FP for review	1.6	1.6
5/31/19	Poonam Juneja	emailing with LW re final edits to cover note for terms sheet	0.1	0.1
5/31/19	Poonam Juneja	reviewing LW final email with Ps initial terms sheet	0.1	0.1
6/5/19	Poonam Juneja	team call re medicaid issues, discovery	0.4	0.4
6/5/19	Poonam Juneja	Team call, including re: term sheet, initial disclosures, RFPs, and case file reviews	0.5	0.5
6/5/19	Poonam Juneja	reviewing email from SD re new named plaintiffs	0.1	0.1
6/5/19	Poonam Juneja	emailing LW re Bethany Roberts returning to Barber Emerson	0.1	0.1
6/5/19	Poonam Juneja	Confer with LW FP re: initial disclosures and RFPs	0.2	0.2
6/5/19	Poonam Juneja	Confer with FP re: RFPs, client file review, and agenda for team call	0.3	0.3
6/5/19	Poonam Juneja	Confer with FP re: retainers for new clients	0.1	0.1
6/6/19	Poonam Juneja	Confer with FP re: file review of client files	0.2	0.2
6/6/19	Poonam Juneja	Confer with FP re: response to Defendants' inquiry re: Bethany Roberts joining Barber Emerson and proposed ethical wall	0.2	0.2
6/7/19	Poonam Juneja	Confer with JS re 23(b)(2) class cert and remedies memo	0.3	0.3
6/7/19	Poonam Juneja	drafting retainers for new named plaintiffs and sending to LW	0.2	0.2
6/7/19	Poonam Juneja	confer with FP re needed legal research, and reviewing FP email re same	0.3	0.3
6/7/19	Poonam Juneja	reviewing SD LW emails re retainers for new named plaintiffs	0.1	0.1
6/9/19	Poonam Juneja	trying to download named plaintiff files and emailing team re error messages	0.2	0.2
6/10/19	Poonam Juneja	downloading named plaintiff files from Ds' file share system	0.3	0.3
6/10/19	Poonam Juneja	review team emails re RFP for complete NP files	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
6/10/19	Poonam Juneja	drafting file review protocol and circulating to LW FP for review	1.3	1.3
6/11/19	Poonam Juneja	reviewing FP email re file management	0.1	0.1
6/11/19	Poonam Juneja	reviewing team emails re meeting with GAL and former CASA	0.2	0.2
6/11/19	Poonam Juneja	Confer with FP LW re: document review protocol for Plaintiff files	0.2	0.2
6/11/19	Poonam Juneja	Confer with FP re: possible motion for preliminary injunction	0.1	0.1
6/11/19	Poonam Juneja	Confer with FP re: document review protocol	0.3	0.3
6/11/19	Poonam Juneja	revising named plaintiff file review protocol based on feedback from FP LW	0.7	0.7
6/12/19	Poonam Juneja	Team call, including discussion of possible preliminary injunction motion and discovery management	0.7	0.7
6/12/19	Poonam Juneja	emailing LW re research tasks outstanding	0.3	0.3
6/12/19	Poonam Juneja	reviewing WD email re named plaintiff doc review and responding	0.2	0.2
6/12/19	Poonam Juneja	emailing LW re review of initial disclosures draft	0.2	0.2
6/12/19	Poonam Juneja	research rules and case law relevant to 30(b)(6) notices, while conferring with FP re same	0.4	0.4
6/12/19	Poonam Juneja	Confer with FP re: use of Relativity for client file review	0.1	0.1
6/12/19	Poonam Juneja	emailing LW re issue of multiple 30b6 notices to the same party and related research	0.2	0.2
6/12/19	Poonam Juneja	Confer with FP re: outstanding research tasks	0.2	0.2
6/13/19	Poonam Juneja	Telephone conference with DLA Piper re: document management	0.3	0.3
6/13/19	Poonam Juneja	Follow up discussion with FP KS re: document management	0.5	0.5
6/14/19	Poonam Juneja	emailing with JK re Medicaid call tomorrow	0.1	0.1
6/17/19	Poonam Juneja	reviewing IL email re intial discovery strategy	0.1	0.1
6/17/19	Poonam Juneja	Confer with L. Welch and FP re: initial disclosures and 30(b)(6) notice	0.2	0.2
6/18/19	Poonam Juneja	reviewing email re unitization issue, and emailing LW re same	0.9	0.9
6/18/19	Poonam Juneja	reviewing JN memo re taking multiple Rule 30(b)(6) depos and emailing LW FP re same	0.3	0.3
6/18/19	Poonam Juneja	drafting RFPs related to individual named plaintiffs	1.2	1.2
6/19/19	Poonam Juneja	Team call, including re: 30(b)(6) notice, RFPs, initial disclosures, case file review, and possible preliminary injunction motion	1.2	1.2
6/19/19	Poonam Juneja	conferring with FP re initial disclosures	0.5	0.5

Date	Name	Description	Time Billed	With Travel at 50%
6/19/19	Poonam Juneja	conferring with JN re research question on bifurcation of discovery	0.4	0.4
6/19/19	Poonam Juneja	reviewing draft agenda and responding	0.1	0.1
6/19/19	Poonam Juneja	review email correspondence re class cert and research tasks	0.1	0.1
6/19/19	Poonam Juneja	revising draft initial disclosures	2.5	2.5
6/19/19	Poonam Juneja	Emailing with FP LW re deposition and interrogatory limits	0.1	0.1
6/20/19	Poonam Juneja	revising initial disclosures	0.4	0.4
6/20/19	Poonam Juneja	reviewing JS draft memo re remedies and class cert standard	0.3	0.3
6/20/19	Poonam Juneja	Emailing with TW FP Re Relativity access issues	0.1	0.1
6/20/19	Poonam Juneja	reviewing draft schedule and recs for 26f conf and conferring with FP re same	0.5	0.5
6/20/19	Poonam Juneja	reviewing LW thoughts/revisions on RFP draft	0.3	0.3
6/20/19	Poonam Juneja	emailing with LW FP re possible settlement meeting in July 8-9	0.1	0.1
6/20/19	Poonam Juneja	emails with CR re initial disclosures draft	0.2	0.2
6/20/19	Poonam Juneja	Confer with LW FP re: case schedule, RFPs, initial disclosures, and Relativity	0.7	0.7
6/21/19	Poonam Juneja	Revising doc review template	0.2	0.2
6/21/19	Poonam Juneja	Revising draft RFPs, incorporating LW feedback, and circulating to team with comments	3.1	3.1
6/21/19	Poonam Juneja	Reviewing draft placement and case worker RFPs	0.4	0.4
6/22/19	Poonam Juneja	reviewing team emails/comments re case schedule	0.2	0.2
6/23/19	Poonam Juneja	reviewing team emails re case schedule	0.1	0.1
6/24/19	Poonam Juneja	Meeting with FP re division of tasks related to case scheduling, discovery requests, discovery planning, etc.	1.1	1.1
6/24/19	Poonam Juneja	Updating doc review directions and directing law clerk to update template	0.4	0.4
6/24/19	Poonam Juneja	Emailing FP re document review protocol and implementation	0.1	0.1
6/24/19	Poonam Juneja	Reviewing draft class cert brief	0.2	0.2
6/24/19	Poonam Juneja	Meet with F. Pitts, J. Nomkin, and L. Gerstley re: document review of Named Plaintiff case files	0.9	0.9
6/25/19	Poonam Juneja	Phone call with DLA (Dave, Billy, Patty), Freya, Kira re case management system	0.4	0.4
6/25/19	Poonam Juneja	Meeting with Kira, Freya following up on case management system and next steps	0.5	0.5
6/25/19	Poonam Juneja	emailing LW re case management system and next steps	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
6/25/19	Poonam Juneja	Confer with FP re: report of parties' planning conference and RFPs	0.4	0.4
6/25/19	Poonam Juneja	phone call with Dan (CR) re initial disclosure documents, rfps, 30b6 notice drafts	0.4	0.4
6/25/19	Poonam Juneja	emailing DLA team re document production related to initial disclosures	0.2	0.2
6/25/19	Poonam Juneja	drafting 30b6 notice topics related to oversight and data systems	0.9	0.9
6/25/19	Poonam Juneja	revising 30b6 notice draft re placement and case managers	0.5	0.5
6/26/19	Poonam Juneja	Team call, including re: 26(f) conference and statement, prospective mediators, and discovery	1.2	1.2
6/26/19	Poonam Juneja	reviewing and editing RFPs re EPSDT claim	0.6	0.6
6/26/19	Poonam Juneja	revising and circulating initial disclosures	0.9	0.9
6/26/19	Poonam Juneja	reviewing and selecting documents to produce with initial disclosures	2.2	2.2
6/26/19	Poonam Juneja	meeting with FP re case management schedule revisions	0.4	0.4
6/26/19	Poonam Juneja	meeting with KS and emailing LW re conf with defendants	0.2	0.2
6/26/19	Poonam Juneja	Internal NCYL follow up discussion after team call re: 26(f) conference logistics	0.1	0.1
6/26/19	Poonam Juneja	Call with DLA Piper re: document management and discovery; follow up conversation with FP re: same	0.3	0.3
6/27/19	Poonam Juneja	reviewing ESI protocol draft, and emailing with team re same and related questions	0.8	0.8
6/27/19	Poonam Juneja	Confer with JN re document review	0.4	0.4
6/27/19	Poonam Juneja	addressing issues with doc production with initial disclosures and email correspondence with PC JC WD Meg re same	1.3	1.3
6/27/19	Poonam Juneja	reviewing T Campbell email re BB MJ ML files	0.1	0.1
6/27/19	Poonam Juneja	reviewing JC email re HighQ	0.1	0.1
6/27/19	Poonam Juneja	reviewing and revising Rule 26f report and cover email	0.4	0.4
6/27/19	Poonam Juneja	emailing with LW FP re 30b6 and RFPs	0.3	0.3
6/27/19	Poonam Juneja	revise draft RFPs	4.1	4.1
6/27/19	Poonam Juneja	Participate in rule 26f conference with defendants	2.2	2.2
6/28/19	Poonam Juneja	revising 30(b)(6) notice and emailing FP re same	2.1	2.1
6/28/19	Poonam Juneja	Revising RFPs, including work session with FP re: same	7.8	7.8
6/29/19	Poonam Juneja	emailing with FP re finalizing 26f report	0.1	0.1
6/29/19	Poonam Juneja	revising 30(b)(6) notice and emailing FP re same	0.5	0.5

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6/29/19	Poonam Juneja	emailing with FP re revisions to RFPs and doc production with initial disclosures	0.2	0.2
6/30/19	Poonam Juneja	reviewing emails from LW FP re revisions to RFPs	0.2	0.2
6/30/19	Poonam Juneja	revising 30(b)(6) notice based on LW comments	1.2	1.2
6/30/19	Poonam Juneja	emailing FP re: 30(b)(6) notice	0.1	0.1
7/1/19	Poonam Juneja	reviewing FP email re changes in 26f report and responding	0.3	0.3
7/1/19	Poonam Juneja	confer with FP re finalizing and serving initial disclosures	0.3	0.3
7/1/19	Poonam Juneja	reviewing documents to be produced to defs with initial disclosures	0.6	0.6
7/1/19	Poonam Juneja	reviewing revisions to ESI protocol and planning report	0.2	0.2
7/1/19	Poonam Juneja	reviewing email correspondence with FP TW re planning report, initial disclosures	0.2	0.2
7/1/19	Poonam Juneja	email correspondence with team re doc production for initial disclosures	0.3	0.3
7/1/19	Poonam Juneja	message with FP re RFP revision	0.1	0.1
7/1/19	Poonam Juneja	reviewing defs' edits on joint report of planning conference and team email correspondence re same	0.2	0.2
7/1/19	Poonam Juneja	emailing FP re POS for initial disclosures	0.1	0.1
7/2/19	Poonam Juneja	email FP re team email list	0.1	0.1
7/2/19	Poonam Juneja	messaging with FP re CMC on Monday	0.1	0.1
7/7/19	Poonam Juneja	reviewing LW notes re rule 26 areas of disagreement	0.1	0.1
7/8/19	Poonam Juneja	reviewing LW email re recap of Rule 26 conference and responding re scheduling next conf call	0.2	0.2
7/9/19	Poonam Juneja	reviewing JN doc review spreadsheet for CA case file and associated questions	0.4	0.4
7/9/19	Poonam Juneja	emailing with FP re case management files on highq	0.1	0.1
7/9/19	Poonam Juneja	reviewign LW email re research needs and next steps	0.1	0.1
7/10/19	Poonam Juneja	reviewing CA doc re night to night placements and effect on him, and emailing team re same	0.3	0.3
7/10/19	Poonam Juneja	Review scheduling order; email correspondence with P. Juneja re: same	0.5	0.5
7/11/19	Poonam Juneja	emailing LW FP re research tasks, gathering client docs, named plaintiff file review	0.2	0.2
7/11/19	Poonam Juneja	reviewing document from M Shelton re filing re ESI and emailing LW re same	0.2	0.2
7/11/19	Poonam Juneja	emailing FP with some items to include on co-counsel call agneda	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
7/11/19	Poonam Juneja	reviewing JN email re updates to doc review protocol and reviewing updated protocol and responding re version control issue	0.3	0.3
7/11/19	Poonam Juneja	Meet with FP JN LG re: client file review	1.0	1.0
7/11/19	Poonam Juneja	reviewing draft agenda and responding to FP	0.1	0.1
7/12/19	Poonam Juneja	Team call, including re: scheduling conference & order, complaint amendment, and stakeholder interviews	1.3	1.3
7/12/19	Poonam Juneja	reviewing emails re named plaintiff file review with DLA	0.1	0.1
7/15/19	Poonam Juneja	reviewing FP and MN emails re named plaintiff file review and responding	0.1	0.1
7/15/19	Poonam Juneja	reviewing T Campbell email re good faith counter offer	0.1	0.1
7/15/19	Poonam Juneja	Confer with LW FP re: ADR, 30(b)(6) notice, stakeholder conversations, and division of labor with co-counsel	0.3	0.3
7/16/19	Poonam Juneja	reviewing Defs' response to settlement proposal and team emails re same	0.3	0.3
7/16/19	Poonam Juneja	reviewing team emails re revisions to 30b6 notice draft	0.1	0.1
7/16/19	Poonam Juneja	review email from JN re CA doc review and next steps	0.1	0.1
7/16/19	Poonam Juneja	confer with LW FP re status of case file productions and outstanding issues	0.6	0.6
7/17/19	Poonam Juneja	Team call, including re: mediation, 30(b)(6) notice, and stakeholder conversations	0.9	0.9
7/17/19	Poonam Juneja	reviewing emails from LW FP re case file status	0.2	0.2
7/17/19	Poonam Juneja	reviewing team emails re settlement counter, mediators, possible new named plaintiff	0.2	0.2
7/17/19	Poonam Juneja	email correspondence with FP re draft co-counsel call agenda	0.2	0.2
7/17/19	Poonam Juneja	troubleshooting access to named plaintiff files	0.4	0.4
7/17/19	Poonam Juneja	confer with FP re case files and review her email re same	0.1	0.1
7/18/19	Poonam Juneja	reviewing CVs of potential mediators	0.1	0.1
7/18/19	Poonam Juneja	emailing with re update on case file status	0.1	0.1
7/18/19	Poonam Juneja	reviewing CA document re night to night and short term placements, and emailing team re same	0.3	0.3
7/18/19	Poonam Juneja	reviewing emails from JC FP re case file access	0.2	0.2
7/18/19	Poonam Juneja	Review revisions to 30b6 notice draft	0.2	0.2
7/18/19	Poonam Juneja	Confer with FP re: 30(b)(6) notice	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
7/19/19	Poonam Juneja	reviewing email from JC re June 25 and July 5 productions	0.1	0.1
7/19/19	Poonam Juneja	Confer with FP LW re: division of labor, class certification, ADR, and stakeholder conversations	0.6	0.6
7/22/19	Poonam Juneja	reviewing IL email re possible trauma expert and linked materials	0.2	0.2
7/22/19	Poonam Juneja	reviewing JN email re updates to doc review protocol and reviewing updated protocol	0.2	0.2
7/22/19	Poonam Juneja	reviewing email from TC re FRE 408 designation, clawback, doc production, and related team emails re response	0.3	0.3
7/22/19	Poonam Juneja	reviewing email from JN with question re docs found in CA file review re placement in hospital and attached docs	0.3	0.3
7/22/19	Poonam Juneja	Email correspondence with FP re: clawback	0.1	0.1
7/23/19	Poonam Juneja	reviewing draft third party contractor subpoena from Billy Diggs	0.3	0.3
7/23/19	Poonam Juneja	reviewing LW email re follow up on case file production	0.1	0.1
7/23/19	Poonam Juneja	review Terry email re discovery and team draft responses to Terry email, and send thoughts	0.4	0.4
7/23/19	Poonam Juneja	Confer with LW FP re: response to T. Campbell	0.4	0.4
7/24/19	Poonam Juneja	Team call, including re: mediation, experts, discovery, and information from stakeholders	0.9	0.9
7/24/19	Poonam Juneja	reviewing draft agenda and responding	0.1	0.1
7/24/19	Poonam Juneja	reviewing MN FP emails re file review and chrons	0.2	0.2
7/24/19	Poonam Juneja	Confer with FP re: document review & coordination with Children's Rights	0.2	0.2
7/25/19	Poonam Juneja	conferring with JN re doc review questions and items found in CA file review	0.6	0.6
7/26/19	Poonam Juneja	prepare for named plaintiff file review call	0.2	0.2
7/26/19	Poonam Juneja	Call with FP MN re: named plaintiff file review	0.6	0.6
7/26/19	Poonam Juneja	reviewing T Campbell email re discovery and disputes, draft response, and emailing feedback	0.3	0.3
7/26/19	Poonam Juneja	Email correspondence with FP re: response to T. Campbell email re: extension requests	0.1	0.1
7/29/19	Poonam Juneja	reviewing spreadsheet analysis re settlement counterproposal	0.3	0.3
7/29/19	Poonam Juneja	discussion with JN re CA doc review and next steps	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
7/29/19	Poonam Juneja	reviewing child welfare task force doc re strategies for managing child welfare system and associated team emails	0.2	0.2
7/29/19	Poonam Juneja	Confer with LW FP re: discovery & mediation	0.2	0.2
7/31/19	Poonam Juneja	Team call, including re: mediation, discovery, and Task Force	0.7	0.7
7/31/19	Poonam Juneja	Confer with LW FP a re: stakeholder updates re: congregate care, named plaintiff file review, and third party subpoenas	0.6	0.6
7/31/19	Poonam Juneja	Emailing with FP re named plaintiff file review	0.1	0.1
8/1/19	Poonam Juneja	Email correspondence re: Named Plaintiff file review	0.1	0.1
8/2/19	Poonam Juneja	reviewing LW SD emails re next friend for JP	0.1	0.1
8/2/19	Poonam Juneja	reviewing JN email and attachments re: CA placement moves	0.3	0.3
8/5/19	Poonam Juneja	reviewing JN email summarizing CA file review and highlighting hot docs and attached chron	0.3	0.3
8/5/19	Poonam Juneja	emails with MF FP re scheduling time to discuss file review	0.1	0.1
8/5/19	Poonam Juneja	reviewing and revising law clerk memo re discovery bifurcation	0.4	0.4
8/6/19	Poonam Juneja	reviewing Arizona BK case class cert motion	0.3	0.3
8/7/19	Poonam Juneja	Team call, including re: work plan, ADR, complaint amendment, and discovery	0.7	0.7
8/7/19	Poonam Juneja	review LW email re 3rd party subpoena to contractors	0.1	0.1
8/7/19	Poonam Juneja	reviewing IL email re agenda items and responding with info re RFPs sent re individual plaintiff files	0.3	0.3
8/7/19	Poonam Juneja	reviewing facts draft for JP	0.1	0.1
8/7/19	Poonam Juneja	reviewing summary of phone call with potential trauma expert	0.1	0.1
8/7/19	Poonam Juneja	research multiple 30b6 depositions and legal standards, and email summary to FP	0.2	0.2
8/7/19	Poonam Juneja	Confer with FP re: document review protocol	0.1	0.1
8/7/19	Poonam Juneja	NCYL follow-up discussion following team call	0.2	0.2
8/7/19	Poonam Juneja	Confer with FP re: staffing	0.2	0.2
8/7/19	Poonam Juneja	reviewing CR email re contact from grandparent in Wichita re abuse/neglect issues re grandchild	0.1	0.1
8/8/19	Poonam Juneja	reviewing revised draft of 30b6 notice from FP and emailing re same	0.2	0.2
8/9/19	Poonam Juneja	Review information from IL re: potential mediator	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
8/10/19	Poonam Juneja	reviewing email from Martha with KDADS documents and legislative budget comm info	0.2	0.2
8/12/19	Poonam Juneja	reviewing team emails re letters received from children alleging abuse and attachment	0.2	0.2
8/12/19	Poonam Juneja	reviewing emails with MN re named plaintiff file review protocol	0.1	0.1
8/12/19	Poonam Juneja	reviewing T Campbell email re mediator and team responses	0.1	0.1
8/12/19	Poonam Juneja	Confer with LW FP re: 30(b)(6) notice, ADR, case file review, search terms, and FAC	0.2	0.2
8/13/19	Poonam Juneja	reviewing and revising JP facts draft	0.4	0.4
8/13/19	Poonam Juneja	Confer with FP re: document review and file review	1.5	1.5
8/13/19	Poonam Juneja	review FP email re 30b6 notice draft questions	0.2	0.2
8/13/19	Poonam Juneja	reviewing FP draft email to LW re unitization problem	0.2	0.2
8/14/19	Poonam Juneja	Team call, including re: ADR, discovery, and complaint amendment	0.8	0.8
8/14/19	Poonam Juneja	emailing FP re concerns on file review division	0.4	0.4
8/14/19	Poonam Juneja	reviewing child welfare task force doc for 30b6 and associated emails	0.3	0.3
8/14/19	Poonam Juneja	reviewing draft letter to johnson county clerk re anonymous letter	0.1	0.1
8/14/19	Poonam Juneja	messaging with JS re questions on class cert issues for memo research	0.2	0.2
8/14/19	Poonam Juneja	reviewing email from T. Campbell re ADR and associated team emails	0.4	0.4
8/14/19	Poonam Juneja	emailing with FP re relativity email to dLA	0.4	0.4
8/14/19	Poonam Juneja	reviewing local rules re filing deposition notices and emailing FP LW re same	0.4	0.4
8/14/19	Poonam Juneja	Confer with FP re: 30(b)(6) notice and case file assignments	0.4	0.4
8/14/19	Poonam Juneja	Call with NCYL (pj, fp), DLA (Meg), and CR (Marissa, et al) re: named plaintiff file review	0.9	0.9
8/14/19	Poonam Juneja	Email correspondence re: case file review	0.5	0.5
8/14/19	Poonam Juneja	Confer with FP re: case file review, communications with Defendants, and ADR	1.2	1.2
8/14/19	Poonam Juneja	review DA memo re lgbtq youth and attachments	0.4	0.4
8/15/19	Poonam Juneja	confer with JS re memo questions related to class cert and remedies	0.6	0.6
8/15/19	Poonam Juneja	Instructions to JS re NP file review	0.9	0.9
8/15/19	Poonam Juneja	review IL email re complaint amendment strategy and attachments and discussing same with LW	1.1	1.1

Date	Name	Description	Time Billed	With Travel at 50%
8/15/19	Poonam Juneja	Confer with FP re: case file review	0.5	0.5
8/16/19	Poonam Juneja	reviewing team emails re mediation dates and ext of filing date	0.2	0.2
8/16/19	Poonam Juneja	emailing with FP re filing deposition notices	0.1	0.1
8/16/19	Poonam Juneja	emails with FP re fixes to relativity doc review screen	0.4	0.4
8/16/19	Poonam Juneja	emails with team re named plaintiff doc review division	0.3	0.3
8/16/19	Poonam Juneja	Confer with JS re RM doc review	0.4	0.4
8/16/19	Poonam Juneja	reviewing and revising TW draft addition to 30b6 notice	0.7	0.7
8/16/19	Poonam Juneja	Confer with FP re: 30(b)(6) depositions notice	0.2	0.2
8/17/19	Poonam Juneja	reviewing SD email re thoughts on complaint amendment	0.2	0.2
8/18/19	Poonam Juneja	reviewing SD email re thoughts on case direction	0.2	0.2
8/19/19	Poonam Juneja	conferring with FP and LW re mediation statement, 30b6 complaint amendment, doc review	0.5	0.5
8/19/19	Poonam Juneja	reviewing DG v Strickland 278 FRD 635 (ND Okla 2011)	0.3	0.3
8/19/19	Poonam Juneja	Confer with FP re: complaint amendment	0.1	0.1
8/19/19	Poonam Juneja	reviewing article related to eCAP placement matching software and exchanging emails with LBB re same	0.2	0.2
8/20/19	Poonam Juneja	Confer with FP re: KU software for matching	0.1	0.1
8/20/19	Poonam Juneja	conferring with LW re class definition and placement instability	0.1	0.1
8/20/19	Poonam Juneja	researching placement instability and class certification issues	2.7	2.7
8/21/19	Poonam Juneja	Team call, including re: complaint amendment, ADR, communications strategy, and discovery	0.9	0.9
8/21/19	Poonam Juneja	continuing to research class definition issues	1.3	1.3
8/21/19	Poonam Juneja	writing email to LW summarizing findings on class def research and thoughts on next steps	0.6	0.6
8/21/19	Poonam Juneja	phone call with LW discussing research on class definition and amendment of complaint and strategy	0.4	0.4
8/21/19	Poonam Juneja	doc review to try to update plaintiff facts	1.2	1.2
8/21/19	Poonam Juneja	emailing LW re outreach from a foster child in KS	0.1	0.1
8/21/19	Poonam Juneja	research re ethical issue on communication from foster child	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
8/21/19	Poonam Juneja	Internal NCYL follow-up conversation re: complaint amendment	0.1	0.1
8/21/19	Poonam Juneja	comparing complaint to answer and creating a table of needed updates to plaintiff allegations for amendment	1.8	1.8
8/22/19	Poonam Juneja	revising ZZ BB facts and emailing to team for review	0.4	0.4
8/22/19	Poonam Juneja	conferring with JS re remedies issues for class cert	0.3	0.3
8/22/19	Poonam Juneja	reviewing JS memo re remedies and class cert and reading related cases	1.2	1.2
8/22/19	Poonam Juneja	emailing FP LW re BB falling within ICWA	0.1	0.1
8/22/19	Poonam Juneja	emailing JS question re MJ facts and documents	0.5	0.5
8/22/19	Poonam Juneja	conferring with JS re question on MJ facts	0.4	0.4
8/22/19	Poonam Juneja	emailing LW re following up with next friends on am complaint and drafting emails to next friends	0.6	0.6
8/22/19	Poonam Juneja	Confer with FP re: complaint amendment and new Named Plaintiff facts	0.2	0.2
8/23/19	Poonam Juneja	reviewing emails re Katharyn McIntyre and updating related facts in Am complaint draft	0.4	0.4
8/23/19	Poonam Juneja	reviewing K. Pacio email re SDP/instability amendment issue	0.2	0.2
8/23/19	Poonam Juneja	reviewing and responding to team emails re updating ZZ BB facts	0.2	0.2
8/23/19	Poonam Juneja	revising 30b6 notice and exhibit and finalizing for service	1.4	1.4
8/23/19	Poonam Juneja	Confer with LW FP re: 30(b)(6) notice.	0.3	0.3
8/23/19	Poonam Juneja	Confer with FP re: State Finance Council meeting	0.1	0.1
8/26/19	Poonam Juneja	review contact memo from SD LW meeting with next friend re placements, therapeutic foster homes, mental health services	0.1	0.1
8/26/19	Poonam Juneja	review RM doc review spreadsheet	0.3	0.3
8/26/19	Poonam Juneja	reviewing named plaintiff fact check and incorporating into draft am complaint	0.4	0.4
8/26/19	Poonam Juneja	reviewing contact memo from visit with GAL, legal services attorney re lack of placements and mental health treatment for kids in care	0.2	0.2
8/26/19	Poonam Juneja	reviewing email from named plaintiff re instability	0.2	0.2
8/26/19	Poonam Juneja	reviewing MB doc review spreadsheet	0.2	0.2
8/26/19	Poonam Juneja	emailing LW re possible updates to facts alleged re risk of harm	0.8	0.8

Date	Name	Description	Time Billed	With Travel at 50%
8/26/19	Poonam Juneja	revising amended complaint with named plaintiff information, including checking facts against docs produced by Ds; emailing team re same	0.9	0.9
8/26/19	Poonam Juneja	meeting with JS re doc review questions	0.4	0.4
8/26/19	Poonam Juneja	reviewing emails from next friends re amended complaint facts and emailing team re same	0.4	0.4
8/26/19	Poonam Juneja	Confer with FP re: complaint amendment for MB and SE	0.1	0.1
8/26/19	Poonam Juneja	Confer with FP LW re: complaint amendment	0.2	0.2
8/26/19	Poonam Juneja	reviewing contact memo re visit with stakeholder LCSW/LSCSW	0.1	0.1
8/27/19	Poonam Juneja	confer with JS re RM doc review	0.4	0.4
8/27/19	Poonam Juneja	reviewing 30b6 notice for prioritization of rfp production from Ds	0.3	0.3
8/27/19	Poonam Juneja	reviewing RFPs for prioritization of productions from Ds	0.3	0.3
8/27/19	Poonam Juneja	revising draft amended complaint	2.9	2.9
8/27/19	Poonam Juneja	locating hot doc in CA files and circulating to team with a summary	0.3	0.3
8/27/19	Poonam Juneja	emailing team with question regarding discrepancies on KDADS website re Laura Howard title	0.2	0.2
8/27/19	Poonam Juneja	conferring with FP re discrepancies on KDADS website re Laura Howard title	0.1	0.1
8/27/19	Poonam Juneja	Confer with FP re: document review	0.1	0.1
8/27/19	Poonam Juneja	Confer with FP re: complaint amendment	0.2	0.2
8/27/19	Poonam Juneja	Confer with FP re: prioritized discovery	0.1	0.1
8/28/19	Poonam Juneja	revising draft amended complaint	1.2	1.2
8/28/19	Poonam Juneja	continuing to review RFPs for prioritization of productions from Defendants and summarizing on spreadsheet	1.3	1.3
8/28/19	Poonam Juneja	conferring with JS re atty-client privilege issue	0.2	0.2
8/28/19	Poonam Juneja	debrief with LW re co-counsel call and motion to amend drafting	0.2	0.2
8/28/19	Poonam Juneja	review JS notes for portion of co-counsel call that I missed re mediation, motion to amend, etc	0.2	0.2
8/29/19	Poonam Juneja	phone call with defendants' counsel re their doc production and request for addl time on objections, etc	0.8	0.8
8/29/19	Poonam Juneja	confer with LW re motion to amend and amendments to complaint	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
8/29/19	Poonam Juneja	confer with LW re third party subpoenas and requests for inspection	0.2	0.2
8/29/19	Poonam Juneja	draft motion for leave to amend complaint	0.5	0.5
8/29/19	Poonam Juneja	draft motion for leave to proceed using pseudonyms	0.3	0.3
8/29/19	Poonam Juneja	draft motion for leave to amend complaint - proposed order	0.1	0.1
8/29/19	Poonam Juneja	draft motion for leave to proceed using pseudonyms - proposed order	0.1	0.1
8/29/19	Poonam Juneja	revise proposed amended complaint	0.5	0.5
8/29/19	Poonam Juneja	revise motion papers in response to feedback from team	0.5	0.5
8/30/19	Poonam Juneja	Call with KS re finalizing docs	0.1	0.1
8/30/19	Poonam Juneja	Call with FP re: finalizing FAC.	0.1	0.1
8/30/19	Poonam Juneja	Confer with FP re: proposed order	0.1	0.1
8/30/19	Poonam Juneja	Confer with FP re: edits to FAC	0.4	0.4
8/30/19	Poonam Juneja	Call with FP re: finalizing FAC, motion for pseudonyms, motion for leave to file FAC	0.2	0.2
8/30/19	Poonam Juneja	final revisions and review of amended complaint, motion for leave to amend, motion to use pseudonyms, proposed orders before filing	5.1	5.1
8/30/19	Poonam Juneja	reviewing letter correspondence to defendants re request for additional time for objections and responses and emailing thoughts to team	0.4	0.4
9/3/19	Poonam Juneja	draft and review notice of errata and corrected FAC	1.2	1.2
9/3/19	Poonam Juneja	reviewing correspondence related to stipulation for extension and edits	0.2	0.2
9/3/19	Poonam Juneja	confer with LW FP re defs' request for names, incoming doc production, 30b6 follow up	0.2	0.2
9/3/19	Poonam Juneja	reviewing email from T Campbell re documents being produced and omitted from production	0.1	0.1
9/3/19	Poonam Juneja	Confer with FP re: document review	0.1	0.1
9/4/19	Poonam Juneja	Team call, including re: notice of errata for FAC, 30(b)(6), and ADR	1.0	1.0
9/4/19	Poonam Juneja	reviewing correspondence with T. Campbell re names of new plaintiffs	0.1	0.1
9/4/19	Poonam Juneja	initial review of DCF production from yesterday and emailing hot doc to FP LW with analysis	0.8	0.8
9/4/19	Poonam Juneja	reviewing TW email re stakeholder interview with former St. Francis worker	0.1	0.1
9/4/19	Poonam Juneja	reviewing emails re contact from St. Francis former employee	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
9/5/19	Poonam Juneja	reviewing foster care stats sent by TW	0.3	0.3
9/5/19	Poonam Juneja	review FP question re doc review tagging question, reviewign relevant docs, and responding	0.3	0.3
9/6/19	Poonam Juneja	revising amended complaint for filing	0.3	0.3
9/6/19	Poonam Juneja	emailing to team with next steps, including for compliance with admin procedures for court	0.4	0.4
9/6/19	Poonam Juneja	reviewing court orders re am complaint and pseudonyms	0.1	0.1
9/6/19	Poonam Juneja	phone call to clerks office re adding new named plaintiffs to docket in advance of filing amended complaint	0.2	0.2
9/6/19	Poonam Juneja	Confer with FP re: FAC	0.1	0.1
9/6/19	Poonam Juneja	Confer with FP KS re: FAC	0.2	0.2
9/6/19	Poonam Juneja	Confer with FP re: filing	0.1	0.1
9/9/19	Poonam Juneja	reviewing JS memo re change of venue motions, researching related issues, and incorporating research into memo	1.3	1.3
9/10/19	Poonam Juneja	reviewing and revising draft settlement statement	2.2	2.2
9/10/19	Poonam Juneja	Confer with FP re: mediation brief	0.1	0.1
9/11/19	Poonam Juneja	Team call, including re: mediation statement, discovery, experts	0.8	0.8
9/11/19	Poonam Juneja	reviewing and revising draft settlement statement	1.5	1.5
9/11/19	Poonam Juneja	conferring with LW FP re draft settlement statement	0.3	0.3
9/11/19	Poonam Juneja	research related to private right of action for medicaid in 10th circuit	0.8	0.8
9/11/19	Poonam Juneja	Discuss mediation statement with FP	0.2	0.2
9/12/19	Poonam Juneja	conferring with LW re revisions to mediation statement	0.1	0.1
9/12/19	Poonam Juneja	researching issues related to enforceability of Medicaid Act provisions	0.5	0.5
9/13/19	Poonam Juneja	Confer with FP re: mediation	0.1	0.1
9/13/19	Poonam Juneja	revising mediation statement	1.5	1.5
9/16/19	Poonam Juneja	revising mediation statement	2.3	2.3
9/16/19	Poonam Juneja	conferring with FP re revisions to mediation statement draft	0.2	0.2
9/17/19	Poonam Juneja	conferring with LW re doc review	0.3	0.3
9/18/19	Poonam Juneja	Team call, including re: ADR, discovery, and experts	1.1	1.1

Date	Name	Description	Time Billed	With Travel at 50%
9/18/19	Poonam Juneja	reviewing docs produced by Ds in regard to 1st RFP for production issues	0.5	0.5
9/18/19	Poonam Juneja	discussing production issues with FP LW	0.4	0.4
9/18/19	Poonam Juneja	emailing Ira etc re priorities in following up on 30b6	0.2	0.2
9/18/19	Poonam Juneja	reviewing and revising updated draft mediation statement	1.1	1.1
9/18/19	Poonam Juneja	revising draft mediation statement to incorporate FP comment	0.1	0.1
9/18/19	Poonam Juneja	discussing draft mediation statement with FP	0.2	0.2
9/18/19	Poonam Juneja	discussing draft mediation statement with LW	0.1	0.1
9/18/19	Poonam Juneja	Confer with FP re: mediation statement	0.3	0.3
9/19/19	Poonam Juneja	Confer with FP re: mediation	0.1	0.1
9/20/19	Poonam Juneja	reviewing email re named plaintiff DOB and emailing FP KS re discrepancy	0.3	0.3
9/20/19	Poonam Juneja	emailing FP re KR protective order acknowledgment	0.1	0.1
9/24/19	Poonam Juneja	reviewing and emailing LW FP re upcoming answer/MTD deadlines	0.2	0.2
9/24/19	Poonam Juneja	reviewing FP comments on discovery letter drafts	0.2	0.2
9/24/19	Poonam Juneja	reviewing and responding to draft agenda for co-counsel call	0.1	0.1
9/25/19	Poonam Juneja	Team call, including re: discovery issues, possible KORA request, experts	1.0	1.0
9/25/19	Poonam Juneja	review discovery letter draft and revisions	0.2	0.2
9/25/19	Poonam Juneja	emailing MN re Kevin Ryan protective order	0.1	0.1
9/25/19	Poonam Juneja	reviewing and responding to MN re email to Kevin Ryan	0.2	0.2
9/25/19	Poonam Juneja	reviewing Judge Birzer ESI order in Smith case	0.3	0.3
9/25/19	Poonam Juneja	emailing LW re checking in with possible expert	0.1	0.1
9/25/19	Poonam Juneja	reviewing online KVC job postings for youth care specialists and circulating notes to team	0.4	0.4
9/25/19	Poonam Juneja	reviewing LBB memo re stakeholder interview with former KVC "intake specialist"	0.3	0.3
9/25/19	Poonam Juneja	Confer with FP re: discovery issues	0.7	0.7
9/25/19	Poonam Juneja	Follow-up discussion with FP re: next steps	0.1	0.1
9/26/19	Poonam Juneja	revising 2nd RFPs	0.5	0.5
9/26/19	Poonam Juneja	drafting amended 30b6 notice and circulating to FP LW	0.5	0.5
9/26/19	Poonam Juneja	emailing FP LW re change in opposing counsel	0.2	0.2
9/26/19	Poonam Juneja	phone call with LW re change in opposing counsel	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
9/26/19	Poonam Juneja	reviewing Teresa email re new opposing counsel	0.1	0.1
9/26/19	Poonam Juneja	meeting with LW re doc production issues	0.3	0.3
9/26/19	Poonam Juneja	researching doc production requirements in Dkan for discovery letter	1.6	1.6
9/26/19	Poonam Juneja	revising Kansas discovery letter	0.3	0.3
9/26/19	Poonam Juneja	Confer with FP re: discovery letter	0.5	0.5
9/26/19	Poonam Juneja	Confer with FP re: 30(b)(6)	0.1	0.1
9/26/19	Poonam Juneja	Confer with FP re: change in counsel	0.1	0.1
9/27/19	Poonam Juneja	phone call re discovery issues	0.6	0.6
9/30/19	Poonam Juneja	confer with LW FP re new opposing counsel, discovery next steps, 30b6, etc	0.2	0.2
9/30/19	Poonam Juneja	emailing Annie at DLA re follow up from Friday's call	0.3	0.3
10/1/19	Poonam Juneja	Confer with FP re: discovery letter	0.1	0.1
10/1/19	Poonam Juneja	Confer with LW FP re: next steps for Kansas discovery	0.2	0.2
10/1/19	Poonam Juneja	final review and edit to letter to opposign counsel	0.2	0.2
10/1/19	Poonam Juneja	final review and edits to amended 30b6	0.4	0.4
10/1/19	Poonam Juneja	co-counsel call re new opposing counsel and upcoming call	0.3	0.3
10/2/19	Poonam Juneja	Team call, including re: discovery letter, mediation, amended 30(b)(6), and potential experts	1.0	1.0
10/2/19	Poonam Juneja	Follow-up following team call with LW FP	0.2	0.2
10/7/19	Poonam Juneja	Confer with FP re: mediation and document review	0.1	0.1
10/7/19	Poonam Juneja	Review ZZ hot docs email and attachment	0.1	0.1
10/8/19	Poonam Juneja	Plaintiffs' only mediation phone call with mediator	1.3	1.3
10/9/19	Poonam Juneja	Team meeting re defs answer, statement of non-opp, ADR, discovery incl ESI	0.8	0.8
10/9/19	Poonam Juneja	Confer with FP re: ADR, document review, and case schedule	0.2	0.2
10/9/19	Poonam Juneja	reviewing ZZ hot docs email from DA and attachments	0.2	0.2
10/9/19	Poonam Juneja	drafted/revised statement of non-opposition	0.3	0.3
10/9/19	Poonam Juneja	reviewing email from JP Bradshaw re defs' answer	0.1	0.1
10/9/19	Poonam Juneja	reviewing Defs' answer to first amended complaint	0.4	0.4
10/10/19	Poonam Juneja	reviewing team emails re strategy session with DLA	0.2	0.2
10/10/19	Poonam Juneja	reviewing ZZ hot docs	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
10/11/19	Poonam Juneja	emailing with LW FP Re ESI call and mediation calls	0.2	0.2
10/11/19	Poonam Juneja	reviewing ZZ hot docs	0.3	0.3
10/11/19	Poonam Juneja	reviewing KS email re file maintenance protocol	0.1	0.1
10/15/19	Poonam Juneja	reviewing emails re PHV motions	0.2	0.2
10/15/19	Poonam Juneja	reviewing and responding to team emails re annotated FAC	0.2	0.2
10/15/19	Poonam Juneja	reviewing class cert decision from BK (Arizona case) and MN cover email	0.6	0.6
10/16/19	Poonam Juneja	Team call, including re: ADR and stakeholders	0.5	0.5
10/16/19	Poonam Juneja	team phone call re discovery, mediation, etc.	0.5	0.5
10/16/19	Poonam Juneja	phone call with Defendants re ESI/discovery	0.5	0.5
10/16/19	Poonam Juneja	Confer with FP re: ESI call with Defendants	0.1	0.1
10/16/19	Poonam Juneja	Follow-up conversation with FP re: ESI	0.1	0.1
10/18/19	Poonam Juneja	text message with LW re defendants' resp and objections	0.1	0.1
10/21/19	Poonam Juneja	emailing team re sources for additions to FAC	0.6	0.6
10/21/19	Poonam Juneja	reviewing information sent by LW related to potential expert	0.3	0.3
10/22/19	Poonam Juneja	reviewing annotated first amended complaint	0.2	0.2
10/22/19	Poonam Juneja	emailing LW re expert comms protocol	0.1	0.1
10/22/19	Poonam Juneja	reviewing materials related to potential experts	1.1	1.1
10/22/19	Poonam Juneja	revising expert communications protocol, file maintenance protocol and responding to team email re same	1.2	1.2
10/23/19	Poonam Juneja	co-counsel call re discovery, ADR, meetings with experts, etc	0.7	0.7
10/23/19	Poonam Juneja	reviewing media article re child missing from foster care	0.1	0.1
10/24/19	Poonam Juneja	reviewing draft letter re redactions and 30(b)(6)	0.2	0.2
10/24/19	Poonam Juneja	emailing team re scheduling mediation prep call and call with KR	0.2	0.2
10/24/19	Poonam Juneja	Confer with FP re: experts	0.1	0.1
10/25/19	Poonam Juneja	reviewing Defs' motion to dismiss	0.5	0.5
10/25/19	Poonam Juneja	reviewing agenda for strategy session and emailing with LW re same	0.2	0.2
10/25/19	Poonam Juneja	Confer with LW re defs response to term sheet and reviewing her email re same	0.3	0.3
10/25/19	Poonam Juneja	Confer with FP re: MTD and 10/28 co-counsel meeting	0.2	0.2
10/28/19	Poonam Juneja	emailing with LW re ESI staffing	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
10/28/19	Poonam Juneja	Confer with FP re: opposition to MTD	0.1	0.1
10/28/19	Poonam Juneja	Confer with LW FP re: DLA Piper meeting prep, document review, opposition to MTD	0.5	0.5
10/30/19	Poonam Juneja	Team call, including re: motion to dismiss, discovery, and ADR	1.3	1.3
10/30/19	Poonam Juneja	reviewing draft co-counsel meeting agenda	0.1	0.1
10/30/19	Poonam Juneja	reviewing emails re dates of produc of docs and checking dates	0.1	0.1
10/30/19	Poonam Juneja	reviewing emails re call with Kevin Ryan and prep call and calendaring	0.1	0.1
10/30/19	Poonam Juneja	reviewing TW draft email re discovery	0.2	0.2
10/30/19	Poonam Juneja	Confer with FP re: MTD and expedited discovery strategy	0.4	0.4
10/31/19	Poonam Juneja	Confer with FP re: discovery and motion to dismiss strategy	0.2	0.2
10/31/19	Poonam Juneja	Confer with FP re: discovery email correspondence and strategy and reviewing FP email	0.3	0.3
10/31/19	Poonam Juneja	reviewing JP emails re discovery disputes and related correspondence	0.5	0.5
11/1/19	Poonam Juneja	Confer with FP re: meet and confer and discovery next steps	0.4	0.4
11/1/19	Poonam Juneja	revising follow up items from Wed co-counsel call	0.2	0.2
11/1/19	Poonam Juneja	reviewing notes from meet and confer call re: motion to dismiss and discovery	0.4	0.4
11/1/19	Poonam Juneja	Email correspondence with FP re: meet and confer	0.2	0.2
11/4/19	Poonam Juneja	reviewing draft motion for extension and cover email and circulating edits to FP LW	0.4	0.4
11/4/19	Poonam Juneja	Discuss motion for extension and discovery with FP	0.2	0.2
11/6/19	Poonam Juneja	reviewing FP notes from Plaintiffs' call with Kevin Ryan	0.2	0.2
11/6/19	Poonam Juneja	reviewing FP notes from Plaintiffs' counsel call	0.2	0.2
11/7/19	Poonam Juneja	phone call with FP re ext on motion to compel deadline	0.2	0.2
11/7/19	Poonam Juneja	reviewing draft motion for extension of time and circulating revisions	0.4	0.4
11/7/19	Poonam Juneja	Confer with FP re: case management and discovery	0.2	0.2
11/8/19	Poonam Juneja	reviewing draft email to Defs re discovery and emailing team re same	0.4	0.4
11/8/19	Poonam Juneja	reviewing and responding to emails re next friends at mediation	0.2	0.2
11/8/19	Poonam Juneja	Confer with FP re: discovery	0.1	0.1
11/8/19	Poonam Juneja	confer with FP re confidentiality of certain informants	0.2	0.2
11/11/19	Poonam Juneja	reviewing LBB email with notes from interview with stakeholder service provider with deep knowledge of FC system and attachments	0.4	0.4

Date	Name	Description	Time Billed	With Travel at 50%
11/11/19	Poonam Juneja	reviewing team emails re file maintenance protocol	0.1	0.1
11/12/19	Poonam Juneja	messaging with FP re mediation status	0.2	0.2
11/13/19	Poonam Juneja	reviewing IL email re settlement drafting schedule and next steps and calendaring dates	0.2	0.2
11/13/19	Poonam Juneja	reviewing emails re po acknowledgement from expert	0.1	0.1
11/13/19	Poonam Juneja	reviewing FP email re mediation doc review proposal and responding	0.3	0.3
11/13/19	Poonam Juneja	reviewing FP email re doc review on NP files	0.1	0.1
11/13/19	Poonam Juneja	emailing with JC re production tracker and reviewing tracker	0.2	0.2
11/15/19	Poonam Juneja	Team call, including re: mediation, experts, and media	0.9	0.9
11/15/19	Poonam Juneja	reviewing and responding to SD IL emails re Overnights and office placements	0.3	0.3
11/15/19	Poonam Juneja	reviewing emails re document production	0.1	0.1
11/15/19	Poonam Juneja	reviewing productions on relativity and emailing with team re missing productions	0.3	0.3
11/18/19	Poonam Juneja	reviewing document productions from Ds for issues and emailing team	1.1	1.1
11/18/19	Poonam Juneja	drafting process component of settlement proposal	1.2	1.2
11/19/19	Poonam Juneja	emailing team with summary regarding problems in productions from defendants	0.6	0.6
11/19/19	Poonam Juneja	Phone call with LW re stakeholder meetings and mediation issues	0.5	0.5
11/20/19	Poonam Juneja	Team call, including re: mediation, document production issues, and experts	0.7	0.7
11/20/19	Poonam Juneja	texting with LW FP re co-counsel meeting	0.1	0.1
11/20/19	Poonam Juneja	reviewing draft agenda for co-counsel meeting from FP prior to sending	0.1	0.1
11/21/19	Poonam Juneja	phone call with FP re doc review	0.4	0.4
11/22/19	Poonam Juneja	reviewing draft settlement proposal components	0.4	0.4
11/22/19	Poonam Juneja	reviewing TW draft email re docs produced and responding with comments	0.3	0.3
12/2/19	Poonam Juneja	training KS re doc review process for mediation purposes	0.3	0.3
12/2/19	Poonam Juneja	Doc review of RFP1 docs supplied by Ds for mediation purposes	4.2	4.2
12/2/19	Poonam Juneja	exchanging messages with FP re doc review	0.2	0.2
12/2/19	Poonam Juneja	reviewing DCF produced docs flagged by KS as hot	0.3	0.3
12/3/19	Poonam Juneja	reviewing LBB comments on settlement draft	0.2	0.2
12/3/19	Poonam Juneja	reviewing email forwarded by JC from K Barker re production of documents	0.1	0.1
12/3/19	Poonam Juneja	revising draft settlement agreement	2.5	2.5

Date	Name	Description	Time Billed	With Travel at 50%
12/3/19	Poonam Juneja	phone call with LW FP re draft settlement proposal and revisions	0.3	0.3
12/4/19	Poonam Juneja	Team call, including re: mediation	0.9	0.9
12/4/19	Poonam Juneja	review CJ and FP emails re missing documents and responding to FP	0.2	0.2
12/4/19	Poonam Juneja	reviewing govt settlement proposal draft	0.4	0.4
12/4/19	Poonam Juneja	revising draft settlement agreement including responding to thoughts raised on the co-counsel call and by email	2.3	2.3
12/4/19	Poonam Juneja	discussion with FP re revisions to settlement proposal	0.2	0.2
12/4/19	Poonam Juneja	phone call with FP re settlement proposal	0.6	0.6
12/4/19	Poonam Juneja	discussion with LW re revisions to settlement proposal	0.4	0.4
12/4/19	Poonam Juneja	reviewing team emails re MJ RR and responding to same	0.2	0.2
12/5/19	Poonam Juneja	Emailing with FP re document review and discovery	0.3	0.3
12/5/19	Poonam Juneja	reviewing IL email re strategy for mediation and mtd opp	0.1	0.1
12/6/19	Poonam Juneja	doc review of KDADS production for mediation purposes	5.2	5.2
12/6/19	Poonam Juneja	emailing team regarding next steps in doc review for mediation purposes	0.6	0.6
12/6/19	Poonam Juneja	reviewing LW email re next steps for mediation prep and responding	0.3	0.3
12/6/19	Poonam Juneja	reviewing hot docs circulated by team	0.5	0.5
12/8/19	Poonam Juneja	reviewing IL email re thoughts on his edits to Defs' settlement draft	0.3	0.3
12/9/19	Poonam Juneja	layering my edits onto FP's edits on Defs' settlement proposal	0.4	0.4
12/9/19	Poonam Juneja	reviewing LBB email re extreme recruitment and remedies	0.1	0.1
12/9/19	Poonam Juneja	reviewing Ira's redline on defs' draft and taking notes	1.2	1.2
12/9/19	Poonam Juneja	responding to reporter inquiry re factchecking	0.4	0.4
12/9/19	Poonam Juneja	reviewing and revising draft motion and proposed order for extension	0.6	0.6
12/10/19	Poonam Juneja	Call re: settlement draft	0.9	0.9
12/10/19	Poonam Juneja	reviewing hot docs from mediation review flagged by KS	0.4	0.4
12/10/19	Poonam Juneja	review email from MN re discovery task status and mediation thought	0.2	0.2
12/11/19	Poonam Juneja	emailing team re JP sending wrong version of doc	0.1	0.1
12/11/19	Poonam Juneja	reviewing defendants' settlement proposal	1.1	1.1
12/11/19	Poonam Juneja	reviewing IL email re conversation with KR	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
12/11/19	Poonam Juneja	reviewing MEK email re critical incident reports re overnight stays and emailing team re same	0.2	0.2
12/11/19	Poonam Juneja	reviewing settlement draft and emailing FP LW with revision and new version	0.5	0.5
12/12/19	Poonam Juneja	reviewing hot docs from OT	0.1	0.1
12/12/19	Poonam Juneja	reviewing new DCF policy manual and circulating to team	0.3	0.3
12/12/19	Poonam Juneja	review policy docs located by KS and emailing her re same	0.3	0.3
12/12/19	Poonam Juneja	co-counsel call re preparing for sunday's mediation	0.4	0.4
12/12/19	Poonam Juneja	call with possible expert PF	1.5	1.5
12/12/19	Poonam Juneja	selecting and compiling hot docs for mediation purposes and circulating to team	1.8	1.8
12/13/19	Poonam Juneja	Confer with FP re: discovery correspondence and MTD	0.1	0.1
12/13/19	Poonam Juneja	reviewing draft letter re targeted discovery on MTD	0.2	0.2
12/13/19	Poonam Juneja	emailing with LBB MN re attendance at mediation	0.1	0.1
12/13/19	Poonam Juneja	reviewing DA hot doc email re underlying causes for placement instability	0.1	0.1
12/13/19	Poonam Juneja	locating hot docs for mediation purposes and sharing with team	0.4	0.4
12/16/19	Poonam Juneja	exchanging messages with FP re possible settlement provisions	0.5	0.5
12/17/19	Poonam Juneja	reviewing team emails re neutral/mediator and responding	0.2	0.2
12/17/19	Poonam Juneja	reviewing team emails re: revisions to settlement draft	0.9	0.9
12/17/19	Poonam Juneja	Confer with FP re: letter re: targeted discovery for motion to dismiss	0.1	0.1
12/17/19	Poonam Juneja	revising settlement proposal draft	0.4	0.4
12/17/19	Poonam Juneja	revising draft motion for stay	0.7	0.7
12/18/19	Poonam Juneja	Team call, including re: mediation, discovery, and motion to stay	0.8	0.8
12/18/19	Poonam Juneja	Confer with FP re updated settlement draft	0.5	0.5
12/18/19	Poonam Juneja	Call with FP re: settlement draft and discovery letter	0.3	0.3
12/18/19	Poonam Juneja	Call with FP re: motion to stay and proposed order	0.1	0.1
12/18/19	Poonam Juneja	Call with FP re: settlement draft, motion, and proposed order	0.3	0.3
12/18/19	Poonam Juneja	revising settlement proposal draft	0.4	0.4
12/18/19	Poonam Juneja	call with FP re settlement proposal revision	0.4	0.4
12/18/19	Poonam Juneja	call with MN re settlement proposal revision	0.2	0.2
12/18/19	Poonam Juneja	call with LW re settlement proposal revision	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
12/19/19	Poonam Juneja	reviewing team emails with C. Josserand re missing production	0.1	0.1
12/19/19	Poonam Juneja	reviewing team emails re communciations with JP Bradshaw	0.2	0.2
12/20/19	Poonam Juneja	reviewing team emails re motion to stay etc	0.2	0.2
12/20/19	Poonam Juneja	reviewing JC email re DCF_PROD_06	0.1	0.1
12/20/19	Poonam Juneja	reviewing FP email re KC Star videos and responding	0.1	0.1
12/20/19	Poonam Juneja	reviewing emails with govt re discovery stay and ADR report and attachments	0.3	0.3
12/23/19	Poonam Juneja	reviewing email summary re conference with Judge Birzer and team responses	0.2	0.2
12/27/19	Poonam Juneja	reviewing KR email re mediation scheduling	0.1	0.1
1/5/20	Poonam Juneja	reviewing settlement draft proposal and emailing feedback to LW/FP	0.8	0.8
1/6/20	Poonam Juneja	Call with co-counsel team re: draft integrated settlement agreement	1.4	1.4
1/6/20	Poonam Juneja	revising draft settlement proposal	1.1	1.1
1/7/20	Poonam Juneja	With FP, revise settlement drft	0.2	0.2
1/7/20	Poonam Juneja	Confer with FP re: revising settlement draft	0.1	0.1
1/7/20	Poonam Juneja	call with defs and judy meltzer re possible role	0.9	0.9
1/7/20	Poonam Juneja	revising draft settlement proposal	3.1	3.1
1/7/20	Poonam Juneja	Meeting with LW and FP re: mediation draft and correspondence re: jurisdictional discovery and motion to dismiss	0.4	0.4
1/8/20	Poonam Juneja	reviewing team emails re neutral and mediator next steps	0.2	0.2
1/8/20	Poonam Juneja	Confer with FP re: correspondence re: 12(b)(1) discovery	0.3	0.3
1/8/20	Poonam Juneja	Confer with FP re: named plaintiff file review	0.1	0.1
1/8/20	Poonam Juneja	revising draft settlement proposal and cover email	1.5	1.5
1/8/20	Poonam Juneja	Meeting with FP re mediation dates	0.1	0.1
1/8/20	Poonam Juneja	meeting with FP re settlement draft revisions and mediation dates	0.5	0.5
1/8/20	Poonam Juneja	call with FP IL re setting draft revisions	0.1	0.1
1/8/20	Poonam Juneja	meeting with FP re discovery letter	0.4	0.4
1/8/20	Poonam Juneja	reviewing and revising discovery letter and related correspondence	1.1	1.1
1/9/20	Poonam Juneja	phone call with TW re gov discovery issues	0.2	0.2
1/9/20	Poonam Juneja	second phone call with TW re gov discovery issue and reframing	0.1	0.1
1/9/20	Poonam Juneja	phone call with EG re MTD and discovery	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
1/9/20	Poonam Juneja	Confer with FP re: correspondence re: 12(b)(1) discovery & change of address notice for D. Kansas	0.4	0.4
1/9/20	Poonam Juneja	revising 12b1 discovery letter including drafting search terms	2.1	2.1
1/10/20	Poonam Juneja	phone call with MN re discovery issues	0.7	0.7
1/10/20	Poonam Juneja	confer with LW re discovery issues	0.2	0.2
1/10/20	Poonam Juneja	reviewing discoveryr letter revisions and emails re same	0.4	0.4
1/10/20	Poonam Juneja	Confer with FP re: possible further edits to 12(b)(1) discovery letter	0.1	0.1
1/12/20	Poonam Juneja	reviewing LW email re lack of response from Defs	0.1	0.1
1/12/20	Poonam Juneja	Met with KS re: doc review - issue review	0.2	0.2
1/13/20	Poonam Juneja	Confer with FP and LW re: mediation status	0.1	0.1
1/13/20	Poonam Juneja	reviewing JP Bradshaw email and team responses re same	0.2	0.2
1/14/20	Poonam Juneja	reviewing CJ email re discovery related to 12b1 motion and team emails re same	0.3	0.3
1/14/20	Poonam Juneja	reviewing and responding to team emails re mediation strategy	0.3	0.3
1/15/20	Poonam Juneja	Team call, including re: mediation strategy, jurisdictional discovery, and discovery planning in advance of stay pending settlement discussions	1.1	1.1
1/15/20	Poonam Juneja	Follow up discussion re: team call with LW FP	0.1	0.1
1/15/20	Poonam Juneja	reviewing IL email re strategy and emailing FP LW re same	0.2	0.2
1/15/20	Poonam Juneja	reviewing KR email re scheduling	1.0	1.0
1/15/20	Poonam Juneja	emailing MF re discovery tasks	0.2	0.2
1/15/20	Poonam Juneja	meeting with FP re discovery strategy/plan and next steps	1.2	1.2
1/15/20	Poonam Juneja	drafting discovery plan	1.1	1.1
1/16/20	Poonam Juneja	Call with FP and DLA Piper team re: next steps for discovery and division of labor	0.4	0.4
1/16/20	Poonam Juneja	follow up email to Meg re discovery next steps	0.1	0.1
1/16/20	Poonam Juneja	Follow up discussion with FP re: next steps for discovery	0.1	0.1
1/16/20	Poonam Juneja	review and respond re draft email to Ds re gov discovery	0.1	0.1
1/16/20	Poonam Juneja	continuing to draft discovery plan	2.1	2.1
1/21/20	Poonam Juneja	Confer with LW FP re: neutrals, mediation, and discovery planning	0.2	0.2
1/21/20	Poonam Juneja	reviewing CR timeline for MTD opp	0.1	0.1
1/22/20	Poonam Juneja	reviewing Megan email re discovery task division and emailing LW MN FP re same	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
1/22/20	Poonam Juneja	Confer with FP re: case planning and document review	0.1	0.1
1/23/20	Poonam Juneja	Team call, including re: mediation and discovery planning	1.1	1.1
1/23/20	Poonam Juneja	reviewing team emails re defendants missing of settlement process deadlines and possible emails to them	0.3	0.3
1/23/20	Poonam Juneja	reviewing JP email and attached revised agreement and team emails re same	1.3	1.3
1/23/20	Poonam Juneja	Confer with FP re: team call agenda and discovery planning	0.1	0.1
1/23/20	Poonam Juneja	confer with FP re agenda for team call	0.2	0.2
1/24/20	Poonam Juneja	reviewing SD email re consent decree conf and defendant state of mind and emailing re same	0.3	0.3
1/24/20	Poonam Juneja	Confer with FP re: discovery planning	0.1	0.1
1/24/20	Poonam Juneja	Confer with FP re: Defendants' revisions to settlement agreement draft	0.2	0.2
1/25/20	Poonam Juneja	reviewing Martha email re DHS budget narrative and attachment	0.3	0.3
1/25/20	Poonam Juneja	reviewing IL and KR emails re plaintiffs' only mediation call	0.1	0.1
1/27/20	Poonam Juneja	reviewing iL email re internal guide for mediation call with Kevin and with Ds	0.1	0.1
1/27/20	Poonam Juneja	emailing with MN re motion to seal for MTD opp	0.1	0.1
1/27/20	Poonam Juneja	Confer with FP re: motion to seal for MTD opposition	0.1	0.1
1/27/20	Poonam Juneja	confer with LW FP re settlement negotiations next steps	0.2	0.2
1/27/20	Poonam Juneja	reviewing and revising draft opp to MTD	1.6	1.6
1/28/20	Poonam Juneja	reviewing and revising draft opp to MTD	0.8	0.8
1/28/20	Poonam Juneja	reviewing IL's mediation guide	0.7	0.7
1/29/20	Poonam Juneja	Team call, including re: mediation and opposition to motion to dismiss	0.8	0.8
1/29/20	Poonam Juneja	Confer with FP re: mediation strategy	0.1	0.1
1/29/20	Poonam Juneja	Confer with FP re: opposition to motion to dismiss	0.1	0.1
1/29/20	Poonam Juneja	reviewing and revising draft opp to MTD	2.2	2.2
1/29/20	Poonam Juneja	reviewing settlement proposal response and analysis	0.5	0.5
1/29/20	Poonam Juneja	Plaintiffs' call with mediator Kevin Ryan	0.4	0.4
1/29/20	Poonam Juneja	reviewing emails re MTD opp exhibits	0.2	0.2
1/30/20	Poonam Juneja	Confer with FP re: document review	0.3	0.3
1/30/20	Poonam Juneja	reviewing emails re MTD opp exhibits	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
1/30/20	Poonam Juneja	reviewing and responding to team emails about office stays spreadsheet located in doc review	0.3	0.3
1/30/20	Poonam Juneja	reviewing DCF's latest production and emailing team re hot doc located in same	4.9	4.9
1/30/20	Poonam Juneja	emailing PC re second pass on documents produced by defendants	0.2	0.2
1/31/20	Poonam Juneja	following up with PC re second pass on documents produced by defendants	0.1	0.1
1/31/20	Poonam Juneja	drafting timeline with all discovery/case tasks and division of responsibility	2.1	2.1
1/31/20	Poonam Juneja	review and respond to emails from FP re spreadsheet produced re: office stays	0.2	0.2
1/31/20	Poonam Juneja	Confer with FP about evidence chart and discovery planning	0.2	0.2
1/31/20	Poonam Juneja	Confer with FP re: case planning, case schedule, and document review protocol	0.9	0.9
1/31/20	Poonam Juneja	phone call with PC re document review panel/batches and emailing PC following up on same	1.2	1.2
2/1/20	Poonam Juneja	reviewing feedback on MTD opp circulated by LW	0.4	0.4
2/3/20	Poonam Juneja	correspondence with PC JC re document review batches and reviewing same in relativity	0.4	0.4
2/3/20	Poonam Juneja	Confer with LW FP re: mediation strategy, opposition to motion to dismiss, and discovery planning	0.5	0.5
2/4/20	Poonam Juneja	reviewing MN thoughts on case timeline and task division	0.4	0.4
2/4/20	Poonam Juneja	emailing PC JC re addition to review panel	0.2	0.2
2/4/20	Poonam Juneja	sharing law clerk RM review docs with MN	0.2	0.2
2/4/20	Poonam Juneja	review FP email re relativity doc review panel	0.1	0.1
2/4/20	Poonam Juneja	Confer with FP re: case schedule and discovery planning	0.5	0.5
2/4/20	Poonam Juneja	Call with MN FP re: case schedule and discovery planning	0.5	0.5
2/5/20	Poonam Juneja	Team call, including re: mediation, discovery, and oppositon to motion to dismiss	0.7	0.7
2/5/20	Poonam Juneja	creating initial division of doc review by team and emailing team re same	0.5	0.5
2/5/20	Poonam Juneja	Discovery call, including re: document review protocol	1.1	1.1
2/5/20	Poonam Juneja	Confer with FP re: document review planning	0.1	0.1
2/5/20	Poonam Juneja	updating general doc review protocol, verifying review panel in relativity, and circulating to team	1.1	1.1
2/6/20	Poonam Juneja	reviewing team emails re filing opposition	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
2/6/20	Poonam Juneja	emailing IL LW re draft case planning timeline	0.4	0.4
2/6/20	Poonam Juneja	emailing MF re MJ doc review	0.2	0.2
2/7/20	Poonam Juneja	reviewing team emails re mediation updates and notes	0.4	0.4
2/7/20	Poonam Juneja	emailing with PC re updates to doc review panel	0.2	0.2
2/7/20	Poonam Juneja	emailing team re doc review procedures	0.1	0.1
2/7/20	Poonam Juneja	doc review for DCF docs and noting issues re same	3.1	3.1
2/7/20	Poonam Juneja	correspondence with FP re mediation updates	0.3	0.3
2/7/20	Poonam Juneja	reviewing public data on DCF website flagged during mediation, including re sibling placements	0.3	0.3
2/7/20	Poonam Juneja	emailing with MF re documents to review in MJ files	0.3	0.3
2/8/20	Poonam Juneja	reviewing LBB email re stakeholder communication from parent	0.2	0.2
2/8/20	Poonam Juneja	reviewing team emails re mediation strategy	0.3	0.3
2/9/20	Poonam Juneja	reviewing team emails and linked article re Laura Howard public statements re human services agency restructuring	0.2	0.2
2/10/20	Poonam Juneja	emailing with MN re the latest settlement draft	0.2	0.2
2/10/20	Poonam Juneja	reviewing team emails re timing for next mediation session	0.1	0.1
2/10/20	Poonam Juneja	doc review of DCF produced documents and simultaneously creating follow up research list based on same	3.4	3.4
2/11/20	Poonam Juneja	Doc review of DCF produced docs	2.3	2.3
2/11/20	Poonam Juneja	emailing LW re task list and timeline	0.1	0.1
2/11/20	Poonam Juneja	calling MN and leaving voicemail re MTD opp	0.1	0.1
2/11/20	Poonam Juneja	reviewing draft MTD opp, reading underlying cases, revising, and emailing LW FP with thoughts and revisions	2.3	2.3
2/11/20	Poonam Juneja	phone call with EG re feedback on draft MTD opp	0.5	0.5
2/11/20	Poonam Juneja	emailing with MN re task list and task deadlines	0.1	0.1
2/12/20	Poonam Juneja	co-counsel call re opp to MTD, mediation updates and next steps	1.0	1.0
2/12/20	Poonam Juneja	emailing with MN re discovery call	0.1	0.1
2/12/20	Poonam Juneja	conferring with FP re agenda for team call, discovery schedule, MTD opp	0.3	0.3
2/12/20	Poonam Juneja	conferring with KS re doc review and tagging	0.7	0.7

Date	Name	Description	Time Billed	With Travel at 50%
2/12/20	Poonam Juneja	reviewing FP/LW edits on MTD opp and emailing with FP re same	0.5	0.5
2/12/20	Poonam Juneja	reviewing NT email re motion to seal and responding to same	0.2	0.2
2/12/20	Poonam Juneja	reviewing and responding to team email re media on opp to MTD	0.1	0.1
2/13/20	Poonam Juneja	reviewing and responding to team emails re finalizing MTD opp	0.1	0.1
2/13/20	Poonam Juneja	reviewing MN email re MTD opp and updated draft settlement agreement and team responses	0.2	0.2
2/13/20	Poonam Juneja	preparing follow up email from team call yesterday	0.2	0.2
2/13/20	Poonam Juneja	circulating case timeline with tasks for discovery and other items	0.3	0.3
2/14/20	Poonam Juneja	Confer with FP re: further edits to settlement draft	0.3	0.3
2/14/20	Poonam Juneja	Email correspondence with team re: recusal & newly assigned judge	0.1	0.1
2/14/20	Poonam Juneja	phone call with MN re language re settlement provision package	0.4	0.4
2/14/20	Poonam Juneja	reviewing draft settlement proposal and doc requests and responding to team emails re same	1.4	1.4
2/17/20	Poonam Juneja	reviewing JP Bradshaw email re dates for mediation	0.1	0.1
2/17/20	Poonam Juneja	reviewing team emails re Jean Paul email re extension request and replying re same	0.1	0.1
2/18/20	Poonam Juneja	DCF document review	2.4	2.4
2/18/20	Poonam Juneja	reviewing TW email re potential witness pediatrician and gov budget and discussing same with FP	0.3	0.3
2/18/20	Poonam Juneja	Confer with FP KS re: Kansas document production and tagging	0.5	0.5
2/19/20	Poonam Juneja	Team call, including re: mediation, discovery, budget process, and potential witnesses	1.0	1.0
2/19/20	Poonam Juneja	reviewing draft agenda from FP	0.1	0.1
2/19/20	Poonam Juneja	Discovery call, including re: document review and new tags	0.3	0.3
2/19/20	Poonam Juneja	reviewing relativity review panel and emailing PC re changes to same	0.2	0.2
2/20/20	Poonam Juneja	reviewing chart of potential experts and conferring with FP re same	0.2	0.2
2/20/20	Poonam Juneja	reviewing FP email notes re practice improvement 6 and crossover youth	0.2	0.2
2/24/20	Poonam Juneja	reviewing team emails re settlement package proposal	0.4	0.4
2/24/20	Poonam Juneja	doc review of KDADS produced documents	1.5	1.5
2/24/20	Poonam Juneja	reviewing relativity review panel and emailing PC re changes to same	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
2/24/20	Poonam Juneja	reviewign notes from Friday's pre-mediation prep call	0.2	0.2
2/24/20	Poonam Juneja	reviewing and responding re draft motion for extension of time	0.1	0.1
2/25/20	Poonam Juneja	reviewing and responding to team communications and questions re mediation issues	1.1	1.1
2/25/20	Poonam Juneja	messaging with FP re settlement negotiation positions	0.7	0.7
2/25/20	Poonam Juneja	finishing drafting and circulating MCO subpoenas	1.5	1.5
2/25/20	Poonam Juneja	reviewing RFPs and starting list of possible search terms for ESI search and custodians	0.5	0.5
2/26/20	Poonam Juneja	reviewing email communications with Ds re settlement	0.2	0.2
2/26/20	Poonam Juneja	emailing with MN FP re: data shared in mediation	0.2	0.2
2/26/20	Poonam Juneja	reviewing team internal mediation proposal re outcome 10 and communicating thoughts to FP	0.3	0.3
2/26/20	Poonam Juneja	Discovery committee/Kansas doc review call with NCYL (PJ), CR, and DLA	0.4	0.4
2/26/20	Poonam Juneja	updatng doc review protocol and emailing doc reviewers	0.3	0.3
2/26/20	Poonam Juneja	reviewing notes from FP re mediation	0.4	0.4
2/26/20	Poonam Juneja	emailing DA re doc review	0.1	0.1
2/26/20	Poonam Juneja	drafting ESI search terms for first set of RFPs	2.1	2.1
2/27/20	Poonam Juneja	email with MF re plaintiff age and legal claim	0.2	0.2
2/27/20	Poonam Juneja	drafting ESI search terms for first set of RFPs	4.3	4.3
2/27/20	Poonam Juneja	reviewing draft clean settlement offer and team emails re same	0.3	0.3
2/28/20	Poonam Juneja	phone call with MF re document review for general discovery	0.5	0.5
2/28/20	Poonam Juneja	continuing to draft ESI search terms and custodian lists and circulating to team	3.1	3.1
2/28/20	Poonam Juneja	exchanging emails with JK EG MN re email search terms	0.3	0.3
2/28/20	Poonam Juneja	Discuss proposed edits to draft search terms, rogs, third party subpoena to MCOs, RFPs, and 30b6 letter with FP	0.2	0.2
2/28/20	Poonam Juneja	revising letter re 30b6 depos, responses to defs' objections to first set of rfps, plaintiffs second rfp to dcf, and pltf's first rogs to dcf, and sending to LW	2.4	2.4
2/28/20	Poonam Juneja	Confer with FP re: discovery plan	0.2	0.2
2/28/20	Poonam Juneja	review team emails re foster care educational outcomes bill	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
2/29/20	Poonam Juneja	reviewing and responding to LW's edits on the 30b6 letter	0.4	0.4
3/1/20	Poonam Juneja	reviewing and responding to team emails re golden rule letter, rfps/rogs,etc	0.8	0.8
3/2/20	Poonam Juneja	reviewing updated responses to responses to first set of RFPs and sending nits; email correspondence re same	0.6	0.6
3/2/20	Poonam Juneja	reviewing JK edits on ESI search terms and emailing team re same	0.6	0.6
3/2/20	Poonam Juneja	exchanging emails with MN re responses to Defs responses and objections	0.2	0.2
3/3/20	Poonam Juneja	reviewign KS email re summary of Batch-DCF-Issue Review-00017	0.2	0.2
3/4/20	Poonam Juneja	co-counsel meeting re mediation, ESI, third party discovery, stakeholder/local updates	0.8	0.8
3/4/20	Poonam Juneja	reviewing and resopnding to email re doc review batches	0.2	0.2
3/4/20	Poonam Juneja	phone call with MN re third party discovery and case staffing	0.7	0.7
3/4/20	Poonam Juneja	reviewing ESI agreement forwarded by MN and responding to same	0.3	0.3
3/4/20	Poonam Juneja	phone call with JK re ESI search terms	1.0	1.0
3/4/20	Poonam Juneja	revising ESI search terms following phone call with JK	1.2	1.2
3/4/20	Poonam Juneja	locate registered agent information for MCOs	0.3	0.3
3/4/20	Poonam Juneja	reviewing MN email re third party subpoenas	0.1	0.1
3/5/20	Poonam Juneja	emailing LW re staffing for third party discovery/ESI	0.5	0.5
3/5/20	Poonam Juneja	further revising ESI search terms	0.6	0.6
3/5/20	Poonam Juneja	drafting cover letter to state re ESI search terms	1.5	1.5
3/5/20	Poonam Juneja	creating search terms lists for plaintiffs SE and MB	2.1	2.1
3/5/20	Poonam Juneja	reviewing email summary of contact from grandmother about experiences of grandchild in DCF custody	0.2	0.2
3/6/20	Poonam Juneja	reviewing team emails re cw advocate stakeholder contact	0.2	0.2
3/6/20	Poonam Juneja	incorporating JK plaintiff search term lists	0.3	0.3
3/6/20	Poonam Juneja	further revising email search terms and circulating to team for feedback	0.7	0.7
3/6/20	Poonam Juneja	revising expert chart and sending to LW with cover note	0.4	0.4
3/9/20	Poonam Juneja	reviewing email re data from DCF website	0.1	0.1
3/9/20	Poonam Juneja	emailing MN re discovery review batches	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
3/9/20	Poonam Juneja	revising search terms to incorporate team feedback and responding to comments; emailing team re same	2.2	2.2
3/9/20	Poonam Juneja	doc review of DCF produced documents	3.5	3.5
3/10/20	Poonam Juneja	call with MN re various discovery matters	1.0	1.0
3/10/20	Poonam Juneja	incorporating MF revisions into ESI search terms	0.3	0.3
3/10/20	Poonam Juneja	incorporating additional thoughts into expert table and circulating to team	0.2	0.2
3/10/20	Poonam Juneja	reviewing team emails re gov and negotiation issues	0.2	0.2
3/10/20	Poonam Juneja	reviewing emails re possible expert	0.1	0.1
3/10/20	Poonam Juneja	summarizing hot docs from dcf file review	0.7	0.7
3/11/20	Poonam Juneja	co-counsel call re experts, settlement negotiations, discovery	1.0	1.0
3/11/20	Poonam Juneja	emailing TW re third party subpoena to contractor	0.1	0.1
3/11/20	Poonam Juneja	emailing team re discovery batch assignments	0.2	0.2
3/11/20	Poonam Juneja	reviewing LW feedback on ESI search terms and cover note and incorporating feedback into same	1.1	1.1
3/11/20	Poonam Juneja	emailing with MF re revisions to ESI search terms for named plaintiff	0.4	0.4
3/11/20	Poonam Juneja	creating agenda for team call, including by reviewing email correspondence and case file, and circulating to team	0.4	0.4
3/11/20	Poonam Juneja	emailing with LW re def responsibility to file ADR report and source of requirement	0.2	0.2
3/11/20	Poonam Juneja	reviewing KS hot docs from Batch-DCF-Issue Review-00019	0.3	0.3
3/12/20	Poonam Juneja	phone call with NT MN re production deficiency letter and issues	0.5	0.5
3/12/20	Poonam Juneja	reviewing MF email re question about named plaintiff's adoptive brother	0.1	0.1
3/12/20	Poonam Juneja	emailing with JK re additional search terms for VA, ZZ, and BB, and incorporating into search terms	0.3	0.3
3/12/20	Poonam Juneja	further revising search terms and adding new terms for named plaintiffs	3.1	3.1
3/12/20	Poonam Juneja	reviewing and checking MN list of deadlines from last few letters and discovery served	0.3	0.3
3/12/20	Poonam Juneja	reviewing emails re ADR report and responding	0.1	0.1
3/13/20	Poonam Juneja	Meeting with KS re: discovery task allocation and plans	0.2	0.2
3/13/20	Poonam Juneja	reviewing emails re ADR report	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
3/13/20	Poonam Juneja	reviewing NT email re docs for deficiency letter	0.1	0.1
3/13/20	Poonam Juneja	co-counsel call re discovery projects status and next steps	0.4	0.4
3/13/20	Poonam Juneja	revising draft of third rfp to DCF and sending to LW with cover note	0.5	0.5
3/13/20	Poonam Juneja	reviewing comments from Gina Trimarco re ESI search terms and cover letter, exchanging emails re same, and incorporating feedback into documents	3.3	3.3
3/16/20	Poonam Juneja	phone call with EG re ESI search terms	0.4	0.4
3/16/20	Poonam Juneja	reviewing D. Kan. Covid administrative order	0.1	0.1
3/17/20	Poonam Juneja	conferring with KS re doc review and tagging	0.2	0.2
3/17/20	Poonam Juneja	reviewing EG notes re call with with possible expert	0.1	0.1
3/17/20	Poonam Juneja	reviewing team emails re tone for letter to defs re 30b6 depositions	0.2	0.2
3/18/20	Poonam Juneja	co-counsel call re discovery updates, coronavirus issues, experts, local/stakeholder updates	0.9	0.9
3/18/20	Poonam Juneja	edits on third set of RFPs and reviewing related ESI docs	0.3	0.3
3/18/20	Poonam Juneja	conferring with LW re agenda for team call	0.1	0.1
3/18/20	Poonam Juneja	emailing with LW MN explaining reasoning regarding certain approaches to ESI search terms and revisions	0.9	0.9
3/18/20	Poonam Juneja	incorporating feedback into ESI search terms and cover note, and circulating to full team for final feedback	0.9	0.9
3/18/20	Poonam Juneja	revising cover note for ESI search terms in line with team call and recirculating	0.3	0.3
3/18/20	Poonam Juneja	emailing with MN re doc review next steps	0.2	0.2
3/18/20	Poonam Juneja	creating agenda for team call, including by reviewing email correspondence and case file, and circulating to team	0.3	0.3
3/19/20	Poonam Juneja	reviewing and revising covid letter to defendants	0.2	0.2
3/19/20	Poonam Juneja	reviewing team edits on ESI search terms doc and emailing LW re same	0.3	0.3
3/19/20	Poonam Juneja	emailing with MN re draft set of RFPs	0.1	0.1
3/20/20	Poonam Juneja	Discovery call, including re: doc review updates and next steps	0.3	0.3
3/20/20	Poonam Juneja	reviewing GT revision to ESI search terms doc and emailing re same	0.2	0.2
3/20/20	Poonam Juneja	emailing team re discovery tasks and hot docs circulation	0.2	0.2
3/20/20	Poonam Juneja	emailing with MF MN re discovery projects and next steps	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
3/20/20	Poonam Juneja	updating and circulating to team file maintenance and expert communications protocol	0.3	0.3
3/20/20	Poonam Juneja	reviewing draft letter re follow up on 30b6 depositions	0.2	0.2
3/20/20	Poonam Juneja	reviewing SD email re contact with next friend Ed Bigus	0.1	0.1
3/20/20	Poonam Juneja	incorporating additional feedback into ESI letter and search term doc and circulating to team	0.5	0.5
3/22/20	Poonam Juneja	reviewing KS email with high level overview of Batch-DCF-Issue Review-00002 hot docs	0.1	0.1
3/23/20	Poonam Juneja	reviewing KS email with detailed summary of Batch-DCF-Issue Review-00002 hot docs	0.4	0.4
3/23/20	Poonam Juneja	emailing team re ESI search terms and cover letter	0.2	0.2
3/23/20	Poonam Juneja	Confer with FP re case status and discovery tasks	0.2	0.2
3/24/20	Poonam Juneja	reviewing redline of 3rd set of RFPs	0.2	0.2
3/24/20	Poonam Juneja	reviewing docs shared by MN re named plaintiffs no longer fitting class definition	0.2	0.2
3/24/20	Poonam Juneja	reviewing team correspondence re draft email re discovery and covid delays and responding re same	0.2	0.2
3/24/20	Poonam Juneja	phone call with MN Meg re discovery projects	0.8	0.8
3/24/20	Poonam Juneja	reviewing team emails re discovery related to covid	1.0	1.0
3/25/20	Poonam Juneja	Team call, including re: COVID-19 response, discovery disputes, and experts	0.7	0.7
3/25/20	Poonam Juneja	putting together draft agenda for counsel call, including by reviewing email correspondence and case file, and messaging with FP re same	0.2	0.2
3/25/20	Poonam Juneja	emailing TW re revisions on contractor subpoena	0.1	0.1
3/25/20	Poonam Juneja	Review LW draft letter re: COVID-19 response and emailing re same	0.1	0.1
3/26/20	Poonam Juneja	reviewing state response to golden rule letter	0.5	0.5
3/27/20	Poonam Juneja	emailing team re discovery call including re next steps on discovery doc review	0.1	0.1
3/30/20	Poonam Juneja	Confer with L. Welch and P. Juneja re: COVID-19 response letter, experts, and discovery	0.2	0.2
4/1/20	Poonam Juneja	Team call, including re: COVID-19 response, discovery, experts, and named plaintiffs	0.8	0.8

Date	Name	Description	Time Billed	With Travel at 50%
4/1/20	Poonam Juneja	reviewing JP Bradshaw email re covid discovery delay request and team emails re same	0.4	0.4
4/1/20	Poonam Juneja	initial review of DCF discovery responses	1.1	1.1
4/1/20	Poonam Juneja	reviewing CR list of deadlines Ds have missed	0.3	0.3
4/1/20	Poonam Juneja	reviewing CR hot docs found in latest doc review	0.4	0.4
4/1/20	Poonam Juneja	locating covid KDADS waiver document and sharing with JK	0.2	0.2
4/1/20	Poonam Juneja	reviewing draft agenda for team meeting and responding	0.1	0.1
4/2/20	Poonam Juneja	Confer with FP re: proposed response to J.P. Bradshaw email re: discovery deadlines	0.1	0.1
4/2/20	Poonam Juneja	Confer with FP re: draft discovery deficiencies letter	0.1	0.1
4/2/20	Poonam Juneja	reviewing 4th set of RFPs to DCF and providing feedback	0.4	0.4
4/2/20	Poonam Juneja	summarizing hot docs	0.5	0.5
4/2/20	Poonam Juneja	conferring with KS re hot docs from doc review	0.4	0.4
4/3/20	Poonam Juneja	Team call, including re: COVID-19 response, discovery, and Next Friend Kathryn Ashburn	1.0	1.0
4/3/20	Poonam Juneja	Confer with LW PJ re: discovery strategy and next steps	0.3	0.3
4/3/20	Poonam Juneja	Confer with FP re: proposed revisions to draft letter re: production deficiencies	0.1	0.1
4/3/20	Poonam Juneja	making suggestions on draft production deficiency letter, incorporating FP edits, and circulating to team with cover note including bates numbers for docs with issues	0.9	0.9
4/3/20	Poonam Juneja	reviewing cover email and making suggested edits	0.2	0.2
4/3/20	Poonam Juneja	call with MN re discovery next steps	0.3	0.3
4/3/20	Poonam Juneja	Discovery call, including re: hot documents and draft letter re production deficiencies	0.3	0.3
4/4/20	Poonam Juneja	reviewing IL email re expert issue	0.1	0.1
4/6/20	Poonam Juneja	drafting notice re third party subpoenas	0.6	0.6
4/6/20	Poonam Juneja	locating third party agent info and incorporating into subpoena draft	0.4	0.4
4/6/20	Poonam Juneja	Confer with FP re: service of third party subpoenas	0.3	0.3
4/7/20	Poonam Juneja	phone call with MN re evidence organization and doc review	0.6	0.6
4/7/20	Poonam Juneja	analyzing and sending MN useful pieces of MO fees decision	0.2	0.2
4/7/20	Poonam Juneja	reviewing third party subpoena to contractors	0.5	0.5
4/7/20	Poonam Juneja	Confer with FP re: service of third party subpoenas	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
4/7/20	Poonam Juneja	Confer with FP re: case schedule	0.2	0.2
4/7/20	Poonam Juneja	Confer with LW FP re: discovery meet and confer	0.1	0.1
4/8/20	Poonam Juneja	co-counsel call re meet and confer with Ds, discovery issues, next friend/client updates, experts, local updates	1.0	1.0
4/8/20	Poonam Juneja	emailing MN with useful pieces of MO fees decision	0.2	0.2
4/8/20	Poonam Juneja	reviewing and responding to emails re scheduling meet and confer with Defendants re discovery	0.1	0.1
4/9/20	Poonam Juneja	reviewing follow up items from counsel call and adding to to-do list	0.2	0.2
4/9/20	Poonam Juneja	Confer with LW FP re: next steps for discovery, including third party subpoenas and document review	0.1	0.1
4/10/20	Poonam Juneja	reviewing and responding to emails re contact possible new next friend	0.2	0.2
4/10/20	Poonam Juneja	finalizing and filing third party subpoenas	0.4	0.4
4/10/20	Poonam Juneja	Confer with LW FP re: discovery next steps, including third party subpoenas, and meet and confer with Defendants	0.1	0.1
4/10/20	Poonam Juneja	Confer with FP re: filing notices re third party subpoenas	0.1	0.1
4/13/20	Poonam Juneja	updating chart of named plaintiff information and circulating to team with information regarding plaintiffs aging out of care	0.5	0.5
4/13/20	Poonam Juneja	Confer with LW FP re: next steps, including meet and confer on discovery issues, case schedule, experts, and next friends	0.4	0.4
4/13/20	Poonam Juneja	Confer with FP re: strategy for meet and confer re: COVID 19	0.1	0.1
4/13/20	Poonam Juneja	Meet and confer with Defendants re: COVID-19 RFPs	0.7	0.7
4/13/20	Poonam Juneja	reviewing draft follow up email from MN re meet and confer confirmation and responding	0.2	0.2
4/13/20	Poonam Juneja	reviewing MN email re today's meet and confer, agenda, and division of labor, and responding	0.2	0.2
4/14/20	Poonam Juneja	locating plaintiff birth certificate, verifying age, and circulating corrected info to team	0.3	0.3
4/14/20	Poonam Juneja	reviewing JP Bradshaw letter re production issues and messaging with FP re same	0.4	0.4

Date	Name	Description	Time Billed	With Travel at 50%
4/14/20	Poonam Juneja	Confer with LW FP JS re: dismissal of Named Plaintiffs who have turned 18; Named Plaintiff file review; preparing for meet & confer re: discovery disputes; third party subpoena to contractors	0.5	0.5
4/15/20	Poonam Juneja	Team call, including re: discovery meet and confer, Named Plaintiffs aging out, Next Friends, and potential experts	1.2	1.2
4/15/20	Poonam Juneja	reviewing JP Bradshaw re scheduling and Daubert, including attached Crabtree order	0.5	0.5
4/15/20	Poonam Juneja	reviewing team emails re Daubert and schedule, and emailing LW FP re same	0.5	0.5
4/15/20	Poonam Juneja	Confer with FP re: agenda for weekly cocounsel call and plan for discovery meet and confer	0.5	0.5
4/15/20	Poonam Juneja	confer with MN re division of labor re discovery and meet and confer prep	1.0	1.0
4/15/20	Poonam Juneja	email team re prep session for meet and confer	0.1	0.1
4/16/20	Poonam Juneja	reviewing TW draft email re daubert	0.1	0.1
4/16/20	Poonam Juneja	downloading meet and confer prep materials and reviewing	0.8	0.8
4/16/20	Poonam Juneja	Confer with LW FP JS re: case schedule and meet and confer	0.1	0.1
4/16/20	Poonam Juneja	Confer with FP re: Kansas case, including case schedule, discovery status and strategy, and upcoming meet and confer	0.7	0.7
4/16/20	Poonam Juneja	Team call to prepare for 4/17 meet and confer re: discovery issues	1.9	1.9
4/16/20	Poonam Juneja	Confer with FP re: division of labor for case file review	0.1	0.1
4/16/20	Poonam Juneja	creating possible modified schedules to accommodate class cert daubert challenges into case schedule and circulating to team with cover note	3.2	3.2
4/16/20	Poonam Juneja	revising case schedule spreadsheet and recirculating	0.2	0.2
4/17/20	Poonam Juneja	emailing JK re ESI issues	0.1	0.1
4/17/20	Poonam Juneja	reviewing MN outline of meet and confer topics	0.4	0.4
4/17/20	Poonam Juneja	Meet and confer with Defendants re: outstanding discovery disputes	1.5	1.5
4/17/20	Poonam Juneja	emailing MN re Jason Koehn correct name and title	0.1	0.1
4/20/20	Poonam Juneja	Review Defendants' responses and objections to RFPs set 3&4 to DCF, 2 to KDHE, and 2 to KDADS	0.9	0.9
4/20/20	Poonam Juneja	Confer with FP re: Kansas discovery meet and confer	0.2	0.2
4/20/20	Poonam Juneja	Receive and review email correspondence re: Sunflower subpoena	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
4/20/20	Poonam Juneja	Confer with FP re: 4/21/20 meet and confer with Defendants	0.2	0.2
4/20/20	Poonam Juneja	Emailing with LW FP re: preparation, strategy, and staffing for 4/21/20 meet and confer with Defendants re: case schedule, COVID-19, and other outstanding discovery items	0.5	0.5
4/20/20	Poonam Juneja	emailing with MN re preparation for the meet and confer tomorrow	0.3	0.3
4/21/20	Poonam Juneja	Team call to prepare for 4/21 meet and confer with Defendants, including re case schedule, COVID-19-related discovery, and written discovery	0.7	0.7
4/21/20	Poonam Juneja	reviewing meet and confer notes	0.3	0.3
4/22/20	Poonam Juneja	team call re discovery, experts, next friends, etc.	0.9	0.9
4/22/20	Poonam Juneja	reviewing emails re signature on certified receipt and responding	0.1	0.1
4/22/20	Poonam Juneja	reviewing draft agenda and responding	0.1	0.1
4/22/20	Poonam Juneja	Confer with LW PJ JS re: team call for Kansas	0.1	0.1
4/23/20	Poonam Juneja	reviewing revisions to follow up email on meet and confer	0.2	0.2
4/24/20	Poonam Juneja	reviewing TW email re need for motion for extension and adding to task list	0.1	0.1
4/24/20	Poonam Juneja	emailing MN re plaintiff file review	0.2	0.2
4/24/20	Poonam Juneja	Emailing team re: meet and confer with Defendants re: ESI	0.1	0.1
4/24/20	Poonam Juneja	Email correspondence with FP re: next steps and assignments for outstanding discovery tasks	0.2	0.2
4/27/20	Poonam Juneja	email TW JK re communication from Amerigroup	0.1	0.1
4/27/20	Poonam Juneja	mc with defendants re ESI search terms - addressing background issues and DCF terms	1.0	1.0
4/27/20	Poonam Juneja	Confer with LW FP JS re: case file review, ESI meet and confer, and call with Amerigroup re: third party subpoena	0.1	0.1
4/27/20	Poonam Juneja	emailing JK MN FP re items to cover on ESI call	0.3	0.3
4/27/20	Poonam Juneja	phone call with JK to prep for ESI mc with Defs	0.5	0.5
4/28/20	Poonam Juneja	reviewing Defs' provided PDF about RFPs that documents are responsive to and emailing JC re same	0.8	0.8
4/28/20	Poonam Juneja	Emails with FP MN re: Named Plaintiff file review and other outstanding discovery tasks	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
4/28/20	Poonam Juneja	Review contact memo from S. Dixon re: Next Friend	0.1	0.1
4/28/20	Poonam Juneja	Confer with FP re: negotiation on ESI search terms	0.2	0.2
4/28/20	Poonam Juneja	Confer with LW FP JS re: named plaintiff file review, ESI, upcoming deadlines, and experts	0.6	0.6
4/28/20	Poonam Juneja	emailing PC re additions to relativity review panel	0.2	0.2
4/28/20	Poonam Juneja	emailing MN re agenda of items to cover on upcoming ESI meet and confer	0.1	0.1
4/29/20	Poonam Juneja	initial review of Sunflower objections to subpoena	0.5	0.5
4/29/20	Poonam Juneja	Team call, including re: Defendants' productions, third party subpoenas, experts, and Next Friends	1.5	1.5
4/29/20	Poonam Juneja	call with JK MN to prep for ESI meet and confer and discuss issues from Monday call	0.5	0.5
4/29/20	Poonam Juneja	emailing JC with question about overlay for past productions and what to request from Ds	0.2	0.2
4/29/20	Poonam Juneja	reviewing and responding to FP email re contractor definition and draft of subpoena to contractors	0.4	0.4
4/29/20	Poonam Juneja	reviewing FP edits on draft motion to extend time and emailing re same	0.2	0.2
4/29/20	Poonam Juneja	continued mc with defendants re ESI search terms - addressing KDADS, KDHE, and individual plaintiff terms	0.5	0.5
4/29/20	Poonam Juneja	Confer with FP JS re: document review, including Named Plaintiff file review, and preparing for meet and confer with Defendants on 5/1/20	0.1	0.1
4/29/20	Poonam Juneja	review follow up items from team call and add to task list	0.2	0.2
4/29/20	Poonam Juneja	initial review of JK memo re privilege and redaction logs	0.3	0.3
4/30/20	Poonam Juneja	reviewing team emails re Ds schedule proposal	0.1	0.1
4/30/20	Poonam Juneja	responding to LW email re dates in doc review	0.1	0.1
4/30/20	Poonam Juneja	reviewing draft mc agenda circulated by MN	0.2	0.2
4/30/20	Poonam Juneja	reviewing and incorporating FP suggestion re mental health care search terms	0.4	0.4
4/30/20	Poonam Juneja	emailing team re prep session for meet and confer	0.1	0.1
4/30/20	Poonam Juneja	phone call with MN re agenda, division, and prep for upcoming discovery meet and confer with Ds	0.4	0.4
4/30/20	Poonam Juneja	drafting agenda for meet and confer and sending to MN	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
4/30/20	Poonam Juneja	Confer with LW FP re: case schedule	0.1	0.1
5/1/20	Poonam Juneja	Team call, including re: prep for meet and confer with Defendants and discussion of proposed revisions to case schedule	1.3	1.3
5/1/20	Poonam Juneja	Confer with LW FP and JS re: meet and confer with Defendants and third party subpoena to contractors	0.1	0.1
5/1/20	Poonam Juneja	reviewing updated named plaintiff file review protocol	0.2	0.2
5/1/20	Poonam Juneja	emailing JC re excel spreadsheet data overlay and how to phrase request to Ds	0.2	0.2
5/1/20	Poonam Juneja	creating excel spreadsheet for data overlay for Ds production	0.3	0.3
5/1/20	Poonam Juneja	emailing PC re modification to fields in relativity	0.1	0.1
5/1/20	Poonam Juneja	Review Amerigroup response to third party subpoena	0.2	0.2
5/1/20	Poonam Juneja	Confer with F. Pitts re: case schedule	0.7	0.7
5/1/20	Poonam Juneja	Email correspondence re: additions to email to Defendants re; production issues	0.1	0.1
5/1/20	Poonam Juneja	Meet and confer with Defendants re: discovery issues	1.3	1.3
5/1/20	Poonam Juneja	reviewing and responding to email re docs with technical issues	0.2	0.2
5/1/20	Poonam Juneja	reviewing defendants proposed schedule and team emails re same	0.3	0.3
5/4/20	Poonam Juneja	putting together draft case schedule modification for team's review, including comments with questions for team and cover email	3.2	3.2
5/4/20	Poonam Juneja	Review Defendants' settlement proposal	0.3	0.3
5/4/20	Poonam Juneja	Confer with L. Welch, F. Pitts, and J. Strout re: third party subpoena to contractors, named plaintiff file review, settlement proposal, and case schedule	0.2	0.2
5/5/20	Poonam Juneja	reviewign emails re recent document productions loaded onto relativity	0.1	0.1
5/5/20	Poonam Juneja	review email re settlement strategy	0.1	0.1
5/5/20	Poonam Juneja	confer with JS re class certification research project	0.3	0.3
5/5/20	Poonam Juneja	reviewing emails re rescheduling ESI meet and confer and resopnding	0.1	0.1
5/5/20	Poonam Juneja	Confer with L. Welch, F. Pitts, and J. Strout re: document review, settlement strategy, and potential Medicaid experts	0.2	0.2
5/6/20	Poonam Juneja	Team call, including re: case schedule, meet and confer with Defendants, and settlement strategy	1.2	1.2

Date	Name	Description	Time Billed	With Travel at 50%
5/6/20	Poonam Juneja	Confer with L. Welch, J. Strout, and F. Pitts re: settlement strategy, third party discovery, and team meeting	0.2	0.2
5/6/20	Poonam Juneja	updating list of plaintiffs leaving fc custody soon and recirculating to team	0.2	0.2
5/6/20	Poonam Juneja	confer with FP re agenda for team meeting	0.1	0.1
5/6/20	Poonam Juneja	reviewing team emails re communications with community service provider stakeholder	0.1	0.1
5/6/20	Poonam Juneja	reviewing IL email re settlement issues to move forward	0.2	0.2
5/6/20	Poonam Juneja	emailing PC re modification to fields in relativity and checking fields	0.2	0.2
5/7/20	Poonam Juneja	revising proposed case schedule based on team feedback, reviewing for consistency with case management order and local rules, etc, leaving comments for team to review, and circulating to team with cover note	3.1	3.1
5/7/20	Poonam Juneja	reviewing email from JP Bradshaw re IT 30b6 and circulating to team	0.1	0.1
5/7/20	Poonam Juneja	reviewing team emails with draft response letter re settlement negotiations	0.2	0.2
5/7/20	Poonam Juneja	reviewing emails from JS re discovery requests directed to minors and responding	0.2	0.2
5/7/20	Poonam Juneja	exchanging messages with FP re case schedule	0.1	0.1
5/8/20	Poonam Juneja	emailing JC re reproduced KDADS/KDHE documents	0.2	0.2
5/8/20	Poonam Juneja	Meet and confer with Defendants re: discovery issues	0.5	0.5
5/8/20	Poonam Juneja	Confer with FP re: resolving production issues	0.2	0.2
5/8/20	Poonam Juneja	Confer with FP JS re: document review, including review of Named Plaintiff files, and Plaintiffs who have or will age out	0.5	0.5
5/8/20	Poonam Juneja	Discovery committee call, including discussion of document review and responding to Defendants' discovery directed at Named Plaintiffs	0.5	0.5
5/8/20	Poonam Juneja	reviewing and responding to team emails re IT 30b6	0.2	0.2
5/8/20	Poonam Juneja	reviewing CG document regarding holes in covid19 production	0.3	0.3
5/8/20	Poonam Juneja	reviewing hot docts from KDHE_PROD_2	0.3	0.3
5/8/20	Poonam Juneja	Prepare and circulate agenda for meet and confer	0.3	0.3
5/8/20	Poonam Juneja	Prepare clean schedule proposal to share with Defs	0.4	0.4
5/9/20	Poonam Juneja	revising ESI search term response and emailing to team	1.5	1.5
5/9/20	Poonam Juneja	emailing OT re certified receipts for MCO subpoenas	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
5/9/20	Poonam Juneja	texting and emailing MN re revisions on JK's ESI document draft	0.3	0.3
5/9/20	Poonam Juneja	reviewing OT response re certified receipts for MCOs	0.1	0.1
5/10/20	Poonam Juneja	reviewing FP email re difficult to place and placement options workgroups and meeting notes	0.2	0.2
5/11/20	Poonam Juneja	Team call re: response to settlement proposal from Defendants	2.5	2.5
5/11/20	Poonam Juneja	Confer with FP re: settlement and discovery next steps	0.2	0.2
5/11/20	Poonam Juneja	finalizing ESI response and circulating to team	0.3	0.3
5/11/20	Poonam Juneja	revising ESI response and circulating to team	0.3	0.3
5/11/20	Poonam Juneja	reviewing TW email re intake and potential new named plaintiff	0.1	0.1
5/11/20	Poonam Juneja	reviewing and responding to emails with JK and TW re third party subpoenas to MCOs and extensions	0.2	0.2
5/11/20	Poonam Juneja	scheduling emails with Ds regarding ESI meet and confer	0.1	0.1
5/11/20	Poonam Juneja	locating and emailing team re statutory definition of qualified mh professional	0.2	0.2
5/11/20	Poonam Juneja	Review S. Dixon contact memo for Next Friend	0.1	0.1
5/11/20	Poonam Juneja	Review team email correspondence re: responding to settlement proposal from Defendants	0.1	0.1
5/11/20	Poonam Juneja	Review Defendants' settlement proposal and Plaintiffs' previous offer to prepare for team meeting on response	0.5	0.5
5/11/20	Poonam Juneja	Review email re KDADS crisis and exception policy for IDD waiver services	0.2	0.2
5/11/20	Poonam Juneja	review draft settlement response	0.5	0.5
5/11/20	Poonam Juneja	phone call with JK re ESI discovery next steps	0.5	0.5
5/12/20	Poonam Juneja	emailing JC re reproduced KDADS/KDHE documents	0.1	0.1
5/12/20	Poonam Juneja	emailing CJ re obtaining overlays for relativity with required discovery information	0.2	0.2
5/12/20	Poonam Juneja	emailing JK TW re United Healthcare deadline and contact	0.2	0.2
5/12/20	Poonam Juneja	review Appleseed data charts on children in foster care	0.2	0.2
5/12/20	Poonam Juneja	Confer with L. Welch, F. Pitts, and J. Strout re: settlement strategy, third party subpoenas	0.4	0.4
5/12/20	Poonam Juneja	Confer with FP re: settlement strategy	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
5/13/20	Poonam Juneja	Team call, including re: settlement, depositions, and responding to Defendants' discovery requests	1.3	1.3
5/13/20	Poonam Juneja	reviewing LW edits on grantee subpoena draft	0.3	0.3
5/13/20	Poonam Juneja	responding to DA email re United Healthcare subpoena status	0.1	0.1
5/13/20	Poonam Juneja	Reviewing team emails re possible settlement response and looking at drafts of settlement re same	0.4	0.4
5/13/20	Poonam Juneja	Confer with FP re: Defendants' proposed modifications to case schedule	0.1	0.1
5/13/20	Poonam Juneja	Receive and review comments from L. Welch on third party subpoena to contractors; email with FP re same	0.1	0.1
5/13/20	Poonam Juneja	Confer with FP re: agenda for Kansas team meeting	0.2	0.2
5/13/20	Poonam Juneja	Confer with L. Welch, FP, and J. Strout re: response to Defendants' discovery request; settlement strategy; and legal research tasks	0.4	0.4
5/13/20	Poonam Juneja	Receive and review memo from J. King re: defendants' redaction logs and strategy for response	0.2	0.2
5/13/20	Poonam Juneja	reviewing KS emails re Lit Site Access & Protective Order	0.1	0.1
5/13/20	Poonam Juneja	reviewing and revising JS memo re Crabtree class cert decisions	0.5	0.5
5/13/20	Poonam Juneja	reviewing SD email re stakeholder community advocate contact and emailing FP re same	0.2	0.2
5/13/20	Poonam Juneja	reviewing SD email re contact with next friend Ed Bigus re settlement and discovery	0.1	0.1
5/14/20	Poonam Juneja	emailing with LW FP JS re preparation and leading meet and confer with Defendants	0.1	0.1
5/14/20	Poonam Juneja	exchanging text messages with MN re preparation and leading meet and confer with Defendants	0.2	0.2
5/14/20	Poonam Juneja	reviewing JK email correspondence with Aetna re third party subpoena	0.1	0.1
5/14/20	Poonam Juneja	reviewing NT email regarding discovery requests directed to minors and emailing re same	0.4	0.4
5/14/20	Poonam Juneja	reviewing team emails re settlement drafts	0.3	0.3
5/14/20	Poonam Juneja	prepare for ESI meet and confer by reviewing current drafts and correspondence, drafting responses, etc.	0.8	0.8

Date	Name	Description	Time Billed	With Travel at 50%
5/14/20	Poonam Juneja	reviewing CR thoughts on case schedule, reviewing schedule possibilities, and responding	0.5	0.5
5/14/20	Poonam Juneja	emailing team re prep for meet and confer	0.3	0.3
5/15/20	Poonam Juneja	emailing JK re depo prep and thoughts on depo questions	0.2	0.2
5/15/20	Poonam Juneja	emailing team re placement depo start time	0.1	0.1
5/15/20	Poonam Juneja	emailing team re scheduling order updates	0.2	0.2
5/15/20	Poonam Juneja	reviewing materials re covid discovery and draft email to Ds re same and emailing team re same	0.3	0.3
5/15/20	Poonam Juneja	phone call with CG re covid discovery	0.2	0.2
5/15/20	Poonam Juneja	reviewing email and attachmetn with proposed language for 2.1.2 Community Accountability Structure	0.2	0.2
5/15/20	Poonam Juneja	preparing agenda and cover note for discovery m/c with defendants and circulating	0.3	0.3
5/15/20	Poonam Juneja	revising case schedule proposal	0.4	0.4
5/15/20	Poonam Juneja	emailing LW re meet and confer with Defendants	0.2	0.2
5/15/20	Poonam Juneja	preparing for meet and confer with Ds by reviewing prior correspondence, notes from MN, etc.	1.1	1.1
5/15/20	Poonam Juneja	emailing team re Melinda Kline 30b6 depo	0.2	0.2
5/15/20	Poonam Juneja	reviewing and responding to CJ emails regarding ESI issues re Relativity overlay	0.2	0.2
5/15/20	Poonam Juneja	emailing team re scheduling meet and confer	0.1	0.1
5/15/20	Poonam Juneja	meet and confer re ESI	0.5	0.5
5/15/20	Poonam Juneja	Confer with L. Welch, F. Pitts, and J. Strout re: depositions, meet and confer, case schedule, settlement strategy, and third party subpoena	0.5	0.5
5/15/20	Poonam Juneja	Discovery committee call re: document review	0.1	0.1
5/15/20	Poonam Juneja	Meet and confer with Defendants re: discovery issues	0.4	0.4
5/17/20	Poonam Juneja	reviewing team emails re state withholding payments to case management contractors	0.2	0.2
5/17/20	Poonam Juneja	reviewing emails re 30b6 amendment and reviewign current 30b6 notice re same	0.3	0.3
5/18/20	Poonam Juneja	drafting and sending feedback on follow up email to Defendnts	0.2	0.2
5/18/20	Poonam Juneja	reviewing IL email re settlement dates for practice improvements and outcomes	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
5/18/20	Poonam Juneja	reviewing SD email and attached contact memos re contacts with next friends	0.3	0.3
5/18/20	Poonam Juneja	searching online for copies of case management contracts	0.2	0.2
5/18/20	Poonam Juneja	reviewing revised draft of third party subpoena to grantees	0.3	0.3
5/18/20	Poonam Juneja	emailing MN and JK with thoughts for Koehn depo prep	0.3	0.3
5/18/20	Poonam Juneja	phone call with JK re prepping for Koehn depo	1.0	1.0
5/18/20	Poonam Juneja	Review correspondence from C. Josserand re: ESI custodians and emailing team re same	0.3	0.3
5/19/20	Poonam Juneja	Confer with F Pitts re: third party subpoenas to contractors	0.1	0.1
5/19/20	Poonam Juneja	Confer with L. Welch, F. Pitts, and J. Strout re: discovery to Named Plaintiffs, Jason Koehn deposition.	0.2	0.2
5/20/20	Poonam Juneja	Team call, including re: discovery, mediation, and experts	1.1	1.1
5/20/20	Poonam Juneja	reviewing DCF012189 – DCF012211 (DCF_PROD_08) and emailing team re same	0.3	0.3
5/20/20	Poonam Juneja	emailing Josh MN re depo logistics	0.1	0.1
5/20/20	Poonam Juneja	reviewing most recent productions from Defendants and emailing team re same	0.4	0.4
5/20/20	Poonam Juneja	check in with FP Js re named plaintiff file review	0.1	0.1
5/20/20	Poonam Juneja	reviewing most recent KDADS production of org charts	0.4	0.4
5/20/20	Poonam Juneja	locating and circulating sample rog/rfp responses for named plaintiffs	0.4	0.4
5/20/20	Poonam Juneja	call with JS re research on 30b6 time limits and responses to rogs, etc	0.4	0.4
5/20/20	Poonam Juneja	reviewing case management order and circulating excerpts with relevant analysis to team	0.3	0.3
5/20/20	Poonam Juneja	reviewing Jon email on redactions to prepare for co-counsel call	0.3	0.3
5/21/20	Poonam Juneja	emailing KS re protective order	0.1	0.1
5/21/20	Poonam Juneja	texting with MN re deposition prep/logistics	0.3	0.3
5/22/20	Poonam Juneja	Prepping for ESI m/c with defendants -- reviewing Carrie's correspondence and comparing against our prior versions, taking notes	0.4	0.4
5/22/20	Poonam Juneja	ESI m/c with defendants	0.7	0.7
5/22/20	Poonam Juneja	Debrief with MN re ESI m/c with ds and next steps re depo	0.3	0.3
5/22/20	Poonam Juneja	drafting follow up email to Defendants re particular search term and circulating for review to team	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
5/22/20	Poonam Juneja	revising follow up email to Ds re search term and sending	0.1	0.1
5/22/20	Poonam Juneja	emailing team re depo logistics	0.3	0.3
5/22/20	Poonam Juneja	locating Five point tech contract and sharing with group	0.3	0.3
5/22/20	Poonam Juneja	phone call with josh and marissa to prep for depo	0.7	0.7
5/22/20	Poonam Juneja	reviewing defendnats' settlement counterproposal and sending thoughts to LW FP	0.4	0.4
5/24/20	Poonam Juneja	reviewing hot docs on Relativity related to computer systems	1.1	1.1
5/24/20	Poonam Juneja	reviewing draft depo outline and circulating suggestions	0.8	0.8
5/25/20	Poonam Juneja	reviewing updated depo outline and providing feedback	0.4	0.4
5/26/20	Poonam Juneja	second chair in 30b6 deposition of Jason Koehn, IT for DCF; including providing follow up questions, locating information to ask witness, help with exhibits, etc	5.3	5.3
5/26/20	Poonam Juneja	conferring with team during breaks in 30b6 depo to provide additional questions, info, etc	1.2	1.2
5/26/20	Poonam Juneja	debrief with josh and marissa after depo incl discussing next steps, follow up rfps and rogs	0.3	0.3
5/27/20	Poonam Juneja	Team call, including re: case schedule, depositions, third party discovery, responding to Defendants' discovery requests, and experts	1.0	1.0
5/27/20	Poonam Juneja	emailing Ds with exhibits from depo in response to their inquiry	0.2	0.2
5/27/20	Poonam Juneja	reviewing FP email re Outcome 7 and Outcome 2 and reviewing settlement draft re same	0.3	0.3
5/27/20	Poonam Juneja	Confer with F Pitts and J. Strout re: team meeting agenda, depositions, response to Defendants' discovery requests, and plan for Plaintiffs who are aging out	0.4	0.4
5/28/20	Poonam Juneja	reviewing materials to prepare for settlement negotiation circulated by IL and emailing team re same	0.5	0.5
5/28/20	Poonam Juneja	emails re scheduling met and confer	0.2	0.2
5/28/20	Poonam Juneja	reviewing materials circulated by MN re NP aging out issue	0.4	0.4
5/28/20	Poonam Juneja	emailing TW re sample responses to rogs/rfps in Dkan	0.1	0.1
5/28/20	Poonam Juneja	reviewing IL email re expert/consulting update	0.1	0.1
5/29/20	Poonam Juneja	Team call re: response to settlement proposal from Defendants	1.5	1.5

Date	Name	Description	Time Billed	With Travel at 50%
5/29/20	Poonam Juneja	researching and writing summary re mootness and aged out plaintiffs and circulating to team	1.3	1.3
5/29/20	Poonam Juneja	Confer with FP re mootness and aged out plaintiffs	0.2	0.2
5/29/20	Poonam Juneja	responding to team emails re mootness and aged out plaintiffs	0.2	0.2
6/1/20	Poonam Juneja	Confer with P. Juneja re: service of third party subpoenas on contractors	0.1	0.1
6/1/20	Poonam Juneja	review email from FP re item 18 inhome services issue and discussion of same	0.3	0.3
6/1/20	Poonam Juneja	Review FP email re: file maintenance protocol and depo transcripts	0.1	0.1
6/2/20	Poonam Juneja	Confer with L. Welch, F Pitts, and J. Strout re: settlement proposal and third party subpoenas	0.2	0.2
6/3/20	Poonam Juneja	Team call, including re: MTD order, settlement prep, and discovery	1.0	1.0
6/3/20	Poonam Juneja	reviewing follow up items from counsel call	0.2	0.2
6/3/20	Poonam Juneja	reviewing Judge's order re motion to dismiss	0.4	0.4
6/3/20	Poonam Juneja	reviewing IL email re placement experts	0.1	0.1
6/3/20	Poonam Juneja	Review draft third party subpoenas to grantees and confer with FP re same	0.4	0.4
6/3/20	Poonam Juneja	reviewing draft email re 30b6 issues	0.2	0.2
6/3/20	Poonam Juneja	revising third party subpoena documents	0.5	0.5
6/3/20	Poonam Juneja	locating webpages online for case management contracts, searching relativity for same, and emailing team re same	0.5	0.5
6/3/20	Poonam Juneja	conferring with FP re St Francis entities and searching Secretary of State website for same	0.5	0.5
6/3/20	Poonam Juneja	emailing JK re status of subpoenas and communications with Nelson Mullins and United Healthcare	0.1	0.1
6/4/20	Poonam Juneja	reviewing team emails re settlement discussions	0.4	0.4
6/4/20	Poonam Juneja	reviewing IL email re expert on contract oversight	0.1	0.1
6/4/20	Poonam Juneja	reviewing Carrie's updated data source list and making notes re same	0.3	0.3
6/4/20	Poonam Juneja	reviewing CJ's updated combined search term document and writing notes	0.4	0.4
6/4/20	Poonam Juneja	reviewing settlement discussion notes	0.8	0.8
6/5/20	Poonam Juneja	discussion with JS about missing categories of docs in named plaintiff files and reviewing list of same	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
6/5/20	Poonam Juneja	beginning review of JS's draft RFP and Rog responses	0.4	0.4
6/5/20	Poonam Juneja	reviewing new clean version of settlement package and IL cover email	0.3	0.3
6/5/20	Poonam Juneja	reviewing contact memo for GAL for named plaintiff	0.1	0.1
6/5/20	Poonam Juneja	reviewing MN and Carrie emails re generic email address list	0.1	0.1
6/5/20	Poonam Juneja	ESI meet and confer with MN JK Reid Carrie	1.0	1.0
6/5/20	Poonam Juneja	meet and confer re schedule and discovery issues with Ds	0.6	0.6
6/8/20	Poonam Juneja	phone call with FP re third party subpoenas	0.3	0.3
6/8/20	Poonam Juneja	reviewing KDHE production KDHE000824 - KDHE000825	0.3	0.3
6/8/20	Poonam Juneja	revising ESI search terms per discussions with Ds and circulating draft revisions to MN JK	0.6	0.6
6/9/20	Poonam Juneja	sending revisions to ESI search terms to defendants	0.3	0.3
6/9/20	Poonam Juneja	Check in with FP re: aging out Plaintiffs issue	0.1	0.1
6/9/20	Poonam Juneja	reviewing proposal to how to deal with substantive obligations language and discussing same with FP	0.4	0.4
6/9/20	Poonam Juneja	exporting named plaintiff file review logs from relativity and reviewing	0.3	0.3
6/9/20	Poonam Juneja	reviewing contact memo for potential new next friend	0.1	0.1
6/9/20	Poonam Juneja	reviewing proposed crisis services definition	0.1	0.1
6/10/20	Poonam Juneja	emailing team re co-counsel call for today	0.1	0.1
6/10/20	Poonam Juneja	reviewing cleaned up settlement draft and internal comments and messaging FP re same	0.5	0.5
6/10/20	Poonam Juneja	reviewing KVC correspondence re third party subpoenas and emailing team re samae	0.2	0.2
6/10/20	Poonam Juneja	Participate in settlement discussions	2.9	2.9
6/11/20	Poonam Juneja	Review Defendants' proposed revisions to draft settlement and our draft counterproposals	0.4	0.4
6/11/20	Poonam Juneja	Participate in settlement discussions	2.8	2.8
6/11/20	Poonam Juneja	reviewing sample motion to dismiss from MN	0.2	0.2
6/11/20	Poonam Juneja	reviewing team emails re outreach to karen and judy	0.1	0.1
6/12/20	Poonam Juneja	reviewing law clerk summary of legal research	0.2	0.2
6/12/20	Poonam Juneja	editing draft stip of dismissal and emailing JS re same	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
6/12/20	Poonam Juneja	Confer with LW JS FP re: next steps for settlement, including preliminary/final approval, fees, third party discovery, and notice	0.4	0.4
6/12/20	Poonam Juneja	emailing Josh TW FP re third party discovery next steps	0.4	0.4
6/12/20	Poonam Juneja	trying to access Sunflower production and emailing team re same	0.3	0.3
6/12/20	Poonam Juneja	putting together draft case schedule for approval/fees	1.3	1.3
6/13/20	Poonam Juneja	reviewing emails re named plaintiffs on settlement and next steps	0.3	0.3
6/13/20	Poonam Juneja	emailing re porposed schedule for settlement approval/fees	0.4	0.4
6/15/20	Poonam Juneja	Confer with FP LW JS re: settlement, including preliminary and final approval, fees motion, third party discovery, and client approval	0.4	0.4
6/15/20	Poonam Juneja	locating sample motions for preliminary approval and sending to JS	0.3	0.3
6/15/20	Poonam Juneja	emailing with LW re the contents of the stip to dismiss aged out plaintiffs	0.9	0.9
6/15/20	Poonam Juneja	revisions to proposed stip to dismiss aged out plaintiffs	0.2	0.2
6/16/20	Poonam Juneja	texting with MN re 3rd party discovery etc	0.2	0.2
6/16/20	Poonam Juneja	check in with FP JS re drafting the motion for preliminary approval and accompanying documents and contents of each	0.4	0.4
6/16/20	Poonam Juneja	emailing LW draft emails for next friends re settlement	0.3	0.3
6/16/20	Poonam Juneja	emailing TW re schedule for settlement approval and fees	0.2	0.2
6/16/20	Poonam Juneja	locating sample motions for preliminary approval incl before our judge and decisions, and reviewing procedures	0.3	0.3
6/16/20	Poonam Juneja	phone call with LW re outreach to NFs and named plaintiffs	0.3	0.3
6/16/20	Poonam Juneja	emailing SD re next steps on speaking wiht NFs re proposed stip to dismiss aged out plaintiffs	0.2	0.2
6/16/20	Poonam Juneja	emailing TW re proposed stip to dismiss aged out plaintiffs	0.1	0.1
6/16/20	Poonam Juneja	reviewing proposed revisions from team to proposed stip to dismiss aged out plaintiffs	0.1	0.1
6/16/20	Poonam Juneja	discussing revisions to proposed stip to dismiss aged out plaintiffs with FP JS	0.2	0.2
6/16/20	Poonam Juneja	revisions to proposed stip to dismiss aged out plaintiffs	0.2	0.2
6/17/20	Poonam Juneja	Team call, including re: preliminary and final approval, fees, neutral, third party discovery, and media strategy	1.2	1.2

Date	Name	Description	Time Billed	With Travel at 50%
6/17/20	Poonam Juneja	reviewing and revising settlement preliminary approval docs	3.7	3.7
6/18/20	Poonam Juneja	reviewing and revising settlement preliminary approval docs	0.8	0.8
6/18/20	Poonam Juneja	phone call with FP debriefing call with defendants and discussing next steps	0.2	0.2
6/18/20	Poonam Juneja	reviewing FP email re recommended edits to settlement agreement before circulating to team	0.2	0.2
6/19/20	Poonam Juneja	Confer with FP re: preliminary approval motion	0.1	0.1
6/19/20	Poonam Juneja	emailing team re follow up on settlement approval	0.1	0.1
6/22/20	Poonam Juneja	Confer with F. Pitts re: J. Meltzer suggested edit to settlement agreement, client approval, etc.	0.3	0.3
6/22/20	Poonam Juneja	Confer with F. Pitts and J. Strout re: next steps for settlement approval and fee motion	0.2	0.2
6/22/20	Poonam Juneja	Confer with F. Pitts re: call with Judge re: settlement	0.1	0.1
6/22/20	Poonam Juneja	Confer with F. Pitts re: class notice, etc	0.1	0.1
6/22/20	Poonam Juneja	emails with IL re contacting court	0.2	0.2
6/22/20	Poonam Juneja	team call re cofidence interval	0.5	0.5
6/22/20	Poonam Juneja	phone call with neutral and Defendants re participation in settlement agreement	0.5	0.5
6/22/20	Poonam Juneja	phone call with mediator and Defendants re settlement agreement	0.2	0.2
6/23/20	Poonam Juneja	Confer with L. Welch, J. Strout, and F. Pitts re: next steps for preliminary approval, final approval, and fee motion	0.4	0.4
6/23/20	Poonam Juneja	reviewing email re AG changes to agreement and responding to NCYL team re thoughts on proposals and next steps	1.3	1.3
6/23/20	Poonam Juneja	reviewing Harper prelim approval docs	0.7	0.7
6/23/20	Poonam Juneja	reviewing call notes re call with Judge Crabtree	0.2	0.2
6/23/20	Poonam Juneja	reviewing KS Tort Claims ACt and emailing team re same	0.9	0.9
6/24/20	Poonam Juneja	Team call, including re: AG's proposed settlement revisions	1.6	1.6
6/24/20	Poonam Juneja	reviewing co-course call draft agenda and preparing for call by reviewing settlement schedule/prelim approval models	0.4	0.4
6/24/20	Poonam Juneja	emailing LW IL MN re schedule for settlement approval process	0.8	0.8
6/24/20	Poonam Juneja	responding to emails re LCC v council for settlement approval	0.4	0.4

Date	Name	Description	Time Billed	With Travel at 50%
6/24/20	Poonam Juneja	NCYL internal follow up call re sttlement negotiations	0.2	0.2
6/24/20	Poonam Juneja	phone call with FP re LCC v council for settlement approval	0.2	0.2
6/24/20	Poonam Juneja	revising draft of motion for prelim approval, notice, poposed order	6.8	6.8
6/25/20	Poonam Juneja	finishing draft of motion for prelim approval, notice, poposed order and circulating to LW FP JS	3.1	3.1
6/25/20	Poonam Juneja	phone call with FP re motion for prelim approval	0.2	0.2
6/26/20	Poonam Juneja	Confer with L. Welch, F. Pitts, and J. Strout re: settlement next steps, press release, and third party discovery	0.2	0.2
6/26/20	Poonam Juneja	incorporating FP's revisions into prelim approval docs and circulating to LW FP JS	0.6	0.6
6/27/20	Poonam Juneja	reviewing emails re strategy on getting sttlement finalized	0.2	0.2
6/27/20	Poonam Juneja	emails with team re checking in on Monday morning about third party discovery	0.2	0.2
6/29/20	Poonam Juneja	Confer with F. Pitts re: State Finance Council	0.2	0.2
6/29/20	Poonam Juneja	phone call with LBB TW FP MH re third party discovery with contractors	0.5	0.5
6/29/20	Poonam Juneja	review correspondence re third party discoveyr with grantees and respond	0.2	0.2
6/29/20	Poonam Juneja	confer with FP re third party discovery with grantees	0.1	0.1
6/29/20	Poonam Juneja	Confer with L. Welch and F. Pitts re: third party discovery, press release, preliminary approval papers, and timeline for fee motion	0.3	0.3
6/29/20	Poonam Juneja	reviewing productions and emailing team with data re racial disparities	0.4	0.4
6/30/20	Poonam Juneja	co-counsel call re next steps in settlement approval/SFC	0.6	0.6
6/30/20	Poonam Juneja	reviewing and responding to emails within team re next steps with getting before SFC	0.4	0.4
7/1/20	Poonam Juneja	Team call, including re: next steps re: settlement approval, dismissal of aged out Named Plaintiffs, preliminary approval motion, and press strategy	1.1	1.1
7/1/20	Poonam Juneja	reviewing and giving feedback on call agenda	0.1	0.1
7/1/20	Poonam Juneja	Locating and sharing with team sample decs in support of appt as class counsel	0.3	0.3
7/1/20	Poonam Juneja	internal ncyL debrief re settlement etc	0.5	0.5
7/2/20	Poonam Juneja	reviewing and respnding to Stephen's email re dismissal of MJ	0.3	0.3
7/6/20	Poonam Juneja	Confer with FP re: email correspondence from Defendants re: next steps in settlement approval and resuming discovery	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
7/6/20	Poonam Juneja	email team re follow up with defense counsel re discovery	0.2	0.2
7/7/20	Poonam Juneja	texting with LW re stip for dismissal and sharing with Ds	0.3	0.3
7/7/20	Poonam Juneja	phone call with JS re prelim approval docs including drafting NCYL firm declaration	0.6	0.6
7/7/20	Poonam Juneja	locating and sending team agenda info for council meeting and links to watch	0.3	0.3
7/8/20	Poonam Juneja	reviewing press release revised draft and emailing revisions	0.3	0.3
7/8/20	Poonam Juneja	texting LW re council meeting and approval status	0.2	0.2
7/8/20	Poonam Juneja	phone call with Stephen re filing dismissal	0.4	0.4
7/8/20	Poonam Juneja	co-counsel call re settlement approval process and next steps	1.0	1.0
7/8/20	Poonam Juneja	phone calls with LW re next steps to finalize and file settlement agreement	0.5	0.5
7/8/20	Poonam Juneja	phone calls with FP re next steps to finalize and file settlement agreement	0.6	0.6
7/8/20	Poonam Juneja	adding signatures to settlement agreement, removing header, and final review for accuracy	0.9	0.9
7/8/20	Poonam Juneja	reviewing emails re problems with settlement agreement draft version and emailing re same	0.3	0.3
7/8/20	Poonam Juneja	listening to council meetings and emailing team re same	0.7	0.7
7/8/20	Poonam Juneja	reaching out to TW LW re adding signatures to dismissal	0.2	0.2
7/8/20	Poonam Juneja	finalizing dismissal of aged-out plaintiffs claims and circulating final version	0.6	0.6
7/8/20	Poonam Juneja	messaging FP re notice of errata and attachments	0.2	0.2
7/8/20	Poonam Juneja	drafting notice of errata and circulating it with packet of attachments to team	0.4	0.4
7/9/20	Poonam Juneja	ncyl team check-in including on next steps for prelim approval docs	0.8	0.8
7/9/20	Poonam Juneja	revising preliminary approval docs to incorporate team feedback	3.2	3.2
7/9/20	Poonam Juneja	finalizing notice of errata re settlement agreement	0.5	0.5
7/9/20	Poonam Juneja	emailing TW re outreach to MCOs re 3rd party subpoenas to let them know about settlement	0.2	0.2
7/9/20	Poonam Juneja	Confer with FP re: notice of errata	0.1	0.1
7/10/20	Poonam Juneja	Confer with FP JS re: next steps for preliminary approval	0.2	0.2
7/13/20	Poonam Juneja	team check in including re release of records, motion for prelim approval docs	0.4	0.4
7/13/20	Poonam Juneja	phone call with JS re release of records to client	0.3	0.3
7/13/20	Poonam Juneja	revising draft declaration in support of motion for prelim approval	1.5	1.5

Date	Name	Description	Time Billed	With Travel at 50%
7/13/20	Poonam Juneja	emailing LBB MH re revisions to proposed order	0.3	0.3
7/14/20	Poonam Juneja	reviewing memo re disclosure of files to client and responding to email re same	0.4	0.4
7/14/20	Poonam Juneja	confer with JS re disclosure of files to client and prelim approval docs	0.5	0.5
7/15/20	Poonam Juneja	Team call, including re: preliminary approval, RR's case file, fee motion, and Appleseed briefings on settlement	1.3	1.3
7/15/20	Poonam Juneja	Confer with L. Welch, F. Pitts, and J. Strout re: preliminary approval papers and RR's case file	0.2	0.2
7/15/20	Poonam Juneja	emailing PG re putting settlement docs on NCYL website	0.2	0.2
7/15/20	Poonam Juneja	emailing sample supporting docs to OT	0.2	0.2
7/15/20	Poonam Juneja	revising preliminary approval docs to incorporate team feedback and citechecking and sending to LW to share with Ds	2.1	2.1
7/15/20	Poonam Juneja	emailing FP LW MN IL re proposed class counsel	0.4	0.4
7/16/20	Poonam Juneja	revising proposed order per feedback and recirculating to team	0.2	0.2
7/16/20	Poonam Juneja	emailing FP LW MN IL re proposed class counsel	0.2	0.2
7/20/20	Poonam Juneja	reviewing email from SD re stakeholder interest in being on advisory group	0.1	0.1
7/21/20	Poonam Juneja	responding to MN question re Larry admission	0.2	0.2
7/22/20	Poonam Juneja	Team call, including re: preliminary approval, fee motion, and contact with families and other stakeholders	0.7	0.7
7/22/20	Poonam Juneja	Confer with LW FP JS re: preliminary approval papers and fee distribution	0.3	0.3
7/22/20	Poonam Juneja	Confer with FP re: proposed edits to class notice	0.1	0.1
7/22/20	Poonam Juneja	Reviewing Defendants' feedback on proposed order and class notice	0.3	0.3
7/22/20	Poonam Juneja	Revising brief, proposed order, class notice, and supporting firm declarations, including to incorporate Defendants' feedback, and circulating comments and suggestions on same to team	2.7	2.7
7/23/20	Poonam Juneja	Confer with F. Pitts, L. Welch, and J. Strout re: motion for preliminary approval and implementation plan	0.3	0.3
7/23/20	Poonam Juneja	emailing Defendants re their proposed changes to the notice and proposed order	0.2	0.2
7/23/20	Poonam Juneja	emailing team re jeff and caryn PHV documents and reviewing same	0.3	0.3
7/24/20	Poonam Juneja	Confer with FP LW JS re: filing motion for preliminary approval	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
7/24/20	Poonam Juneja	reviewing Stephen email re stakeholder social worker/prof feedback on settlement and implementation	0.1	0.1
7/24/20	Poonam Juneja	emailing with OT re DLA dec in support of motion for prelim approval	0.2	0.2
7/24/20	Poonam Juneja	texted LW re emailing Defendants re their proposed changes to the notice and proposed order	0.1	0.1
7/26/20	Poonam Juneja	revising proposed notice	0.2	0.2
7/26/20	Poonam Juneja	revising draft motion and inserting dec citations	0.4	0.4
7/26/20	Poonam Juneja	revising LW dec in support of motion for prelim approval and emailing FP LW JS re same	0.3	0.3
7/26/20	Poonam Juneja	emailing DLA re revisions to sig block	0.1	0.1
7/27/20	Poonam Juneja	reviewing TW revised dec and emailing Kira re same	0.3	0.3
7/27/20	Poonam Juneja	final review and revisions to motion for prelim approval and supporting documents	2.3	2.3
7/27/20	Poonam Juneja	emailing TW re sending proposed order and notice doc to chambers	0.1	0.1
8/20/18	Freya Pitts	Call with L. Welch re: outlining complaint	0.1	0.1
8/22/18	Freya Pitts	Co-counsel team meeting re investigation and complaint drafting	1.1	1.1
8/23/18	Freya Pitts	Meet with A. Grill re: strategy for complaint drafting	0.2	0.2
8/23/18	Freya Pitts	Review Kansas findings of fact document to inform drafting of complaint	0.3	0.3
8/24/18	Freya Pitts	Call with M. Nardi, I. Lustbader, and A. Grill re: complaint outline	1.2	1.2
8/24/18	Freya Pitts	Review Kansas findings of fact document and sample complaints to inform drafting of complaint	0.9	0.9
8/24/18	Freya Pitts	Review sample complaints and file to prepare for call with M. Nardi, I. Lustbader, and A. Grill re: complaint drafting	1.0	1.0
8/24/18	Freya Pitts	Search for sample of annotated complaint to inform complaint drafting; email correspondence with A. Grill re: same	0.1	0.1
8/24/18	Freya Pitts	Strategy meeting with A. Grill re: complaint outline and collecting evidence from findings of fact document	0.3	0.3
8/24/18	Freya Pitts	Update L. Welch on CR input on complaint outline	1.1	1.1
8/27/18	Freya Pitts	Confer with L. Welch re: complaint strategy	0.3	0.3
8/28/18	Freya Pitts	Team call with cocounsel re complaint drafting	0.4	0.4

Date	Name	Description	Time Billed	With Travel at 50%
8/30/18	Freya Pitts	Review relevant press coverage re: deficiencies in Kansas's welfare system to inform drafting of complaint	0.1	0.1
9/5/18	Freya Pitts	Team call with cocounsel re complaint, investigation strategy, etc	1.5	1.5
9/12/18	Freya Pitts	Team call with cocounsel re next steps and strategy for complaint and named plaintiffs, and follow up discussion	0.5	0.5
9/12/18	Freya Pitts	Email correspondence with M. Nardi re: complaint samples	0.1	0.1
9/12/18	Freya Pitts	Review CR memos on confidentiality	0.4	0.4
9/15/18	Freya Pitts	Review A. Grill memo on Kansas child welfare system	0.6	0.6
9/17/18	Freya Pitts	Review contact memos from KS visit	0.2	0.2
9/18/18	Freya Pitts	Review sample complaints and file to inform drafting of complaint	2.3	2.3
9/19/18	Freya Pitts	Team call with cocounsel re: complaint, local stakeholders, potential Plaintiffs and Next Friends, call with Kansas Appleseed, and upcoming visit	0.8	0.8
9/19/18	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
9/19/18	Freya Pitts	Confer with J. Stolzenberg re: research on intra-district transfers	0.1	0.1
9/19/18	Freya Pitts	Follow up discussion after team call with L. Welch and J. Stolzenberg re: next steps	0.5	0.5
9/19/18	Freya Pitts	Outline complaint; send to L. Welch for review	3.1	3.1
9/19/18	Freya Pitts	Review sample complaints and file to inform drafting of complaint	1.0	1.0
9/21/18	Freya Pitts	Confer with L. Welch re: complaint outline and next steps	0.2	0.2
9/21/18	Freya Pitts	Review L. Welch edits to complaint outline	0.5	0.5
9/24/18	Freya Pitts	Complete and edit revised complaint outline and discussion questions for team re: same	1.5	1.5
9/24/18	Freya Pitts	Revise complaint outline, including legal research re: Defendants' legal duties for same	3.8	3.8
9/25/18	Freya Pitts	Create agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
9/25/18	Freya Pitts	Review I. Lustbader feedback on complaint outline; confer with L. Welch re: implementing same	0.3	0.3
9/25/18	Freya Pitts	Review L. Welch edits to complaint outline	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
9/25/18	Freya Pitts	Revise complaint outline to incorporate I. Lustbader feedback; send to L. Welch for review	1.7	1.7
9/26/18	Freya Pitts	Team call with cocounsel discussing draft complaint and next Kansas trip	1.0	1.0
9/26/18	Freya Pitts	Circulate agenda for 9/26/18 team call; email correspondence with E. McGuinness re: same	0.1	0.1
9/27/18	Freya Pitts	Review CR legal memo re: naming Governor as a defendant	0.2	0.2
10/2/18	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.3	0.3
10/2/18	Freya Pitts	Email correspondence with L. Welch and J. Stolzenberg re: EPSDT claims	0.1	0.1
10/2/18	Freya Pitts	Review memos from CR re: class certification and EPSDT claims	0.4	0.4
10/3/18	Freya Pitts	Team call, including re: complaint, named plaintiffs, and co-counsel	1.0	1.0
10/3/18	Freya Pitts	Email correspondence with team re: next steps	0.5	0.5
10/3/18	Freya Pitts	Follow up discussion with L. Welch and J. Stolzenberg re: claims in Kansas complaint	0.2	0.2
10/9/18	Freya Pitts	Travel from Oakland to Kansas City for co-counsel meeting (time was split with another case)	2.9	1.45
10/9/18	Freya Pitts	Review agenda and reading list for 10/10 in person meeting	0.1	0.1
10/10/18	Freya Pitts	Travel from Kansas meeting to hotel	0.6	0.3
10/10/18	Freya Pitts	Travel to Kansas meeting from hotel	0.5	0.25
10/10/18	Freya Pitts	In person meeting with Children's Rights, Kansas Appleseed, and L. Welch re: strategy and timeline for filing complaint	4.5	4.5
10/12/18	Freya Pitts	Travel from Kansas City to Oakland from co-counsel meeting (time was split with another case)	2.9	1.45
10/12/18	Freya Pitts	Confer with J. Stolzenberg re: research on confidentiality protections for GALs	0.2	0.2
10/12/18	Freya Pitts	Edit complaint outline to incorporate strategy decisions made at 10/10/18 meeting	2.1	2.1
10/15/18	Freya Pitts	Edit complaint outline; send to L. Welch for review	0.3	0.3
10/27/18	Freya Pitts	Review updated complaint outline; confer with L. Welch re: same	0.1	0.1
10/28/18	Freya Pitts	Draft complaint: harm from EPSDT deficiencies	2.9	2.9
10/28/18	Freya Pitts	Review draft complaint outline, samples, and factual memos	1.7	1.7
10/29/18	Freya Pitts	Draft complaint: harm from EPSDT deficiencies	1.6	1.6

Date	Name	Description	Time Billed	With Travel at 50%
10/29/18	Freya Pitts	Instructions to J. Stolzenberg re: drafting Kansas complaint	0.2	0.2
10/29/18	Freya Pitts	Receive and review contact memo from Topeka from S. Dixon	0.1	0.1
10/30/18	Freya Pitts	Confer with J. Stolzenberg re: drafting section of complaint re: Defendants	0.2	0.2
10/30/18	Freya Pitts	Draft complaint: harm from EPSDT deficiencies	4.5	4.5
10/30/18	Freya Pitts	Email correspondence with L. Welch re: EPSDT claim re: trauma screen and possible disability rights claim	0.3	0.3
10/30/18	Freya Pitts	Instructions from L. Welch re: next steps for drafting complaint	0.1	0.1
10/30/18	Freya Pitts	Review draft Kansas complaint sections drafted by Children's Rights	3.1	3.1
10/31/18	Freya Pitts	Team call re: complaint draft and identifying plaintiffs	0.7	0.7
10/31/18	Freya Pitts	Review Fifth Circuit opinion re: placement array class	0.9	0.9
11/1/18	Freya Pitts	Review and revise updated draft complaint	3.7	3.7
11/2/18	Freya Pitts	Draft and revise complaint: mental health delivery system	1.8	1.8
11/2/18	Freya Pitts	Factual research re: MCOs to inform drafting of complaint	0.2	0.2
11/4/18	Freya Pitts	Legal and factual research re: supporting evidence for Kansas complaint	5.8	5.8
11/5/18	Freya Pitts	Team call re: complaint draft	2.0	2.0
11/5/18	Freya Pitts	Confer with J. Stolzenberg re: factual research to support allegations in complaint	0.3	0.3
11/5/18	Freya Pitts	Email correspondence with K. Setren re: research literature citations in complaint	0.1	0.1
11/5/18	Freya Pitts	Review draft complaint and related email correspondence with D. Adamek re: research literature citations	0.8	0.8
11/6/18	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.3	0.3
11/6/18	Freya Pitts	Confer with D. Adamek, K. Setren, and M. Nardi re: research literature citations for complaint	0.2	0.2
11/6/18	Freya Pitts	Review child welfare task force meeting materials to inform complaint	0.5	0.5
11/6/18	Freya Pitts	Review J. Stolzenberg memo re: intra-district transfer	0.4	0.4
11/7/18	Freya Pitts	Team call re: named plaintiffs, complaint draft, and factual research	0.8	0.8
11/7/18	Freya Pitts	Create memo re: outstanding pre-filing factual research	0.5	0.5
11/7/18	Freya Pitts	Confer with J. Stolzenberg re: pre-filing factual research	0.1	0.1
11/7/18	Freya Pitts	Email correspondence with L. Welch re: next steps for finalizing complaint	0.6	0.6

Date	Name	Description	Time Billed	With Travel at 50%
11/7/18	Freya Pitts	Review and revise section of complaint re: named plaintiffs	1.6	1.6
11/8/18	Freya Pitts	Email correspondence with D. Adamek and J. Stolzenberg re: factual support for Kansas complaint	0.1	0.1
11/8/18	Freya Pitts	Review J. Stolzenberg email re: factual research for complaint; email correspondence with J. Stolzenberg and L. Welch re: same	0.1	0.1
11/9/18	Freya Pitts	Team call re: named plaintiffs and logistics for finalizing and filing complaint	1.1	1.1
11/9/18	Freya Pitts	Email correspondence with D. Adamek and J. Stolzenberg re: factual support for Kansas complaint	0.2	0.2
11/9/18	Freya Pitts	Review Fifth Circuit opinion re: placement array class to inform drafting of complaint	1.4	1.4
11/10/18	Freya Pitts	Complete review of Fifth Circuit opinion re: placement array class to inform drafting of complaint	0.4	0.4
11/11/18	Freya Pitts	Cite check and add additional citations to draft complaint	2.9	2.9
11/11/18	Freya Pitts	Draft new language for EPSDT claim in draft complaint	1.6	1.6
11/11/18	Freya Pitts	Edit draft complaint	4.3	4.3
11/11/18	Freya Pitts	Review Children's Rights' edits to draft complaint; further edits to same	3.2	3.2
11/12/18	Freya Pitts	Team call re: complaint draft	1.1	1.1
11/12/18	Freya Pitts	Draft fact sections for new named plaintiffs J.M. and J.X.	0.6	0.6
11/12/18	Freya Pitts	Email correspondence with team re: outstanding factual research for complaint	0.2	0.2
11/13/18	Freya Pitts	Confer with L. Welch re: revisions to EPSDT claim	0.1	0.1
11/13/18	Freya Pitts	Confer with L. Welch re: revisions to EPSDT screening claim	0.7	0.7
11/13/18	Freya Pitts	Instructions from L. Welch re: EPSDT claim	0.2	0.2
11/13/18	Freya Pitts	Instructions to J. Stolzenberg re: revisions to and cite checking Kansas complaint	0.1	0.1
11/13/18	Freya Pitts	Legal research re: revisions to EPSDT claim	0.2	0.2
11/13/18	Freya Pitts	Legal research re: revisions to EPSDT screening claim; email correspondence with I. Lustbader, L. Welch, E. McGuinness, and J. King re: same	1.3	1.3
11/13/18	Freya Pitts	Phone conference with L. Welch re: revisions to EPSDT screening claim	0.3	0.3
11/13/18	Freya Pitts	Confer w L. Welch & J. Stolzenberg re complaint, next steps	0.7	0.7
11/13/18	Freya Pitts	Revise draft complaint to incorporate edits to EPSDT screening claim	3.0	3.0
11/13/18	Freya Pitts	Telephone conference with E. McGuinness re: revisions to EPSDT claim	0.4	0.4

Date	Name	Description	Time Billed	With Travel at 50%
11/14/18	Freya Pitts	Co-counsel call, including discussion of EPSDT claims	1.0	1.0
11/14/18	Freya Pitts	Call with colleague at partner organization re: EPSDT screening claim	0.4	0.4
11/14/18	Freya Pitts	Phone conference with L. Welch re: revisions to EPSDT screening claim	0.2	0.2
11/14/18	Freya Pitts	Revise EPSDT claims in Kansas complaint; send to L. Welch for review	1.4	1.4
11/14/18	Freya Pitts	confer with L. Welch & J. Stolzenberg re complaint draft	0.3	0.3
11/15/18	Freya Pitts	Call with J. Stolzenberg re: cite checking complaint	0.1	0.1
11/15/18	Freya Pitts	Edit complaint for filing, including cite checking	5.1	5.1
11/15/18	Freya Pitts	Email correspondence re: filing strategy for Kansas complaint	0.3	0.3
11/15/18	Freya Pitts	Email correspondence with L. Welch and I. Lustbader re: EPSDT screening claim and possible experts	0.1	0.1
11/15/18	Freya Pitts	Email correspondence with L. Welch re: statutory cites for EPSDT screening claim	0.5	0.5
11/15/18	Freya Pitts	Email correspondence with M. Nardi and L. Welch re: formatting requirements	0.1	0.1
11/15/18	Freya Pitts	Review KORA responses to requests for DCF data; email correspondence with J. King re: same	0.1	0.1
11/15/18	Freya Pitts	Review legal memos from J. King re: EPSDT claims; email correspondence with L. Welch re: same	0.8	0.8
11/15/18	Freya Pitts	Revise complaint for filing, including integrating edits from L. Welch, M. Nardi, E. McGuinness, and I. Lustbader, and including phone conferences re: same	5.8	5.8
11/16/18	Freya Pitts	Edit complaint for filing, including cite checking	5.8	5.8
11/16/18	Freya Pitts	Proofread final version of complaint and initial filing documents; confer with M. Nardi and D. Adamek re: same	2.2	2.2
11/16/18	Freya Pitts	Review formatting of complaint pre-filing	0.2	0.2
11/16/18	Freya Pitts	Review requirements for pro hac vice application; email L. Welch with next steps for same	0.5	0.5
11/19/18	Freya Pitts	Instructions to K. Setren re: motions for leave to appear pro hac vice and accompanying paperwork; review drafts of same	0.4	0.4
11/20/18	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
11/20/18	Freya Pitts	Email correspondence re: pro hac vice applications	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
11/20/18	Freya Pitts	Email correspondence with L. Welch re: Medicaid statute citations	0.2	0.2
11/20/18	Freya Pitts	Email correspondence with M. Nardi re: service requirements	0.1	0.1
11/20/18	Freya Pitts	Phone call with court clerk re: pro hac vice applications	0.1	0.1
11/20/18	Freya Pitts	Phone call with W.D. Washington court clerk re: L. Welch admission for pro hac vice motion	0.1	0.1
11/21/18	Freya Pitts	Team call re: post-filing logistics, including pro hac applications, pseudonyms, co-counsel, and stakeholder/community connections	1.0	1.0
11/21/18	Freya Pitts	Call district court clerk re: service requirements for pro hac vice motions	0.1	0.1
11/21/18	Freya Pitts	Finalize paperwork for pro hac vice applications; instructions to D. Adamek and K. Setren re: same	0.9	0.9
11/26/18	Freya Pitts	Email correspondence with D. Dawson re: filing and service of pro hac paperwork	0.3	0.3
11/26/18	Freya Pitts	Instructions to K. Setren and D. Adamek re: pro hac applications	0.3	0.3
11/26/18	Freya Pitts	Phone conference with D. Dawson re: filing and service of pro hac paperwork	0.1	0.1
11/26/18	Freya Pitts	Review draft pro hac paperwork	0.1	0.1
11/27/18	Freya Pitts	Email correspondence with D. Dawson re: filing and service of pro hac paperwork	0.3	0.3
12/3/18	Freya Pitts	Email correspondence re: proofs of service of complaint	0.2	0.2
12/4/18	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
12/5/18	Freya Pitts	Team call re: local stakeholders and AG's request re: deadlines	1.5	1.5
12/5/18	Freya Pitts	Confer with L. Welch re: timeline for amending complaint	0.2	0.2
12/5/18	Freya Pitts	Email correspondence with L. Welch and M. Nardi re: amending complaint	0.1	0.1
12/5/18	Freya Pitts	Follow up discussion with L. Welch and J. Stolzenberg re: deadlines	0.5	0.5
12/5/18	Freya Pitts	Legal research re: amending complaint and email correspondence re: same	0.2	0.2
12/6/18	Freya Pitts	Phone conference with M. Nardi re: filing proofs of service	0.1	0.1
12/7/18	Freya Pitts	Factual research re: grant/bid process for DCF	0.1	0.1
12/10/18	Freya Pitts	Email correspondence re: Defendants' request for an extension of time to respond	0.1	0.1
12/11/18	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
12/11/18	Freya Pitts	Review information from L. Rute re: Defendants' request for extension of time to answer	0.4	0.4
12/12/18	Freya Pitts	Team call, including re: community contacts, experts, Defendants' request for extension of time to answer	1.3	1.3
12/18/18	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.4	0.4
12/19/18	Freya Pitts	Team call, including re: Defendants' request for extension, local updates, and experts	0.8	0.8
12/20/18	Freya Pitts	Confer with L. Welch re: response to Defendants' request for extension	0.1	0.1
12/20/18	Freya Pitts	Review federal rules, local rules, and standing orders relevant to deadlines for filing, briefing, and arguing a possible motion to dismiss; email L. Welch re: same, and protective order	0.5	0.5
12/21/18	Freya Pitts	Confer with L. Welch re: response to Defendants' request for extension	0.1	0.1
12/21/18	Freya Pitts	Legal research re: in camera review of child in need of care records in the District of Kansas; email L. Welch re: same	1.1	1.1
12/30/18	Freya Pitts	Review motion for extension of time	0.1	0.1
1/2/19	Freya Pitts	Team call, including discussion of opposition to motion for extension of time to answer and potential expert witnesses	1.0	1.0
1/2/19	Freya Pitts	Background factual research re: DCF	0.4	0.4
1/2/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
1/2/19	Freya Pitts	Create chart of potential expert witnesses	0.7	0.7
1/2/19	Freya Pitts	Confer with L. Welch re: agenda for team call and identifying experts	0.2	0.2
1/2/19	Freya Pitts	Draft opposition to motion for extension	3.4	3.4
1/2/19	Freya Pitts	Email correspondence with L. Welch re: team call and follow-up items, including re: experts	0.9	0.9
1/2/19	Freya Pitts	Instructions to K. Setren re: compiling expert contact information	0.1	0.1
1/2/19	Freya Pitts	Review J. King research for opposition to motion for extension of time to answer	0.1	0.1
1/3/19	Freya Pitts	Review and incorporate proposed revisions to opposition to motion for extension; email correspondence with L. Welch re: same	1.3	1.3

Date	Name	Description	Time Billed	With Travel at 50%
1/3/19	Freya Pitts	Revise opposition to motion for extension	1.9	1.9
1/4/19	Freya Pitts	Confer with D. Adamek re: filing opposition to motion for extension	0.3	0.3
1/4/19	Freya Pitts	Confer with L. Welch re: finalizing opposition to motion for extension	0.1	0.1
1/4/19	Freya Pitts	Email correspondence re: entry of appearance for L. Burns-Bucklew	0.1	0.1
1/4/19	Freya Pitts	Email correspondence re: filing opposition to motion for extension and proof of service	0.1	0.1
1/4/19	Freya Pitts	Email correspondence with team re: finalizing opposition to motion for extension	0.1	0.1
1/4/19	Freya Pitts	Finalize opposition to motion for extension for filing	0.4	0.4
1/4/19	Freya Pitts	Legal research re: discovery deadlines and scheduling for opposition to motion for extension of time	0.3	0.3
1/4/19	Freya Pitts	Telephone conference with J. King re: outstanding citation issue in opposition to motion for extension	0.1	0.1
1/9/19	Freya Pitts	Team call, including discussion of status conference, experts, and co-counsel	0.8	0.8
1/9/19	Freya Pitts	Create and circulate task list, agenda for team call, and list of potential expert witnesses; review email correspondence and case file to inform same	0.6	0.6
1/9/19	Freya Pitts	Factual research re: The Wall placement	0.1	0.1
1/11/19	Freya Pitts	Team call re: telephonic hearing re: motion for extension and next steps	0.3	0.3
1/11/19	Freya Pitts	Confer with L. Welch re: status conference on motion for extension	0.2	0.2
1/14/19	Freya Pitts	Confer w L. Welch and J. Stolzenberg re next tasks	0.3	0.3
1/15/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
1/16/19	Freya Pitts	Team call, including discussion of litigation strategy, protective order, and motion for leave to use pseudonyms	1.0	1.0
1/16/19	Freya Pitts	Confer with L. Welch re: motion for leave to use pseudonyms and protective order	0.6	0.6
1/16/19	Freya Pitts	Edit and proofread motion for leave to use pseudonyms	1.3	1.3
1/16/19	Freya Pitts	Revise motion for leave to use pseudonyms; legal research for same	2.3	2.3
1/17/19	Freya Pitts	Email correspondence with L. Welch re: revisions to motion for leave to use pseudonyms	0.2	0.2
1/18/19	Freya Pitts	Finalize motion for leave to use pseudonyms, including proposed order	1.1	1.1

Date	Name	Description	Time Billed	With Travel at 50%
1/18/19	Freya Pitts	Review Defendants' proposed revisions to draft stipulated protective order	0.5	0.5
1/18/19	Freya Pitts	Review draft correspondence re: litigation holds; email correspondence re: proposed edits	0.3	0.3
1/21/19	Freya Pitts	Review Defendants' proposed revisions to draft stipulated protective order; email correspondence with team re: same	0.3	0.3
1/22/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
1/23/19	Freya Pitts	Team call, including re: protective order, potential co-counsel, experts, and stakeholder updates	0.7	0.7
1/25/19	Freya Pitts	Instructions to J. Stolzenberg re: legal research memo on protective orders and in camera review	0.8	0.8
1/25/19	Freya Pitts	Review draft stipulated protective order; email correspondence re: same	0.4	0.4
1/28/19	Freya Pitts	Revise draft stipulated protective order	0.3	0.3
1/28/19	Freya Pitts	Confer with L. Welch and J. Stolzenberg re next tasks	0.1	0.1
1/29/19	Freya Pitts	Telephone conference re: expert witness strategy	1.3	1.3
1/29/19	Freya Pitts	Review draft stipulated protective order; email correspondence re: same	0.2	0.2
1/30/19	Freya Pitts	Team call, including discussion of protective order and co-counsel	0.4	0.4
1/31/19	Freya Pitts	Confer with L. Welch re: protective order	0.2	0.2
1/31/19	Freya Pitts	Instructions to J. Stolzenberg re: legal research memo on protective orders and in camera review	0.3	0.3
2/4/19	Freya Pitts	Confer with L. Welch re: protective order, litigation hold, and legal research assignments	0.3	0.3
2/5/19	Freya Pitts	Finalize draft stipulated protective order	0.7	0.7
2/6/19	Freya Pitts	Factual research re: trauma screening	0.2	0.2
2/6/19	Freya Pitts	Finalize and circulate stipulated protective order; call clerk re: appropriate chambers to direct proposed order to	0.7	0.7
2/7/19	Freya Pitts	Email correspondence with chambers re: protective order	0.1	0.1
2/8/19	Freya Pitts	Email correspondence with L. Cohen and L. Welch re: NBC reporter follow-up	0.1	0.1
2/12/19	Freya Pitts	Travel to meeting with M. Hodgesmith in Lawrence, KS	1.3	0.65

Date	Name	Description	Time Billed	With Travel at 50%
2/12/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
2/12/19	Freya Pitts	Factual research re: comparator states' Medicaid systems	0.1	0.1
2/13/19	Freya Pitts	Team co-counsel call, including re: named plaintiffs, experts, co-counsel, and new witnesses	1.4	1.4
2/13/19	Freya Pitts	Confer with J. Stolzenberg re: research on confidentiality of children's files in Kansas	0.1	0.1
2/13/19	Freya Pitts	Draft and revise protective order acknowledgment form; send to L. Welch for review	0.4	0.4
2/13/19	Freya Pitts	Instructions to J. Stolzenberg re: summary of relevant child welfare litigation in Kansas	0.1	0.1
2/13/19	Freya Pitts	Review CV of potential expert	0.1	0.1
2/13/19	Freya Pitts	Review notice of appearance for L. Burns-Bucklew	0.1	0.1
2/14/19	Freya Pitts	Circulate protective order acknowledgment form to team for review	0.1	0.1
2/14/19	Freya Pitts	Create chart of named plaintiffs and pseudonymous initials	0.2	0.2
2/14/19	Freya Pitts	Finalize litigation hold letters to Defendants and Next Friends; email correspondence with L. Welch re: same	0.7	0.7
2/14/19	Freya Pitts	Review DLA Piper's proposed cocounsel agreement	0.3	0.3
2/14/19	Freya Pitts	Review J. Stolzenberg memo re: D.D. complaint; email correspondence re: same	0.1	0.1
2/15/19	Freya Pitts	Instructions from L. Welch re: Medicaid research	0.2	0.2
2/18/19	Freya Pitts	Review proposed legislation relevant to putative class members	0.2	0.2
2/19/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
2/19/19	Freya Pitts	Confer with L. Welch re: litigation hold, legal research, and expert strategy	0.1	0.1
2/19/19	Freya Pitts	Email correspondence with team re: identifying named Plaintiffs to defendants	0.1	0.1
2/19/19	Freya Pitts	Update chart of named plaintiffs and pseudonymous initials	0.1	0.1
2/22/19	Freya Pitts	Email correspondence with J. King and E. McGuinness re: litigation hold letters	0.1	0.1
2/25/19	Freya Pitts	Confer with L. Welch and J. Stolzenberg re: litigation hold, Barber Emerson, DLA Piper, experts, and outstanding legal research	0.5	0.5
2/25/19	Freya Pitts	Email correspondence with L. Welch re: Kansas Medicaid research	0.1	0.1
2/25/19	Freya Pitts	Factual research re: Kansas Medicaid system	0.4	0.4

Date	Name	Description	Time Billed	With Travel at 50%
2/26/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
2/26/19	Freya Pitts	Email correspondence with J. King re: litigation holds	0.1	0.1
2/26/19	Freya Pitts	Finalize litigation hold letters to Defendants and Next Friends; email correspondence with L. Welch re: same	0.1	0.1
2/27/19	Freya Pitts	Team call, including discussion of staffing, named plaintiffs, and case management	1.0	1.0
2/27/19	Freya Pitts	Email correspondence with I. Lustbader and L. Welch re: agenda for team meeting	0.1	0.1
2/27/19	Freya Pitts	Finalize named plaintiff pseudonym list; email L. Welch re: same	0.1	0.1
2/27/19	Freya Pitts	Review draft settlement terms sheet	1.0	1.0
2/27/19	Freya Pitts	Review J. Stolzenberg memo re: case law on recovering attorney's fees	0.2	0.2
2/28/19	Freya Pitts	Confer with L. Welch re: staffing and responsibilities	0.1	0.1
2/28/19	Freya Pitts	Email team re: follow-up items from 2/27 meeting	0.4	0.4
2/28/19	Freya Pitts	Factual research re: DCF related legislation	0.1	0.1
3/1/19	Freya Pitts	Review J. King research on substitution of official capacity defendants	0.1	0.1
3/3/19	Freya Pitts	Consult notes from meeting with M. Hodgesmith; update Medicaid research memo	0.6	0.6
3/3/19	Freya Pitts	Research MCO contracts and Medicaid waivers; update Medicaid research memo	0.5	0.5
3/3/19	Freya Pitts	Research Medicaid system; draft research memo re: same	2.2	2.2
3/3/19	Freya Pitts	Review existing factual research re: Medicaid system; update Medicaid research memo	0.8	0.8
3/4/19	Freya Pitts	Email correspondence with L. Welch re: Medicaid research	0.1	0.1
3/4/19	Freya Pitts	Continue to review existing factual research re: Medicaid system; update Medicaid research memo	1.8	1.8
3/5/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.6	0.6
3/5/19	Freya Pitts	Confer with P. Juneja re: case planning and staffing	0.6	0.6
3/5/19	Freya Pitts	Review potential expert witness CVs and biographies; update memo re: same	1.7	1.7
3/5/19	Freya Pitts	Update memo re: potential expert witnesses	0.3	0.3
3/6/19	Freya Pitts	Team call, including discussion of: gathering named plaintiff files and litigation timeline/strategy	0.8	0.8

Date	Name	Description	Time Billed	With Travel at 50%
3/6/19	Freya Pitts	Circulate caption template to new co-counsel	0.1	0.1
3/6/19	Freya Pitts	Create notes from team call; draft list of follow-up items and assignments and email L. Welch and P. Juneja re: same	0.9	0.9
3/6/19	Freya Pitts	Confer with P. Juneja re: case planning and staffing, named plaintiff status	0.8	0.8
3/6/19	Freya Pitts	Confer with paralegal team and P. Juneja re: file sharing procedures	0.1	0.1
3/6/19	Freya Pitts	Email correspondence with L. Welch and I. Lustbader re: team call	0.1	0.1
3/6/19	Freya Pitts	Email correspondence with P. Juneja re: outstanding legal research tasks	0.1	0.1
3/6/19	Freya Pitts	Email correspondence with paralegal team re: annotated complaint	0.1	0.1
3/6/19	Freya Pitts	Update memo re: potential additions to a First Amended Complaint	0.3	0.3
3/7/19	Freya Pitts	Case planning meeting with P. Juneja	1.6	1.6
3/7/19	Freya Pitts	Create list of next steps and outstanding projects in preparation for case planning meeting with P. Juneja	0.5	0.5
3/7/19	Freya Pitts	Confer with P. Juneja re: protective order and contact memos	0.2	0.2
3/7/19	Freya Pitts	Email correspondence re: follow up from 3/6/19 team call	0.1	0.1
3/7/19	Freya Pitts	Email correspondence with P. Juneja re: prospective expert witnesses	0.1	0.1
3/7/19	Freya Pitts	Email correspondence with P. Juneja re: protective order acknowledgment forms	0.1	0.1
3/7/19	Freya Pitts	Update list of next steps and outstanding projects; email correspondence with P. Juneja re: same	0.1	0.1
3/8/19	Freya Pitts	Circulate list of next steps and follow-up items to litigation team	0.2	0.2
3/8/19	Freya Pitts	Locate and put together materials re: EPSDT claims and contact memos for P. Juneja review	0.5	0.5
3/8/19	Freya Pitts	Compile PHV materials for DLA Piper attorneys	0.4	0.4
3/8/19	Freya Pitts	Confer with L. Welch re: updates from next friends and local contacts, named plaintiff file reviews	0.7	0.7
3/8/19	Freya Pitts	Confer with P. Juneja re: case file reviews and staffing	0.2	0.2
3/8/19	Freya Pitts	Confer with P. Juneja re: EPSDT claims and case planning	0.3	0.3
3/8/19	Freya Pitts	Confer with P. Juneja re: PHV applications for P. Juneja & DLA Piper attorneys	0.2	0.2
3/8/19	Freya Pitts	Email correspondence with K. Setren re: file sharing with co-counsel	0.1	0.1
3/8/19	Freya Pitts	Instructions to K. Setren re: certificates of service for PHV applications	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
3/8/19	Freya Pitts	Review and revise list of proposed materials to send to DLA Piper for review; email correspondence re: same	1.0	1.0
3/8/19	Freya Pitts	Review P. Juneja PHV application	0.1	0.1
3/8/19	Freya Pitts	Review P. Juneja PHV application; email correspondence re: filing logistics for same	0.3	0.3
3/11/19	Freya Pitts	Locate and put together background documents for new cocounsel's review	1.5	1.5
3/11/19	Freya Pitts	Confer with P. Juneja re: case file reviews	0.1	0.1
3/11/19	Freya Pitts	Confer with P. Juneja re: priority documents to share with new co-counsel	0.1	0.1
3/11/19	Freya Pitts	Email correspondence re: discovery software	0.2	0.2
3/11/19	Freya Pitts	Instructions to K. Setren re: file sharing with DLA Piper	0.1	0.1
3/11/19	Freya Pitts	Receive and review email correspondence from P. Juneja re: 3/20/19 co-counsel strategy meeting	0.1	0.1
3/11/19	Freya Pitts	Send model PHV paperwork to J. Calderon at DLA Piper	0.2	0.2
3/12/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.3	0.3
3/12/19	Freya Pitts	Create list of Relativity users and email addresses for DLA Piper	0.3	0.3
3/12/19	Freya Pitts	Confer with P. Juneja re: claims and case strategy	0.5	0.5
3/13/19	Freya Pitts	Create list of follow up items from 3/13 team call	0.3	0.3
3/13/19	Freya Pitts	Confer with P. Juneja re: legal research needs and document management plan for Kansas	0.8	0.8
3/13/19	Freya Pitts	Instructions from L. Welch re: Medicaid research	0.1	0.1
3/14/19	Freya Pitts	Call with prospective expert re: Medicaid issues	1.1	1.1
3/14/19	Freya Pitts	Confer with P. Juneja and L. Welch re: potential privilege issues related to Next Friends' files	0.2	0.2
3/14/19	Freya Pitts	Draft research memo re: Kansas Medicaid: SED waiver and MCO contracts	0.8	0.8
3/14/19	Freya Pitts	Email correspondence re: foster parent K.I. intake	0.1	0.1
3/15/19	Freya Pitts	Return call from community member K.I., a foster parent	0.1	0.1
3/15/19	Freya Pitts	Review and provide input on list of outstanding legal research needs; email correspondence with P. Juneja and L. Welch re: same	0.4	0.4

Date	Name	Description	Time Billed	With Travel at 50%
3/18/19	Freya Pitts	Confer with L. Welch and P. Juneja re: agenda for 3/20 strategy meeting, legal research re: privilege, and Medicaid research	0.5	0.5
3/18/19	Freya Pitts	Email correspondence re: discovery software	0.1	0.1
3/18/19	Freya Pitts	Receive and review email correspondence re: agenda for 3/20 strategy meeting and division of labor for legal research	0.1	0.1
3/18/19	Freya Pitts	Review draft motion for B. Magnuson's withdrawal; check local rules re: same	0.2	0.2
3/18/19	Freya Pitts	With P. Juneja, troubleshoot Relativity access	0.1	0.1
3/19/19	Freya Pitts	Confer with D. Adamek re: filing B. Magnuson's withdrawal	0.1	0.1
3/19/19	Freya Pitts	Draft and circulate memo re: document management plan	1.0	1.0
3/19/19	Freya Pitts	Email correspondence re: B. Magnuson's withdrawal	0.1	0.1
3/19/19	Freya Pitts	Email correspondence with P. Juneja and L. Welch re: follow up for foster parent K.I.	0.2	0.2
3/19/19	Freya Pitts	Instructions to J. Stolzenberg re: legal research memo on class certification	0.2	0.2
3/19/19	Freya Pitts	Instructions to J. Stolzenberg re: logistics for team strategy meeting on 3/20	0.2	0.2
3/19/19	Freya Pitts	Phone call with foster parent K.I. re: problems with St. Francis	0.2	0.2
3/20/19	Freya Pitts	Confer with L. Welch re: staffing	0.1	0.1
3/20/19	Freya Pitts	Follow up with P. Juneja and L. Welch re: strategy meeting, including re: Medicaid claim	0.5	0.5
3/20/19	Freya Pitts	Instructions to J. Stolzenberg re: legal research memo on class certification	0.2	0.2
3/20/19	Freya Pitts	Prepare for presentation on EPSDT claims and complaint amendment strategy in 3/20 team strategy meeting; confer with P. Juneja and L. Welch re: same	2.4	2.4
3/20/19	Freya Pitts	Review briefing on bifurcation of discovery in Riley v. P.K. to inform strategy re: bifurcation	0.7	0.7
3/21/19	Freya Pitts	Confer with P. Juneja re: B. Magnuson withdrawal and notifying clients re: same	0.2	0.2
3/21/19	Freya Pitts	Prepare model claims chart for DLA Piper review; confer with P. Juneja re: same	1.0	1.0
3/22/19	Freya Pitts	Confer with P. Juneja and J. Stolzenberg re: legal research memo re: Lungstrum's class certification decisions	0.3	0.3
3/22/19	Freya Pitts	Confer with P. Juneja re: class members' entitlement to Medicaid	0.1	0.1
3/22/19	Freya Pitts	Review J. Stolzenberg draft memo re: J. Lungstrum class certification decisions	0.1	0.1
3/24/19	Freya Pitts	Review final cocounsel agreement and proposal for updating clients re: DLA Piper	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
3/25/19	Freya Pitts	Strategy meeting with P. Juneja re: document management and sharing protocol	0.8	0.8
3/25/19	Freya Pitts	Call with L. Welch & P. Juneja re next steps in legal research, discussions with opposing counsel	0.7	0.7
3/26/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.3	0.3
3/26/19	Freya Pitts	Confer with P. Juneja re: document collection from next friends	0.1	0.1
3/26/19	Freya Pitts	Email correspondence with L. Welch re: correspondence with Named Plaintiffs	0.1	0.1
3/26/19	Freya Pitts	Email correspondence with team re: follow-up for Named Plaintiff M.L.	0.1	0.1
3/28/19	Freya Pitts	Create list of questions in preparation for phone call with potential expert S.W. re: Kansas Medicaid system	0.3	0.3
3/28/19	Freya Pitts	Email correspondence re: Defendants' proposal for extension of time to answer	0.1	0.1
3/28/19	Freya Pitts	Phone call with L. Welch and potential expert S.W. re: Kansas Medicaid system	0.5	0.5
3/29/19	Freya Pitts	Confer with P. Juneja and L. Welch re: legal research re: in camera review	0.2	0.2
3/29/19	Freya Pitts	Confer with P. Juneja re: Defendants' draft stipulation re: extension of time to answer	0.3	0.3
3/29/19	Freya Pitts	Research waiver of defenses; email correspondence re: same	0.4	0.4
3/29/19	Freya Pitts	Review Defendants' draft stipulation re: extension of time to answer	0.1	0.1
3/29/19	Freya Pitts	Review J. King research memo re: abstention	0.7	0.7
4/1/19	Freya Pitts	Create list of next steps	0.1	0.1
4/3/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
4/3/19	Freya Pitts	Create and circulate list of follow up items from 4/3/19 call	0.2	0.2
4/3/19	Freya Pitts	Confer with L. Welch and P. Juneja re: 4/19/19 meeting	0.2	0.2
4/4/19	Freya Pitts	Email correspondence with L. Welch and I. Lustbader re: potential expert Medicaid expert N.S.	0.1	0.1
4/4/19	Freya Pitts	Review D. Kan materials re: 26(f) conference, pillars of professionalism, and ESI guidelines	0.7	0.7
4/4/19	Freya Pitts	Review J. King memo re: distinguishing Fifth Circuit case	0.4	0.4
4/5/19	Freya Pitts	Update team task list	0.3	0.3
4/7/19	Freya Pitts	Create and circulate task list	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
4/8/19	Freya Pitts	Confer with P. Juneja re: legal research re: in camera review of child in care files	0.1	0.1
4/9/19	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Stolzenberg re: cocounsel agreement, legal research tasks, and early mediation	0.4	0.4
4/10/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
4/10/19	Freya Pitts	Create list of follow up items from 4/10/19 team call	0.3	0.3
4/10/19	Freya Pitts	Confer with P. Juneja re: proposed additional substantive due process claim	0.1	0.1
4/10/19	Freya Pitts	Follow up with L. Welch and P. Juneja re: team call, including discussion of document management and early settlement	0.7	0.7
4/10/19	Freya Pitts	Review draft agreement re: entry into 30 day settlement period	0.2	0.2
4/10/19	Freya Pitts	Review draft term sheet and P. Juneja proposed edits to same	0.5	0.5
4/12/19	Freya Pitts	Confer with P. Juneja re: cocounsel agreement, memo re: in camera review, and correspondence re: early settlement	0.5	0.5
4/12/19	Freya Pitts	Instructions to J. Stolzenberg re: client letter re: DLA Piper	0.2	0.2
4/12/19	Freya Pitts	Review and edit memo for Defendants re: in camera review	0.5	0.5
4/12/19	Freya Pitts	Review and propose revisions to correspondence re: early settlement	0.1	0.1
4/12/19	Freya Pitts	Review draft materials for Defendants re: in camera review and early settlement	0.1	0.1
4/15/19	Freya Pitts	Confer with L. Welch and P. Juneja re: 4/19/19 meeting, email correspondence with Defendants re: same, and co-counsel agreement	0.3	0.3
4/16/19	Freya Pitts	Create list of questions in advance of call with community member expert on Medicaid N.W.	0.2	0.2
4/17/19	Freya Pitts	Team call, including discussion of 4/19/19 meeting with defendants and early settlement strategy	0.8	0.8
4/17/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
4/17/19	Freya Pitts	Update L. Welch on team call	0.2	0.2
4/18/19	Freya Pitts	Confer with L. Welch and P. Juneja re: follow up for Kansas call	0.1	0.1
4/22/19	Freya Pitts	Confer with L. Welch and P. Juneja re: follow up from meeting with Defendants, settlement strategy, and Medicaid research follow-up	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
4/23/19	Freya Pitts	Confer with P. Juneja re: privilege research needs	0.3	0.3
4/23/19	Freya Pitts	Email correspondence with L. Welch re: Medicaid system research	0.1	0.1
4/24/19	Freya Pitts	Call with DLA Piper re: class certification draft	0.5	0.5
4/24/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
4/24/19	Freya Pitts	Create list of follow up items from 4/24/19 team call	0.1	0.1
4/24/19	Freya Pitts	Confer with L. Welch and P. Juneja re: next steps for term sheet	0.1	0.1
4/24/19	Freya Pitts	Follow up with P. Juneja re: DLA Piper class certification call	0.3	0.3
4/25/19	Freya Pitts	Confer with P. Juneja and L. Rute's office re: PHV motions	0.1	0.1
4/30/19	Freya Pitts	Confer with P. Juneja and L. Welch re: answer to complaint	0.1	0.1
5/2/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
5/2/19	Freya Pitts	Confer with P. Juneja re: research needs	0.3	0.3
5/2/19	Freya Pitts	Instructions to J. Stolzenberg re: class certification research, including re: B.K. decision	0.1	0.1
5/3/19	Freya Pitts	Create list of follow-up items from 5/2/19 call	0.3	0.3
5/3/19	Freya Pitts	Confer with L. Welch and P. Juneja re: terms sheet, complaint amendments, and research needs	0.4	0.4
5/7/19	Freya Pitts	Begin review of P. Juneja's draft settlement term sheet	0.2	0.2
5/7/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
5/7/19	Freya Pitts	Confer with P. Juneja re: scheduling order	0.1	0.1
5/7/19	Freya Pitts	Review scheduling order	0.1	0.1
5/8/19	Freya Pitts	Create and circulate follow up item list from team call	0.1	0.1
5/8/19	Freya Pitts	Confer with P. Juneja re: initial disclosures	0.1	0.1
5/9/19	Freya Pitts	Confer with P. Juneja re: Medicaid claims	0.1	0.1
5/9/19	Freya Pitts	Receive and review email correspondence re: Medicaid claims	0.1	0.1
5/9/19	Freya Pitts	Review and revise term sheet draft	0.6	0.6
5/9/19	Freya Pitts	Review B.K. v. Snyder decision to inform proposed amendments to complaint	1.2	1.2

Date	Name	Description	Time Billed	With Travel at 50%
5/9/19	Freya Pitts	Review J. King legal research memo re: possible amendments to complaint re: Governor	0.3	0.3
5/10/19	Freya Pitts	Confer with P. Juneja re: scheduling conference and corresponding deadlines	0.2	0.2
5/10/19	Freya Pitts	Confer with P. Juneja re: scheduling conference and corresponding deadlines; term sheet draft	0.7	0.7
5/10/19	Freya Pitts	Instructions to J. Stolzenberg re: research on remedy	0.1	0.1
5/10/19	Freya Pitts	Review Children's Rights' edits to term sheet	0.1	0.1
5/13/19	Freya Pitts	Confer with L. Welch and P. Juneja re: scheduling conference and related deadlines; email T. Woody re: same	0.3	0.3
5/13/19	Freya Pitts	Confer with L. Welch and P. Juneja re: scheduling conference, term sheet, complaint amendments, and initial disclosures	0.5	0.5
5/13/19	Freya Pitts	Confer with P. Juneja re: complaint amendments and scheduling conference	0.2	0.2
5/14/19	Freya Pitts	Email correspondence with L. Welch re: Medicaid statutory cites	0.1	0.1
5/14/19	Freya Pitts	Email correspondence with L. Welch, P. Juneja, and I. Lustbader re: rescheduling Rule 26 conference	0.1	0.1
5/14/19	Freya Pitts	Review revised draft term sheet	0.1	0.1
5/15/19	Freya Pitts	Call with partner organization attorney re: class certification and discovery in the 10th Circuit	0.8	0.8
5/15/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
5/15/19	Freya Pitts	Confer with L. Welch and P. Juneja re: follow-up from team call	0.1	0.1
5/15/19	Freya Pitts	Confer with P. Juneja re: draft term sheet	0.1	0.1
5/15/19	Freya Pitts	Draft memo for S. Dixon re: facts relevant to Medicaid claims	1.5	1.5
5/15/19	Freya Pitts	Review complaint redline for amendment	0.8	0.8
5/16/19	Freya Pitts	Factual research re: FFPSA	0.1	0.1
5/16/19	Freya Pitts	Factual research re: KU program with DCF	0.1	0.1
5/19/19	Freya Pitts	Create list of questions in advance of call with partner organization re: Medicaid claims	0.1	0.1
5/20/19	Freya Pitts	Call with partner organization re: Medicaid claim	0.6	0.6

Date	Name	Description	Time Billed	With Travel at 50%
5/20/19	Freya Pitts	Confer with L. Welch and P. Juneja re: complaint amendment	1.0	1.0
5/20/19	Freya Pitts	Confer with P. Juneja re: amending complaint and simultaneously email L. Welch re: same	0.5	0.5
5/20/19	Freya Pitts	Confer with T. Woody and P. Juneja re: complaint amendment	0.3	0.3
5/20/19	Freya Pitts	Email correspondence with team re: amending complaint	0.1	0.1
5/20/19	Freya Pitts	Revise fact section for E.B.	0.1	0.1
5/22/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
5/22/19	Freya Pitts	Confer with L. Welch and P. Juneja re: follow up from team call	0.2	0.2
5/22/19	Freya Pitts	Confer with P. Juneja re: next steps	0.3	0.3
5/23/19	Freya Pitts	Compile notes from call with partner organization re: Medicaid claims to circulate to team	0.5	0.5
5/23/19	Freya Pitts	Update facts for EB for amended complaint	0.4	0.4
5/24/19	Freya Pitts	Create list of follow up items from 5/22 team call	0.4	0.4
5/24/19	Freya Pitts	Create task list	0.2	0.2
5/24/19	Freya Pitts	Email correspondence with L. Welch and P. Juneja re: Medicaid cites	0.3	0.3
5/24/19	Freya Pitts	Final review of term sheet	0.2	0.2
5/24/19	Freya Pitts	Review L. Welch memo re: Medicaid facts for amended complaint	0.1	0.1
5/26/19	Freya Pitts	Complete final review of term sheet; email P. Juneja re: proposed edits to same	0.3	0.3
5/27/19	Freya Pitts	Review K. Setren file organization to share with co-counsel team	0.4	0.4
5/28/19	Freya Pitts	Confer with L. Welch and P. Juneja re: terms sheet and E.B. facts	0.1	0.1
5/28/19	Freya Pitts	Review K. Setren file organization to share with co-counsel team	0.5	0.5
5/29/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
5/29/19	Freya Pitts	Confer with P. Juneja re: 30(b)(6) notice	0.1	0.1
5/29/19	Freya Pitts	Email correspondence with P. Juneja and L. Welch re: term sheet	0.1	0.1
5/29/19	Freya Pitts	Review L. Welch draft email re: interim relief and term sheet; propose edits to same	0.3	0.3
5/29/19	Freya Pitts	Review L. Welch memo re: questions for clients re: Medicaid claims	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
5/29/19	Freya Pitts	Review report of 26(f) conference, model scheduling order, and ESI guidelines in preparation for scheduling conference with Judge Birzer; confer with P. Juneja re: same	1.7	1.7
5/30/19	Freya Pitts	Creating list of follow-up items from 5/29/19 call	0.4	0.4
6/4/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
6/4/19	Freya Pitts	Review T. Woody draft initial disclosures and P. Juneja proposed edits to same in preparation for strategy call on 6/5	0.2	0.2
6/5/19	Freya Pitts	Create list of follow up items from 6/5/19 team call	0.3	0.3
6/5/19	Freya Pitts	Confer with L. Welch and P. Juneja re: initial disclosures and RFPs	0.2	0.2
6/5/19	Freya Pitts	Confer with P. Juneja re: retainers for new clients	0.1	0.1
6/5/19	Freya Pitts	Confer with P. Juneja re: RFPs, client file review, and agenda for team call	0.3	0.3
6/5/19	Freya Pitts	Instructions to L. Gerstley re: client file review	0.2	0.2
6/5/19	Freya Pitts	Instructions to L. Gerstley re: legal research memo on legal standards for substantive due process claims brought by foster youth	0.3	0.3
6/5/19	Freya Pitts	Revise and circulate agenda for team call	0.2	0.2
6/6/19	Freya Pitts	Confer with P. Juneja re: file review of client files	0.2	0.2
6/6/19	Freya Pitts	Confer with P. Juneja re: response to Defendants' inquiry re: Bethany Roberts joining Barber Emerson and proposed ethical wall	0.2	0.2
6/7/19	Freya Pitts	Confer with P. Juneja re legal research	0.2	0.2
6/9/19	Freya Pitts	Attempt to download client files from Defendants; email correspondence with L. Welch, P. Juneja, and L. Burns-Bucklew re: same	0.1	0.1
6/10/19	Freya Pitts	Review and revise K. Setren compilation of case management materials for transfer to Relativity	2.4	2.4
6/10/19	Freya Pitts	Review draft document review protocol	0.6	0.6
6/11/19	Freya Pitts	Confer with K. Setren re: management of discovery documents	0.4	0.4
6/11/19	Freya Pitts	Confer with P. Juneja and L. Welch re: document review protocol for Plaintiff files	0.2	0.2
6/11/19	Freya Pitts	Confer with P. Juneja re: document review protocol	0.3	0.3
6/11/19	Freya Pitts	Confer with P. Juneja re: possible motion for preliminary injunction	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
6/11/19	Freya Pitts	Email correspondence with K. Setren re: additional potential named plaintiffs and management of discovery documents	0.1	0.1
6/11/19	Freya Pitts	Review information for new named plaintiffs	0.2	0.2
6/12/19	Freya Pitts	Confer with P. Juneja re: outstanding research tasks	0.2	0.2
6/12/19	Freya Pitts	Confer with P. Juneja re: use of Relativity for client file review	0.1	0.1
6/12/19	Freya Pitts	Email correspondence with W. Diggs re: use of Relativity for client file review	0.1	0.1
6/12/19	Freya Pitts	Instructions to L. Gerstley re: legal research memo on substantive due process claims brought by foster youth	0.2	0.2
6/12/19	Freya Pitts	Revise document review protocol section re: Medicaid claims	0.1	0.1
6/12/19	Freya Pitts	With P. Juneja, research rules and case law relevant to 30(b)(6) notices	0.4	0.4
6/13/19	Freya Pitts	Check shared litigation documents for completeness; email correspondence with P. Juneja re: same	0.6	0.6
6/13/19	Freya Pitts	Email correspondence re: document management and review	0.6	0.6
6/13/19	Freya Pitts	Email correspondence re: technical issues with Relativity	0.2	0.2
6/13/19	Freya Pitts	Prepare proposed case schedule	1.1	1.1
6/13/19	Freya Pitts	Review document review protocol	0.4	0.4
6/13/19	Freya Pitts	Update shared litigation documents for co-counsel; email correspondence with K. Setren re: same	0.4	0.4
6/14/19	Freya Pitts	Email correspondence re: call with local expert stakeholders re: Medicaid system in Kansas	0.1	0.1
6/15/19	Freya Pitts	Call with local expert stakeholders re: Medicaid system in Kansas	1.6	1.6
6/17/19	Freya Pitts	Confer with L. Welch and P. Juneja re: initial disclosures and 30(b)(6) notice	0.2	0.2
6/17/19	Freya Pitts	Receive and review email correspondence from I. Lustbader re: discovery	0.1	0.1
6/18/19	Freya Pitts	Instructions to J. Nomkin re: legal research project re: multiple 30(b)(6) notices to same entity	0.3	0.3
6/18/19	Freya Pitts	Review J. Nomkin research memo re: multiple 30(b)(6) notices to same entity; email correspondence with P. Juneja & L. Welch re: same	0.1	0.1
6/18/19	Freya Pitts	Review P. Juneja draft RFPs re: Named Plaintiffs & general topics; email correspondence with L. Welch and P. Juneja re: Medicaid-related RFPs	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
6/19/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
6/19/19	Freya Pitts	Compile notes from call with local expert stakeholders re: Medicaid system in Kansas; circulate to team	0.7	0.7
6/19/19	Freya Pitts	Draft memo re: proposed case schedule and discovery proposals in preparation for Rule 26(f) conference and report of parties' planning conference; send to L. Welch and P. Juneja for review	2.7	2.7
6/19/19	Freya Pitts	Email correspondence re: class certification and bifurcation	0.1	0.1
6/19/19	Freya Pitts	Email correspondence with L. Welch and P. Juneja re: deposition and interrogatory limits	0.1	0.1
6/19/19	Freya Pitts	Email correspondence with W. Diggs and M. Fowler re: ESI and clawback provisions in report of parties' planning conference	0.1	0.1
6/19/19	Freya Pitts	Meeting with L. Gerstley re: legal research memo on substantive due process claims brought by foster youth	0.9	0.9
6/19/19	Freya Pitts	Review draft initial disclosures; confer with P. Juneja re: same	0.8	0.8
6/19/19	Freya Pitts	Troubleshoot Relativity login problems	0.4	0.4
6/20/19	Freya Pitts	Confer with L. Welch and P. Juneja re: case schedule, RFPs, initial disclosures, and Relativity	0.7	0.7
6/20/19	Freya Pitts	Email correspondence re: 26(f) conference	0.1	0.1
6/20/19	Freya Pitts	Email correspondence re: case schedule	0.1	0.1
6/20/19	Freya Pitts	Email correspondence with T. Woody & P. Juneja re: Relativity access issues	0.1	0.1
6/20/19	Freya Pitts	Revise memo re: proposed case schedule and discovery proposals in preparation for Rule 26(f) conference and report of parties' planning conference	1.0	1.0
6/21/19	Freya Pitts	Email correspondence re: discovery plan and RFPs	0.2	0.2
6/21/19	Freya Pitts	Review draft RFPs	0.5	0.5
6/22/19	Freya Pitts	Review P. Juneja draft RFPs	0.1	0.1
6/22/19	Freya Pitts	Revise draft case schedule	0.5	0.5
6/24/19	Freya Pitts	Create and circulate task list	0.4	0.4
6/24/19	Freya Pitts	Confer with P. Juneja re: case schedule and discovery planning	1.1	1.1

Date	Name	Description	Time Billed	With Travel at 50%
6/24/19	Freya Pitts	Draft report of parties' planning conference	1.6	1.6
6/24/19	Freya Pitts	Email correspondence re: case schedule	0.1	0.1
6/24/19	Freya Pitts	Email correspondence re: Named Plaintiff case file review	0.1	0.1
6/24/19	Freya Pitts	Email correspondence with T. Woody re: pretrial conferences and local practice	0.4	0.4
6/24/19	Freya Pitts	Meet with P. Juneja, J. Nomkin, and L. Gerstley re: document review of Named Plaintiff case files	0.9	0.9
6/24/19	Freya Pitts	Review draft RFPs from J. King, P. Juneja, and T. Woody	0.4	0.4
6/24/19	Freya Pitts	Review T. Woody contact memo from conversation with local expert stakeholders re: Medicaid	0.2	0.2
6/25/19	Freya Pitts	Circulate draft report of parties' planning conference to team	0.2	0.2
6/25/19	Freya Pitts	Confer with P. Juneja re: report of parties' planning conference and RFPs	0.4	0.4
6/25/19	Freya Pitts	Draft outline for 26(f) conference; email correspondence re: same	3.1	3.1
6/25/19	Freya Pitts	Draft report of parties' planning conference	1.5	1.5
6/25/19	Freya Pitts	Edit draft RFPs; add additional RFPs related to Medicaid claim	3.2	3.2
6/25/19	Freya Pitts	Email correspondence with T. Woody re: pretrial conferences and local practice	0.1	0.1
6/26/19	Freya Pitts	Create list of follow up items from 6/26/19 team call	0.4	0.4
6/26/19	Freya Pitts	Email correspondence with L. Welch re: RFPs	0.1	0.1
6/26/19	Freya Pitts	Email correspondence with S. Dixon re: information needed from Next Friends for report to magistrate judge	0.1	0.1
6/26/19	Freya Pitts	Internal NCYL follow up discussion after team call re: 26(f) conference logistics	0.1	0.1
6/26/19	Freya Pitts	Meet with L. Gerstley re: legal research memo re: substantive due process standard	0.9	0.9
6/26/19	Freya Pitts	Review relevant email correspondence and compile agenda for team call	0.5	0.5
6/26/19	Freya Pitts	Revise draft report of parties' planning conference; circulate to team with other 26(f) prep materials	1.7	1.7
6/26/19	Freya Pitts	Revise proposed case schedule per team input	1.5	1.5
6/26/19	Freya Pitts	Send proposed 26(f) conference outline to T. Woody and L. Burns Bucklew for review	0.1	0.1
6/26/19	Freya Pitts	Confer with P. Juneja re case management schedule revisions	0.4	0.4
6/27/19	Freya Pitts	Participate in 26(f) conference	2.2	2.2
6/27/19	Freya Pitts	Review and revise J. Stolzenberg notes re: 26(f) conference for circulation to team	0.4	0.4

Date	Name	Description	Time Billed	With Travel at 50%
6/27/19	Freya Pitts	Revise draft report of parties' planning conference based on 26(f) conference and circulate to team for review	1.6	1.6
6/27/19	Freya Pitts	Revise draft report of parties' planning conference based on team feedback	0.3	0.3
6/27/19	Freya Pitts	Revise draft RFPs; discussion with P. Juneja re: same	2.3	2.3
6/28/19	Freya Pitts	Call with local partners re: family finding, recruitment, and retention practices	0.9	0.9
6/28/19	Freya Pitts	Revise RFPs, including work session with P. Juneja re: same	5.8	5.8
6/29/19	Freya Pitts	Add mental and behavioral health topics to draft 30(b)(6) notice	0.4	0.4
6/29/19	Freya Pitts	Email correspondence with P. Juneja re: finalizing 26(f) report	0.1	0.1
6/29/19	Freya Pitts	Revise RFP drafts	3.4	3.4
6/30/19	Freya Pitts	Email correspondence with P. Juneja re: 30(b)(6) notice	0.1	0.1
6/30/19	Freya Pitts	Revise RFP drafts	2.3	2.3
7/1/19	Freya Pitts	Email correspondence re: service of initial disclosures	0.4	0.4
7/1/19	Freya Pitts	Email correspondence with M. Nardi re: MTD deadline	0.1	0.1
7/1/19	Freya Pitts	Email correspondence with P. Juneja re: ESI protocol and production format	0.1	0.1
7/1/19	Freya Pitts	File certificate of service for initial disclosures	0.2	0.2
7/1/19	Freya Pitts	Finalize 26(f) report and ESI protocol for submission, including review of Defendants' proposed edits, discussions with team re: same, final revisions, and consulting with T. Woody re: logistics and timing	3.5	3.5
7/1/19	Freya Pitts	Review Defendants' initial disclosures	0.1	0.1
7/2/19	Freya Pitts	Confer w P. Juneja re CMC on Monday	0.1	0.1
7/2/19	Freya Pitts	Email correspondence re: revisions to RFPs	0.1	0.1
7/2/19	Freya Pitts	Email team re: mailing list and correspondence logistics	0.1	0.1
7/2/19	Freya Pitts	Prepare and file proof of service for RFPs	0.6	0.6
7/2/19	Freya Pitts	Revise and finalize RFPs for service	2.2	2.2
7/8/19	Freya Pitts	Review final served RFPs	0.2	0.2
7/9/19	Freya Pitts	Call with L. Welch re: 30(b)(6) notice and outstanding legal research needs	0.1	0.1
7/10/19	Freya Pitts	Review scheduling order; email correspondence with P. Juneja re: same	0.5	0.5
7/11/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
7/11/19	Freya Pitts	Email correspondence re: research needs	0.1	0.1
7/11/19	Freya Pitts	Meet with P. Juneja, L. Gerstley, and J. Nomkin re: client file review	1.0	1.0
7/11/19	Freya Pitts	Provide feedback and instructions to L. Gerstley re: SDP research memo	0.4	0.4
7/12/19	Freya Pitts	Create and circulate list of follow-up items from team call	0.3	0.3
7/15/19	Freya Pitts	Confer with L. Welch and P. Juneja re: ADR, 30(b)(6) notice, stakeholder conversations, and division of labor with co-counsel	0.3	0.3
7/15/19	Freya Pitts	Email correspondence with M. Nardi re: named plaintiff file review	0.1	0.1
7/15/19	Freya Pitts	Revise 30(b)(6) notice	2.2	2.2
7/16/19	Freya Pitts	Additional revisions to 30(b)(6) notice to incorporate L. Welch feedback	0.2	0.2
7/16/19	Freya Pitts	Draft correspondence to T. Campbell re: outstanding case files	0.2	0.2
7/16/19	Freya Pitts	Review Defendants' settlement correspondence	0.2	0.2
7/16/19	Freya Pitts	Review files and correspondence to determine status of case file productions and outstanding issues	0.4	0.4
7/16/19	Freya Pitts	confer with L. Welch and P. Juneja re: status of case file productions and outstanding issues	0.6	0.6
7/16/19	Freya Pitts	Revise 30(b)(6) notice	1.2	1.2
7/17/19	Freya Pitts	Create and circulate list of follow-up items from team call	0.5	0.5
7/17/19	Freya Pitts	Online research re: Ginther report on TANF and DCF; email correspondence with P. Juneja re: same	0.2	0.2
7/17/19	Freya Pitts	Review CR edits to 30(b)(6) draft	0.2	0.2
7/17/19	Freya Pitts	Review files and correspondence re status of case file production; troubleshoot file access issues; email correspondence re: same	0.6	0.6
7/18/19	Freya Pitts	Confer with P. Juneja re: 30(b)(6) notice	0.1	0.1
7/18/19	Freya Pitts	Email correspondence re: case file production status and file access issues	0.5	0.5
7/18/19	Freya Pitts	Review L. Welch edits to 30(b)(6) notice; email correspondence re: same	0.2	0.2
7/18/19	Freya Pitts	Revise 30(b)(6) notice	0.8	0.8
7/19/19	Freya Pitts	Confer with L. Welch and P. Juneja re: division of labor, class certification, ADR, and stakeholder conversations	0.6	0.6
7/22/19	Freya Pitts	Email correspondence with P. Juneja re: clawback	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
7/23/19	Freya Pitts	Confer with L. Welch and P. Juneja re: response to T. Campbell	0.4	0.4
7/24/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
7/24/19	Freya Pitts	Confer with P. Juneja re: document review & coordination with Children's Rights	0.2	0.2
7/24/19	Freya Pitts	Email correspondence with M. Nardi re: document review	0.1	0.1
7/25/19	Freya Pitts	Create and circulate list of follow-up items from team call	0.4	0.4
7/25/19	Freya Pitts	Prepare for call with M. Nardi re: named plaintiff file review	0.1	0.1
7/26/19	Freya Pitts	Call with P. Juneja and M. Nardi re: named plaintiff file review	0.6	0.6
7/26/19	Freya Pitts	Email correspondence with P. Juneja re: response to T. Campbell email re: extension requests	0.1	0.1
7/26/19	Freya Pitts	Prepare for call with M. Nardi re: named plaintiff file review	0.2	0.2
7/26/19	Freya Pitts	Receive and review email correspondence re: scheduling	0.1	0.1
7/29/19	Freya Pitts	Confer with L. Welch and P. Juneja re: discovery & mediation	0.2	0.2
7/31/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
7/31/19	Freya Pitts	Confer with L. Welch and P. Juneja re: stakeholder updates re: congregate care, named plaintiff file review, and third party subpoenas	0.6	0.6
7/31/19	Freya Pitts	Email correspondence with P. Juneja re: named plaintiff file review	0.1	0.1
8/1/19	Freya Pitts	Email correspondence re: Named Plaintiff file review	0.1	0.1
8/2/19	Freya Pitts	Review L. Gerstley document review spreadsheet for M.B.	0.2	0.2
8/2/19	Freya Pitts	Review L. Gerstley legal research memo re: substantive due process claims	0.2	0.2
8/4/19	Freya Pitts	Create and circulate list of follow-up items from team call	0.2	0.2
8/6/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
8/6/19	Freya Pitts	Email correspondence re: document review	0.1	0.1
8/6/19	Freya Pitts	Email correspondence re: Named Plaintiff file review	0.2	0.2
8/6/19	Freya Pitts	Review draft work plan	0.2	0.2
8/7/19	Freya Pitts	Confer with P. Juneja re: document review protocol	0.1	0.1
8/7/19	Freya Pitts	Confer with P. Juneja re: staffing	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
8/7/19	Freya Pitts	Draft 30(b)(6) notice	1.3	1.3
8/7/19	Freya Pitts	NCYL follow-up discussion following team call	0.2	0.2
8/7/19	Freya Pitts	Receive and review email correspondence re: potential neuroscience expert P.F.	0.1	0.1
8/7/19	Freya Pitts	Receive and review research from P. Juneja re: multiple 30(b)(6) depositions	0.1	0.1
8/7/19	Freya Pitts	Review summary of call with potential neuroscience expert P.F.	0.1	0.1
8/8/19	Freya Pitts	Create and circulate list of follow-up items from team call	0.3	0.3
8/8/19	Freya Pitts	Revise draft 30(b)(6) notice	0.1	0.1
8/9/19	Freya Pitts	Review information re: potential mediator	0.2	0.2
8/12/19	Freya Pitts	Confer with L. Welch and P. Juneja re: 30(b)(6) notice, ADR, case file review, search terms, and FAC	0.2	0.2
8/12/19	Freya Pitts	Review letters received from children in foster care in KS; email correspondence re: same	0.2	0.2
8/13/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
8/13/19	Freya Pitts	Create packet of support materials for document review training	0.6	0.6
8/13/19	Freya Pitts	Confer with P. Juneja re: document review and file review	1.5	1.5
8/13/19	Freya Pitts	Draft email re: Relativity usage and unitization	0.4	0.4
8/13/19	Freya Pitts	Email correspondence re: Relativity and HighQ	0.2	0.2
8/13/19	Freya Pitts	Email correspondence re: Relativity training	0.1	0.1
8/13/19	Freya Pitts	Email correspondence with DLA Piper re: Relativity changes and Named Plaintiff case files	0.8	0.8
8/13/19	Freya Pitts	Email correspondence with E. McGuinness re: document collection from Next Friends	0.1	0.1
8/13/19	Freya Pitts	Email M. Nardi re: case file assignments	0.3	0.3
8/13/19	Freya Pitts	Receive and review email correspondence re: mediation strategy	0.2	0.2
8/13/19	Freya Pitts	Review and revise J.P. facts for FAC	0.2	0.2
8/13/19	Freya Pitts	Revise and finalize 30(b)(6) notice; email correspondence re: same	0.8	0.8
8/14/19	Freya Pitts	Call with M. Fowler re: file review	0.2	0.2
8/14/19	Freya Pitts	Call with M. Nardi re: case assignments	0.2	0.2
8/14/19	Freya Pitts	Confer with P. Juneja re: 30(b)(6) notice and case file assignments	0.4	0.4

Date	Name	Description	Time Billed	With Travel at 50%
8/14/19	Freya Pitts	Confer with P. Juneja re: case file review, communications with Defendants, and ADR	1.2	1.2
8/14/19	Freya Pitts	Email correspondence re: case file review	0.5	0.5
8/14/19	Freya Pitts	Receive and review email correspondence re: response to letters from children in foster care in KS	0.1	0.1
8/14/19	Freya Pitts	Review key documents from C.A. case file	0.1	0.1
8/15/19	Freya Pitts	Confer with P. Juneja re: case file review.	0.5	0.5
8/15/19	Freya Pitts	Receive and review email correspondence re: ADR strategy and scheduling	0.2	0.2
8/16/19	Freya Pitts	Confer with P. Juneja re: 30(b)(6) deposition notice	0.2	0.2
8/16/19	Freya Pitts	Email correspondence re: 30(b)(6) deposition notice	0.1	0.1
8/16/19	Freya Pitts	Email correspondence re: ADR	0.1	0.1
8/16/19	Freya Pitts	Email correspondence re: case file review	0.5	0.5
8/16/19	Freya Pitts	Receive and review email correspondence re: FAC strategy	0.2	0.2
8/19/19	Freya Pitts	Confer with L. Welch re: ADR, 30(b)(6), complaint amendment	0.8	0.8
8/19/19	Freya Pitts	Confer with P. Juneja re: complaint amendment	0.1	0.1
8/19/19	Freya Pitts	Confer with P. Juneja and L. Welch re mediation statement, 30(b)(6) complaint amendment, doc review	0.5	0.5
8/19/19	Freya Pitts	Email correspondence re: Kansas mediation	0.2	0.2
8/20/19	Freya Pitts	Call with E. McGuinness re: document collection from Named Plaintiffs	0.3	0.3
8/20/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.3	0.3
8/20/19	Freya Pitts	Confer with L. Welch re: complaint amendment	0.1	0.1
8/20/19	Freya Pitts	Confer with P. Juneja re: KU software for matching	0.1	0.1
8/20/19	Freya Pitts	Email correspondence re: KU software for placement matching	0.1	0.1
8/20/19	Freya Pitts	Factual research re: Governor Kelly	0.2	0.2
8/20/19	Freya Pitts	Receive and review email correspondence re: complaint amendment	0.1	0.1
8/22/19	Freya Pitts	Create and circulate list of follow-up items from team call	0.3	0.3
8/22/19	Freya Pitts	Confer with P. Juneja re: complaint amendment and new Named Plaintiff facts	0.2	0.2
8/22/19	Freya Pitts	Email correspondence re: complaint amendment	0.2	0.2
8/23/19	Freya Pitts	Confer with L. Welch and P. Juneja re: 30(b)(6) notice	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
8/23/19	Freya Pitts	Confer with P. Juneja re: State Finance Council meeting	0.1	0.1
8/23/19	Freya Pitts	Email correspondence with L. Welch re: 30(b)(6) notice	0.2	0.2
8/23/19	Freya Pitts	Revise 30(b)(6) notice	0.1	0.1
8/25/19	Freya Pitts	Research re: EPSDT claim; draft memo re: diagnostic services	2.7	2.7
8/26/19	Freya Pitts	Confer with L. Welch re: ADR, complaint amendment	0.3	0.3
8/26/19	Freya Pitts	Confer with P. Juneja and L. Welch re: complaint amendment	0.2	0.2
8/26/19	Freya Pitts	Confer with P. Juneja re: complaint amendment for MB and SE	0.1	0.1
8/27/19	Freya Pitts	Confer with P. Juneja re: complaint amendment	0.2	0.2
8/27/19	Freya Pitts	Confer with P. Juneja re: document review	0.1	0.1
8/27/19	Freya Pitts	Confer with P. Juneja re: prioritized discovery	0.1	0.1
8/27/19	Freya Pitts	Receive and review email correspondence re: local updates	0.2	0.2
8/27/19	Freya Pitts	Confer with P. Juneja re discrepancies on KDADS website re Laura Howard title	0.1	0.1
8/28/19	Freya Pitts	Team call, including re: ADR, amended complaint, local updates	0.9	0.9
8/28/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
8/30/19	Freya Pitts	Call with P. Juneja re: finalizing FAC, motion for pseudonyms, motion for leave to file FAC	0.2	0.2
8/30/19	Freya Pitts	Call with P. Juneja re: finalizing FAC.	0.1	0.1
8/30/19	Freya Pitts	Circulate final FAC and pseudonym documents	0.1	0.1
8/30/19	Freya Pitts	Confer re: filing of motion to use pseudonyms	0.3	0.3
8/30/19	Freya Pitts	Confer with L. Welch re: amended complaint	0.1	0.1
8/30/19	Freya Pitts	Confer with P. Juneja re: edits to FAC	0.4	0.4
8/30/19	Freya Pitts	Confer with P. Juneja re: proposed order	0.1	0.1
8/30/19	Freya Pitts	Edit final FAC; confer with P. Juneja re: same	0.1	0.1
8/30/19	Freya Pitts	Final pre-filing read-through of FAC	1.7	1.7
8/30/19	Freya Pitts	Pre-filing review of FAC, motion for leave to file FAC, motion for pseudonyms	0.2	0.2
8/30/19	Freya Pitts	Review draft letter to T. Campbell	0.2	0.2
8/30/19	Freya Pitts	Review T. Woody letter re: Defendants' production	0.1	0.1
9/2/19	Freya Pitts	Review complaint redline	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
9/3/19	Freya Pitts	Confer with J. Stolzenberg re: document review	0.3	0.3
9/3/19	Freya Pitts	Confer with L. Welch P. Juneja re: document review, 30(b)(6) priorities	0.2	0.2
9/3/19	Freya Pitts	Confer with P. Juneja re: document review	0.1	0.1
9/3/19	Freya Pitts	Receive and review email correspondence re: discovery stipulation	0.1	0.1
9/3/19	Freya Pitts	Review discovery stipulation	0.1	0.1
9/3/19	Freya Pitts	Review, finalize, and file notice of errata	1.3	1.3
9/4/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.3	0.3
9/4/19	Freya Pitts	Consult rules to confirm no chambers copies needed	0.2	0.2
9/4/19	Freya Pitts	Discuss with L. Gerstley question re: tagging hospitalizations in review of Named Plaintiff files	0.1	0.1
9/4/19	Freya Pitts	Email correspondence re: Defendants' 9/3 production	0.1	0.1
9/4/19	Freya Pitts	Instructions to L. Gerstley re: Named Plaintiff document review	0.7	0.7
9/4/19	Freya Pitts	Receive and review email correspondence re: updated foster care data	0.1	0.1
9/5/19	Freya Pitts	Create and circulate list of follow-up items following team call	0.4	0.4
9/5/19	Freya Pitts	Resolve document review question re: tagging hospitalization records in Named Plaintiff files	0.2	0.2
9/6/19	Freya Pitts	Confer with K. Setren re: filing	0.1	0.1
9/6/19	Freya Pitts	Confer with P. Juneja and K. Setren re: FAC	0.2	0.2
9/6/19	Freya Pitts	Confer with P. Juneja re: FAC	0.1	0.1
9/6/19	Freya Pitts	Confer with P. Juneja re: filing	0.1	0.1
9/9/19	Freya Pitts	Review draft mediation statement	0.8	0.8
9/10/19	Freya Pitts	Confer with P. Juneja re: mediation brief	0.1	0.1
9/10/19	Freya Pitts	Review and revise draft mediation statement	0.9	0.9
9/11/19	Freya Pitts	Compile agenda for team call	0.3	0.3
9/11/19	Freya Pitts	Discuss mediation statement with P. Juneja	0.2	0.2
9/11/19	Freya Pitts	Revise mediation statement	1.6	1.6
9/11/19	Freya Pitts	Confer with L. Welch and P. Juneja re draft settlement statement	0.3	0.3
9/12/19	Freya Pitts	Email correspondence re: file maintenance protocol	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
9/13/19	Freya Pitts	Confer with P. Juneja re: mediation	0.1	0.1
9/13/19	Freya Pitts	Review J. Stolzenberg memo re: RM file review	0.1	0.1
9/13/19	Freya Pitts	Review L. Burns Bucklew stakeholder relative provider contact memo	0.1	0.1
9/16/19	Freya Pitts	Revise draft mediation statement	2.5	2.5
9/16/19	Freya Pitts	Confer with P. Juneja re revisions to mediation statement draft	0.2	0.2
9/17/19	Freya Pitts	Review information from foster parent stakeholders from M. Hodgesmith	0.2	0.2
9/17/19	Freya Pitts	Review L. Welch revisions to mediation statement	0.1	0.1
9/17/19	Freya Pitts	Review updated mediation draft; email M. Nardi re: same	0.2	0.2
9/18/19	Freya Pitts	Team call, including re: ADR, discovery, and experts	1.1	1.1
9/18/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.4	0.4
9/18/19	Freya Pitts	Discussing draft mediation statement with P. Juneja	0.2	0.2
9/18/19	Freya Pitts	Confer with P. Juneja re: mediation statement	0.3	0.3
9/18/19	Freya Pitts	Email correspondence re: 30(b)(6) notice	0.4	0.4
9/18/19	Freya Pitts	Email L. Welch re: mediation statement	0.1	0.1
9/18/19	Freya Pitts	Review L. Welch revisions to mediation statement	0.1	0.1
9/18/19	Freya Pitts	Review P. Juneja edits to mediation draft	0.1	0.1
9/18/19	Freya Pitts	Discussing production issues with P. Juneja and L. Welch	0.4	0.4
9/19/19	Freya Pitts	Create and circulate follow up items from team call	0.2	0.2
9/19/19	Freya Pitts	Confer with P. Juneja re: mediation	0.1	0.1
9/19/19	Freya Pitts	Email correspondence re: mediation call with K. Ryan	0.1	0.1
9/19/19	Freya Pitts	Email correspondence re: third party subpoenas to MCOs	0.1	0.1
9/20/19	Freya Pitts	Review final mediation statement	0.1	0.1
9/24/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
9/24/19	Freya Pitts	Receive and review correspondence re: document production and redactions	0.1	0.1
9/24/19	Freya Pitts	Review CMS guidance on QRTPs	0.2	0.2
9/24/19	Freya Pitts	Review Judge Birzer ESI order	0.4	0.4
9/24/19	Freya Pitts	Review T. Woody discovery letter draft	0.7	0.7

Date	Name	Description	Time Billed	With Travel at 50%
9/25/19	Freya Pitts	Team call, including re: discovery issues, possible KORA request, experts	1.0	1.0
9/25/19	Freya Pitts	Confer with P. Juneja re: discovery issues	0.7	0.7
9/25/19	Freya Pitts	Email correspondence with L. Burns-Bucklew re: stakeholder interview with former KVC employee	0.1	0.1
9/25/19	Freya Pitts	Follow-up discussion with P. Juneja re: next steps	0.1	0.1
9/25/19	Freya Pitts	Phone call with L. Gerstley re: document review	0.1	0.1
9/25/19	Freya Pitts	Receive and review L. Burns Bucklew contact memo with former KVC employee	0.2	0.2
9/25/19	Freya Pitts	Review L. Welch revisions to discovery letter	0.1	0.1
9/26/19	Freya Pitts	Confer with P. Juneja re: 30(b)(6)	0.1	0.1
9/26/19	Freya Pitts	Confer with P. Juneja re: change in counsel	0.1	0.1
9/26/19	Freya Pitts	Confer with P. Juneja re: discovery letter	0.5	0.5
9/26/19	Freya Pitts	Receive and review CR edits to discovery letter	0.1	0.1
9/26/19	Freya Pitts	Review P. Juneja edits to discovery letter	0.1	0.1
9/30/19	Freya Pitts	Create follow up items for Kansas	0.3	0.3
9/30/19	Freya Pitts	Confer with L. Welch and P. Juneja re: new Defendants' counsel	0.2	0.2
10/1/19	Freya Pitts	Confer with L. Welch and P. Juneja re: next steps for Kansas discovery	0.2	0.2
10/1/19	Freya Pitts	Confer with P. Juneja re: discovery letter	0.1	0.1
10/1/19	Freya Pitts	Receive and review information re: Families First grants	0.1	0.1
10/1/19	Freya Pitts	Review and edit discovery letter and amended 30(b)(6) notice	0.5	0.5
10/1/19	Freya Pitts	Review L. Welch revisions to KS discovery letter	0.1	0.1
10/1/19	Freya Pitts	Revise amended 30(b)(6) notice and discovery letter	1.2	1.2
10/2/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
10/2/19	Freya Pitts	Follow-up following team call with L. Welch and P. Juneja	0.2	0.2
10/2/19	Freya Pitts	Receive and review email correspondence re: mediation	0.1	0.1
10/2/19	Freya Pitts	Review L. Welch revisions to KS discovery letter	0.1	0.1
10/3/19	Freya Pitts	Create and circulate follow-up items from team meeting	0.2	0.2
10/7/19	Freya Pitts	Confer with P. Juneja re: mediation and document review	0.1	0.1
10/7/19	Freya Pitts	Email correspondence re: mediation	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
10/7/19	Freya Pitts	Review ZZ Kansas hot docs	0.1	0.1
10/8/19	Freya Pitts	Email correspondence re: mediation call prep	0.1	0.1
10/8/19	Freya Pitts	Plaintiffs-only mediation call with K. Ryan	1.3	1.3
10/9/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
10/9/19	Freya Pitts	Confer with P. Juneja re: ADR, document review, and case schedule	0.2	0.2
10/9/19	Freya Pitts	Review ZZ Kansas hot docs	0.1	0.1
10/10/19	Freya Pitts	Create and circulate follow-up items from team meeting	0.1	0.1
10/10/19	Freya Pitts	Review non-opposition	0.1	0.1
10/10/19	Freya Pitts	Review ZZ Kansas hot docs	0.2	0.2
10/11/19	Freya Pitts	Email correspondence re: ESI	0.1	0.1
10/11/19	Freya Pitts	Email correspondence re: ESI and mediation next steps	0.1	0.1
10/11/19	Freya Pitts	Email correspondence re: mediation	0.1	0.1
10/14/19	Freya Pitts	Email correspondence re: ESI	0.1	0.1
10/15/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
10/15/19	Freya Pitts	Email correspondence re: ESI	0.1	0.1
10/15/19	Freya Pitts	Email correspondence re: file review	0.1	0.1
10/16/19	Freya Pitts	Create and circulate follow-up items from team meeting	0.1	0.1
10/16/19	Freya Pitts	Create and circulate prep outline for ESI call with Defendants	0.5	0.5
10/16/19	Freya Pitts	Compile Medicaid prep materials for L. Welch call with potential expert N.S.	0.6	0.6
10/16/19	Freya Pitts	Confer with P. Juneja re: ESI call with Defendants	0.1	0.1
10/16/19	Freya Pitts	Follow-up conversation with P. Juneja re: ESI	0.1	0.1
10/16/19	Freya Pitts	Prep call for ESI call with Defendants	0.4	0.4
10/24/19	Freya Pitts	Confer with P. Juneja re: experts	0.1	0.1
10/24/19	Freya Pitts	Email correspondence re: mediation	0.1	0.1
10/24/19	Freya Pitts	Receive and review discovery letter; email correspondence re: same	0.2	0.2
10/25/19	Freya Pitts	Confer with P. Juneja re: MTD and 10/28 co-counsel meeting	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
10/28/19	Freya Pitts	Confer with L. Welch and P. Juneja re: DLA Piper meeting prep, document review, opposition to MTD	0.5	0.5
10/28/19	Freya Pitts	Confer with P. Juneja re: opposition to MTD	0.1	0.1
10/30/19	Freya Pitts	Team call, including re: motion to dismiss, discovery, and ADR (partial participant)	0.3	0.3
10/30/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
10/30/19	Freya Pitts	Confer with P. Juneja re: MTD and expedited discovery strategy	0.4	0.4
10/30/19	Freya Pitts	Email correspondence re: targeted discovery	0.1	0.1
10/31/19	Freya Pitts	Create and circulate follow-up items from team meeting	0.2	0.2
10/31/19	Freya Pitts	Confer with P. Juneja re: discovery and motion to dismiss strategy	0.2	0.2
10/31/19	Freya Pitts	Confer with P. Juneja re: discovery email correspondence and strategy	0.3	0.3
10/31/19	Freya Pitts	Email correspondence re: discovery	0.1	0.1
10/31/19	Freya Pitts	Email correspondence re: DLA substitution; review relevant local rules and template	0.3	0.3
10/31/19	Freya Pitts	Review D. Adamek notes re: cocounsel call	0.1	0.1
11/1/19	Freya Pitts	Confer with P. Juneja re: meet and confer and discovery next steps	0.4	0.4
11/1/19	Freya Pitts	Email correspondence with P. Juneja re: meet and confer	0.2	0.2
11/1/19	Freya Pitts	Follow up conversation with L. Welch re: meet and confer	0.2	0.2
11/3/19	Freya Pitts	Research re: MTDs by governors	0.3	0.3
11/3/19	Freya Pitts	Review and revise T. Woody draft email re extension and discovery concern; email correspondence re: same	0.7	0.7
11/3/19	Freya Pitts	Review CR draft motion for extension and cover email	0.4	0.4
11/4/19	Freya Pitts	Discuss motion for extension and discovery with P. Juneja	0.2	0.2
11/5/19	Freya Pitts	Review background information on suggested expert witnesses	0.1	0.1
11/5/19	Freya Pitts	Review BB document review spreadsheet from E. McGuinness	0.2	0.2
11/5/19	Freya Pitts	Review motion to dismiss	0.2	0.2
11/6/19	Freya Pitts	Team call, including re: ADR, MTD, discovery, experts	1.0	1.0
11/6/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
11/6/19	Freya Pitts	Create and circulate list of follow-up items from team call	0.5	0.5

Date	Name	Description	Time Billed	With Travel at 50%
11/6/19	Freya Pitts	Email correspondence re: requesting extension for MTD opposition	0.1	0.1
11/6/19	Freya Pitts	Plaintiffs' mediation call with K. Ryan	0.6	0.6
11/6/19	Freya Pitts	Review draft subpoena to Kelly	0.2	0.2
11/6/19	Freya Pitts	Review resources re: Medicaid waivers	0.1	0.1
11/7/19	Freya Pitts	Confer with P. Juneja re: case management and discovery	0.2	0.2
11/7/19	Freya Pitts	Instructions for K. Setren re: file management	0.1	0.1
11/7/19	Freya Pitts	Review draft motion for extension; discuss same with P. Juneja	0.6	0.6
11/8/19	Freya Pitts	Confer with L. Welch re: mediation prep	0.1	0.1
11/8/19	Freya Pitts	Confer with P. Juneja re: discovery	0.1	0.1
11/8/19	Freya Pitts	Email correspondence re: discovery	0.2	0.2
11/8/19	Freya Pitts	confer with P. Juneja re confidentiality of certain informants	0.2	0.2
11/10/19	Freya Pitts	Review AZ class cert decision and petition for review to inform class cert strategy	1.0	1.0
11/10/19	Freya Pitts	Review background information re: potential expert K.N.	1.0	1.0
11/10/19	Freya Pitts	Review background information re: potential expert N.S.	0.5	0.5
11/10/19	Freya Pitts	Review info re: potential expert C.M.	0.5	0.5
11/10/19	Freya Pitts	Review RFP responses and objections	1.0	1.0
11/11/19	Freya Pitts	Travel to and from co-counsel meeting re strategy for mediation	0.3	0.15
11/11/19	Freya Pitts	Travel to KC for mediation	4.6	2.3
11/11/19	Freya Pitts	Co-counsel meeting to strategize for mediation	2.5	2.5
11/11/19	Freya Pitts	Review comparator settlement agreements (NJ, MO, OK, FL) in preparation for mediation	2.0	2.0
11/11/19	Freya Pitts	Review Defendants' answer in preparation for mediation	0.6	0.6
11/11/19	Freya Pitts	Review L. Burns Bucklew memo re: stakeholder service provider update and accompanying documents	0.5	0.5
11/11/19	Freya Pitts	Review mediation agreement	0.1	0.1
11/11/19	Freya Pitts	Review parties' correspondence re: settlement in preparation for mediation	0.4	0.4
11/12/19	Freya Pitts	Email correspondence re: document production	0.1	0.1
11/12/19	Freya Pitts	In person mediation	8.2	8.2
11/12/19	Freya Pitts	Named Plaintiff document review for SE	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
11/12/19	Freya Pitts	Review sample mental health stability review protocols	0.2	0.2
11/13/19	Freya Pitts	Travel from KC for mediation	2.5	1.25
11/13/19	Freya Pitts	Email correspondence re: document review	0.1	0.1
11/13/19	Freya Pitts	Email correspondence re: mediation	0.1	0.1
11/13/19	Freya Pitts	Named Plaintiff document review for SE	5.1	5.1
11/15/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
11/15/19	Freya Pitts	Email correspondence re: DLA withdrawals	0.2	0.2
11/19/19	Freya Pitts	Email correspondence re: Kansas production issues	0.1	0.1
11/19/19	Freya Pitts	Email correspondence with P. Juneja re: production issues	0.6	0.6
11/19/19	Freya Pitts	Review T. Woody settlement draft	0.1	0.1
11/20/19	Freya Pitts	Team call, including re: mediation, document production issues, and experts	0.7	0.7
11/20/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
11/20/19	Freya Pitts	Texting with L. Welch and P. Juneja re co-counsel meeting	0.1	0.1
11/20/19	Freya Pitts	Review P. Juneja draft of process components of KS settlement	0.4	0.4
11/21/19	Freya Pitts	Confer with L. Welch re: mediation draft	0.1	0.1
11/21/19	Freya Pitts	Confer with P. Juneja re: Kansas document review	0.4	0.4
11/21/19	Freya Pitts	Email correspondence re: mediation-targeted document review	0.1	0.1
11/21/19	Freya Pitts	Email correspondence with P. Juneja re: document production issues	0.2	0.2
11/22/19	Freya Pitts	Receive and review email correspondence re: document production	0.1	0.1
11/24/19	Freya Pitts	Receive and review email correspondence re: settlement draft	0.3	0.3
11/24/19	Freya Pitts	Review working draft of settlement	1.1	1.1
11/25/19	Freya Pitts	Team call re: settlement draft	1.0	1.0
11/25/19	Freya Pitts	Compile and send notes from call re: settlement draft; email correspondence with P. Juneja and L. Welch re: settlement draft feedback and next steps	0.6	0.6
11/25/19	Freya Pitts	Receive and review email correspondence re: settlement draft	0.2	0.2
11/26/19	Freya Pitts	Review settlement draft	2.3	2.3
11/29/19	Freya Pitts	Revise settlement draft	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
11/30/19	Freya Pitts	Revise settlement draft	1.1	1.1
12/1/19	Freya Pitts	Review correspondence from mediator	0.1	0.1
12/1/19	Freya Pitts	Revise settlement draft	2.9	2.9
12/2/19	Freya Pitts	Call re: settlement draft	1.3	1.3
12/2/19	Freya Pitts	Email correspondence re: settlement	0.4	0.4
12/2/19	Freya Pitts	Email correspondence re: settlement edits	0.2	0.2
12/2/19	Freya Pitts	Revise settlement draft	2.4	2.4
12/2/19	Freya Pitts	Confer with P. Juneja re document review	0.2	0.2
12/3/19	Freya Pitts	Call with P. Juneja and L. Welch re: settlement	0.3	0.3
12/3/19	Freya Pitts	Email correspondence re: settlement	0.4	0.4
12/3/19	Freya Pitts	Work with L. Welch on settlement	1.6	1.6
12/4/19	Freya Pitts	Team call, including re: mediation (partial participant)	0.6	0.6
12/4/19	Freya Pitts	Call with P. Juneja re: settlement	0.6	0.6
12/4/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
12/4/19	Freya Pitts	Create and circulate follow-up items from team call	0.2	0.2
12/4/19	Freya Pitts	Confer with P. Juneja re: settlement	0.2	0.2
12/4/19	Freya Pitts	Email correspondence re: production issues	0.3	0.3
12/4/19	Freya Pitts	Review and edit settlement draft	1.6	1.6
12/5/19	Freya Pitts	Document review for mediation	2.3	2.3
12/5/19	Freya Pitts	Email correspondence re: documents and discovery	0.3	0.3
12/5/19	Freya Pitts	Receive and review email correspondence re: mediation	0.2	0.2
12/5/19	Freya Pitts	Review Defendants' mediation proposal	1.4	1.4
12/8/19	Freya Pitts	Email correspondence re: document review	0.1	0.1
12/8/19	Freya Pitts	Receive and review team comments and edits to settlement draft	0.7	0.7
12/9/19	Freya Pitts	Confer with L. Welch re: settlement draft, document review, experts	0.3	0.3
12/9/19	Freya Pitts	Email correspondence re: mediation prep	0.1	0.1
12/9/19	Freya Pitts	Email correspondence re: notices of withdrawal for DLA	0.3	0.3
12/9/19	Freya Pitts	Receive and review email correspondence from L. Burns-Bucklew re: remedies	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
12/9/19	Freya Pitts	Review draft motion for extension and proposed order	0.2	0.2
12/9/19	Freya Pitts	Review L. Welch edits to settlement draft	0.1	0.1
12/9/19	Freya Pitts	Review P. Juneja comments on settlement draft	0.1	0.1
12/9/19	Freya Pitts	Revise motions to withdraw	0.4	0.4
12/9/19	Freya Pitts	Revise settlement redline	1.0	1.0
12/10/19	Freya Pitts	Call re: settlement draft	0.9	0.9
12/10/19	Freya Pitts	Review L. Welch email re: settlement	0.1	0.1
12/10/19	Freya Pitts	Revise settlement draft	4.1	4.1
12/11/19	Freya Pitts	Email correspondence re: document review	0.1	0.1
12/11/19	Freya Pitts	Review Defendants' settlement redline	0.3	0.3
12/11/19	Freya Pitts	Review information re: potential neuroscience expert P.F.	1.0	1.0
12/11/19	Freya Pitts	Revise settlement draft	1.3	1.3
12/12/19	Freya Pitts	Call re: experts and mediation	0.1	0.1
12/12/19	Freya Pitts	Call with potential neuroscience expert P.F.	1.5	1.5
12/12/19	Freya Pitts	Receive and review email correspondence re: kinship models	0.1	0.1
12/12/19	Freya Pitts	Review settlement redlines	0.3	0.3
12/13/19	Freya Pitts	Compile materials for mediation	0.2	0.2
12/13/19	Freya Pitts	Confer with P. Juneja re: discovery correspondence and MTD	0.1	0.1
12/14/19	Freya Pitts	Travel from Oakland to Kansas City for mediation	9.4	4.7
12/15/19	Freya Pitts	Mediation	7.1	7.1
12/15/19	Freya Pitts	Revise draft settlement agreement	0.8	0.8
12/16/19	Freya Pitts	Mediation	6.3	6.3
12/17/19	Freya Pitts	Travel from Kansas City to Oakland for mediation	4.6	2.3
12/17/19	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
12/17/19	Freya Pitts	Confer with P. Juneja re: letter re: targeted discovery for motion to dismiss	0.1	0.1
12/17/19	Freya Pitts	Email correspondence re: Relativity upload of docs produced by Ds	0.1	0.1
12/17/19	Freya Pitts	Email correspondence with M. Nardi re: revisions to settlement draft	0.9	0.9

Date	Name	Description	Time Billed	With Travel at 50%
12/17/19	Freya Pitts	Mediation follow-up, including revisions to settlement draft, notes, and determining next steps	2.4	2.4
12/17/19	Freya Pitts	Review and revise draft letter re: targeted discovery for motion to dismiss	0.6	0.6
12/17/19	Freya Pitts	Revisions to settlement draft	0.8	0.8
12/18/19	Freya Pitts	Call with P. Juneja re: motion to stay and proposed order	0.1	0.1
12/18/19	Freya Pitts	Call with P. Juneja re: settlement	0.4	0.4
12/18/19	Freya Pitts	Call with P. Juneja re: settlement draft and discovery letter	0.3	0.3
12/18/19	Freya Pitts	Call with P. Juneja re: settlement draft, motion, and proposed order	0.3	0.3
12/18/19	Freya Pitts	Review draft motion to stay and to modify scheduling order	0.3	0.3
12/18/19	Freya Pitts	Review updated settlement draft; confer with P. Juneja re: same	0.5	0.5
12/18/19	Freya Pitts	Revise motion to stay and proposed order	1.1	1.1
12/18/19	Freya Pitts	Revise settlement draft to incorporate L. Welch edits	0.1	0.1
12/19/19	Freya Pitts	Email correspondence re: document productions	0.3	0.3
12/19/19	Freya Pitts	Email correspondence with Defendants re: document production issue	0.1	0.1
12/20/19	Freya Pitts	Email correspondence re: saving factual evidence collected	0.1	0.1
12/20/19	Freya Pitts	Review ADR report	0.1	0.1
12/27/19	Freya Pitts	Email correspondence re: mediation	0.1	0.1
12/30/19	Freya Pitts	Review updated scheduling order	0.1	0.1
1/2/20	Freya Pitts	Email correspondence with L. Welch re: Kansas settlement redline	0.1	0.1
1/3/20	Freya Pitts	Email correspondence with L. Welch re: identifying Kansas neutral and mediator	0.1	0.1
1/3/20	Freya Pitts	Email correspondence with L. Welch re: response to call from stakeholder parent	0.2	0.2
1/5/20	Freya Pitts	Review and revise draft integrated settlement agreement	0.7	0.7
1/6/20	Freya Pitts	Review and revise draft integrated settlement agreement	0.5	0.5
1/6/20	Freya Pitts	Review email correspondence from C. Jossierand re: 12(b)(1) targeted discovery	0.1	0.1
1/7/20	Freya Pitts	Call with CSSP re: potential implementation role as Neutral	0.9	0.9
1/7/20	Freya Pitts	Confer with L. Welch and P. Juneja re: mediation draft and correspondence re: jurisdictional discovery and motion to dismiss	0.4	0.4
1/7/20	Freya Pitts	Confer with P. Juneja re: revising settlement draft	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
1/7/20	Freya Pitts	Email correspondence with Children's Rights re: correspondence re: jurisdictional discovery and motion to dismiss	0.3	0.3
1/7/20	Freya Pitts	Relativity training with DLA Piper	0.5	0.5
1/7/20	Freya Pitts	Review CR proposed draft response to C. Josserand email re: 12(b)(1) targeted discovery	0.1	0.1
1/7/20	Freya Pitts	Review documents referenced in email correspondence from C. Josserand re: 12(b)(1) targeted discovery	0.8	0.8
1/7/20	Freya Pitts	Review I. Lustbader draft cover email for integrated settlement draft	0.1	0.1
1/7/20	Freya Pitts	Revise settlement draft	1.4	1.4
1/7/20	Freya Pitts	With P. Juneja, revise settlement draft	0.2	0.2
1/8/20	Freya Pitts	Confer with P. Juneja re: correspondence re: 12(b)(1) discovery	0.3	0.3
1/8/20	Freya Pitts	Confer with P. Juneja re: mediation dates	0.1	0.1
1/8/20	Freya Pitts	Confer with P. Juneja re: named plaintiff file review	0.1	0.1
1/8/20	Freya Pitts	Receive and review email correspondence re: mediation strategy	0.2	0.2
1/8/20	Freya Pitts	Review final email to J.P. Bradshaw re: updated settlement draft.	0.1	0.1
1/8/20	Freya Pitts	Review media coverage re: reorganization of Defendant agencies	0.2	0.2
1/8/20	Freya Pitts	Meeting with P. Juneja re discovery letter	0.4	0.4
1/8/20	Freya Pitts	Watch L. Kelly and L. Howard press conference re: creation of new agency and email team re same	0.3	0.3
1/8/20	Freya Pitts	With P. Juneja, work on revisions to settlement draft	0.5	0.5
1/9/20	Freya Pitts	Confer with P. Juneja re: correspondence re: 12(b)(1) discovery & change of address notice for D. Kansas	0.4	0.4
1/9/20	Freya Pitts	Review and revise draft letter re: 12(b)(1) discovery	0.6	0.6
1/9/20	Freya Pitts	With P. Juneja, revise draft letter re: 12(b)(1) discovery	0.8	0.8
1/10/20	Freya Pitts	Confer with P. Juneja re: possible further edits to 12(b)(1) discovery letter	0.1	0.1
1/10/20	Freya Pitts	Email correspondence with L. Welch and K. Setren re: notification of change in address	0.1	0.1
1/13/20	Freya Pitts	Confer with L. Welch and P. Juneja re: mediation status	0.1	0.1
1/13/20	Freya Pitts	Receive and review email correspondence re: mediation strategy	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
1/14/20	Freya Pitts	Email correspondence re: mediation schedule and strategy	0.2	0.2
1/15/20	Freya Pitts	Follow up discussion re: team call with L. Welch and P. Juneja	0.1	0.1
1/15/20	Freya Pitts	Review parties' correspondence re: mediation and draft email to J.P. Bradshaw re: progress to date and neutral issue; send to L. Welch for review	0.9	0.9
1/15/20	Freya Pitts	Work session with P. Juneja to discuss discovery planning and case management	1.2	1.2
1/16/20	Freya Pitts	Create and circulate follow up items from team call	0.2	0.2
1/16/20	Freya Pitts	Follow up discussion with P. Juneja re: next steps for discovery	0.1	0.1
1/16/20	Freya Pitts	Review T. Woody draft of email re: 12(b)(1) jurisdictional discovery	0.1	0.1
1/21/20	Freya Pitts	Confer with L. Welch and P. Juneja re: neutrals, mediation, and discovery planning	0.2	0.2
1/22/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
1/22/20	Freya Pitts	Confer with P. Juneja re: case planning and document review	0.1	0.1
1/22/20	Freya Pitts	Email P. Juneja re: notifying clients re: address change	0.1	0.1
1/23/20	Freya Pitts	Create follow up items from team call, including proposed next steps for discovery; email P. Juneja re: same	0.3	0.3
1/23/20	Freya Pitts	Confer with P. Juneja re: team call agenda and discovery planning	0.1	0.1
1/23/20	Freya Pitts	Email correspondence with team re: mediation	0.1	0.1
1/23/20	Freya Pitts	Receive and review email correspondence re: settlement draft and mediation	0.1	0.1
1/23/20	Freya Pitts	Revise agenda for team call; confer with P. Juneja re: same	0.2	0.2
1/24/20	Freya Pitts	Confer with P. Juneja re: Defendants' revisions to settlement agreement draft	0.2	0.2
1/24/20	Freya Pitts	Confer with P. Juneja re: discovery planning	0.1	0.1
1/24/20	Freya Pitts	Receive and review S. Dixon comments on Defendants' revisions to settlement agreement draft	0.1	0.1
1/24/20	Freya Pitts	Review Defendants' revisions to settlement agreement draft	1.1	1.1
1/26/20	Freya Pitts	Review Governor's budget documents re: DCF, KDADS, and new DHS	0.5	0.5
1/27/20	Freya Pitts	Confer with P. Juneja and L. Welch re: MTD opposition and mediation strategy	0.2	0.2
1/27/20	Freya Pitts	Confer with P. Juneja re: motion to seal for MTD opposition	0.1	0.1
1/29/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
1/29/20	Freya Pitts	Create and circulate follow-up items from team call	0.2	0.2
1/29/20	Freya Pitts	Confer with P. Juneja re: mediation strategy	0.1	0.1
1/29/20	Freya Pitts	Confer with P. Juneja re: opposition to motion to dismiss	0.1	0.1
1/29/20	Freya Pitts	Email correspondence with M. Nardi re: exhibits for opposition to MTD	0.1	0.1
1/29/20	Freya Pitts	Plaintiffs' call with mediator Kevin Ryan	0.4	0.4
1/29/20	Freya Pitts	Review and revise draft opposition to motion to dismiss	2.8	2.8
1/29/20	Freya Pitts	Review exhibit list for opposition to MTD; email correspondence with P. Juneja re: same	0.2	0.2
1/29/20	Freya Pitts	Review I. Lustbader memo re: mediation positions	0.7	0.7
1/30/20	Freya Pitts	Confer with P. Juneja re: document review	0.3	0.3
1/31/20	Freya Pitts	Confer with P. Juneja about evidence chart and discovery planning	0.2	0.2
1/31/20	Freya Pitts	Confer with P. Juneja re: case planning, case schedule, and document review protocol	0.9	0.9
1/31/20	Freya Pitts	Edit opposition to MTD - introduction and background sections	4.3	4.3
1/31/20	Freya Pitts	Review P. Juneja draft case schedule	0.3	0.3
1/31/20	Freya Pitts	Review spreadsheet produced re: office stays; email correspondence with P. Juneja and M. Nardi re: same	0.2	0.2
2/1/20	Freya Pitts	Revise introduction to opposition to MTD	0.5	0.5
2/2/20	Freya Pitts	Review L. Welch edits to opposition to MTD draft	0.3	0.3
2/3/20	Freya Pitts	Confer with L. Welch and P. Juneja re: mediation strategy, opposition to motion to dismiss, and discovery planning	0.5	0.5
2/3/20	Freya Pitts	Review P. Juneja discovery schedule	0.2	0.2
2/4/20	Freya Pitts	Check new Relativity document review panel; email correspondence with P. Juneja re: same	0.2	0.2
2/4/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
2/4/20	Freya Pitts	Confer with P. Juneja re: case schedule and discovery planning	0.5	0.5
2/4/20	Freya Pitts	Review Defendants' mediation guides	0.3	0.3
2/4/20	Freya Pitts	Review language in draft settlement and settlements in other jurisdictions re: role of the neutral in preparation for 2/7/20 mediation	0.5	0.5

Date	Name	Description	Time Billed	With Travel at 50%
2/5/20	Freya Pitts	Create and circulate follow up items from team call	0.1	0.1
2/5/20	Freya Pitts	Confer with P. Juneja re: document review planning	0.1	0.1
2/5/20	Freya Pitts	Review document review protocol	0.1	0.1
2/6/20	Freya Pitts	Travel to Kansas City for mediation	6.4	3.2
2/7/20	Freya Pitts	In person mediation	7.5	7.5
2/7/20	Freya Pitts	Correspondence with PJ re mediation updates	0.3	0.3
2/8/20	Freya Pitts	Travel from Kansas City for mediation	8.4	4.2
2/12/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
2/12/20	Freya Pitts	Confer with P. Juneja re: agenda for team call, discovery schedule, and opposition to MTD	0.3	0.3
2/12/20	Freya Pitts	Email correspondence re: revisions to opposition to MTD	0.1	0.1
2/12/20	Freya Pitts	Revise opposition to MTD	1.5	1.5
2/13/20	Freya Pitts	Email correspondence re: mediation strategy	0.1	0.1
2/13/20	Freya Pitts	Review declaration in support of opposition to MTD and filing plan	0.1	0.1
2/13/20	Freya Pitts	Review final pre-filing version of opposition to MTD	0.1	0.1
2/13/20	Freya Pitts	Review L. Welch further edits to opposition to MTD draft	0.1	0.1
2/13/20	Freya Pitts	Review updated case planning schedule	0.1	0.1
2/13/20	Freya Pitts	Revise updated settlement draft	1.7	1.7
2/14/20	Freya Pitts	Confer with P. Juneja re: further edits to settlement draft	0.3	0.3
2/14/20	Freya Pitts	Email correspondence with team re: recusal & newly assigned judge	0.1	0.1
2/18/20	Freya Pitts	Confer with P. Juneja and K. Setren re: Kansas document production and tagging	0.5	0.5
2/18/20	Freya Pitts	Confer with P. Juneja re TW email re potential witness pediatrician and government budget	0.1	0.1
2/19/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
2/19/20	Freya Pitts	Create and circulate follow up items from team call	0.3	0.3
2/20/20	Freya Pitts	Email correspondence with L. Welch re: preparation for mediation	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
2/20/20	Freya Pitts	Review mediation notes re: juvenile justice/crossover issue and practice improvement 6; email P. Juneja re: same	0.3	0.3
2/20/20	Freya Pitts	Revise file management and expert protocol; email P. Juneja re: same	0.5	0.5
2/20/20	Freya Pitts	Update memo re: potential litigation experts; email P. Juneja re: same	0.9	0.9
2/23/20	Freya Pitts	Review email correspondence re: mediation strategy	0.2	0.2
2/24/20	Freya Pitts	Travel from DC to Kansas City for mediation (time was reduced by 50% to share with another case; originally billed 4.8)	2.4	1.2
2/24/20	Freya Pitts	Email correspondence re: memo re: potential experts	0.1	0.1
2/24/20	Freya Pitts	Review D. Adamek notes from mediation prep call	0.2	0.2
2/24/20	Freya Pitts	Review Defendants' draft motion for an extension	0.1	0.1
2/25/20	Freya Pitts	Mediation	9.5	9.5
2/25/20	Freya Pitts	Review and revise updated settlement draft from M. Nardi	0.5	0.5
2/26/20	Freya Pitts	Email correspondence with M. Nardi and P. Juneja re: data shared in mediation	0.2	0.2
2/26/20	Freya Pitts	File review for Named Plaintiff S.E.	2.3	2.3
2/26/20	Freya Pitts	Mediation	5.4	5.4
2/26/20	Freya Pitts	Review documents provided by Defendants to inform mediation	0.9	0.9
2/27/20	Freya Pitts	Travel from Kansas City for mediation	4.2	2.1
2/27/20	Freya Pitts	File review for Named Plaintiff S.E.	2.8	2.8
2/27/20	Freya Pitts	Receive and review email correspondence re: qualifications for EPSDT screeners	0.1	0.1
2/27/20	Freya Pitts	Review M. Nardi draft of settlement offer	0.3	0.3
2/28/20	Freya Pitts	Confer with P. Juneja re: discovery plan	0.2	0.2
2/28/20	Freya Pitts	Review draft search terms, rogs, third party subpoena to MCOs, RFPs, and 30b6 letter	0.6	0.6
2/28/20	Freya Pitts	discuss proposed edits to draft search terms, rogs, third party subpoena to MCOs, RFPs, and 30b6 letter with P. Juneja	0.2	0.2
3/23/20	Freya Pitts	Confer with P. Juneja re case status and discovery tasks	0.2	0.2
3/23/20	Freya Pitts	Receive and review email correspondence re: ESI search terms	0.2	0.2
3/23/20	Freya Pitts	Receive and review email correspondence re: subpoena to MCOs	0.1	0.1
3/24/20	Freya Pitts	Email correspondence re: COVID-19 response	0.1	0.1
3/24/20	Freya Pitts	Instructions to K. Setren re: Named Plaintiff file review	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
3/25/20	Freya Pitts	Create and circulate follow-up items from Kansas team call	0.3	0.3
3/25/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.3	0.3
3/25/20	Freya Pitts	Review Defendants' response to Golden Rule letter	0.3	0.3
3/25/20	Freya Pitts	Review L. Welch draft letter re: COVID-19 response in Kansas and email correspondence re: same	0.1	0.1
3/25/20	Freya Pitts	Review resources from stakeholders re: child welfare system responses to COVID-19 in other states	0.6	0.6
3/26/20	Freya Pitts	Review case files to locate evidence that KVC is custodian of some documents produced in Named Plaintiff files; email to D. Adamek	0.2	0.2
3/30/20	Freya Pitts	Confer with L. Welch and P. Juneja re: COVID-19 response letter, experts, and discovery	0.2	0.2
3/31/20	Freya Pitts	Instructions to K. Setren re: document review	0.1	0.1
3/31/20	Freya Pitts	Review Children's Bureau guidance re: COVID-19 and child welfare systems	0.1	0.1
3/31/20	Freya Pitts	Review correspondence from Defendants re: COVID-19 and team email correspondence re: same	0.1	0.1
3/31/20	Freya Pitts	Review publicly available state guidance re: COVID-19	0.5	0.5
4/1/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
4/1/20	Freya Pitts	Create and circulate follow-up items from 4/1/20 team call	0.4	0.4
4/1/20	Freya Pitts	Receive and review correspondence from Defendants re: COVID-19 and case schedule	0.1	0.1
4/1/20	Freya Pitts	Receive and review email correspondence from CR re: missed deadlines and discovery next steps	0.1	0.1
4/1/20	Freya Pitts	Review and revise 4th RFPs re: COVID-19	0.4	0.4
4/1/20	Freya Pitts	Review memo re: hot documents reviewed	0.2	0.2
4/2/20	Freya Pitts	Complete review of summary of hot docs from document review	0.2	0.2
4/2/20	Freya Pitts	Confer with L. Welch re: discovery correspondence, document review, and contact with clients	0.2	0.2
4/2/20	Freya Pitts	Confer with P. Juneja re: draft discovery deficiencies letter	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
4/2/20	Freya Pitts	Confer with P. Juneja re: proposed response to J.P. Bradshaw email re: discovery deadlines	0.1	0.1
4/2/20	Freya Pitts	Draft proposed response to J.P. Bradshaw re: discovery deadlines; send to P. Juneja and L. Welch for review	0.3	0.3
4/2/20	Freya Pitts	Review and revise CR draft letter re: production deficiencies	0.3	0.3
4/2/20	Freya Pitts	Review and revise third party subpoena to MCOs	0.4	0.4
4/2/20	Freya Pitts	Review Defendants' responses & objections to interrogatories & RFPs	0.5	0.5
4/2/20	Freya Pitts	Review draft email correspondence to J.P. Bradshaw re: discovery deadlines and correspondence re: same	0.1	0.1
4/2/20	Freya Pitts	Review revised fourth set of RFPs re: COVID-19	0.1	0.1
4/3/20	Freya Pitts	Confer with L. Welch and P. Juneja re: discovery strategy and next steps	0.3	0.3
4/3/20	Freya Pitts	Confer with P. Juneja re: proposed revisions to draft letter re: production deficiencies	0.1	0.1
4/3/20	Freya Pitts	Email correspondence with L. Welch and P. Juneja re: proposed edits to cover email for letter re: production deficiencies	0.1	0.1
4/3/20	Freya Pitts	Receive and review email correspondence re: COVID-19 response and case strategy	0.2	0.2
4/3/20	Freya Pitts	Receive and review email correspondence re: next friend Kathryn Ashburn	0.1	0.1
4/3/20	Freya Pitts	Review revised production deficiencies letter; email correspondence with M. Nardi re: proposed edits to same	0.7	0.7
4/3/20	Freya Pitts	Review updated cover email for letter re: production deficiencies; email correspondence with P. Juneja and L. Welch re: proposed edits to same	0.1	0.1
4/3/20	Freya Pitts	Revise CR draft letter re: production deficiencies	0.8	0.8
4/4/20	Freya Pitts	Receive and review email correspondence re: possible Medicaid expert N.S.	0.1	0.1
4/4/20	Freya Pitts	Review final version of production deficiencies letter	0.2	0.2
4/4/20	Freya Pitts	Review summaries of hot documents identified in document review	0.3	0.3
4/5/20	Freya Pitts	Revise draft third party subpoena to contractors	0.7	0.7
4/6/20	Freya Pitts	Confer with P. Juneja re: service of third party subpoenas	0.3	0.3
4/6/20	Freya Pitts	Review subpoena to MCOs and accompanying notice; email P. Juneja re: proposed edit to same	0.1	0.1
4/6/20	Freya Pitts	Revise draft third party subpoena to contractors	0.8	0.8

Date	Name	Description	Time Billed	With Travel at 50%
4/7/20	Freya Pitts	Confer with L. Welch and P. Juneja re: discovery meet and confer	0.1	0.1
4/7/20	Freya Pitts	Confer with P. Juneja re: case schedule	0.2	0.2
4/7/20	Freya Pitts	Confer with P. Juneja re: service of third party subpoenas	0.1	0.1
4/7/20	Freya Pitts	Email correspondence re: meet and confer with Kansas Defendants re: discovery	0.1	0.1
4/7/20	Freya Pitts	Review possible extension dates in preparation for discovery meet and confer	0.1	0.1
4/7/20	Freya Pitts	Revise draft third party subpoena to contractors	1.6	1.6
4/8/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.4	0.4
4/9/20	Freya Pitts	Create and circulate follow-up items from team call	0.2	0.2
4/9/20	Freya Pitts	Confer with L. Welch and P. Juneja re: next steps for discovery, including third party subpoenas and document review	0.1	0.1
4/9/20	Freya Pitts	Receive and review email correspondence re: service of third party subpoenas	0.1	0.1
4/10/20	Freya Pitts	Confer with L. Welch and P. Juneja re: discovery next steps, including third party subpoenas, and meet and confer with Defendants	0.1	0.1
4/10/20	Freya Pitts	Confer with P. Juneja re: filing notices re third party subpoenas	0.1	0.1
4/11/20	Freya Pitts	Review T. Woody proposed responses to J.P. Bradshaw discovery letter; email P. Juneja re: response to same	0.3	0.3
4/12/20	Freya Pitts	Named Plaintiff S.E. file review	0.4	0.4
4/13/20	Freya Pitts	Confer with L. Welch and P. Juneja re: next steps, including meet and confer on discovery issues, case schedule, experts, and next friends	0.4	0.4
4/13/20	Freya Pitts	Confer with P. Juneja re: strategy for meet and confer re: COVID 19	0.1	0.1
4/13/20	Freya Pitts	Named Plaintiff S.E. file review	2.3	2.3
4/13/20	Freya Pitts	Review and provide feedback on M. Nardi draft email memorializing meet and confer	0.2	0.2
4/13/20	Freya Pitts	Review meet and confer notes from 2019 re: production of new NP files; email correspondence with P. Juneja re: same to inform 4/17 discovery meet and confer	0.2	0.2
4/13/20	Freya Pitts	Update retainers for new Next Friend	0.1	0.1
4/14/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: dismissal of Named Plaintiffs who have turned 18; Named Plaintiff file review; preparing for meet & confer re: discovery disputes; third party subpoena to contractors	0.5	0.5

Date	Name	Description	Time Billed	With Travel at 50%
4/14/20	Freya Pitts	Named Plaintiff S.E. file review	7.8	7.8
4/14/20	Freya Pitts	Review correspondence from J.P. Bradshaw re: discovery disputes	0.2	0.2
4/14/20	Freya Pitts	Review M. Nardi outline for discovery meet and confer	0.4	0.4
4/15/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.3	0.3
4/15/20	Freya Pitts	Create and circulate follow-up items from 4/15/20 weekly call	0.3	0.3
4/15/20	Freya Pitts	Confer with P. Juneja re: agenda for weekly cocounsel call and plan for discovery meet and confer	0.5	0.5
4/15/20	Freya Pitts	Email correspondence re: proposed revisions to case schedule, including Defendants' email re: Daubert challenges at class certification stage	0.4	0.4
4/15/20	Freya Pitts	Named Plaintiff S.E. file review	8.8	8.8
4/15/20	Freya Pitts	Online research re: potential deponent Jason Koehn	0.2	0.2
4/16/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: case schedule and meet and confer	0.1	0.1
4/16/20	Freya Pitts	Confer with P. Juneja re: division of labor for case file review	0.1	0.1
4/16/20	Freya Pitts	Confer with P. Juneja re: Kansas case, including case schedule, discovery status and strategy, and upcoming meet and confer	0.7	0.7
4/16/20	Freya Pitts	Email correspondence re: changes to case schedule	0.1	0.1
4/16/20	Freya Pitts	Named Plaintiff S.E. file review	6.5	6.5
4/16/20	Freya Pitts	Review and evaluate P. Juneja's proposals for case schedule revisions	0.2	0.2
4/18/20	Freya Pitts	Receive and review feedback from P. Juneja re: third party subpoena to contractors	0.1	0.1
4/20/20	Freya Pitts	Confer with P. Juneja re: 4/21/20 meet and confer with Defendants re: case schedule	0.2	0.2
4/20/20	Freya Pitts	Confer with P. Juneja re: Kansas discovery meet and confer	0.2	0.2
4/20/20	Freya Pitts	Email correspondence with L. Welch and P. Juneja re: preparation, strategy, and staffing for 4/21/20 meet and confer with Defendants re: case schedule, COVID-19, and other outstanding discovery items	0.5	0.5
4/20/20	Freya Pitts	Receive and review email correspondence re: Sunflower subpoena	0.1	0.1
4/21/20	Freya Pitts	Create and circulate plan and checklist for meet and confer to team	0.8	0.8
4/21/20	Freya Pitts	Create chart of possible revised case schedules in preparation for meet and confer with Defendants; send to L. Welch for review	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
4/21/20	Freya Pitts	Create list of outstanding topics for 4/21/20 meet and confer with Defendants	0.5	0.5
4/21/20	Freya Pitts	Confer with L. Welch and J. Strout re: follow up from last meet and confer; scheduling next meet and confer; and connecting with potential new next friend	0.1	0.1
4/21/20	Freya Pitts	Email correspondence re: scheduling next meet and confer with Defendants	0.2	0.2
4/21/20	Freya Pitts	Email correspondence with J. Strout re: discovery status	0.1	0.1
4/21/20	Freya Pitts	Email M. Nardi re: prep for 4/21/20 meet and confer with Defendants re: case schedule and discovery items	0.1	0.1
4/21/20	Freya Pitts	Meet and confer with Defendants re: COVID-19 RFPs	0.7	0.7
4/21/20	Freya Pitts	Review and revise M. Nardi email recapping 4/17/20 meet and confer with Defendants re: outstanding discovery issues; circulate to team	1.4	1.4
4/21/20	Freya Pitts	Review M. Nardi revised email recapping 4/17/20 meet and confer with Defendants	0.2	0.2
4/22/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
4/22/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: team call for Kansas	0.1	0.1
4/23/20	Freya Pitts	Confer with L. Welch and J. Strout re: discovery and experts	0.1	0.1
4/23/20	Freya Pitts	Draft email recapping 4/21/20 meet and confer with Defendants	0.9	0.9
4/23/20	Freya Pitts	Email correspondence re: meet and confer with Kansas Defendants re: ESI	0.1	0.1
4/23/20	Freya Pitts	Review discovery-related correspondence from Defendants	0.1	0.1
4/23/20	Freya Pitts	Revise email recapping 4/21/20 meet and confer with Defendants to incorporate M. Nardi edits	0.2	0.2
4/24/20	Freya Pitts	Check in with K. Setren re: status of review of Named Plaintiff MB's case file	0.1	0.1
4/24/20	Freya Pitts	Email correspondence re: meet and confer with Kansas Defendants re: ESI	0.1	0.1
4/24/20	Freya Pitts	Email correspondence with P. Juneja re: next steps and assignments for outstanding discovery tasks	0.4	0.4
4/26/20	Freya Pitts	Email D. Adamek re: 4/22 team meeting	0.1	0.1
4/27/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: case file review, ESI meet and confer, and call with Amerigroup re: third party subpoena	0.1	0.1
4/27/20	Freya Pitts	Email correspondence re: management and assignment of discovery-related tasks	0.1	0.1
4/27/20	Freya Pitts	Review C. Connaughton notes from 4/22/20 Kansas team meeting	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
4/27/20	Freya Pitts	Review Defendants' recent correspondence re: discovery	0.1	0.1
4/28/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: named plaintiff file review, ESI, upcoming deadlines, and experts	0.6	0.6
4/28/20	Freya Pitts	Confer with P. Juneja re: negotiation on ESI search terms	0.2	0.2
4/28/20	Freya Pitts	Email correspondence re: Defendants' new productions	0.1	0.1
4/28/20	Freya Pitts	Email correspondence with P. Juneja and M. Nardi re: Named Plaintiff file review and other outstanding discovery tasks	0.1	0.1
4/28/20	Freya Pitts	Receive and review contact memo from S. Dixon re: Next Friend	0.1	0.1
4/28/20	Freya Pitts	Receive and review redaction log for MA case file	0.1	0.1
4/28/20	Freya Pitts	Review Defendants' responses and objections to RFPs sets 3&4 to DCF, 2 to KDHE, and 2 to KDADS; redaction and privilege logs, issue logs, and correspondence re: litigation holds	0.9	0.9
4/28/20	Freya Pitts	Review M. Fowler memo re: hot docs from document review; email P. Juneja re: same	0.7	0.7
4/29/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
4/29/20	Freya Pitts	Create and circulate follow-up items from 4/22/20 team call	0.7	0.7
4/29/20	Freya Pitts	Confer with P. Juneja and J. Strout re: document review, including Named Plaintiff file review, and preparing for meet and confer with Defendants on 5/1/20	0.1	0.1
4/29/20	Freya Pitts	Edit file review spreadsheet for Named Plaintiff S.E.	0.1	0.1
4/29/20	Freya Pitts	Receive and review email correspondence re: ESI search terms on KidZones	0.1	0.1
4/29/20	Freya Pitts	Receive and review J. King memo re: privilege and redaction logs	0.1	0.1
4/29/20	Freya Pitts	Receive and review Sunflower's objections to third party subpoena	0.4	0.4
4/29/20	Freya Pitts	Review and revise T. Woody draft motion for extension of deadlines to file motions to compel	0.4	0.4
4/29/20	Freya Pitts	Review legal research memo re: access to case files	0.1	0.1
4/29/20	Freya Pitts	Review new COVID-19 guidance re: HCBS waivers	0.1	0.1
4/29/20	Freya Pitts	Revise third party subpoena to contractors	0.4	0.4
4/30/20	Freya Pitts	Check in with K. Setren re: filing of motion to extend deadlines	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
4/30/20	Freya Pitts	Compile resources in preparation to train J. Strout on Relativity & file review	0.4	0.4
4/30/20	Freya Pitts	Confer with L. Welch and J. Strout re: document review; prep for meet and confer on 5/1/20; filing motion for extension of time to file motions to compel.	0.2	0.2
4/30/20	Freya Pitts	Confer with L. Welch and P. Juneja re: case schedule	0.1	0.1
4/30/20	Freya Pitts	Finalize motion for extension to file motions to compel; email correspondence with K. Setren, P. Juneja, and T. Woody re: filing same	0.3	0.3
4/30/20	Freya Pitts	Propose revision to search terms re: mental health screening and treatment	0.3	0.3
4/30/20	Freya Pitts	Receive and review email correspondence and materials from C. Glasspiegel re: discovery deadlines in COVID-19 pandemic	0.2	0.2
4/30/20	Freya Pitts	Review C. Glasspiegel draft email re: production issues	0.1	0.1
4/30/20	Freya Pitts	Review Defendants' proposed revised case schedule; email L. Welch, P. Juneja, and J. Strout re: same	0.2	0.2
4/30/20	Freya Pitts	Review Defendants' RFPs and rogs; email P. Juneja re: same	0.5	0.5
4/30/20	Freya Pitts	Review draft agenda for meet and confer with Defendants	0.1	0.1
4/30/20	Freya Pitts	Review S.E. case file review chart to suggest additions to C. Glasspiegel draft email re: production issues	0.2	0.2
4/30/20	Freya Pitts	Review updated named plaintiff file review protocol	0.5	0.5
4/30/20	Freya Pitts	Train J. Strout on Relativity and case file review protocol	0.8	0.8
4/30/20	Freya Pitts	Update SE named plaintiff file review; email P. Juneja re: question re: same	0.4	0.4
5/1/20	Freya Pitts	Confer with J. Strout re: review of KDHE document production	0.1	0.1
5/1/20	Freya Pitts	Confer with K. Setren re: finalizing filing of motion for extension to file motions to compel	0.1	0.1
5/1/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: meet and confer with Defendants and third party subpoena to contractors	0.1	0.1
5/1/20	Freya Pitts	Confer with P. Juneja re: case schedule	0.7	0.7
5/1/20	Freya Pitts	Email correspondence re: additions to email to Defendants re: production issues	0.1	0.1
5/1/20	Freya Pitts	Instructions to K. Setren re: file maintenance	0.1	0.1
5/1/20	Freya Pitts	Review Amerigroup response to third party subpoena	0.2	0.2
5/1/20	Freya Pitts	Review and revise proposed order for motion for extension to file motions to compel	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
5/1/20	Freya Pitts	Review and revise recap email from meet and confer	0.4	0.4
5/1/20	Freya Pitts	Review hot documents from COVID-19 production	0.3	0.3
5/1/20	Freya Pitts	Review Kansas plan for reopening to inform discovery strategy	0.1	0.1
5/1/20	Freya Pitts	Revise Named Plaintiff case file review protocol; circulate to discovery team	0.5	0.5
5/4/20	Freya Pitts	Circulate proposed edits to meet and confer follow up email	0.1	0.1
5/4/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: third party subpoena to contractors, named plaintiff file review, settlement proposal, and case schedule	0.2	0.2
5/4/20	Freya Pitts	Review Defendants' settlement proposal	0.3	0.3
5/4/20	Freya Pitts	Review P. Juneja proposed new case schedule	0.1	0.1
5/5/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: document review, settlement strategy, and potential Medicaid experts	0.2	0.2
5/5/20	Freya Pitts	Receive and review email correspondence re: settlement strategy	0.1	0.1
5/6/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.3	0.3
5/6/20	Freya Pitts	Confer with J. Strout re: discovery directed at Named Plaintiffs	0.1	0.1
5/6/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: settlement strategy, third party discovery, and team meeting	0.2	0.2
5/6/20	Freya Pitts	Confer with P. Juneja re: agenda for Kansas team meeting	0.1	0.1
5/6/20	Freya Pitts	Email correspondence with L. Welch re: response to settlement offer	0.1	0.1
5/6/20	Freya Pitts	Meet with K. Setren re: organization of case files	0.8	0.8
5/6/20	Freya Pitts	Receive and review email correspondence from I. Lustbader re: settlement strategy	0.1	0.1
5/6/20	Freya Pitts	Receive and review memo from P. Juneja re: updated list of Named Plaintiffs with ages and statuses	0.1	0.1
5/6/20	Freya Pitts	Review J. Strout memo re: discovery requests to minors	0.1	0.1
5/6/20	Freya Pitts	Review order granting motion for extension of deadline to file motions to compel	0.1	0.1
5/7/20	Freya Pitts	Create and circulate list of follow-up items for Kansas team call	0.4	0.4
5/7/20	Freya Pitts	Confer with P. Juneja re: case schedule	0.1	0.1
5/7/20	Freya Pitts	Email correspondence re: responding to discovery requests to Named Plaintiffs	0.1	0.1
5/7/20	Freya Pitts	Email correspondence with P. Juneja re: resolving production issues	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
5/7/20	Freya Pitts	Review I. Lustbader draft correspondence re: settlement; email L. Welch re proposed edits to same	0.1	0.1
5/7/20	Freya Pitts	Review P. Juneja revised proposed schedule; email correspondence re: same	0.2	0.2
5/8/20	Freya Pitts	Confer with P. Juneja and J. Strout re: document review, including review of Named Plaintiff files, and Plaintiffs who have or will age out	0.5	0.5
5/8/20	Freya Pitts	Confer with P. Juneja re: resolving production issues	0.2	0.2
5/8/20	Freya Pitts	Consult files to verify that all Named Plaintiff case files have been produced in preparation for meet and confer	0.1	0.1
5/8/20	Freya Pitts	Review agenda for discovery meet and confer	0.1	0.1
5/8/20	Freya Pitts	Revise draft third party subpoena to contractors; email correspondence with L. Welch re: same	0.2	0.2
5/9/20	Freya Pitts	Review M. Nardi draft follow-up email from 5/8 meet and confer; propose edits to same	0.4	0.4
5/9/20	Freya Pitts	Review P. Juneja proposed new case schedule	0.1	0.1
5/10/20	Freya Pitts	Draft language for Defendants re: information sought in Medicaid-related ESI search terms	0.4	0.4
5/10/20	Freya Pitts	Review J. Strout summary of hot documents from KDHE production 2	0.1	0.1
5/10/20	Freya Pitts	Search production for documents relevant to the "difficult to place" and "placement options" workgroups; email P. Juneja re: analysis of same	0.5	0.5
5/11/20	Freya Pitts	Confer with P. Juneja re: settlement and discovery next steps	0.2	0.2
5/11/20	Freya Pitts	Email correspondence re: responding to settlement proposal from Defendants	0.1	0.1
5/11/20	Freya Pitts	Email correspondence with L. Welch re: proposed edits to third party subpoena to contractors	0.2	0.2
5/11/20	Freya Pitts	Prepare Plaintiffs' settlement response; send to L. Welch for review	2.5	2.5
5/11/20	Freya Pitts	Receive and review email correspondence from P. Juneja re: mental health screening requirement to inform settlement draft	0.1	0.1
5/11/20	Freya Pitts	Review Defendants' settlement proposal and Plaintiffs' previous offer in preparation for work session with team	0.4	0.4
5/11/20	Freya Pitts	Review information from J. King re: remote deposition software	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
5/11/20	Freya Pitts	Review KDADS crisis and exception policy for IDD waiver services	0.3	0.3
5/11/20	Freya Pitts	Review S. Dixon contact memo for Next Friend	0.1	0.1
5/12/20	Freya Pitts	Call with potential expert re: Medicaid system	1.1	1.1
5/12/20	Freya Pitts	Circulate proposed edits to meet and confer follow up email	0.1	0.1
5/12/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: settlement strategy, third party subpoenas	0.4	0.4
5/12/20	Freya Pitts	Confer with P. Juneja re: settlement strategy	0.1	0.1
5/12/20	Freya Pitts	Receive and review email correspondence from I. Lustbader re: settlement strategy	0.1	0.1
5/12/20	Freya Pitts	Receive and review email correspondence re: Medicaid data	0.1	0.1
5/12/20	Freya Pitts	Review DCF data compiled and analyzed by Appleseed team	0.1	0.1
5/12/20	Freya Pitts	Review proposed mental health/trauma screen instrument	0.1	0.1
5/12/20	Freya Pitts	Revise and circulate settlement response to team for review	0.3	0.3
5/13/20	Freya Pitts	Team call, including re: settlement, depositions, and responding to Defendants' discovery requests	1.3	1.3
5/13/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.6	0.6
5/13/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: response to Defendants' discovery request; settlement strategy; and legal research tasks	0.4	0.4
5/13/20	Freya Pitts	Confer with P. Juneja re: Defendants' proposed modifications to case schedule	0.1	0.1
5/13/20	Freya Pitts	Receive and review comments from L. Welch on third party subpoena to contractors; email P. Juneja re: same	0.1	0.1
5/13/20	Freya Pitts	Receive and review email correspondence from I. Lustbader re: settlement strategy	0.1	0.1
5/13/20	Freya Pitts	Receive and review memo from J. King re: defendants' redaction logs and strategy for response	0.2	0.2
5/13/20	Freya Pitts	Review correspondence from Defendants re: case schedule and 30(b)(6) designees	0.1	0.1
5/13/20	Freya Pitts	Review correspondence from Defendants re: discovery	0.1	0.1
5/13/20	Freya Pitts	Review J. Strout memo re: class certification decisions issued by Judge Crabtree	0.2	0.2
5/13/20	Freya Pitts	Review Kansas draft settlement agreement in preparation for team discussion re: same	0.6	0.6

Date	Name	Description	Time Billed	With Travel at 50%
5/14/20	Freya Pitts	Call with potential expert re: Medicaid system	1.0	1.0
5/14/20	Freya Pitts	Create and circulate follow-up items from Kansas team meeting	0.3	0.3
5/14/20	Freya Pitts	Confer with L. Welch and J. Strout re: Medicaid experts	0.1	0.1
5/14/20	Freya Pitts	Email correspondence re: settlement proposal and preparation for 5/15/20 meet and confer	0.1	0.1
5/14/20	Freya Pitts	Email correspondence with T. Woody re: request for an extension to respond to discovery	0.2	0.2
5/14/20	Freya Pitts	Instructions to J. Strout re: document review	0.1	0.1
5/14/20	Freya Pitts	Receive and review draft email from C. Glasspiegel re: COVID-19 discovery; email P. Juneja re: same	0.2	0.2
5/14/20	Freya Pitts	Receive and review email correspondence from I. Lustbader re: settlement strategy	0.1	0.1
5/14/20	Freya Pitts	Receive and review email correspondence from team re: settlement strategy	0.2	0.2
5/14/20	Freya Pitts	Receive and review memo from N.Taykahan re: responses to discovery requests directed at Named Plaintiffs	0.1	0.1
5/14/20	Freya Pitts	Review memo from Children's Rights re topics to be covered in meet and confer; provide feedback to P. Juneja re: same	0.4	0.4
5/14/20	Freya Pitts	Review T. Woody draft email re: extension for discovery responses; consult federal and local rules re: same; email L. Welch, P. Juneja, and J. Strout re: proposed revisions to draft	0.6	0.6
5/14/20	Freya Pitts	Update Plaintiffs' settlement proposal based on team feedback; email correspondence with team members re: same	2.0	2.0
5/15/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: depositions, meet and confer, case schedule, settlement strategy, and third party subpoena	0.5	0.5
5/15/20	Freya Pitts	Final review of settlement proposal for Defendants	0.3	0.3
5/15/20	Freya Pitts	Revise settlement draft	0.6	0.6
5/17/20	Freya Pitts	Receive and review email correspondence re: deposition strategy	0.1	0.1
5/17/20	Freya Pitts	Review 30(b)(6) notice; email correspondence with NCYL team re: scope of same for contractors	0.4	0.4
5/17/20	Freya Pitts	Review and send Word version of settlement draft for Defendants	0.4	0.4

Date	Name	Description	Time Billed	With Travel at 50%
5/17/20	Freya Pitts	Review media coverage of contractor funding issue; email correspondence re: same	0.3	0.3
5/18/20	Freya Pitts	Review and revise draft meet and confer recap email	0.3	0.3
5/18/20	Freya Pitts	Review correspondence from C. Josserand re: ESI custodians	0.2	0.2
5/18/20	Freya Pitts	Review email correspondence re: proposed case schedule	0.1	0.1
5/18/20	Freya Pitts	Revise third party subpoena to contractors/grantees, including review of DCF RFP and online research re: current grants	3.6	3.6
5/19/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: discovery to Named Plaintiffs, Jason Koehn deposition.	0.2	0.2
5/19/20	Freya Pitts	Confer with P. Juneja re: third party subpoenas to contractors	0.1	0.1
5/19/20	Freya Pitts	Email correspondence re: video depositions	0.1	0.1
5/20/20	Freya Pitts	Clean up and circulate draft third party subpoena to contractors to team	0.3	0.3
5/20/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.6	0.6
5/20/20	Freya Pitts	Confer with P. Juneja and J. Strout re: document review.	0.1	0.1
5/21/20	Freya Pitts	Create and circulate follow-up items from Kansas team meeting	0.4	0.4
5/21/20	Freya Pitts	Confer with L. Welch and T. Woody re: response to RFA from community member	0.1	0.1
5/21/20	Freya Pitts	Email correspondence with team re: 30(b)(6) deposition	0.5	0.5
5/21/20	Freya Pitts	Instructions to K. Setren re: mediation logistics	0.1	0.1
5/21/20	Freya Pitts	Receive and review email correspondence re: ESI custodians and search terms	0.2	0.2
5/21/20	Freya Pitts	Review M. Nardi draft email re: 30b6 depositions	0.1	0.1
5/22/20	Freya Pitts	Review Defendants' settlement proposal; confer with P. Juneja re: same	0.3	0.3
5/25/20	Freya Pitts	Review deposition outline for J. Koehn; email P. Juneja with feedback re: same	0.2	0.2
5/25/20	Freya Pitts	Review LiveLitigation training materials in preparation for virtual deposition	0.2	0.2
5/25/20	Freya Pitts	Review potential exhibits for Jason Koehn deposition	0.8	0.8
5/26/20	Freya Pitts	Confer with L. Welch and J. Strout re: Jason Koehn deposition, settlement negotiations, file review, third party subpoenas	0.2	0.2
5/26/20	Freya Pitts	Email correspondence re: prep for settlement conference	0.1	0.1
5/27/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
5/27/20	Freya Pitts	Create and circulate list of follow-up items for Kansas team call	0.4	0.4
5/27/20	Freya Pitts	Confer with P. Juneja and J. Strout re: team meeting agenda, depositions, response to Defendants' discovery requests, and plan for Plaintiffs who are aging out	0.4	0.4
5/27/20	Freya Pitts	Review Defendants' settlement proposal and I. Lustbader comments re: same; email L. Welch, P. Juneja, and J. Strout re: response to Defendants' proposal to eliminate Outcome 7 as redundant with Outcome 2	1.5	1.5
5/28/20	Freya Pitts	Confer with L. Welch and J. Strout re: named plaintiff file review for JP	0.4	0.4
5/28/20	Freya Pitts	Email correspondence with P. Juneja and K. Setren re: settlement conference logistics	0.1	0.1
5/28/20	Freya Pitts	Review email correspondence from I. Lustbader re: settlement negotiation and relevant CFSR documents	0.2	0.2
5/29/20	Freya Pitts	Confer with P. Juneja re: legal research question re: Plaintiffs aging out	0.2	0.2
5/29/20	Freya Pitts	Email correspondence with T. Woody re: service of third party subpoenas on grantees	0.1	0.1
6/1/20	Freya Pitts	Confer with P. Juneja re: service of third party subpoenas on contractors	0.1	0.1
6/1/20	Freya Pitts	Email correspondence re: settlement proposal for Defendants	0.2	0.2
6/1/20	Freya Pitts	Email P. Juneja and K. Setren re: file maintenance protocol and depo transcripts	0.1	0.1
6/1/20	Freya Pitts	Online research re: rules governing service of third party subpoenas	0.3	0.3
6/1/20	Freya Pitts	Prepare Plaintiffs' response to Defendants' settlement proposal	1.8	1.8
6/1/20	Freya Pitts	Review CFSR item 18 to inform settlement response; email P. Juneja re: same	0.3	0.3
6/2/20	Freya Pitts	Confer with L. Welch re: Plaintiffs' response to Defendants' settlement proposal	0.1	0.1
6/2/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: settlement proposal and third party subpoenas	0.2	0.2
6/2/20	Freya Pitts	Revise and finalize Plaintiffs' response to Defendants' settlement proposal	1.0	1.0
6/3/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
6/3/20	Freya Pitts	Final review of subpoenas to four grantees for service and filing	0.3	0.3
6/3/20	Freya Pitts	Prepare third party subpoenas to grantees and supporting documents for filing and service; confer with T. Woody, P. Juneja, and K. Setren re: same	3.6	3.6
6/3/20	Freya Pitts	Receive and review email correspondence re: discovery next steps	0.2	0.2
6/3/20	Freya Pitts	Review EPSDT data offered in connection with settlement	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
6/3/20	Freya Pitts	Review order on MTD governor Kelly	0.6	0.6
6/3/20	Freya Pitts	conferring with P. Juneja re St Francis entities	0.5	0.5
6/3/20	Freya Pitts	Review settlement draft and email team re: game plan for settlement meeting and follow-up items after team call	0.7	0.7
6/4/20	Freya Pitts	Review settlement draft, EPSDT data, and notes re: CFSR outcomes in preparation for settlement discussions	0.5	0.5
6/4/20	Freya Pitts	Confer with L. Welch and M. Nardi re: next steps for KS settlement discussions	0.1	0.1
6/4/20	Freya Pitts	Participate in settlement discussions	5.0	5.0
6/5/20	Freya Pitts	Email correspondence re: Defendants' document production	0.1	0.1
6/5/20	Freya Pitts	Review settlement proposal to be sent to Defendants	0.7	0.7
6/7/20	Freya Pitts	Review federal and local rules to confirm next steps for third party subpoenas for grantees	0.2	0.2
6/8/20	Freya Pitts	Review contact memo regarding Plaintiff JP	0.1	0.1
6/8/20	Freya Pitts	Review draft settlement agreement to identify issues to resolve	1.7	1.7
6/8/20	Freya Pitts	phone call with P. Juneja re third party subpoenas	0.3	0.3
6/9/20	Freya Pitts	Check in with P. Juneja re: aging out Plaintiffs issue	0.1	0.1
6/9/20	Freya Pitts	Confer with P. Juneja re: proposal to deal with substantive obligations language	0.3	0.3
6/10/20	Freya Pitts	Further revisions, clean up, and review of settlement draft; email correspondence with team re: same	2.3	2.3
6/10/20	Freya Pitts	Participate in settlement discussions	2.9	2.9
6/10/20	Freya Pitts	Revise and clean up settlement draft	3.0	3.0
6/11/20	Freya Pitts	Review Defendants' proposed revisions to draft settlement	0.2	0.2
6/11/20	Freya Pitts	Clean up, finalize, and review draft settlement agreement; email correspondence with team re: same	0.7	0.7
6/11/20	Freya Pitts	Participate in settlement discussions	2.8	2.8
6/12/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: next steps for settlement, including preliminary/final approval, fees, third party discovery, and notice	0.4	0.4
6/12/20	Freya Pitts	Receive and review email correspondence re: next steps for third party discovery	0.1	0.1
6/12/20	Freya Pitts	Review correspondence from L. Welch to clients re: proposed settlement	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
6/12/20	Freya Pitts	Review M. Nardi draft talking points re: settlement for Next Friends	0.1	0.1
6/12/20	Freya Pitts	Confer with L. Welch, P. Juneja, and F. Pitts re: next steps for settlement, including preliminary/final approval, fees, third party discovery, and notice	0.4	0.4
6/13/20	Freya Pitts	Review draft stipulation dismissing Named Plaintiffs; email correspondence re: same	0.3	0.3
6/13/20	Freya Pitts	Review P. Juneja proposed case schedule for approval and fees; email correspondence re: same	0.3	0.3
6/15/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: settlement, including preliminary and final approval, fees motion, third party discovery, and client approval	0.4	0.4
6/15/20	Freya Pitts	Review draft email to Next Friends re: approval of settlement draft	0.1	0.1
6/16/20	Freya Pitts	Confer with P. Juneja and J. Strout re: next steps for settlement approval and fee motion	0.4	0.4
6/16/20	Freya Pitts	Receive and review email correspondence re: schedule for preliminary approval, notice, final approval, and fees motion	0.2	0.2
6/16/20	Freya Pitts	Receive and review email correspondence re: settlement next steps and draft press release	0.3	0.3
6/16/20	Freya Pitts	Receive and review email correspondence re: stipulation for dismissal	0.1	0.1
6/17/20	Freya Pitts	Team call, including re: preliminary and final approval, fees, neutral, third party discovery, and media strategy	1.2	1.2
6/17/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
6/17/20	Freya Pitts	Create and circulate list of follow-up items from team call.	0.6	0.6
6/17/20	Freya Pitts	Follow up meeting with NCYL team re: settlement next steps	0.4	0.4
6/17/20	Freya Pitts	Receive and review email correspondence re: J. Meltzer suggested settlement edits	0.1	0.1
6/17/20	Freya Pitts	Review contractors' motion for an extension re: third party subpoenas	0.1	0.1
6/18/20	Freya Pitts	Update settlement draft with J. Meltzer's proposed revisions to settlement; circulate to team	0.4	0.4
6/18/20	Freya Pitts	Call with Defendants re: settlement process	1.0	1.0
6/18/20	Freya Pitts	Call with P. Juneja re: settlement process next steps	0.2	0.2
6/18/20	Freya Pitts	Email correspondence re: press strategy	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
6/18/20	Freya Pitts	Email correspondence with C. Lawson and M. Nardi re: attachments to settlement	0.1	0.1
6/18/20	Freya Pitts	Email L. Welch re: settlement process next steps	0.3	0.3
6/18/20	Freya Pitts	Email team re: J. Meltzer proposed revisions to settlement	0.1	0.1
6/18/20	Freya Pitts	Follow up call with I. Lustbader and J. Strout re: settlement next steps	0.1	0.1
6/18/20	Freya Pitts	Read info circulated re: state finance council	0.1	0.1
6/18/20	Freya Pitts	Review and propose edits to I. Lustbader proposed recap email	0.2	0.2
6/18/20	Freya Pitts	Review settlement attachments; email correspondence with team re: same	0.3	0.3
6/19/20	Freya Pitts	Confer with P. Juneja re: preliminary approval motion	0.1	0.1
6/22/20	Freya Pitts	Confer with P. Juneja re: J. Meltzer suggested edit to settlement agreement, client approval, etc.	0.3	0.3
6/22/20	Freya Pitts	Confer with P. Juneja and J. Strout re: next steps for settlement approval and fee motion	0.2	0.2
6/22/20	Freya Pitts	Confer with P. Juneja re: call with Judge re: settlement	0.1	0.1
6/22/20	Freya Pitts	Confer with P. Juneja re: class notice, etc	0.1	0.1
6/22/20	Freya Pitts	Email correspondence with I. Lustbader and C. Ostmeyer re: press plan	0.2	0.2
6/23/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: next steps for preliminary approval, final approval, and fee motion	0.4	0.4
6/23/20	Freya Pitts	Confer with P. Juneja re: AG proposed changes to settlement agreement	0.2	0.2
6/23/20	Freya Pitts	Email correspondence re: AG proposed changes to settlement agreement	0.7	0.7
6/23/20	Freya Pitts	Receive and review email correspondence re: conference with DDC	0.1	0.1
6/23/20	Freya Pitts	Review Harper preliminary approval papers recommended by DDC as a model	0.4	0.4
6/24/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
6/24/20	Freya Pitts	Email correspondence re: draft response to AG's proposed settlement revisions; confer with P. Juneja re: same	0.3	0.3
6/24/20	Freya Pitts	Email correspondence re: State Finance Council	0.5	0.5
6/24/20	Freya Pitts	NCYL debrief call, including re: AG's proposed settlement revisions and next steps	0.2	0.2
6/24/20	Freya Pitts	Receive and review email correspondence re: response to AG proposed changes to settlement agreement	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
6/24/20	Freya Pitts	Receive and review email correspondence re: settlement next steps	0.1	0.1
6/24/20	Freya Pitts	phone call with PJ re LCC v council for settlement approval	0.2	0.2
6/25/20	Freya Pitts	Confer with L. Welch and J. Strout re: preliminary approval papers, next steps for settlement approval, and fee motion	0.5	0.5
6/25/20	Freya Pitts	Confer with P. Juneja re edits to preliminary approval papers	0.2	0.2
6/25/20	Freya Pitts	Receive and review information re: Kansas budget updates	0.1	0.1
6/25/20	Freya Pitts	Review email correspondence and legal research re: State Finance Council and LCC in Kansas	0.3	0.3
6/26/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: settlement next steps, press release, and third party discovery	0.2	0.2
6/26/20	Freya Pitts	Review and revise preliminary approval papers, including motion, proposed order, and draft notice	2.9	2.9
6/27/20	Freya Pitts	Email correspondence re: third party discovery	0.1	0.1
6/28/20	Freya Pitts	Email correspondence re: third party discovery	0.1	0.1
6/28/20	Freya Pitts	Receive and review email correspondence re: settlement strategy	0.1	0.1
6/29/20	Freya Pitts	Confer with K. Setren re: expenses	0.1	0.1
6/29/20	Freya Pitts	Confer with L. Welch and P. Juneja re: third party discovery, press release, preliminary approval papers, and timeline for fee motion	0.3	0.3
6/29/20	Freya Pitts	Confer with P. Juneja re: State Finance Council	0.2	0.2
6/29/20	Freya Pitts	Receive and review email correspondence re: Kansas legislature and budget process, potential impact on settlement	0.2	0.2
6/29/20	Freya Pitts	Receive and review email correspondence re: third party discovery for grantees; confer with P. Juneja re: same	0.2	0.2
6/30/20	Freya Pitts	Email correspondence re: settlement next steps	0.1	0.1
6/30/20	Freya Pitts	Review and propose edits to press release	0.1	0.1
7/1/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.4	0.4
7/1/20	Freya Pitts	Email correspondence re: next steps for settlement approval	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
7/1/20	Freya Pitts	Follow-up NCYL call, including re: aged out Named Plaintiffs, and preliminary approval papers	0.5	0.5
7/4/20	Freya Pitts	Review P. Juneja and L. Welch revisions to draft preliminary approval motion, notice, and proposed order	0.4	0.4
7/6/20	Freya Pitts	Confer with P. Juneja re: email correspondence from Defendants re: next steps in settlement approval	0.1	0.1
7/6/20	Freya Pitts	Confer with P. Juneja re: email correspondence with Defendants re: resuming discovery	0.1	0.1
7/6/20	Freya Pitts	Receive and review email correspondence from Defendants re: next steps in settlement approval	0.1	0.1
7/7/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.2	0.2
7/7/20	Freya Pitts	Email correspondence re: next steps for settlement approval	0.1	0.1
7/7/20	Freya Pitts	Review CR edits to preliminary approval motion draft; email correspondence re: same	0.3	0.3
7/8/20	Freya Pitts	Confer with P. Juneja re: notice of errata	0.2	0.2
7/8/20	Freya Pitts	phone calls with P. Juneja re next steps to finalize and file settlement agreement	0.6	0.6
7/8/20	Freya Pitts	Review draft notice of errata	0.1	0.1
7/8/20	Freya Pitts	Review final version of settlement	0.3	0.3
7/8/20	Freya Pitts	Review settlement draft; prepare redline and highlighted versions showing version error; email correspondence with L. Welch re: same	0.4	0.4
7/9/20	Freya Pitts	Confer with P. Juneja re: notice of errata	0.1	0.1
7/10/20	Freya Pitts	Confer with P. Juneja and J. Strout re: next steps for preliminary approval	0.2	0.2
7/11/20	Freya Pitts	Email correspondence re: billing rates	0.2	0.2
7/12/20	Freya Pitts	Review updated draft of preliminary approval motion, notice, and proposed order; email P. Juneja re: proposed revisions to same	0.8	0.8
7/13/20	Freya Pitts	Confer with P. Juneja and J. Strout re: bluebooking preliminary approval motion; sharing Named Plaintiff RR's file	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
7/13/20	Freya Pitts	Review draft I. Lustbader preliminary approval declaration and edits to notice, proposed order, and motion	0.2	0.2
7/13/20	Freya Pitts	Review J. Strout research memo re: disclosing case file to Named Plaintiff RR	0.2	0.2
7/13/20	Freya Pitts	Review L. Welch edits to declaration in support of preliminary approval; email correspondence re: further edits to same	0.1	0.1
7/13/20	Freya Pitts	Review L. Welch preliminary approval declaration	0.2	0.2
7/13/20	Freya Pitts	Revise L. Welch declaration in support of preliminary approval	0.4	0.4
7/14/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
7/14/20	Freya Pitts	Confer with P. Juneja, J. Strout, and L. Welch re: preliminary approval documents	0.1	0.1
7/14/20	Freya Pitts	Discuss preliminary approval motion with J. Rigal	0.1	0.1
7/15/20	Freya Pitts	Team call, including re: preliminary approval, RR's case file, fee motion, and Appleseed briefings on settlement	1.3	1.3
7/15/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: preliminary approval papers and RR's case file	0.2	0.2
7/20/20	Freya Pitts	Review and propose revisions to T. Woody declaration in support of preliminary approval	0.4	0.4
7/22/20	Freya Pitts	Call with P. Juneja re: preliminary approval papers	0.2	0.2
7/22/20	Freya Pitts	Create and circulate agenda for team meeting; review email correspondence and case file to inform same	0.1	0.1
7/22/20	Freya Pitts	Confer with L. Welch, P. Juneja, and J. Strout re: preliminary approval papers and fee distribution	0.3	0.3
7/22/20	Freya Pitts	Confer with P. Juneja re: proposed edits to class notice	0.1	0.1
7/22/20	Freya Pitts	Email P. Juneja re: suggested revisions to T. Woody declaration	0.1	0.1
7/22/20	Freya Pitts	NCYL team debrief re: settlement agreement and approval	0.4	0.4
7/22/20	Freya Pitts	Review and suggest revisions to C. Schechtman declaration	0.1	0.1
7/22/20	Freya Pitts	Review and suggest revisions to L. Burns Bucklew declaration	0.3	0.3
7/22/20	Freya Pitts	Review Defendants' edits to proposed notice and order; email correspondence re: same	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
7/22/20	Freya Pitts	Review revised L. Welch declaration	0.1	0.1
7/23/20	Freya Pitts	Confer with P. Juneja, L. Welch, and J. Strout re: motion for preliminary approval and implementation plan	0.3	0.3
7/23/20	Freya Pitts	Receive and review information re: State Finance Council approval process	0.4	0.4
7/24/20	Freya Pitts	Create and circulate follow-up items from team call	0.2	0.2
7/24/20	Freya Pitts	Confer with P. Juneja, L. Welch, and J. Strout re: filing motion for preliminary approval	0.2	0.2
7/24/20	Freya Pitts	Review DLA declaration in support of preliminary approval	0.1	0.1
7/27/20	Freya Pitts	Confer with P. Juneja re: prelim approval filing	0.2	0.2
7/27/20	Freya Pitts	Email correspondence re: prelim approval filing	0.1	0.1
7/27/20	Freya Pitts	Final review of Kansas preliminary approval filings	2.4	2.4
4/14/20	Jean Strout	Confer with LW FP PJ re: dismissal of Named Plaintiffs who have turned 18; Named Plaintiff file review; preparing for meet & confer re: discovery disputes; third party subpoena to contractors	0.5	0.5
4/16/20	Jean Strout	Confer with L. Welch, P. Juneja, and F. Pitts re: case schedule and meet and confer	0.1	0.1
4/21/20	Jean Strout	Confer with F. Pitts and L. Welch re: follow up from last meet and confer; scheduling next meet and confer; and connecting with potential new next friend	0.1	0.1
4/23/20	Jean Strout	Confer with L. Welch and F. Pitts re: discovery and experts	0.1	0.1
4/27/20	Jean Strout	Confer with L. Welch, P. Juneja, and F. Pitts re: case file review, ESI meet and confer, and call with Amerigroup re: third party subpoena	0.1	0.1
4/28/20	Jean Strout	Confer with L. Welch, P. Juneja, and F. Pitts re: named plaintiff file review, ESI, upcoming deadlines, and experts	0.6	0.6
4/29/20	Jean Strout	Confer with P. Juneja and F. Pitts re: document review, including Named Plaintiff file review, and preparing for meet and confer with Defendants on 5/1/20	0.1	0.1
4/30/20	Jean Strout	Confer with L. Welch and F. Pitts re: document review; prep for meet and confer on 5/1/20; filing motion for extension of time to file motions to compel.	0.2	0.2
4/30/20	Jean Strout	Confer with F. Pitts re Relativity training and case file review protocol	0.8	0.8
4/30/20	Jean Strout	Named Plaintiff Doc Review - J.P. Prod 1	2.0	2.0

Date	Name	Description	Time Billed	With Travel at 50%
5/1/20	Jean Strout	Confer with L. Welch, P. Juneja, and F. Pitts re: meet and confer with Defendants and third party subpoena to contractors	0.1	0.1
5/1/20	Jean Strout	Confer with F. Pitts re: review of KDHE document production	0.1	0.1
5/4/20	Jean Strout	Confer with L. Welch, P. Juneja, and F. Pitts re: third party subpoena to contractors, named plaintiff file review, settlement proposal, and case schedule	0.2	0.2
5/4/20	Jean Strout	Doc review - KDHE_PROD 2	4.0	4.0
5/5/20	Jean Strout	confer with PJ re class certification research project	0.3	0.3
5/5/20	Jean Strout	Confer with L. Welch, P. Juneja, and F. Pitts re: document review, settlement strategy, and potential Medicaid experts	0.2	0.2
5/6/20	Jean Strout	Confer with F. Pitts re: discovery directed at Named Plaintiffs	0.1	0.1
5/6/20	Jean Strout	Doc review - KDHE_PROD 2	2.0	2.0
5/6/20	Jean Strout	Research on discovery addressed to minor plaintiffs	2.0	2.0
5/6/20	Jean Strout	Confer with L. Welch, P. Juneja, and F. Pitts re: settlement strategy, third party discovery, and team meeting	0.2	0.2
5/8/20	Jean Strout	Confer with P. Juneja and F. Pitts re: document review, including review of Named Plaintiff files, and Plaintiffs who have or will age out	0.5	0.5
5/12/20	Jean Strout	Confer with L. Welch, P. Juneja, and F. Pitts re: settlement strategy, third party subpoenas	0.4	0.4
5/13/20	Jean Strout	Doc Review - KSJP Prod 1	4.0	4.0
5/13/20	Jean Strout	Confer with L. Welch, FP, and P. Juneja re: response to Defendants' discovery request; settlement strategy; and legal research tasks	0.4	0.4
5/14/20	Jean Strout	Confer with L. Welch and F. Pitts re: Medicaid experts	0.1	0.1
5/14/20	Jean Strout	Doc Review - KSJP Prod 1	4.0	4.0
5/15/20	Jean Strout	Confer with L. Welch, F. Pitts, and P. Juneja re: depositions, meet and confer, case schedule, settlement strategy, and third party subpoena	0.5	0.5
5/18/20	Jean Strout	Doc Review - KSJP Prod 1	4.0	4.0
5/19/20	Jean Strout	Confer with L. Welch, P. Juneja, and F. Pitts re: discovery to Named Plaintiffs, Jason Koehn deposition.	0.2	0.2
5/20/20	Jean Strout	call with P. Juneja re research on 30b6 time limits and responses to rogs, etc	0.4	0.4

Date	Name	Description	Time Billed	With Travel at 50%
5/20/20	Jean Strout	Confer with P. Juneja and F. Pitts re: document review.	0.1	0.1
5/20/20	Jean Strout	Doc Review - KSJP Prod 1	4.0	4.0
5/21/20	Jean Strout	Doc Review -KSJP 761-1039	4.0	4.0
5/22/20	Jean Strout	Doc Review - KSJP 1040-1351	4.0	4.0
5/26/20	Jean Strout	Confer with L. Welch and J. F. Pitts re: Jason Koehn deposition, settlement negotiations, file review, third party subpoenas	0.2	0.2
5/26/20	Jean Strout	Doc Review - KSJP 1352- 1759	5.5	5.5
5/26/20	Jean Strout	Review of defendant's first set of interrogatories	1.0	1.0
5/27/20	Jean Strout	Confer with P. Juneja and F. Pitts re: team meeting agenda, depositions, response to Defendants' discovery requests, and plan for Plaintiffs who are aging out	0.4	0.4
5/27/20	Jean Strout	Doc Review - KSJP 1760 - 1982, 2184-2316	4.5	4.5
5/28/20	Jean Strout	Confer with L.Welch and F. Pitts re: named plaintiff file review for JP	0.4	0.4
5/28/20	Jean Strout	Doc Review - KSJP 2316 - 2525	2.5	2.5
5/28/20	Jean Strout	Drafting responses to first set of ROGs/RFPs	2.5	2.5
5/29/20	Jean Strout	Doc Review - KSJP 1983 - 2092, 2937-3022	2.5	2.5
6/1/20	Jean Strout	Doc Review - completed KSJP PROD 1	4.0	4.0
6/2/20	Jean Strout	Confer with L. Welch, P. Juneja, and F. Pitts re: settlement proposal and third party subpoenas	0.2	0.2
6/2/20	Jean Strout	Doc Review - KSJP PROD 2 & timeline	2.0	2.0
6/2/20	Jean Strout	Drafting responses to first set of ROGs	1.0	1.0
6/3/20	Jean Strout	Drafting responses to first set of ROGs/RFPs	1.5	1.5
6/5/20	Jean Strout	discussion with P. Juneja about missing categories of docs in named plaintiff files and reviewing list of same	0.3	0.3
6/14/20	Jean Strout	Drafting Preliminary Cert/Settlement Motion, Notice of Settlement, Draft Order	3.0	3.0
6/15/20	Jean Strout	Confer with L. Welch, P. Juneja, and F. Pitts re: settlement, including preliminary and final approval, fees motion, third party discovery, and client approval	0.4	0.4
6/15/20	Jean Strout	Drafting Preliminary Cert/Settlement Motion, Notice of Settlement, Draft Order	3.0	3.0
6/16/20	Jean Strout	Confer with P. Juneja and F. Pitts re: next steps for settlement approval and fee motion	0.4	0.4

Date	Name	Description	Time Billed	With Travel at 50%
6/16/20	Jean Strout	Drafting Preliminary Cert/Settlement Motion, Notice of Settlement, Draft Order	1.0	1.0
6/22/20	Jean Strout	Confer with P. Juneja and F. Pitts re: next steps for settlement approval and fee motion	0.2	0.2
6/23/20	Jean Strout	Confer with L. Welch, P. Juneja, and F. Pitts re: next steps for preliminary approval, final approval, and fee motion	0.4	0.4
6/24/20	Jean Strout	LCC/SFC Research	1.0	1.0
6/24/20	Jean Strout	Second Draft of Notice of Settlement, Draft Order	1.0	1.0
6/25/20	Jean Strout	Confer with L. Welch and F. Pitts re: preliminary approval papers, next steps for settlement approval, and fee motion	0.5	0.5
6/26/20	Jean Strout	Confer with L. Welch, P. Juneja, and F. Pitts re: settlement next steps, press release, and third party discovery	0.2	0.2
7/7/20	Jean Strout	Drafting NCYL Declaration	2.0	2.0
7/7/20	Jean Strout	phone call with P. Juneja re prelim approval docs including drafting NCYL firm declaration	0.6	0.6
7/8/20	Jean Strout	Counsel call re settlement	1.0	1.0
7/8/20	Jean Strout	Drafting NCYL Declaration	0.5	0.5
7/10/20	Jean Strout	Confer with P. Juneja and F. Pitts re: next steps for preliminary approval	0.2	0.2
7/13/20	Jean Strout	phone call with P. Juneja re release of records to client	0.3	0.3
7/13/20	Jean Strout	Confer with P. Juneja and F. Pitts re: bluebooking preliminary approval motion; sharing Named Plaintiff RR's file	0.2	0.2
7/13/20	Jean Strout	RR Protective Order Memo	2.5	2.5
7/14/20	Jean Strout	Confer with P. Juneja, F. Pitts, and L. Welch re: preliminary approval documents	0.1	0.1
7/14/20	Jean Strout	confer with P. Juneja re disclosure of files to client and prelim approval docs	0.5	0.5
7/15/20	Jean Strout	Confer with L. Welch, P. Juneja, and F. Pitts re: preliminary approval papers and RR's case file	0.2	0.2
7/22/20	Jean Strout	Confer with L. Welch, P. Juneja, and F. Pitts re: preliminary approval papers and fee distribution	0.3	0.3
7/23/20	Jean Strout	Confer with P. Juneja, L. Welch, and F. Pitts re: motion for preliminary approval and implementation plan	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
7/24/20	Jean Strout	Confer with P. Juneja, L. Welch, and F. Pitts re: filing motion for preliminary approval	0.2	0.2
4/10/18	Amanda Grill	legal research review - private right of action	1.1	1.1
4/18/18	Amanda Grill	review minutes and exhibits for child welfare task-force meetings and summarize for team	0.9	0.9
4/23/18	Amanda Grill	continue to review minutes and exhibits for child welfare task-force meetings and summarize for team	0.6	0.6
4/24/18	Amanda Grill	continue to review minutes and exhibits for child welfare task-force meetings and summarize for team	2.7	2.7
4/25/18	Amanda Grill	review child welfare task-force meetings	2.7	2.7
4/26/18	Amanda Grill	continue to review minutes and exhibits for child welfare task-force meetings and summarize for team	0.3	0.3
4/30/18	Amanda Grill	continue to review minutes and exhibits for child welfare task-force meetings and summarize for team	3.6	3.6
5/1/18	Amanda Grill	continue to review minutes and exhibits for child welfare task-force meetings and summarize for team	1.4	1.4
5/2/18	Amanda Grill	continue to review minutes and exhibits for child welfare task-force meetings and summarize for team	3.0	3.0
5/4/18	Amanda Grill	continue to review minutes and exhibits for child welfare task-force meetings and summarize for team	4.3	4.3
5/5/18	Amanda Grill	continue to review minutes and exhibits for child welfare task-force meetings and summarize for team	3.0	3.0
5/7/18	Amanda Grill	continue to review minutes and exhibits for child welfare task-force meetings and summarize for team	3.6	3.6
5/23/18	Amanda Grill	Cleaning and revising co-counsel team meeting notes	0.1	0.1
5/23/18	Amanda Grill	internal counsel meeting with LW PJ re Kansas investigation and research tasks	1.2	1.2
5/23/18	Amanda Grill	Review task force docs	0.9	0.9
5/24/18	Amanda Grill	Create "findings of fact" doc	3.6	3.6
5/25/18	Amanda Grill	Create "findings of fact" doc summarizing and organizing all evidence supporting possible legal claims	1.4	1.4

Date	Name	Description	Time Billed	With Travel at 50%
5/29/18	Amanda Grill	Further work on creating "findings of fact" doc summarizing and organizing all evidence supporting possible legal claims	6.4	6.4
5/30/18	Amanda Grill	Co-counsel team meeting including re: stakeholder updates, local counsel, legal research, and fact development	1.2	1.2
5/30/18	Amanda Grill	Further work on creating "findings of fact" doc summarizing and organizing all evidence supporting possible legal claims	4.2	4.2
5/31/18	Amanda Grill	Further work on creating "findings of fact" doc summarizing and organizing all evidence supporting possible legal claims	0.1	0.1
5/31/18	Amanda Grill	Creating outline for "findings of fact" to organize evidence supporting possible claims	2.1	2.1
6/1/18	Amanda Grill	Case development - reading KS news articles	0.4	0.4
6/1/18	Amanda Grill	Further work to create outline for "findings of fact" to organize evidence supporting possible claims	1.2	1.2
6/5/18	Amanda Grill	reviewing emails re Kansas child welfare changes	0.1	0.1
6/6/18	Amanda Grill	Co-counsel team meeting re: stakeholder updates, local counsel, legal research, and fact development	0.9	0.9
6/6/18	Amanda Grill	reading KS contact memos	1.0	1.0
6/6/18	Amanda Grill	Research KS Juvenile Court structure, powers, etc. to evaluate possible abstention defense	0.9	0.9
6/6/18	Amanda Grill	Resesarch placement waiver regulations	0.8	0.8
6/7/18	Amanda Grill	Research KS Juvenile Court structure, powers, etc. to evaluate possible abstention defense	3.1	3.1
6/8/18	Amanda Grill	Further research re KS Juvenile Court structure, powers, etc. to evaluate possible abstention defense	1.8	1.8
6/11/18	Amanda Grill	Further research re KS Juvenile Court structure, powers, etc. to evaluate possible abstention defense	0.4	0.4
6/12/18	Amanda Grill	Further research re KS Juvenile Court structure, powers, etc. to evaluate possible abstention defense	5.2	5.2
6/13/18	Amanda Grill	Further research re KS Juvenile Court structure, powers, etc. to evaluate possible abstention defense	4.1	4.1

Date	Name	Description	Time Billed	With Travel at 50%
6/14/18	Amanda Grill	Further research re KS Juvenile Court structure, powers, etc. to evaluate possible abstention defense	0.1	0.1
6/15/18	Amanda Grill	Writing KS Child Welfare System Overview Memo	4.3	4.3
6/18/18	Amanda Grill	Writing KS Child Welfare System Overview Memo	1.8	1.8
6/19/18	Amanda Grill	Writing KS Child Welfare System Overview Memo	4.3	4.3
6/20/18	Amanda Grill	Writing KS Child Welfare System Overview Memo	3.6	3.6
7/5/18	Amanda Grill	Call with co-counsel re findings of fact doc coordination	0.7	0.7
7/5/18	Amanda Grill	Filling out findings of fact doc	0.7	0.7
7/5/18	Amanda Grill	Internal conversation re coordinating findings of fact	0.5	0.5
7/11/18	Amanda Grill	Team call re investigation, FOF, local counsel, etc	0.6	0.6
7/11/18	Amanda Grill	Team Call with consulting expert re EPSDT	0.7	0.7
7/11/18	Amanda Grill	Preparing EPSDT notes	0.5	0.5
7/12/18	Amanda Grill	Further preparing EPSDT notes	1.1	1.1
7/18/18	Amanda Grill	Co-counsel meeting, including re: investigation, local counsel, FOF, retainer, Kansas trip, and GAL outreach	0.8	0.8
7/18/18	Amanda Grill	Compiling notes from team call	0.8	0.8
7/18/18	Amanda Grill	Developing factual research in findings of fact doc	0.8	0.8
7/20/18	Amanda Grill	Developing factual research in findings of fact doc	1.6	1.6
7/21/18	Amanda Grill	Developing factual research in findings of fact doc	3.1	3.1
7/22/18	Amanda Grill	Developing factual research in findings of fact doc	2.6	2.6
7/27/18	Amanda Grill	Reading emails about co-counsel search	0.2	0.2
7/30/18	Amanda Grill	Reviewing compiled FOF	0.6	0.6
7/31/18	Amanda Grill	co-counsel call with LB Childrens Rights NCYL re investigation	0.3	0.3
7/31/18	Amanda Grill	Reviewing master FOF	1.1	1.1
8/8/18	Amanda Grill	Reading contact memos from co-counsel's recent visits with local individuals involved in child welfare system	0.4	0.4
8/8/18	Amanda Grill	Reviewing master FOF	7.2	7.2
8/9/18	Amanda Grill	Editing master FOF	9.5	9.5
8/10/18	Amanda Grill	Editing master FOF	2.0	2.0

Date	Name	Description	Time Billed	With Travel at 50%
8/23/18	Amanda Grill	Meet with F. Pitts re strategy for complaint drafting	0.2	0.2
8/24/18	Amanda Grill	Updating FOF outline	0.9	0.9
8/24/18	Amanda Grill	Strategy meeting with F. Pitts re: complaint outline and collecting evidence from findings of fact document	0.3	0.3
9/6/18	Amanda Grill	Compiling notes re legal research questions and memos	0.4	0.4
9/6/18	Amanda Grill	Revising memo on KS juvenile courts	0.8	0.8
9/8/18	Amanda Grill	Finalizing memo on KS juvenile courts	2.2	2.2
9/12/18	Jackie Stolzenberg	Review CR memos on confidentiality	0.8	0.8
9/14/18	Jackie Stolzenberg	Review contact memos from recent meetings in KS with individuals connected with child welfare system	0.5	0.5
9/15/18	Jackie Stolzenberg	Review contact memos from recent meetings in KS with individuals connected with child welfare system	0.5	0.5
9/19/18	Jackie Stolzenberg	Confer with F. Pitts re: research on intra-district transfers	0.1	0.1
9/19/18	Jackie Stolzenberg	follow up discussion with L. Welch and F. Pitts re: next steps	0.5	0.5
9/20/18	Jackie Stolzenberg	Research Kansas confidentiality laws re foster youth	4.1	4.1
9/21/18	Jackie Stolzenberg	Research Kansas confidentiality laws re foster youth	3.8	3.8
9/24/18	Jackie Stolzenberg	Reseach intra-district transfer in Kansas	4.4	4.4
9/25/18	Jackie Stolzenberg	Reseach intra-district transfer in Kansas	0.9	0.9
9/26/18	Jackie Stolzenberg	Reseach intra-district transfer in Kansas	2.7	2.7
9/26/18	Jackie Stolzenberg	Review complaint outline	0.4	0.4
9/27/18	Jackie Stolzenberg	Review CR legal memo re: naming Governor as a defendant	0.4	0.4
10/2/18	Jackie Stolzenberg	review KS Child Welfare Taks Force Report and DCF Response	0.4	0.4
10/2/18	Jackie Stolzenberg	review memos from CR re: class certification and EPSDT claims	0.6	0.6
10/3/18	Jackie Stolzenberg	follow up discussion with L. Welch and F. Pitts re: claims in Kansas complaint	0.2	0.2
10/4/18	Jackie Stolzenberg	research and drafting memo on intra-district transfer in KS	1.2	1.2
10/5/18	Jackie Stolzenberg	research and drafting memo on intra-district transfer in KS	1.3	1.3
10/8/18	Jackie Stolzenberg	review complaint outline	0.1	0.1
10/9/18	Jackie Stolzenberg	research and drafting memo on intra-district transfer in KS	3.7	3.7
10/12/18	Jackie Stolzenberg	confer with F. Pitts re: research on confidentiality protections for GALs	0.2	0.2

Date	Name	Description	Time Billed	With Travel at 50%
10/12/18	Jackie Stolzenberg	research on KS confidentiality laws foster youth files	1.3	1.3
10/15/18	Jackie Stolzenberg	research on KS confidentiality laws, access to foster youth files	0.8	0.8
10/17/18	Jackie Stolzenberg	Team call, including re: potential plaintiffs and fact development	1.0	1.0
10/19/18	Jackie Stolzenberg	research on KS confidentiality laws, access to foster youth files	1.6	1.6
10/24/18	Jackie Stolzenberg	Team call, including re: plaintiffs and filing planning and logistics	1.0	1.0
10/29/18	Jackie Stolzenberg	instructions from F. Pitts re: drafting Kansas complaint	0.2	0.2
10/29/18	Jackie Stolzenberg	review complaint samples and draft complaint: defendants section	3.4	3.4
10/30/18	Jackie Stolzenberg	Confer with F. Pitts re: drafting section of complaint re: Defendants	0.2	0.2
11/2/18	Jackie Stolzenberg	research for complaint, reviewing sources cited	4.8	4.8
11/5/18	Jackie Stolzenberg	Team call re: complaint draft	2.0	2.0
11/5/18	Jackie Stolzenberg	Confer with J. Stolzenberg re: factual research to support allegations in complaint	0.3	0.3
11/5/18	Jackie Stolzenberg	researching disclosable sources for complaint	5.8	5.8
11/6/18	Jackie Stolzenberg	researching disclosable sources for complaint	0.9	0.9
11/7/18	Jackie Stolzenberg	Team call re: named plaintiffs, complaint draft, and factual research	0.8	0.8
11/7/18	Jackie Stolzenberg	email correspondence w team re KS intra-district transfer memo	0.2	0.2
11/7/18	Jackie Stolzenberg	researching disclosable sources for complaint	3.8	3.8
11/8/18	Jackie Stolzenberg	researching disclosable sources for complaint	2.0	2.0
11/8/18	Jackie Stolzenberg	review complaint draft	2.3	2.3
11/9/18	Jackie Stolzenberg	confer w F Pitts re complaint draft	0.1	0.1
11/9/18	Jackie Stolzenberg	researching disclosable sources for complaint	3.2	3.2
11/9/18	Jackie Stolzenberg	review contact memos	0.2	0.2
11/13/18	Jackie Stolzenberg	cite-checking complaint	1.3	1.3
11/13/18	Jackie Stolzenberg	confer w L. Welch & F. Pitts re complaint, next steps	0.7	0.7
11/13/18	Jackie Stolzenberg	research on KS confidentiality laws re foster youth files	0.5	0.5
11/13/18	Jackie Stolzenberg	review contact memos from recent meetings in KS with local individuals with info on foster care issues	0.8	0.8
11/14/18	Jackie Stolzenberg	cite-checking complaint	5.5	5.5
11/14/18	Jackie Stolzenberg	confer w L. Welch & F. Pitts re complaint draft	0.3	0.3
11/14/18	Jackie Stolzenberg	Call with F. Pitts re: cite checking complaint	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
11/14/18	Jackie Stolzenberg	email correspondence w D. Adamek re sources	0.2	0.2
11/15/18	Jackie Stolzenberg	cite-checking complaint, reviewing sources	4.1	4.1
11/15/18	Jackie Stolzenberg	research on KS confidentiality laws re: foster youth files	1.2	1.2
11/28/18	Jackie Stolzenberg	Team call, including re: stakeholder outreach, media, research, potential co-counsel, potential experts	1.1	1.1
11/28/18	Jackie Stolzenberg	research on J. Lungstrum class cert decisions	1.8	1.8
11/29/18	Jackie Stolzenberg	research KS litigation brought on behalf of foster youth, email correspondence w L. Welch re same	3.1	3.1
11/29/18	Jackie Stolzenberg	research on J. Lungstrum class cert decisions	2.8	2.8
11/30/18	Jackie Stolzenberg	intake call w KS parent of child in FC re foster care issues	1.3	1.3
11/30/18	Jackie Stolzenberg	research on J. Lungstrum class cert decisions	1.9	1.9
12/3/18	Jackie Stolzenberg	drafting contact memo re call with parent of child in FC	0.6	0.6
12/3/18	Jackie Stolzenberg	research and drafting memo on Lungstrum cert decisions	4.8	4.8
12/5/18	Jackie Stolzenberg	Follow up discussion with L. Welch and F. Pitts re: deadlines	0.5	0.5
12/10/18	Jackie Stolzenberg	finish contact memo re call with parent of child in FC, email correspondence with team re same	1.3	1.3
12/11/18	Jackie Stolzenberg	research and drafting memo on Lungstrum cert decisions	1.0	1.0
12/11/18	Jackie Stolzenberg	research on KSA 38-2212(e) in camera review	1.9	1.9
12/11/18	Jackie Stolzenberg	review report by potential expert witness	0.5	0.5
12/12/18	Jackie Stolzenberg	research on KSA 38-2212(e) in camera review	1.0	1.0
12/13/18	Jackie Stolzenberg	research on KSA 38-2212(e) in camera review	2.9	2.9
12/13/18	Jackie Stolzenberg	review stakeholder updates, potential expert bio	0.3	0.3
12/18/18	Jackie Stolzenberg	review email correspondence case updates	0.2	0.2
1/10/19	Jackie Stolzenberg	Research re in camera review, and email L. Welch re same	2.8	2.8
1/10/19	Jackie Stolzenberg	Review email correspondence re updates in case; email correspondence w L. Welch re KS law citations for mot to use pseudonymous initials draft	0.9	0.9
1/14/19	Jackie Stolzenberg	Confer w L. Welch and F. Pitts re next tasks	0.3	0.3
1/14/19	Jackie Stolzenberg	Research re in camera review, "child's attorney" definition	1.2	1.2
1/16/19	Jackie Stolzenberg	Discuss strategies/research re protective order and pseudonyms w L. Welch & F. Pitts	0.6	0.6

Date	Name	Description	Time Billed	With Travel at 50%
1/16/19	Jackie Stolzenberg	Research re in camera review, protective orders	2.1	2.1
1/16/19	Jackie Stolzenberg	Review pseudonyms draft	0.6	0.6
1/17/19	Jackie Stolzenberg	Research re in camera review, protective orders	2.6	2.6
1/18/19	Jackie Stolzenberg	Research re protective orders	1.8	1.8
1/18/19	Jackie Stolzenberg	Research re in camera review, protective orders, while reviewing Ds' draft protective order	0.8	0.8
1/20/19	Jackie Stolzenberg	Prepare and send documents re protective orders and summary to L. Welch & F. Pitts	1.0	1.0
1/22/19	Jackie Stolzenberg	Review protective order drafts to prepare for phone call w Ds re same	0.1	0.1
1/22/19	Jackie Stolzenberg	Call w Ds' counsel re protective order	0.7	0.7
1/22/19	Jackie Stolzenberg	Research KSA 45-221	0.3	0.3
1/23/19	Jackie Stolzenberg	Team call, including re: protective order, potential co-counsel, experts, and stakeholder updates	0.7	0.7
1/23/19	Jackie Stolzenberg	Research protective orders, "child's attorney"	2.5	2.5
1/25/19	Jackie Stolzenberg	Instructions from F. Pitts re: legal research memo on protective orders and in camera review	0.8	0.8
1/25/19	Jackie Stolzenberg	Research re protective orders, state law privileges re redaction of files	5.1	5.1
1/25/19	Jackie Stolzenberg	Review protective order drafts	0.2	0.2
1/28/19	Jackie Stolzenberg	Confer w L. Welch and F. Pitts re next tasks	0.1	0.1
1/28/19	Jackie Stolzenberg	Draft memo re protective orders	1.4	1.4
1/30/19	Jackie Stolzenberg	Team call w co-counsel, including discussion of protective order and co-counsel	0.4	0.4
1/31/19	Jackie Stolzenberg	Confer w F. Pitts re protective order memo	0.3	0.3
1/31/19	Jackie Stolzenberg	Draft memo re protective orders and in camera review	4.1	4.1
2/1/19	Jackie Stolzenberg	Draft memo re protective orders and in camera review	3.2	3.2
2/14/19	Jackie Stolzenberg	Review DD complaint (sexual assault at KVC office damages suit), and write summary memo	2.4	2.4
2/19/19	Jackie Stolzenberg	Review drafts of proposed Kansas legislative bills relating to child welfare, Medicaid	0.8	0.8
2/20/19	Jackie Stolzenberg	Team co-counsel call, including re: identifying Plaintiffs to Defendants, DLA Piper, experts, and class certification	0.7	0.7
2/20/19	Jackie Stolzenberg	Edit call notes, including by reviewing follow up emails	0.6	0.6

Date	Name	Description	Time Billed	With Travel at 50%
2/25/19	Jackie Stolzenberg	Confer with L. Welch and F. Pitts re: litigation hold, Barber Emerson, DLA Piper, experts, and outstanding legal research	0.5	0.5
3/12/19	Jackie Stolzenberg	Review memo on class certification in 10th Cir post- <i>Dukes</i>	0.4	0.4
3/19/19	Jackie Stolzenberg	Research J. Lungstrum class cert decisions, bifurcation of discovery	1.1	1.1
3/19/19	Jackie Stolzenberg	Instructions from F. Pitts re: legal research memo on class certification	0.2	0.2
3/19/19	Jackie Stolzenberg	Instructions from F. Pitts re: logistics for team strategy meeting on 3/20	0.2	0.2
3/20/19	Jackie Stolzenberg	Instructions from F. Pitts re: legal research memo on class certification	0.2	0.2
3/21/19	Jackie Stolzenberg	Research and draft memo re J. Lungstrum class cert decisions	2.8	2.8
3/22/19	Jackie Stolzenberg	Confer w F. Pitts & P. Juneja re Lungstrum class cert memo	0.3	0.3
3/25/19	Jackie Stolzenberg	Research and draft memo re J. Lungstrum class cert decisions	2.7	2.7
4/9/19	Jackie Stolzenberg	Confer with L. Welch, P. Juneja, and F. Pitts re: cocounsel agreement, legal research tasks, and early mediation	0.4	0.4
4/9/19	Jackie Stolzenberg	Research re in camera review, protective orders	0.5	0.5
4/10/19	Jackie Stolzenberg	Confer w L. Welch, F. Pitts, P. Juneja re next steps	0.5	0.5
4/12/19	Jackie Stolzenberg	Confer w F. Pitts & P. Juneja re class certification memo, in camera review, drafting letter to Next Friends	1.0	1.0
4/12/19	Jackie Stolzenberg	Draft and send email to Kansas attorney re in camera review	0.2	0.2
4/12/19	Jackie Stolzenberg	Research, draft and send email to P. Juneja re foster youth file access in KS	0.2	0.2
4/12/19	Jackie Stolzenberg	Review and revise 1-page doc re plaintiffs' position on in camera review to send defendants	0.4	0.4
4/15/19	Jackie Stolzenberg	Confer w L. Welch, F. Pitts, P. Juneja re next steps	0.3	0.3
4/15/19	Jackie Stolzenberg	Draft letter to Next Friends re new co-counsel	1.0	1.0
4/16/19	Jackie Stolzenberg	Call w Nick Wood re Kansas Medicaid and SED waivers	1.0	1.0
4/20/19	Jackie Stolzenberg	Confer w L. Welch, F. Pitts, P. Juneja re next steps	0.3	0.3
5/2/19	Jackie Stolzenberg	Revise, review, & circulate notes 5/2/19 team call	0.4	0.4
5/2/19	Jackie Stolzenberg	Instructions from F. Pitts re: class certification research, including re: B.K. decision	0.1	0.1
5/6/19	Jackie Stolzenberg	Research and draft short memo re Circuit court decisions re class certification	4.8	4.8
5/7/19	Jackie Stolzenberg	Finish drafting memo re class cert decisions, correspond w L. Welch, F. Pitts, & P. Juneja re same	4.7	4.7

Date	Name	Description	Time Billed	With Travel at 50%
5/8/19	Jackie Stolzenberg	Draft memo re in camera review	1.4	1.4
5/9/19	Jackie Stolzenberg	Draft memo re in camera review	2.6	2.6
5/10/19	Jackie Stolzenberg	Draft memo re in camera review	2.1	2.1
5/13/19	Jackie Stolzenberg	Revise memo re in camera review	2.3	2.3
5/20/19	Jackie Stolzenberg	Call w Jane Perkins re Kansas Medicaid	0.6	0.6
5/20/19	Jackie Stolzenberg	Confer w L. Welch, F. Pitts, & P. Juneja re possible complaint amendments	0.5	0.5
5/22/19	Jackie Stolzenberg	Call w P. Juneja re FRCP 23(b)(2) remedies question	0.7	0.7
5/27/19	Jackie Stolzenberg	Research 23(b)(2) class cert standard and remedies	1.0	1.0
6/3/19	Jackie Stolzenberg	Research 23(b)(2) class cert and remedies decisions	2.3	2.3
6/4/19	Jackie Stolzenberg	Research and draft memo re 23(b)(2) class cert and remedies	0.8	0.8
6/5/19	Jackie Stolzenberg	Team call, including re: term sheet, initial disclosures, RFPs, and case file reviews	0.5	0.5
6/5/19	Jackie Stolzenberg	Team call w co-counsel re Kansas Medicaid	0.4	0.4
6/7/19	Jackie Stolzenberg	Confer w P. Juneja re 23(b)(2) class cert and remedies memo	0.3	0.3
6/17/19	Jackie Stolzenberg	Research and draft memo re 23(b)(2) class cert and remedies	2.3	2.3
6/20/19	Jackie Stolzenberg	Draft memo re 23(b)(2) class cert and remedies	1.0	1.0
6/27/19	Jackie Stolzenberg	Revise, review, & circulate notes from 26(f) conference	1.4	1.4
6/27/19	Jackie Stolzenberg	Participate in Rule 26(f) conference call w defendants	2.2	2.2
7/1/19	Jackie Stolzenberg	Team call w local foster care advocates/service providers	0.9	0.9
7/29/19	Jackie Stolzenberg	Confer w L. Welch, F. Pitts, P. Juneja re next steps	0.2	0.2
7/31/19	Jackie Stolzenberg	Confer w L. Welch, F. Pitts, P. Juneja re next steps, including re file review	0.3	0.3
8/14/19	Jackie Stolzenberg	Research and draft memo re 23(b)(2) class cert analysis and remedies	1.1	1.1
8/14/19	Jackie Stolzenberg	Revise, review, & circulate notes 8/14/19 team call	0.1	0.1
8/14/19	Jackie Stolzenberg	Confer with P. Juneja re questions on class cert issues for memo research	0.2	0.2
8/15/19	Jackie Stolzenberg	Research and draft memo re 23(b)(2) class cert analysis incl. remedies	1.6	1.6
8/15/19	Jackie Stolzenberg	Instruction from P. Juneja re NP file review	0.9	0.9
8/15/19	Jackie Stolzenberg	Confer with P. Juneja re memo questions related to class cert and remedies	0.6	0.6
8/16/19	Jackie Stolzenberg	Research and draft memo re 23(b)(2) class cert analysis, inc remedies	2.1	2.1
8/16/19	Jackie Stolzenberg	Confer with P. Juneja re RM doc review	0.4	0.4
8/20/19	Jackie Stolzenberg	Research, draft, and finish memo re 23(b)(2) class cert analysis, inc remedies	3.5	3.5

Date	Name	Description	Time Billed	With Travel at 50%
8/21/19	Jackie Stolzenberg	Edit and revise memo re 23(b)(2) class cert analysis inc remedies	1.6	1.6
8/21/19	Jackie Stolzenberg	M.J. file review	1.0	1.0
8/21/19	Jackie Stolzenberg	R.M. file review	1.0	1.0
8/21/19	Jackie Stolzenberg	Revise, review, & circulate notes 8/21/19 team call	0.4	0.4
8/22/19	Jackie Stolzenberg	Edit and revise memo re 23(b)(2) remedies	0.3	0.3
8/22/19	Jackie Stolzenberg	Confer with P. Juneja question on MJ facts	0.4	0.4
8/22/19	Jackie Stolzenberg	Confer with P. Juneja re remedies issues for class cert	0.3	0.3
8/22/19	Jackie Stolzenberg	M.J. file review	0.3	0.3
8/22/19	Jackie Stolzenberg	R.M. file review	2.2	2.2
8/23/19	Jackie Stolzenberg	R.M. file review	1.5	1.5
8/26/19	Jackie Stolzenberg	R.M. file review	5.7	5.7
8/26/19	Jackie Stolzenberg	Confer with P. Juneja re doc review questions	0.4	0.4
8/27/19	Jackie Stolzenberg	R.M. file review	6.3	6.3
8/28/19	Jackie Stolzenberg	R.M. file review	4.1	4.1
8/28/19	Jackie Stolzenberg	Revise, review, & circulate notes 8/28/19 team call	0.2	0.2
8/28/19	Jackie Stolzenberg	Confer with P. Juneja re attorney-client privilege issue	0.2	0.2
8/29/19	Jackie Stolzenberg	R.M. file review	6.7	6.7
8/30/19	Jackie Stolzenberg	R.M. file review	5.5	5.5
9/3/19	Jackie Stolzenberg	Confer with F. Pitts re document review	0.3	0.3
9/3/19	Jackie Stolzenberg	R.M. file review	5.1	5.1
9/4/19	Jackie Stolzenberg	R.M. file review	5.7	5.7
9/4/19	Jackie Stolzenberg	Revise, review, & circulate notes 8/28/19 team call	0.1	0.1
9/5/19	Jackie Stolzenberg	R.M. file review	6.1	6.1
9/6/19	Jackie Stolzenberg	R.M. file review	0.9	0.9
9/9/19	Jackie Stolzenberg	R.M. file review	2.4	2.4
9/12/19	Jackie Stolzenberg	Transfer memo - summary of named plaintiff RM's files	4.0	4.0
6/26/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	3.8	3.8
6/27/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	3.1	3.1
6/28/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	6.0	6.0

Date	Name	Description	Time Billed	With Travel at 50%
7/1/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	4.6	4.6
7/2/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	4.8	4.8
7/3/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	4.7	4.7
7/8/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	6.7	6.7
7/9/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	4.9	4.9
7/10/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	6.1	6.1
7/11/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	2.4	2.4
7/12/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	2.7	2.7
7/15/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	6.1	6.1
7/16/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	5.0	5.0
7/16/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure, inc. proposed deadline to Poonam	0.6	0.6
7/18/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	6.5	6.5
7/19/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	4.8	4.8
7/22/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	6.8	6.8
7/26/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	5.5	5.5
7/27/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	1.0	1.0
7/28/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	3.8	3.8
7/29/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	5.4	5.4
7/30/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	4.2	4.2
7/31/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	5.8	5.8
8/1/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	6.7	6.7
8/2/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	4.7	4.7
8/3/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	2.8	2.8
8/4/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure	2.4	2.4
8/5/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure - cleanup of review file	6.4	6.4
8/5/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure - Cover Memo	3.5	3.5
8/6/19	Josh Nomkin	Document Review: CA Initial Defendant Disclosure - cleanup of review file	0.4	0.4
7/11/18	Kira Setren	Prepared meeting notes from team calls and call with EPSDT consulting expert with Amanda per Leecia	1.1	1.1

Date	Name	Description	Time Billed	With Travel at 50%
7/11/18	Kira Setren	Team Call with consulting expert re EPSDT	0.7	0.7
11/15/18	Kira Setren	Helped review and prepare Complaint for filing	3.2	3.2
11/16/18	Kira Setren	Prepared PHV motion and exhibits per Freya	0.2	0.2
11/19/18	Kira Setren	Prepared PHV motion and exhibits per Freya	3.1	3.1
11/20/18	Kira Setren	Prepared PHV motion and exhibits per Leecia	1.0	1.0
11/21/18	Kira Setren	Prepared PHV motion and exhibits per Leecia	0.4	0.4
11/26/18	Kira Setren	Filed PHV motions for Leecia and Freya	0.8	0.8
11/26/18	Kira Setren	Finalized PHV motions	0.6	0.6
11/26/18	Kira Setren	Served PHV motions for Leecia and Freya	2.2	2.2
1/18/19	Kira Setren	Kansas pseudonym motion filing	1.0	1.0
3/7/19	Kira Setren	Drafted PHV application and associated materials for Poonam Juneja	1.0	1.0
3/8/19	Kira Setren	Prepared Poonam's PHV; corr. re: same	0.7	0.7
4/26/19	Kira Setren	PHV Motion for Poonam Juneja - prepare & file	0.5	0.5
6/13/19	Kira Setren	Meeting with fp and pj re: defs' prod and document review	0.5	0.5
6/13/19	Kira Setren	Relativity structure for DLA Piper per FP	0.4	0.4
6/25/19	Kira Setren	Internal Relativity call w/ pj & fp, following up on case management system and next steps	0.5	0.5
6/25/19	Kira Setren	Setting up secure external platform for co-counsel teams per pj & fp	0.3	0.3
8/23/19	Kira Setren	Assisted Poonam Juenja and Freya Pitts with the preparation of Kansas 30(b)(6) deposition notice and exhibit	0.7	0.7
8/23/19	Kira Setren	E-filed notice of 30(b)(6) deposition for Teresa	0.3	0.3
8/29/19	Kira Setren	Edited Amended Complaint per Poonam; corr. with Poonam re: same	2.8	2.8
8/30/19	Kira Setren	Assisted Poonam and Leecia in the editing and fact-checking of the Amended Complaint	0.6	0.6
8/30/19	Kira Setren	Filed motion to amend complaint and motion to use pseudonyms; corr. re: same pj, fp	0.8	0.8
9/6/19	Kira Setren	E-filed First Amended Complaint	0.2	0.2
9/6/19	Kira Setren	Prepared first amended complaint filing; corr. with pj & fp re: same	1.7	1.7
10/2/19	Kira Setren	Finalized and e-filed amended 30(b)(6) notice for DCF on Teresa's behalf	0.3	0.3

Date	Name	Description	Time Billed	With Travel at 50%
10/10/19	Kira Setren	Filed statement of non-opposition on Teresa's behalf per Poonam	0.3	0.3
10/11/19	Kira Setren	Prepared motions and pleadings templates for full co-counsel team's use; email pj re: same	1.0	1.0
12/2/19	Kira Setren	Assisted pj with hot docs from mediation review (DCF006543 - DCF007991)	0.1	0.1
12/2/19	Kira Setren	Confer with pj re: doc review for mediation	0.3	0.3
12/2/19	Kira Setren	Document review of batch in preparation for mediation	1.8	1.8
12/2/19	Kira Setren	Review complaint for mediation doc review	0.4	0.4
12/2/19	Kira Setren	Summarize and analyze doc review findings re batch DCF006543 - DCF007991 in email to pj	0.8	0.8
12/3/19	Kira Setren	Document review of document batch up through DCF007857 for responsiveness	1.3	1.3
12/4/19	Kira Setren	Document review of batch DCF006543 - DCF007991 for mediation	1.4	1.4
12/6/19	Kira Setren	Mediation hot doc review and circulation to team	0.5	0.5
12/9/19	Kira Setren	Mediation review batch starting with DCF007992	1.1	1.1
12/10/19	Kira Setren	Mediation review and analysis of hot docs from section	1.2	1.2
12/10/19	Kira Setren	Mediation review batch starting DCF008100 - DCF008177	0.6	0.6
12/12/19	Kira Setren	Mediation doc review hot doc analysis	0.2	0.2
12/12/19	Kira Setren	Mediation doc review hot doc compilation and send to team	1.2	1.2
12/12/19	Kira Setren	Mediation doc review starting DCF008174	1.5	1.5
1/12/20	Kira Setren	Meet with PJ re: doc review for issue review	0.2	0.2
1/12/20	Kira Setren	Prepare doc review for Batch-DCF-Issue Review-00016	0.4	0.4
1/12/20	Kira Setren	Review document review guide	0.2	0.2
1/13/20	Kira Setren	Performed review of production Batch-DCF-Issue Review-00016	0.9	0.9
2/18/20	Kira Setren	Met with PJ and FP re: KS doc review	0.5	0.5
2/26/20	Kira Setren	Kansas doc review up to DCF008608	1.5	1.5
2/26/20	Kira Setren	Kansas doc review up to DCF008637, including creating acronym guide	1.3	1.3
2/27/20	Kira Setren	Checked review batch 1; captured and circulated analysis of same	1.2	1.2
2/27/20	Kira Setren	Doc review - created trackers for acronyms and status updtcs; corr. re: same	0.4	0.4
2/27/20	Kira Setren	Doc review up to DCF008708	0.5	0.5
2/27/20	Kira Setren	Kansas doc review up through DCF008687	0.6	0.6

Date	Name	Description	Time Billed	With Travel at 50%
2/27/20	Kira Setren	Kansas doc review up to DCF008663	1.0	1.0
2/28/20	Kira Setren	Doc review of Batch-DCF-Issue Review-00017 through DCF008724	0.5	0.5
3/2/20	Kira Setren	Doc review up to DCF008784	1.6	1.6
3/3/20	Kira Setren	Doc review - completed, reviewed, and analyzed Batch-DCF-Issue Review-00017	1.3	1.3
3/4/20	Kira Setren	Doc review and analysis of Batch-DCF-Issue Review-00018 (full)	3.5	3.5
3/5/20	Kira Setren	Doc review and analysis of Batch-DCF-Issue Review-00019 up to DCF009056	2.5	2.5
3/6/20	Kira Setren	Doc review and analysis of Batch-DCF-Issue Review-00019	0.8	0.8
3/9/20	Kira Setren	Doc review and analysis of Batch-DCF-Issue Review-00019	3.5	3.5
3/10/20	Kira Setren	Doc review analysis of batch 19 (up to DCF009166)	2.0	2.0
3/11/20	Kira Setren	Analysis of doc review batch 19	2.0	2.0
3/13/20	Kira Setren	Meeting with Poonam re: discovery task allocation and plans	0.2	0.2
3/17/20	Kira Setren	Confer with PJ re doc review and tagging	0.2	0.2
3/19/20	Kira Setren	Doc review issue batch 2, starting at DCF010237	1.9	1.9
3/21/20	Kira Setren	Doc review batch 2 (Batch-DCF-Issue Review-00002)	1.8	1.8
3/22/20	Kira Setren	Doc review batch 2 (Batch-DCF-Issue Review-00002)	5.1	5.1
3/23/20	Kira Setren	Doc review batch 2 (Batch-DCF-Issue Review-00002)	2.7	2.7
3/24/20	Kira Setren	MB named plaintiff doc review per Freya	2.6	2.6
3/26/20	Kira Setren	Performed review and summary of MB's files	0.6	0.6
3/27/20	Kira Setren	Prepared summary of completed batches and hot docs for team	0.3	0.3
3/30/20	Kira Setren	Prepared summary of completed batches and hot docs for team; corr. re: same with pj	1.7	1.7
3/31/20	Kira Setren	Prepared summary of completed batches 16-19 and hot docs for team	0.7	0.7
4/2/20	Kira Setren	Call with Poonam re: document review hot docs	0.4	0.4
4/2/20	Kira Setren	Completed doc review and prepared hot doc summaries for team	1.7	1.7
4/2/20	Kira Setren	Reviewed discovery deficiency letter per Poonam	0.3	0.3
4/3/20	Kira Setren	Completed doc review and prepared hot doc summaries for team	3.1	3.1
4/10/20	Kira Setren	Prepared and filed COS re subpoenas to MCOs per PJ	0.5	0.5
4/10/20	Kira Setren	Prepared and filed subpoenas to MCOs per PJ	0.9	0.9
4/24/20	Kira Setren	Check in with F. Pitts re: status of review of Named Plaintiff MB's case file	0.1	0.1

Date	Name	Description	Time Billed	With Travel at 50%
4/30/20	Kira Setren	Check in with FP re: filing of motion to extend deadlines	0.1	0.1
5/1/20	Kira Setren	Confer with FP re: finalizing filing of motion for extension to file motions to compel	0.1	0.1
5/1/20	Kira Setren	Prepared and ECF filed Plaintiffs' Second Unopposed Motion for Extension of Time to File Potential Motions to Compel Regarding Discovery Responses	0.3	0.3
6/3/20	Kira Setren	Prepared and executed subpoena filings - Cornerstones, KVC, St. Francis, Tfl	0.7	0.7
6/29/20	Kira Setren	Confer with F. Pitts re: expenses	0.1	0.1
6/29/20	Kira Setren	Prepared NCYL expenses for fees & expense motion	1.0	1.0
7/8/20	Kira Setren	Finalized and e-filed Settlement	0.4	0.4
7/9/20	Kira Setren	Finalized and e-filed notice of errata of Settlement with Exhibits	0.3	0.3
7/14/20	Kira Setren	Bluebooked, citechecked, and compiled Motion for Preliminary Approval	1.9	1.9
7/27/20	Kira Setren	Assisted Poonam Juneja in preparing class counsel declaration for Teresa Woody	0.4	0.4

Exhibit D

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

EMMA C., et al.,

Plaintiffs,

v.

TONY THURMOND, et al.,

Defendants.

Case No.: 3:96-cv-4179 (VC)

~~[PROPOSED]~~ **STIPULATED ORDER
RE: PAYMENT OF PLAINTIFFS'
ATTORNEYS' FEES FOR THE
PERIOD OF JANUARY 1, 2020
THROUGH JUNE 30, 2020**

Hon. Vince Chhabria

~~[PROPOSED]~~ **ORDER**

In view of the Parties' stipulation, and GOOD CAUSE APPEARING THEREOF, the California Department of Education shall pay Plaintiffs' attorneys' fees in this action for the period of January 1, 2020 through June 30, 2020. Attorneys' fees will be paid to the Stanford Law School-Youth and Education Law Project and to the National Center for Youth Law, subject to further terms specified in the stipulation and as follows:

The California Department of Education will pay all STATE-related fees and costs, in the amounts of \$28,437.00 to the National Center for Youth Law, and \$18,276.90 to the Stanford Law School-Youth and Education Law Project. There are no Plaintiffs' attorneys' fees owing for DISTRICT-related work for this time period, and therefore no invoices have been prepared or submitted for this category and no payments are ordered.

Upon entry of this Court's order approving this stipulation, Defendants will timely seek the necessary agency approvals for preparation and relay of the checks. The checks will be provided to Plaintiffs' counsel within 60 days of obtaining such agency approvals.

IT IS SO ORDERED.

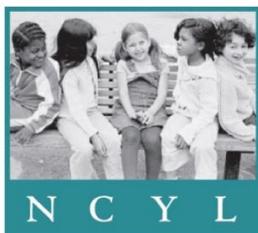
Dated: September 15, 2020



VINCE CHHABRIA
United States District Judge

~~[PROPOSED]~~ STIPULATED ORDER

Exhibit E



National Center for Youth Law

INVOICE

Invoice #3
Date: 8/18/2020
Due On: 9/17/2020

National Center for Youth Law

1212 Broadway, Suite 600
Oakland, CA 94612

Emma C. v. Thurmond, 3:96-cv-04179-VC
U.S. District Court, N.D. Cal.

State-related work

Date	Name	Notes	Time	Rate	Total
2/2/20	Freya Pitts	Email correspondence with L. Welch re: availability for CMC	0.1	\$385	\$ 38.50
2/3/20	Leecia Welch	Email re scheduling CMC	0.1	\$630	\$ 63.00
2/3/20	Leecia Welch	Confer with F. Pitts re CMC	0.1	\$630	\$ 63.00
2/3/20	Freya Pitts	Confer with L. Welch re: availability for CMC and preparation for Phase 2 hearing	0.1	\$385	\$ 38.50
2/3/20	Freya Pitts	Review CDE's further phase 2 submission	1.9	\$385	\$ 731.50
2/4/20	Freya Pitts	Complete review of CDE's further Phase 2 submission	1.4	\$385	\$ 539.00
2/13/20	Freya Pitts	Receive and review email correspondence re: Monitor's data requests	0.2	\$385	\$ 77.00
2/14/20	Freya Pitts	Receive and review email correspondence re: Monitor's data requests	0.1	\$385	\$ 38.50
2/14/20	Freya Pitts	Review quarterly & semiannual CDE reports	0.2	\$385	\$ 77.00

2/15/20	Leecia Welch	Review CDE submission materials	1.5	\$630	\$ 945.00
2/19/20	Leecia Welch	Attend telephonic CMC	0.9	\$630	\$ 567.00
2/19/20	Freya Pitts	Court conference re: extension targets issue and scheduling	0.9	\$385	\$ 346.50
2/20/20	Freya Pitts	Call with K. Gill, M. Mlawer, and B. Koski re: use of draft & extension targets in Monitors' report	0.4	\$385	\$ 154.00
4/23/20	Leecia Welch	Confer with F. Pitts re State and Monitor submissions	0.1	\$630	\$ 63.00
4/23/20	Freya Pitts	Confer with L. Welch re: response to State and Monitor's reports	0.1	\$385	\$ 38.50
4/24/20	Leecia Welch	Review Monitor's report in prep of Plaintiffs' response	3.5	\$630	\$ 2,205.00
4/27/20	Leecia Welch	Review and analyze State's response to Monitor's report	2.1	\$630	\$ 1,323.00
5/11/20	Freya Pitts	Review and revise B. Koski draft response to Phase 2 reports	0.7	\$385	\$ 269.50
5/12/20	Leecia Welch	Confer with F. Pitts re Plaintiffs' response to Phase 2 submissions	0.2	\$630	\$ 126.00
5/12/20	Freya Pitts	Confer with L. Welch re: response to Phase 2 reports	0.2	\$385	\$ 77.00
5/12/20	Freya Pitts	Review briefing from Defendants and Monitor to inform preparation of Plaintiffs' response	4.7	\$385	\$ 1,809.50
5/13/20	Leecia Welch	Edit and revise Plaintiffs' response brief	3.6	\$630	\$ 2,268.00
5/13/20	Leecia Welch	Research issues for response brief	0.6	\$630	\$ 378.00
5/13/20	Freya Pitts	Review briefing from Defendants and Monitor to inform preparation of Plaintiffs' response	1.9	\$385	\$ 731.50
5/13/20	Freya Pitts	Confer with L. Welch re: response to Phase 2 reports	0.1	\$385	\$ 38.50

5/13/20	Freya Pitts	Review and revise B. Koski draft response to Phase 2 reports	3.9	\$385	\$ 1,501.50
5/13/20	Freya Pitts	Proofread draft response to Phase 2 reports	0.4	\$385	\$ 154.00
5/13/20	Freya Pitts	Review L. Welch edits to draft response to Phase 2 reports	0.2	\$385	\$ 77.00
5/14/20	Leecia Welch	Review final plaintiffs' response brief	0.4	\$630	\$ 252.00
5/14/20	Freya Pitts	Receive and review email correspondence re: draft response to Phase 2 reports	0.1	\$385	\$ 38.50
5/14/20	Freya Pitts	Confer with L. Welch re: response to Phase 2 reports	0.2	\$385	\$ 77.00
5/14/20	Freya Pitts	Review and revise B. Koski revised draft response; email correspondence with L. Welch re: same	0.8	\$385	\$ 308.00
5/15/20	Leecia Welch	Confer with F. Pitts re phase 2 hearings	0.1	\$630	\$ 63.00
5/15/20	Freya Pitts	Confer with L. Welch re: Phase 2 hearings	0.1	\$385	\$ 38.50
5/17/20	Freya Pitts	Review amicus brief re: Phase 2 submissions	0.2	\$385	\$ 77.00
5/26/20	Leecia Welch	Email with F. Pitts re 6/8 and 10 hearing prep	0.1	\$630	\$ 63.00
5/26/20	Freya Pitts	Email correspondence with L. Welch re: preparation for 6/8 and 6/10 hearings	0.1	\$385	\$ 38.50
6/2/20	Leecia Welch	Meeting with B. Koski and F. Pitts re Phase 2 hearing prep	0.8	\$630	\$ 504.00
6/2/20	Freya Pitts	Review briefing in preparation for co-counsel meeting re: upcoming Phase 2 hearings	0.3	\$385	\$ 115.50
6/2/20	Freya Pitts	Meeting with L. Welch and B. Koski to prepare for Phase 2 hearings on 6/8 and 6/10	0.8	\$385	\$ 308.00
6/5/20	Leecia Welch	Review prep materials for June hearing	0.5	\$630	\$ 315.00

6/7/20	Leecia Welch	Prepare for June 8 hearing	0.8	\$630	\$ 504.00
6/7/20	Freya Pitts	Review CDE and USDOE guidance re: providing FAPE during COVID 19 pandemic in preparation for hearing	0.9	\$385	\$ 346.50
6/7/20	Freya Pitts	Review briefing in preparation for Phase 2 hearing	0.4	\$385	\$ 154.00
6/8/20	Leecia Welch	Attend June 8 hearing	4.5	\$630	\$ 2,835.00
6/8/20	Leecia Welch	Attend meeting with co-counsel re prep for June 10 hearing	0.5	\$630	\$ 315.00
6/8/20	Freya Pitts	Review previous Phase 2 order and briefing in preparation for Phase 2 hearing	1.4	\$385	\$ 539.00
6/8/20	Freya Pitts	Phase 2 hearing	4.5	\$385	\$ 1,732.50
6/8/20	Freya Pitts	Co-counsel debrief following Phase 2 hearing	0.5	\$385	\$ 192.50
6/10/20	Leecia Welch	Attend June 10 hearing	2.5	\$630	\$ 1,575.00
6/10/20	Freya Pitts	Review briefing in preparation for Phase 2 hearing	0.7	\$385	\$ 269.50
6/10/20	Freya Pitts	Phase 2 hearing	2.5	\$385	\$ 962.50
6/10/20	Freya Pitts	Co-counsel debrief following Phase 2 hearing	0.3	\$385	\$ 115.50
6/13/20	Freya Pitts	Email L. Welch re: next steps for 6/26 filing	0.4	\$385	\$ 154.00
6/15/20	Freya Pitts	Review Morgan Hill submission requesting leave to file a supplemental brief	0.1	\$385	\$ 38.50
6/18/20	Freya Pitts	Review Court's order re: next round of briefing	0.1	\$385	\$ 38.50
6/24/20	Freya Pitts	Review and revise draft submission to Court re: small school districts	1.9	\$385	\$ 731.50
6/25/20	Leecia Welch	Edit and revise response to 6/18 Court order	1.3	\$630	\$ 819.00

6/25/20	Leecia Welch	Confer with F. Pitts re small districts draft submission	0.1	\$630	\$ 63.00
6/25/20	Freya Pitts	Confer with L. Welch re: submission to Court re: small school districts	0.1	\$385	\$ 38.50
6/25/20	Freya Pitts	Review L. Welch edits to brief re: small school districts	0.1	\$385	\$ 38.50
6/28/20	Freya Pitts	Review supplemental briefing re: small school districts	0.1	\$385	\$ 38.50
Total					\$ 28,437.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
3	9/17/2020	\$28,437.00	\$0.00	\$28,437.00
Outstanding Balance				\$28,437.00
Total Amount Outstanding				\$28,437.00

Please make all amounts payable to:

National Center for Youth Law
1212 Broadway, Suite 600
Oakland, CA 94612

Please pay within 30 days.

Exhibit F

THE HON. THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

T.R., by and through his guardian and next friend,
R.R.; S.P., by and through her mother and next
friend, D.H.; C.A., by and through her mother and
next friend, A.A.; T.F., by and through her father
and next friend, D.F.; P.S., by and through his
mother and next friend, W.S.; T.V., by and
through his guardian and next friend. C.D.; E.H.
by and through his mother and next friend, C.H.;
E.D., by and through his mother and next friend,
A.D.; and L.F.S., by and through his mother and
next friend, B.S.,

Plaintiffs,

v.

CHERYL STRANGE, not individually, but solely
in her official capacity as Secretary of the
Washington State Department of Social and
Health Services; and SUE BIRCH, not
individually, but solely in her official capacity as
the Director of the Washington State Health Care
Authority,

Defendants.

No. C09-1677-TSZ

**ORDER REGARDING PAYMENT
OF ATTORNEYS' FEES AND COSTS
FOR JULY 1, 2019, THROUGH
JUNE 30, 2020**

Pursuant to 42 U.S.C. §§ 1988 and 12205, and the parties' Stipulation Regarding
Payment of Attorneys' Fees and Costs from July 1, 2019, through June 30, 2020, docket no. 184,
Defendants shall pay \$210,000.00 to Plaintiffs' counsel. Defendants have 15 days from the entry
of this Order to make the payment.

Exhibit G

THE HON. THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

T.R., by and through his guardian and next friend,
R.R.; S.P., by and through her mother and next
friend, D.H.; C.A., by and through her mother and
next friend, A.A.; T.F., by and through her father
and next friend, D.F.; P.S., by and through his
mother and next friend, W.S.; T.V., by and
through his guardian and next friend. C.D.; E.H.
by and through his mother and next friend, C.H.;
E.D., by and through his mother and next friend,
A.D.; and L.F.S., by and through his mother and
next friend, B.S.,

Plaintiffs,

v.

CHERYL STRANGE, not individually, but solely
in her official capacity as Secretary of the
Washington State Department of Social and
Health Services; and SUE BIRCH, not
individually, but solely in her official capacity as
the Director of the Washington State Health Care
Authority,

Defendants.

No. C09-1677-TSZ

**STIPULATION REGARDING
PAYMENT OF ATTORNEYS' FEES
AND COSTS FROM JULY 1, 2019
THROUGH JUNE 30, 2020**

The parties respectfully submit this Stipulation Regarding Payment of Attorneys' Fees
and Costs and request Court approval of the accompanying Proposed Order. In accordance with
this Court's November 19, 2014 Order re Periodic Payment of Fees, the parties have negotiated

1 an agreed amount of attorneys' fees and costs to be paid to Plaintiffs' counsel for work
2 completed and costs incurred from July 1, 2019, through June 30, 2020.

3 I. FACTS AND PROCEDURAL HISTORY

4 On December 19, 2013, the Court approved the parties' Settlement Agreement (Dkt. 119-
5 1), calling it a "resounding success" and "nothing less than a landmark reform." Verbatim
6 Report of Proceedings at 25, *T.R. v. Quigley*, No. C09-1677TSZ (W.D. Wash. Dec. 19, 2013).
7 The Settlement Agreement contemplates that Defendants will develop a program and deliver
8 intensive mental health services, called Wraparound with Intensive Services ("WISE"), to
9 Medicaid-eligible children in Washington statewide. Dkt. 119-1 ¶ 1. The Settlement Agreement
10 also provides for Plaintiffs' recovery of attorneys' fees and costs, noting that "[t]he parties will
11 make good faith efforts to negotiate the amount of attorneys' fees, costs, and litigation expenses
12 to be awarded to Plaintiffs' counsel, after March 7, 2012."¹ *Id.* at ¶ 89. Subsequent to settling
13 the case, the parties negotiated an amount for work performed through August 31, 2013. Dkt.
14 126 at 11.

15 On November 19, 2014, the Court issued an Order granting approval of the parties'
16 negotiated fees and costs for work completed by Plaintiffs' counsel from September 2013
17 through June 2014. The Order also approved the parties' proposal for an annual process to
18 resolve Plaintiffs' future claims for attorneys' fees and costs. Pursuant to this Order, on
19 September 10, 2015, the parties submitted a Stipulation Regarding Payment of Attorney Fees
20 and Costs for July 1, 2014 through June 30, 2015, which the Court approved on October 6, 2015.
21 On September 8, 2016, the parties submitted a Stipulation Regarding Payment of Attorney Fees
22 and Costs for July 1, 2015, through June 30, 2016, which the Court approved on September 15,
23 2016. On September 13, 2017, the parties submitted a Stipulation Regarding Payment of
24 Attorney Fees and Costs for July 1, 2016, through June 30, 2017, which the Court approved on

¹ The parties had previously negotiated an amount of attorneys' fees and costs to be paid to Plaintiffs' counsel for work performed through March 7, 2012. Dkt. 119-1 ¶ 90. The parties received Court approval for this fee amount after the case settled. Dkt. 138.

1 September 18, 2017. On September 28, 2018, the parties submitted a Stipulation Regarding
2 Payment of Attorney Fees and Costs for July 1, 2017, through June 30, 2018, which the Court
3 approved on October 11, 2018. On September 6, 2019, the parties submitted a Stipulation
4 Regarding Payment of Attorney Fees and Costs for July 1, 2018, through June 30, 2019, which
5 the Court approved on September 12, 2019.

6 Since July 2019, Plaintiffs' counsel have continued to devote significant time and
7 resources toward representing the class and have played a critical role in the ongoing
8 implementation of the parties' Settlement Agreement. This time period has been primarily
9 focused on addressing areas of implementation that have proven most challenging to achieve and
10 that will ensure the long-term sustainability and quality of WISE services. Plaintiffs' counsel
11 devoted significant time to: finalizing the Behavior Rehabilitation Services (BRS) stipulation and
12 analyzing BRS data, providing input on the revised Quality Management Plan (QMP), providing
13 input on the WISE Manual and Status Report, and working with Defendants to reach consensus
14 on exit issues through use of an exit matrix. All of these activities have been for the benefit of the
15 class to ensure successful implementation of the WISE program.

16 **II. RESOLUTION OF PLAINTIFFS' FEE CLAIM FOR WORK** 17 **PERFORMED FROM JULY 2019 THROUGH JUNE 2020**

18 The parties seek this Court's approval for their negotiated resolution of Plaintiffs'
19 attorneys' fees and costs for work performed and costs incurred from July 2019 through June
20 2020.

21 On August 18, 2020, Plaintiffs submitted their billing statement to Defendants' counsel,
22 seeking payment of attorneys' fees, costs, and expenses incurred from July 1, 2019, through June
23 30, 2020. Prior to submitting this statement to Defendants, Plaintiffs' counsel exercised billing
judgment to exclude time that they felt was necessary to complete their work but may have had
only incidental impacts on the class or were inconsistent with their overarching desire to keep
fees and costs low. Plaintiffs' counsel also calculated their lodestar using their 2015-16 billing

1 rates rather than current rates. Plaintiffs' counsel then deducted a 5% across the board reduction
2 of their attorneys' fees total to account for any duplication of effort. After these reductions were
3 made, the billing statement totaled \$228,257.45 in attorneys' fees and \$4569.96 in costs and
4 expenses, as summarized in the chart attached hereto. *See* Exhibit A. Defendants responded to
5 Plaintiffs' fee demand on August 26, 2020. Thereafter, the parties agreed to fully satisfy
6 Plaintiffs' claim for attorneys' fees, costs and expenses for a payment by Defendants to Plaintiffs
7 in the amount of \$210,000.00.

8 This Court has previously found that Plaintiffs are the prevailing party under 42 U.S.C.
9 §§ 1988 and 12205 and awarded reasonable attorneys' fees and costs. Dkt. 138, at 3, 5. It is
10 well settled that plaintiffs may also recover fees and costs for post-judgment monitoring of a
11 settlement agreement. *Prison Legal News v. Schwarzenegger*, 608 F.3d 446, 451-52 (9th Cir.
12 2010) ("We therefore hold that [the plaintiff] may recover attorneys' fees under § 1988 for
13 monitoring the state officials' compliance with the parties' settlement agreement.").

14 Payment of Plaintiffs' attorneys' fees and costs claim from July 2019 through June 2020
15 is proper for the same reasons set forth in Plaintiffs' Petition and Memorandum in Support of
16 Petition for Approval of Attorneys' Fees and Costs. *See* Dkt. 126. Over the twelve-month
17 period in question, Plaintiffs' counsel have worked with Defendants to finalize the BRS
18 stipulation and analyze BRS data, provide input on the revised QMP, provide input on the WISE
19 Manual and Status Report, and reach consensus on exit issues through use of an exit matrix, all
20 in furtherance of zealously representing the interests of the class. The parties stipulate that the
21 agreed upon award of attorneys' fees for the recently completed period of work is reasonable and
22 appropriate under applicable law.

23 **IV. CONCLUSION**

Based on the foregoing, the parties respectfully submit this Stipulation Regarding
Payment of Attorneys' Fees and Costs from July 1, 2019, through June 30, 2020, as well as the
attached Proposed Order for this Court's approval.

Respectfully submitted this 3rd day of September, 2020.

For Plaintiffs:

/s/Susan Kas

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/s/ Eric Nelson

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of September, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Eric Nelson (EricN1@atg.wa.gov).

Dated this 3rd day of September, 2020 at Oakland, California.

/s/ Soraya Morales Nuñez
Litigation Assistant
National Center for Youth Law

Exhibit A

2019-20	ATTY	Year	Hours	Rates	Fees	Fees total	Costs	Total Lodestar	Minus 5% reduction on fees	Total requested	Total Amt
GLAMH	Patrick Gardner	1986	115.4	\$ 710	\$ 81,934	\$ 81,934	\$ 982.29	\$ 82,916.29	\$ 4,096.70	\$ 78,819.59	\$ 70,551.93
NCYL	Leecia Welch	1996	89.1	\$ 595	\$ 53,015	\$ 53,015	\$ 1,385.06	\$ 54,399.56	\$ 2,650.73	\$ 51,748.84	\$ 47,028.17
DRW	Susan Kas	2005	93.8	\$ 450	\$ 42,210	\$ 42,210	\$ -	\$ 42,210.00	\$ 2,110.50	\$ 40,099.50	\$ 35,415.65
NHELP	Kim Lewis	1989	93.5	\$ 675	\$ 63,113	\$ 63,113	\$ 2,202.61	\$ 65,315.11	\$ 3,155.63	\$ 62,159.49	\$ 57,004.25
Total			391.8		\$ 240,271	\$ 240,271	\$ 4,569.96	\$ 244,840.96	\$ 12,013.55	\$ 232,827.41	\$ 210,000.00

Exhibit H

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
CIVIL MINUTES—GENERAL

JS-6

Case No. **EDCV 18-1399 JGB (JEMx)** Date June 22, 2020

Title ***Sigma Beta Xi, Inc., et al. v. County of Riverside, et al.***

Present: The Honorable **JESUS G. BERNAL, UNITED STATES DISTRICT JUDGE**

MAYNOR GALVEZ

Deputy Clerk

Not Reported

Court Reporter

Attorney(s) Present for Plaintiff(s):

None Present

Attorney(s) Present for Defendant(s):

None Present

Proceedings: Order (1) GRANTING Plaintiff’s Motion for Final Approval of Class Action Settlement (Dkt. No. 80); and (2) GRANTING Plaintiffs’ Motion for Attorneys’ Fees and Expenses (Dkt. No. 58)

Before the Court is Plaintiffs’ unopposed motion for final approval of class action settlement (“MFA,” Dkt. No. 80) and unopposed motion for attorneys’ fees and expenses (“MAF,” Dkt. No. 58). (Collectively, “Motions”.) The Court held a hearing on this matter on June 22, 2020. Upon consideration of the oral arguments and documents filed in support of the Motion, the Court GRANTS the Motions.

I. BACKGROUND

Plaintiffs Sigma Beta Xi, Inc.; Andrew M., by and through his next friend Denise M.; Jacob T., by and through his next friend Heather T., on behalf of himself and all others similarly situated; J.F., by and through her next friend Cindy McConnell, on behalf of herself and all others similarly situated (collectively, “Plaintiffs”) filed their class action complaint against the County of Riverside, Chief of the Riverside County Probation Department Mark Hake, and Chief Deputy of the Riverside County Probation Department Bryce Hulstrom (collectively, “Defendants”) on July 1, 2018. (See Dkt. No. 1.) Plaintiffs challenge the legality of Riverside’s Youth Accountability Team (“YAT”) program, which Plaintiffs allege “sweeps children into six-month terms of probation... for being ‘defiant,’ ‘easily persuaded by peers,’ or tardy to school; using ‘inappropriate language’; and behavior associated with grieving over the death of a parent.” (*Id.* ¶ 1.)

On September 13, 2018, the parties stipulated to certify the following class: “All children in Riverside County who have been referred to the Riverside County Youth Accountability Team (‘YAT’) program pursuant to Cal. Welf. & Inst. Code § 601, and who have either been placed on a YAT probation contract or have been referred but not yet placed on a YAT probation contract.” (“Class Cert. Stip.,” Dkt. No. 35 ¶ 4.) On September 17, 2019, the Court approved the Class Certification Stipulation and issued an order certifying the class under Rule 23(a) and 23(b)(2) of the Federal Rules of Civil Procedure.¹ (“Class Cert. Order,” Dkt. No. 37 at 2.)

On September 26, 2018, Plaintiffs filed a first amended complaint. (“FAC,” Dkt. No. 38.) The FAC contains eleven causes of action: 1) deprivation of the right to procedural due process in violation of the Fourteenth Amendment of the U.S. Constitution (42 U.S.C. § 1983); 2) violation of the Due Process Clause of the Fourteenth Amendment of the U.S. Constitution resulting from Welf. & Inst. Code § 601’s vagueness on its face pursuant (42 U.S.C. § 1983); 3) violation of the Due Process Clause of the Fourteenth Amendment of the U.S. Constitution resulting from Welf. & Inst. Code § 601’s vagueness as applied (42 U.S.C. § 1983); 4) unreasonable search and seizure in violation of the Fourth Amendment of the U.S. Constitution (42 U.S.C. § 1983); 5) violation of the First Amendment of the U.S. Constitution (42 U.S.C. § 1983); 6) violation of Art. I, § 7 of the California Constitution; 7) violation of Art. I, § 13 of the California Constitution; 8) violation of Art. I, §§ 2a, 3 of the California Constitution; and 9) violation of Art. I, § 7 of the California Constitution. (FAC.)

On July 24, 2019, Plaintiffs filed an unopposed motion for preliminary settlement approval. (Dkt. No. 57.) On August 26, 2019, the Court held a hearing on the matter and granted the motion. (“MPA Order,” Dkt. No. 59.)

On July 26, 2019, Plaintiffs filed the MAF, along with the following attachments:

- Declaration of Sylvia Torres-Guillén (“STG Declaration,” Dkt. No. 58-1);
 - Settlement Agreement
 - Declaration of Moe Keshavarzi (“Ex. 2” or “Keshavarzi Declaration”);
 - Second Declaration of Sylvia Torres- Guillén (“Ex. 3” or “STG 2d Declaration”);
 - Declaration of Sarah Hinger (“Ex. 4” or “Hinger Declaration”);
 - Declaration of Michael Harris (“Ex. 5” or “Harris Declaration”); and

¹ In order to be certified, a class must meet the requirements of Rule 23(a) and demonstrate one of the following: (1) a risk that separate actions would create incompatible standards of conduct for the defendant or prejudice individual class members not parties to the action; (2) the defendant has treated the members of the class as a class, making appropriate injunctive or declaratory relief with respect to the class as a whole; or (3) common questions of law or fact predominate over questions affecting individual members and that a class action is a superior method for fairly and efficiently adjudicating the action. See Fed. R. Civ. P. 23(b)(1)-(3). Here, the parties stipulated and the Court found that injunctive relief was appropriate respecting the class as a whole. See Fed. R. Civ. P. 23(b)(2).

- Proposed Order (Dkt. No. 58-2).

On March 9, 2020, Plaintiffs filed the MFA. (See MFA.) In support of the MFA, Plaintiffs filed the following:

- Summary of Objections or Responses to Class Settlement Received from Class Members (“Class Objections,” Dkt. No. 80-1);
- Declaration of Sylvia Torres- Guillén (“STG 3d Declaration,” Dkt. No. 80-2);
 - Settlement Agreement (“Settlement” or “Agreement”);
 - YAT Contract (“Ex. A”);
 - Training Plan for Riverside County Probation Department’s YAT Program (“Ex. B”);
 - Monitoring Plan for the Riverside County Probation Department’s YAT Program (“Ex. C”);
 - Notice of Class Action Settlement² (“Ex. D”);
 - About AB Data Information Sheet (“Ex. E”);³
- Declaration of Linnea L. Nelson (“Nelson Declaration,” Dkt. No. 80-3);
- Declaration of Kelly Moran (“Moran Declaration,” Dkt. No. 80-4); and
- Proposed Order (Dkt. No. 80-5).

Both Motions are unopposed. On June 22, 2020, the Court held a hearing on the Motion.

II. SETTLEMENT TERMS

In July 2019, the parties signed the Agreement. (See Agreement at 26–28.) In this Part, the Court summarizes the terms of the Agreement.

A. Settlement Class

The settlement class includes “any child in Riverside County who has been referred to the Riverside County Youth Accountability Team (‘YAT’) program pursuant to California Welfare & Institutions Code § 601, and who was either placed on a YAT probation contract or was referred but has not yet been placed on a YAT probation contract.” (Id. at § I.B.)

² On March 12, 2020, Plaintiffs filed a supplemental declaration explaining that the notice of class action settlement originally filed with the Court was outdated. (Dkt. No. 81 at 3.) An exhibit was filed with the supplemental declaration correcting the error and providing the most recent iteration of the notice. (“Corrected Notice of Class Action Settlement,” Dkt. No. 81-1.)

³ Plaintiffs also refiled Declarations from Kesharvazi, Torres-Guillén, Hinger, and Harris with the MFA for the convenience of the Court. (See generally STG 3d Declaration.)

B. Financial Terms

The Agreement includes certain financial terms. The County will provide at least \$7 million to community-based organizations that focus on positive youth development practices and demonstrate effectiveness in providing affirmative, evidence-based supports to the Riverside County community on a voluntary basis. (Agreement § XII; MFA at 20–21.) This \$7 million will be disbursed in increments of \$1.4 million each fiscal year. (Agreement § XII.) The Agreement also provides for an award of attorneys’ fees and costs in the amount of \$1 million. (Id. § XVII.) It does not appear that the class representatives seek service awards. (See generally id.) The settlement administrator will be AB Data. (Id. § XVI.A.) Defendants will contract with AB Data to create and implement the notice plan. (See id. § XVI.A.)

C. Injunctive Relief

The Agreement principally provides for injunctive relief. The injunctive terms provide for the following:

- Referrals to YAT and YAT contracts will no longer include youths who are alleged to have violated California Welfare and Institutions Code § 601. (Agreement § III.A.) Such referrals will only include children referred under § 602. (Id. § III.B.) In certain circumstances where the Probation Department has discretion to counsel and close, provide a referral to community-based service, or refer the child to YAT, the Probation Department may not disclose information obtained from the child’s parent or guardian to the District Attorney and shall not be used against the child during any Court proceeding. (Id. § III.C.) For certain enumerated offenses, there shall be a presumption that the Probation Department will counsel and close the matter or refer the child to a community-based organization. (Id.)
- Defendants will provide defense counsel, at no cost to the County’s Office of the Public Defender, for all youth referred to the YAT program or other non-court-ordered supervision programs. (Id. § IV.A–F.) The Agreement explains the responsibilities and obligations of defense counsel. (See id.) A child’s defense counsel will be part of the YAT team or any other non-court-ordered supervision program team. (Id. § IV.A.)
- Children will be afforded due process in all contacts with Defendants related to the YAT program or any other non-court-ordered supervision program. (Id. § V.A.) Before assigning a child to the YAT program, the Probation Department must determine there is probable cause to believe the child committed the alleged offense. (Id. § V.A.1.) When a child is referred to the YAT program, the Probation Department will provide the child and their parent/guardian with an easy-to-understand notice available in both English and Spanish. (Id. § V.A.2–3 (explaining what information is required to be in the notice).) The Probation

Department must provide notice of program completion or notice that a child is in danger of not completing the program. (Id. § V.A.9–10.) The Agreement provides additional protections required for certain circumstances such as disability, drug and alcohol testing, meeting times, etc. (See id. § V.A.4-8.)

- The Probation Department will provide introductory and ongoing training to its officers in applying its risk analysis system⁴ that determines whether a child will be referred to the YAT program or receive a lesser intervention. (Id. § VI.A.)
- For children participating in YAT, their contract will be jointly developed with their parent/guardian, defense counsel, and the YAT probation officer. (Id. § VII.A.) The contracts will be based off the template at Exhibit A. (Id.) The contract will include the allegations against the child, positive development goals, identification of the child’s strengths, among other items. (See id. § VII.A.1–2; see also Ex. A.) The YAT contracts are prohibited from including certain terms, e.g., a tour of a correction facility, restrictions on associations with certain people, searches of the child’s person or property. (See Agreement § VII.A.5.) There will also be a presumption against drug and alcohol testing which may be rebutted under certain specified circumstances. (See id. § VII.A.4, VII.A.6.) The contract must be translated if necessary for the child or parent, and the Probation Department must provide accommodations for children with disabilities. (Id. §§ VII.A.3–4.)
- The Agreement also provides the process for record collection, creation, and retention. (See id. § VIII.) The Probation Department will not collect or maintain information on children who do not fall under Welfare & Institutions Code § 601 or § 602. (Id. § VIII.A.) The Probation Department will only retain information in an application for a petition for children referred to the YAT program. (Id.) No information referred under § 601 will be maintained in any gang-related intelligence databases, and the Probation Department will not seek information about immigration status of a child or their parent/guardian. (Id. § VIII.B-C.) For children referred under § 602, the Probation Department will minimize the amount of information requested and maintain confidentiality as provided by law. (Id. § VIII.D.2–3.)
- The Probation Department will provide the Juvenile Justice Coordinating Council (“JJCC”) and the County Executive Officer an annual analysis of anonymized data regarding referrals, participation, and outcomes for children in the YAT program or any other non-court-ordered juvenile supervision programming. (Id. § IX.A-B.) The reports will be publicly available. (Id.) The Agreement details what information will be collected and the timing of the data collection. (See id.)

⁴ The Probation Department uses the Ohio Youth Assessment System for Diversion (“OYAS”).

- The Probation Department will create a mandatory training program for those involved with the YAT program and similar programs. (Id. § X.D.) The training, led by experts Scott MacDonald and Naomi Goldstein, will emphasize positive development, identifying necessary educational supports, youth response to trauma, and cultural competence. (Id. § X.D; see also Ex. B.)
- There will be five additional community representatives to the JJCC, appointed through the Riverside County Board of Supervisors. (Agreement § XI.A.) Plaintiff Sigma Beta Xi will have an additional seat on the JJCC for two years. (Id.) The JJCC will solicit and incorporate community feedback, review data reports, develop action plans to reduce disproportionalities in referrals to and enrollment in the YAT program, evaluate effectiveness of the YAT program, and identify potential improvements or modification to Defendants’ policies and/or practices. (Id.)
- For a child referred to YAT probation without an application for a petition, the Probation Department will identify, seal, and destroy the child’s YAT file within 180 days of final approval of the Agreement. (Id. § XIII.A.1.) For a child referred to YAT probation with an application for petition under § 601, the Probation Department will maintain or destroy the child’s YAT file consistent with the department’s retention policy. (Id. § XIII.A.2.) For children referred to YAT under § 602, the Probation Department will file an application to the Presiding Judge of the Riverside County Juvenile Court requesting that it seal all juvenile case files that would be eligible for sealing. (Id. § XIII.A.3.)
- Defendants will provide Plaintiffs’ Counsel specific records to certify they are complying with the terms of the Agreement. (Id. § XIV.A.) The Agreement enumerates the information Defendants must provide. (Id. § XIV.A.1-4.)
- The parties agree that Scott MacDonald and Naomi Goldstein should be appointed as third-party monitors to ensure compliance. (Id. § XIV.B.) They will jointly monitor the County for five years and provide the Court with the necessary information to oversee Defendants’ compliance. (Id.)

The complete text of the injunctive terms is available in the Agreement §§ III–XIV.

D. Release

All settlement class members agree to release their claims as follows:

As of the Effective Date of Settlement, the Plaintiffs and the Class Members, on behalf of themselves, their heirs, executors, administrators, representatives, attorneys, successors, assigns, agents, affiliates, and partners, and any persons

they represent, by operation of any final judgment entered by the Court, fully, finally, and forever release, relinquish, and discharge the Defendants of and from any and all of the Settled Claims. This Release shall not apply to claims that arise or accrue after the termination of this Agreement.

(Agreement § II.A.) The “Settled Claims” include

all claims for declaratory or injunctive relief that were brought on behalf of Sigma Beta Xi, Inc., or Class Members based on the facts and circumstances alleged in the Complaint and First Amended Complaint, including but not limited to claims that Defendants’ policies, procedures, and practices related to the YAT program violated organizational plaintiff Sigma Beta Xi, Inc.’s and Class Members’ rights to due process under the Fourteenth Amendment to the U.S. Constitution and Article I, § 7 of the California Constitution; their rights to be free from unlawful search and seizure under the Fourth Amendment to the U.S. Constitution and Article I, § 13 of the California Constitution; their rights to freedom of association under the First Amendment to the U.S. Constitution and Article I, §§ 2a and 3 of the California Constitution; and their statutory rights to be free from unlawful racial discrimination under California Government Code § 11135.

(Id. at § I.J.)

E. Notice and Administration

Pursuant to the Agreement, AB Data served as the settlement administrator. (Id. § XVI.A.) The parties completed the Agreement’s procedures for notifying class members of the settlement. (See Settlement Agreement § XVI; see generally Nelson Declaration; see also Moran Declaration.) Within 10 days of preliminary approval, notices were posted on appropriate county department websites, the County’s main website, and on the website of the ACLU of Southern California, ACLU of Northern California, ACLU of San Diego and Imperial Counties, and the National Center for Youth Law. (Id. § XVI.A.1.a, XVI.A.1.c.) AB Data also provided notice to juvenile defense attorneys via the Riverside County Public Defender and alternate public defender offices. (Id. § XVI.A.1.b.) The notice was posted in locations where Riverside County YAT probation officers are regularly stationed. (Id. § XVI.A.1.e.) AB Data and the County sent via First-Class U.S. Mail a postcard notice containing a summary of the case to the parent/guardian of each child whose records will be sealed or destroyed pursuant to the Agreement. (Id. § XVI.A.1.e.) The notice provided direction to website materials for more comprehensive information. (See Ex. D.) The applicable county department websites posted Spanish language translations of the comprehensive settlement information. (Agreement § XVI.D.) Class members had at least 45 days after distribution of the notice to submit objections to the Agreement. (See id. § XVI.A.3; Ex. D at 6.) There have been no objections and no opt outs from the class. (Nelson Declaration ¶ 17; Moran Declaration ¶ 13.)

III. LEGAL STANDARDS

A. Class Action Settlement

Class action settlements must be approved by the Court. See Fed. R. Civ. P. 23(e). Whether to approve a class action settlement is “committed to the sound discretion of the trial judge.” Class Plaintiffs v. Seattle, 955 F.2d 1268, 1276 (9th Cir. 1992). A strong judicial policy favors settlement of class actions. Id.

Nevertheless, the Court must examine the settlement as a whole for overall fairness. Cheng Jiangchen v. Rentech, Inc., 2019 WL 5173771, at *5 (C.D. Cal. Oct. 10, 2019) (citing Hanlon v. Chrysler Corp., 150 F.3d 1011, 1026 (9th Cir. 1998)). Neither district courts nor appellate courts have the power to delete, modify, or substitute provisions in the negotiated settlement agreement. Hanlon, 150 F.3d at 1026. “The settlement must stand or fall in its entirety.” Id.

In order to approve a class action settlement, the court must conduct a three-step inquiry. See Adoma v. Univ. of Phoenix, Inc., 913 F. Supp. 2d 964, 972 (E.D. Cal. 2012). First, it assesses whether the parties have met notice requirements under the Class Action Fairness Act. Id. Next, it determines whether the notice requirements of Federal Rule of Civil Procedure 23(c)(2)(B) have been satisfied. Id. Finally, the court must find that the proposed settlement is fair, reasonable, and adequate under Rule 23(e)(2). Id.

B. Attorneys’ Fees

The procedure for requesting attorneys’ fees is set forth in Rule 54(d)(2). While the rule specifies requests shall be made by motion “unless the substantive law governing the action provides for the recovery of . . . fees as an element of damages to be proved at trial,” the rule does not itself authorize the awarding of fees. “Rather, [Rule 54(d)(2)] and the accompanying advisory committee comment recognize that there must be another source of authority for such an award . . . [in order to] give[] effect to the ‘American Rule’ that each party must bear its own attorneys’ fees in the absence of a rule, statute or contract authorizing such an award.” MRO Commc’ns, Inc. v. AT&T, 197 F.3d 1276, 1281 (9th Cir. 1999).

In class actions, statutory provisions and the common fund exception to the “American Rule” provide the authority for awarding attorneys’ fees. See Alba Conte and Herbert B. Newberg, Newberg on Class Actions, § 14.1 (4th ed. 2005) (“Two significant exceptions [to the “American Rule”] are statutory fee-shifting provisions and the equitable common-fund doctrine.”). Rule 23(h) authorizes a court to award “reasonable attorney’s fees and nontaxable costs that are authorized by law or by the parties’ agreement.” Fed. R. Civ. Proc. 23(h). Under normal circumstances, once it is established that a party is entitled to attorneys’ fees, “[i]t remains for the district court to determine what fee is ‘reasonable.’” Hensley v. Eckerhart, 461 U.S. 424, 433 (1983).

IV. DISCUSSION

A. Motion for Final Approval of Class Settlement

1. Rule 23(a) and (b) Requirements

As referenced above, the Court certified the Settlement Class in this matter under Rules 23(a) and 23(b)(2) pursuant to the parties' joint stipulation. (See Class Cert. Order ¶¶ 1–2.) The Court “need not find anew that the settlement class meets the certification requirements of Rule 23(a) and (b).” Adoma, 913 F. Supp. 2d at 974; see also Harris v. Vector Marketing, 2012 WL 381202 at *3 (N.D. Cal. Feb. 6, 2012) (“As a preliminary matter, the Court notes that it previously certified... a Rule 23(b)(3) class... [and thus] need not analyze whether the requirements for certification have been met and may focus instead on whether the proposed settlement is fair, adequate, and reasonable.”); In re Apollo Group Inc. Securities Litigation, 2012 WL 1378677 at *4 (D. Ariz. Apr. 20, 2012). The parties have made no changes to the proposed Settlement Class since it was certified by the Court. Because the criteria for class certification remain satisfied, the Court confirms its Class Certification Order.

2. Rule 23(c)(2) Requirements

Rule 23(c)(2)(A) instructs that “[f]or any class certified under Rule 23(b)(1) or 23(b)(2), the court may direct appropriate notice to the class.” Fed. R. Civ. P. 23(c)(2)(A). Similarly, Rule 23(e)(1) requires that a proposed settlement may only be approved after notice is directed in a reasonable manner to all class members who would be bound by the agreement. Fed. R. Civ. P. 23(e)(1). In the MPA Order, the Court approved three different types of notice sent to the Settlement Class. (MPA Order at 11.) AB Data adequately provided notice in the manner detailed by the terms of the Settlement and the Court’s order. (See generally Nelson Declaration; see also Moran Declaration.) The Court thus finds that notice to the Settlement Class was adequate.

3. Fair, Reasonable, and Adequate

Under Rule 23(e), “the claims, issues, or defenses of a certified class may be settled . . . only with the court’s approval.” Fed. R. Civ. P. 23(e). “The primary concern of [Rule 23(e)] is the protection of those class members, including the named plaintiffs, whose rights may not have been given due regard by the negotiating parties.” Officers for Justice v. Civil Serv. Comm’n of City & Cnty. of San Francisco, 688 F.2d 615, 624 (9th Cir. 1982). The Court’s inquiry is procedural in nature. Id. Pursuant to Rule 23(e)(2), “[i]f the proposal would bind class members, the court may approve it only after a hearing and on finding that it is fair, reasonable, and adequate.” Fed. R. Civ. P. 23(e)(2). The Court held a final approval hearing on June 22, 2020.

In determining whether a settlement agreement is fair, adequate, and reasonable to all concerned, the Court may consider some or all of the following factors:

- (1) the strength of the plaintiff's case;
- (2) the risk, expense, complexity, and likely duration of further litigation;
- (3) the risk of maintaining class action status throughout the trial;
- (4) the amount offered in settlement;
- (5) the extent of discovery completed, and the stage of the proceedings;
- (6) the experience and views of counsel;
- (7) the presence of a governmental participant; and
- (8) any opposition by class members.

Linney v. Cellular Alaska P'ship, 151 F.3d 1234, 1242 (9th Cir. 1998). This list of factors is not exhaustive, and a court may balance and weigh different factors depending on the circumstances of each case. See Torrisi v. Tucson Elec. Power Co., 8 F.3d 1370, 1376 (9th Cir. 1993).

a. Strength of Plaintiffs' Case

The initial fairness factor addresses Plaintiffs' likelihood of success on the merits. See Rodriguez v. W. Publ'g Corp., 563 F.3d 948, 964–65 (9th Cir. 2009). In determining the probability of Plaintiffs' success on the merits, there is no "particular formula by which that outcome must be tested." Id. at 965. Here, Plaintiffs' MFA sufficiently illustrates the legal and evidentiary strength of their civil rights-based claims. For example, Plaintiffs detail how Defendants failed to give adequate notice to youth and their guardians about the voluntary nature of the YAT program, the basis of referrals to the program, the requirements of the program, and the fact that participation in the program would make them ineligible for diversion in future proceedings. (MFA at 29.) Plaintiffs further describe how youth were urged to agree to YAT contracts in highly coercive environments like law enforcement offices and were not provided with legal counsel prior to signing the contracts. (Id.) In all, Plaintiffs have sufficiently described enough of a factual and evidentiary basis to permit the Court to conclude that their probability of success on the merits is substantial. Indeed, the strength of Plaintiffs' claims in this matter was significant enough for Defendants to stipulate to class certification and appointment of class counsel. (See Dkt. No. 35.) Consequently, the Court finds this factor weighs in favor of granting final approval.

b. Risk, Expense, Complexity, and Likely Duration of Further Litigation

Despite Plaintiffs' likelihood of success on the merits, proceeding further in this matter would not be without risk. In assessing the risk, expense, complexity, and likely duration of further litigation, the Court evaluates the time and cost required. "[U]nless the settlement is clearly inadequate, its acceptance and approval are preferable to lengthy and expensive litigation with uncertain results." Nat'l Rural Telecomms. Coop. v. DIRECTV, Inc., 221 F.R.D. 523, 526 (C.D. Cal. 2004) (quoting 3 Newberg on Class Actions § 11:50 (4th ed. 2012)).

In the instant matter, Plaintiffs acknowledge that despite the strength of their claims, many of the issues and theories underlying those claims are novel, complex, and would demand

significant resources to litigate. (MFA at 30.) As Plaintiffs put it, “[b]y negotiating and agreeing to a comprehensive settlement, Plaintiffs have eliminated the risk of litigation and ensured broad and substantial relief.” (*Id.*) The Court agrees. Accordingly, because settlement will conserve the resources of the Court and the parties, the second factor weighs in favor of approval. See Metrow v. Liberty Mut. Managed Care LLC, 2018 WL 6265085, at *7 (C.D. Cal. June 14, 2018) (weighing second factor favorably where “[w]ithout the Settlement Agreement, the parties would be required to litigate the merits of the case — a process which the Court acknowledges is long, complex, and expensive”).

c. Risk of Maintaining Class Action Status Throughout the Trial

Plaintiffs provide no reason why there might be an elevated risk of decertification in this case. Thus, this factor is neutral.

d. Amount Offered in Settlement

The Settlement reached by the parties does not provide for monetary damages. However, the injunctive relief provided by the Settlement is, in one word, sweeping. As described in more detail above, injunctive relief pursuant to the Settlement will: ensure meaningful, beneficial changes in the structure of the YAT program and other supervision programs operated by the County Probation department; mitigate the long-term consequences of youth participation in the YAT program by ensuring the sealing and destruction of YAT records subsequent to completion of the program; provide training, monitoring and oversight for the benefit of YAT participants and program managers; ensure that an agreement to participate in the YAT program is voluntary and informed; provide free defense counsel for youth referred to the program; and permit criminal defense counsel to participate as members of the YAT team. (See generally Agreement.) The broad and comprehensive nature of the injunctive relief agreed upon by the parties provides a benefit to Class Members immeasurable in monetary terms, but nonetheless significant. DIRECTV, Inc., 221 F.R.D. at 527 (“Although the Proposed Settlement does not provide for monetary damages; it provides Class Members with other valuable benefits not measured in terms of monetary recovery.”).

Moreover, the Settlement also provides for some financial benefit: under the terms of the Agreement, the County will provide at least \$7 million to community-based organizations that focus on positive youth development practices and demonstrate effectiveness in providing affirmative, evidence-based supports to the Riverside County community on a voluntary basis. (Agreement § XII; MFA at 20–21.) This \$7 million funding will be disbursed incrementally in the sum of \$1.4 million each fiscal year. (Agreement § XII.) Taken in light of the difficulty presented by continued litigation in this matter, the Court finds the combination of injunctive and financial relief obtained pursuant to the Agreement to be reasonable.

e. Extent of Discovery Completed, and the Stage of the Proceedings

The fifth factor requires the Court to evaluate whether “the parties have sufficient information to make an informed decision about settlement.” Linney, 151 F.3d at 1239.

According to Class Counsel, settlement occurred only after extensive formal and informal discovery, including the review of thousands of pages of public records and comprehensive independent investigations. (MFA at 27; STG 3d Declaration ¶¶ 3–6.) Although Class Counsel did not conduct depositions, they held lengthy meetings with Defendants and their counsel to assess, address, and correct perceived issues with the YAT program and other County Probation policies and procedures. (MFA at 28; STG 3d Declaration ¶¶ 10, 12.) These meetings included high-level staff from the Probation Department and County, who offered insight into issues with the YAT program and the potential for reforms. (STG 3d Declaration ¶¶ 10, 12.)

As a whole, based on these facts, the Court finds the discovery conducted was sufficient to permit the parties to make an informed decision about settlement. See Lewis v. Starbucks Corp., 2008 WL 4196690, at *6 (E.D. Cal. Sept. 11, 2008) (“While the parties did not fully complete discovery prior to settlement negotiations, approval of a class action settlement is proper as long as discovery allowed the parties to form a clear view of the strengths and weaknesses of their cases.”) (citing In re Immune Response Secs. Litig., 497 F. Supp. 2d 1166, 1174 (S.D.Cal.2007)); see also DIRECTV, Inc., 221 F.R.D. at 527 (“A court is more likely to approve a settlement if most of the discovery is completed because it suggests that the parties arrived at a compromise based on a full understanding of the legal and factual issues surrounding the case.”) (quoting 5 Moore’s Federal Practice § 23.85[2][e] (Matthew Bender 3d ed.)). Therefore, the fifth factor favors approval of the settlement.

f. Experience and Views of Counsel

In considering the adequacy of the terms of a settlement, the trial court is entitled to, and should, rely upon the judgment of experienced counsel for the parties. See DIRECTV, Inc., 221 F.R.D. at 528 (“Great weight is accorded to the recommendation of counsel, who are most closely acquainted with the facts of the underlying litigation[.]”) (internal quotation marks and citations omitted). This reliance is predicated on the fact that “[p]arties represented by competent counsel are better positioned than courts to produce a settlement that fairly reflects each party’s expected outcome in the litigation.” In re Pac. Enters. Sec. Litig., 47 F.3d 373, 378 (9th Cir. 1995).

Here, Class Counsel has submitted evidence of their skill and expertise in civil rights, criminal justice, and class action litigation. (STG 3d Declaration ¶ 19.) As described below in more detail, Class Counsel’s wealth of relevant experience in similar matters lends significant weight to their judgment and decision to settle this matter. Additionally, Class Counsel demonstrate a realistic and balanced view of the potential outcome of the litigation based on the facts of the case and the relative positions of the parties. As a result, the experience and views of Class Counsel also weigh in favor of final approval.

g. Presence of a Governmental Participant

“The participation of a government agency serves to protect the interests of the class members, particularly absentees, and approval by the agency is an important factor for the court’s consideration.” McKibben v. McMahan, 2019 WL 1109683, at *10 (C.D. Cal. Feb. 28, 2019)

(quoting Marshall v. Holiday Magic, Inc., 550 F.2d 1173, 1178 (9th Cir. 1977)). Defendants in this matter include the County of Riverside and two head officials of the Riverside County Probation Department. (MFA at 32; see also FAC.) In light of government participation and consent to the terms of injunctive relief, the seventh factor weighs in favor of final approval of the Settlement.

h. Any Opposition by Class Members

The last factor to consider is whether any Class Member has opposed or objected to the terms of the Agreement. The existence of overwhelming support for a settlement agreement by the class lends weight to a finding that the settlement agreement is fair, adequate, and reasonable. DIRECTV, Inc., 221 F.R.D. at 529 (“It is established that the absence of a large number of objections to a proposed class action settlement raises a strong presumption that the terms of a proposed class settlement action are favorable to the class members.”).

In this case, notice was provided to class members in a number of ways, including: (1) mailing the notice to class members’ addresses; (2) posting the notice on the County’s website; (3) posting the notice on ACLU websites; (4) posting the notice in areas where YAT probation officers are regularly stationed; and (5) providing the notice to juvenile defense attorneys for the County. (MFA at 24–25.) The direct notice by mail was completed by January 3, 2020 and January 17, 2020 in English and Spanish, respectively. (Moran Declaration ¶ 11.) The deadline for Class Members to file any objection to the Settlement Agreement was February 17, 2020. (Dkt. No. 77.) During the response period, of tens of thousands of potential Class Members, Class Counsel received one email and 154 voicemail messages from affected youth and their parents or guardians. (Nelson ¶¶ 9, 13.) At least ten callers affirmatively expressed support for the Agreement, most were neutral towards it, and only two callers conveyed negative reactions to the Agreement.⁵ (Id. ¶¶ 15–16.) Importantly, neither Class Counsel nor counsel for Defendants received an objection to or request for exclusion from the Agreement. (Nelson Declaration ¶ 17; Moran Declaration ¶ 13.) Accordingly, the Court finds that the final factor weighs in favor of approval. Because seven of the eight factors weigh in favor of approval of the Settlement, the Court GRANTS the MFA and APPROVES the Settlement Agreement.

B. Motion for Attorneys’ Fees and Costs

1. Attorneys’ Fees

Plaintiffs also seek approval of their request for attorneys’ fees. (See MAF.) Courts are obliged to ensure the attorneys’ fees awarded in a class action settlement are reasonable, even if

⁵ The negative responses included one individual who contacted Class Counsel by email to express amusement at the lawsuit and state that she had a positive experience with the YAT program. (Nelson Declaration ¶ 16.) The other individual who expressed a negative reaction called Class Counsel and was upset that the class did not seek monetary damages. (Id.) Neither individual formally objected to the Settlement.

the parties have already agreed on the amount. In re Bluetooth Headset Prods. Liab. Litig., 654 F.3d 935, 941 (9th Cir. 2011). “In employment, civil rights and other injunctive relief class actions, courts often use a lodestar calculation [to determine attorneys’ fees] because there is no way to gauge the net value of the settlement or any percentage thereof.” Hanlon v. Chrysler Corp., 150 F.3d 1011, 1029 (9th Cir. 1998). The court determines the lodestar amount by multiplying the number of hours reasonably expended on the litigation by a reasonable hourly rate. McGrath v. Cnty. of Nev., 67 F.3d 248, 252 (9th Cir. 1995). The hourly rates used to calculate the lodestar must be “in line with those prevailing in the community for similar services by lawyers of reasonably comparable skill, experience and reputation.” Blum v. Stenson, 465 U.S. 886, 895 n.11 (1984). Next, the court must decide whether to adjust the ‘presumptively reasonable’ lodestar figure based upon the factors listed in Kerr v. Screen Extras Guild, Inc., 526 F.2d 67, 69–70 (9th Cir. 1975), abrogated on other grounds by City of Burlington v. Dague, 505 U.S. 557 (1992), that have not been subsumed in the lodestar calculation, Caudle v. Bristow Optical Co., Inc., 224 F.3d 1014, 1028–29 (9th Cir. 2000). A non-exhaustive list of the Kerr factors a court may consider includes: “(1) the novelty and complexity of the issues, (2) the special skill and experience of counsel, (3) the quality of representation, (4) the results obtained, and (5) the contingent nature of the fee agreement.” Gonzalez v. City of Maywood, 729 F.3d 1196, 1209 (9th Cir. 2013) (citing Kerr, 526 F.2d at 70).

The Court finds the attorneys’ fees requested are reasonable. Class Counsel represent their work on the case amounts to approximately \$2,216,082.48. (STG Declaration at 7–8.) Class Counsel — consisting of dozens of different attorneys from five distinct organizations and firms — have spent thousands of hours on this case at a variety of hourly rates. Class Counsel rates included \$760 for Moe Keshavarzi, \$870 for Sylvia Torres- Guillén, \$600 for Victor Leung, \$738 for Sarah Hinger, \$875 for Michael Harris, and \$600 for Hannah Benton Eidsath.⁶ (Id.) These rates are reasonable in light of counsels’ experience:

- Moe Keshavarzi has practiced law for over fifteen years. (Keshavarzi Declaration at 3.) He has represented clients in numerous class actions. (Id.) He has also

⁶ Various other attorneys also billed at a variety of rates. (STG Declaration at 8.) Aside from providing the year each attorney graduated from law school and their employer, Plaintiffs failed to submit information that would allow the Court to determine whether those attorneys’ rates are reasonable. However, a number of factors lead the Court to find that the rates are reasonable. For one, each attorney’s hourly rate is consistent with the amount of time that has elapsed since they graduated law school — more recent graduates billed less, and less recent graduates billed more. (STG Declaration at 7–8.) Second, the rates billed are within a range of rates the Court has found reasonable. (Id.) Third, several of the attorneys worked fifty or less hours on the case, making their contribution to the lodestar amount de minimis. (Id.) Fourth, Plaintiffs’ MFA is uncontested and there is no common fund provided by the Agreement. Thus, an award of attorneys’ fees does not risk depriving Class Members of their award. (MFA at 7, 18.) Last, Plaintiffs’ requested attorneys’ fees are so significantly below the lodestar amount that the Court is confident that even major adjustments would not impact the reasonability of the requested attorneys’ fees.

litigated other civil rights pro bono cases. (Id.) Keshavarzi is a board member of multiple civil rights and legal aid organizations. (Id. at 3–4.)

- Sylvia Torres- Guillén has about twenty-seven years of experience practicing law. (STG 2d Declaration at 4.) She has defended thousands of criminal cases as a federal public defender. (Id.) More recently, Torres- Guillén was appointed as General Counsel of the California Agricultural Labor Relations Board, and later served as special counsel to California Governor Jerry Brown. (Id. at 4–5.) After her time in state government, Torres- Guillén joined the American Civil Liberties Union (“ACLU”) and has served as a senior staff attorney and lead counsel on a number of civil rights cases over the last three years. (Id. at 5.) She has received a litany of awards and accolades over the last ten years in recognition of her exceptional legal work. (Id.)
- Victor Leung has practiced law for approximately ten years. (Id.) As an associate at Latham & Watkins LLP, he specialized in complex commercial litigation and handled dozens of cases in state and federal court. (Id.) For the last five years, Leung has worked for the ACLU and serves as the Deputy Litigation Director. (Id. at 6.) He was named a California Lawyer Attorney of the Year in 2018 in the area of education law. (Id.)
- Sarah Hinger has practiced law for approximately ten years. (Hinger Declaration at 4.) After graduation from law school, she served as a trial attorney for the United States Department of Justice in the Civil Rights Division. (Id.) She joined the ACLU in 2015 where she is employed as a staff attorney and has been involved in the litigation of numerous federal civil rights cases. (Id.)
- Michael Harris has over thirty years of experience litigating civil rights cases. (Harris Declaration at 3.) He is the Senior Director of Juvenile Justice and Legal Advocacy at the National Center for Youth Law (“NCYL”). (Id.) Previously, he was a staff attorney and Assistant Director of the Lawyer’s Committee for Civil Rights in San Francisco. (Id. at 4.)
- Hannah Benton Eidsath has over ten years of experience representing youth involved in the juvenile justice system. (Id.) During that time, she has accumulated a wealth of experience serving as co-counsel representing both classes and individuals in suits challenging the constitutionality of government practices in truancy courts, youth-justice systems, and schools. (Id.)

See McKibben, 2019 WL 1109683, at *14 (finding hourly rates for civil rights attorneys between \$336 and \$1230 per hour are reasonable depending on attorney experience).

The Court also finds the number of hours billed to be reasonable. As an initial matter, Class Counsel sufficiently details the character, quantity, and complexity of legal work performed

since Plaintiffs filed the complaint. Furthermore, the amount of hours billed is consistent with the complexity, length, and difficulty of litigating and resolving the issues in this matter. In the year-and-a-half since the Complaint was filed, Class Counsel has: conducted extensive factual investigation; made numerous records requests and reviewed thousands of pages of public documents; consulted with potential clients before the commencement of litigation; consulted with youth, their guardians, and local non-profit organizations involved in the YAT program; conducted legal research and analysis on complex civil rights issues; developed case strategy in connection with the complaint; and engaged multiple experts to provide a disparate impact analysis and to assess the efficacy of the YAT program. (Hinger Declaration at 4; STG 2d Declaration at 6; STG Declaration at 5–6.) While thousands of hours were billed, the Court is confident that the involved and complicated nature of this litigation required the intensive labor Class Counsel now seeks compensation for.

In addition to the hours worked by attorneys and detailed above, several paralegals and law clerks employed by Class Counsel worked additional hours that Class Counsel did not bill. (MAF at 26.) Likewise, because the MAF was filed several months prior to finalization of the Settlement, the hours billed and fees requested in the MAF omit the additional hours Class Counsel was required to work in order to finalize approval of the settlement. (*Id.*) At the time of the filing of the MAF, Class Counsel anticipated working between fifty or one-hundred additional hours in order to finalize approval of the settlement and conclude their work for Plaintiffs. (*Id.*) The Court finds that the hours billed are reasonable in light of the significant amount of labor required and Class Counsel’s generous underbilling. Finally, the Court has no reason to adjust the lodestar downward based on unconsidered *Kerr* factors such as the nature of the results obtained or the complexity of the issues resolved. *Kerr*, 526 F.2d at 70. Indeed, as detailed throughout this Order, the breadth of the injunctive relief obtained in addition to the circumvention of sizable legal hurdles by Class Counsel warrant commendation and further weigh in favor an award of the requested attorneys’ fees.

The requested fee (\$1,000,000) represents a lodestar multiplier of approximately .45.⁷ A requested fee so significantly discounted from the lodestar weighs in favor of a finding that the provided rates are reasonable. *See McKibben*, 2019 WL 1109683, at *14 (“[T]he fact that counsel seeks a significantly discounted lodestar weighs in favor of finding that the provided rates are reasonable.”). Considering the complexity of the case, the risks involved, and the potential length of litigation, the Court finds the .45 multiplier to be reasonable. Accordingly, the Court GRANTS the MAF and AWARDS the requested \$1,000,000 in attorneys’ fees.

2. Costs

“In a certified class action, the court may award... nontaxable costs that are authorized by law or by the parties’ agreement.” Fed. R. Civ. 23(h); *see Trans Container Servs. v. Sec. Forwarders, Inc.*, 752 F.2d 483, 488 (9th Cir. 1985). “Expenses such as reimbursement for

⁷ Requested Fee (\$1,000,000) / Lodestar (\$2,216,082.48) = Lodestar Multiplier (approximately .45).

travel, meals, lodging, photocopying, long-distance telephone calls, computer legal research, postage, courier service, mediation, exhibits, documents scanning, and visual equipment are typically recoverable.” Rutti v. Lojack Corp., Inc., 2012 WL 3151077, at *12 (C.D. Cal. July 31, 2012).

Class counsel requests \$49,253.21 in costs. (MAF at 21.) The costs submitted include meal costs, travel costs, litigation expenses, and consultant fees. (Id.) All of these expenses are typically recoverable in litigation. See In re Immune Response Sec. Litig., 497 F. Supp. 2d 1166, 1177–78 (S.D. Cal. 2007) (finding expenses on meals, travel, consultants, and other litigation expenses reasonable and recoverable in a class action settlement). The Court therefore GRANTS the MAF to the extent it seeks reimbursement of \$49,253.21 for costs.

V. CONCLUSION

For the foregoing reasons described above, the Court:

- (1) GRANTS the MFA and APPROVES the Settlement Agreement;
- (2) GRANTS the MAF as it pertains to attorneys’ fees and AWARDS Class Counsel attorneys’ fees in the amount of \$1,000,000;
- (3) GRANTS the MAF as it pertains to costs and AWARDS Class Counsel costs in the amount of \$49,253.21; and
- (4) DISMISSES the FAC WITH PREJUDICE.

The Clerk is directed to close the case.

IT IS SO ORDERED.

Exhibit I

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

M.B., et al.,

Plaintiffs,

v.

Jennifer Tidball, et al.,

Defendants.

Case No. 2:17-cv-4102-NKL

ORDER

I. INTRODUCTION

This class action was brought on behalf of children in foster care who alleged that Defendants, the Acting Director of the Missouri Department of Social Services and the Director of the Children’s Division of the Missouri Department of Social Services, had failed to implement a system of safeguards and oversight with respect to the administration of psychotropic drugs to children in their custody. The Court certified a class consisting of “all children in Children’s Division foster care custody who presently are, or in the future will be, prescribed or administered one or more psychotropic medications while in state care.” Before dispositive motions were filed, however, the parties engaged in extensive mediation and ultimately reached an agreement settling the case. The settlement agreement includes specific “Commitments” by the state agencies with regard to training, monitoring, maintenance of medical records, review, informed consent, oversight, and enforcement. Doc. 280-1 (Settlement Agreement).

Plaintiffs’ counsel, consisting of attorneys from various non-profit organizations and one major law firm, have moved for an award of \$3,894,975.22 in fees (for 11,417.6 hours of work) and \$132,907.56 in expenses. Plaintiffs’ attorneys’ work involved not only investigations and research undertaken before the case was filed, but also motion practice—some of which was

peculiarly necessitated by Defendants' decisions to move to dismiss the case, to appeal the Court's class certification decision, and to seek to stay the litigation in this Court pending resolution of their appeal from the class certification decision, as well as more minor matters such as oppositions to motions for appointment of Next Friends for the minor children and the voluntary withdrawal of a Named Plaintiff, as well as the filing of a discovery motion aimed at procuring private therapy notes for a child that the Court found were protected by the psychotherapist-patient privilege. No less important was the work Plaintiffs undertook to reach a comprehensive settlement with respect to complicated issues surrounding the administration of psychotropic drugs to children in Missouri's foster care system.

For the reasons, discussed below, Plaintiffs' motion for fees, Doc. 285, is granted in part.

II. BACKGROUND

a. Pre-Filing Investigation

Before filing this lawsuit in 2017, Plaintiffs' counsel conducted a nearly-two-year investigation into the oversight and monitoring of psychotropic medications in the Missouri child welfare system. Declaration of Samantha Bartosz in Support of Plaintiffs' Motion for Fees and Expenses (Doc. 285-2, "Bartosz Decl.") ¶ 29. During the investigation, Plaintiffs' counsel collected and reviewed publicly available information; researched applicable case law, statutes, and regulations; conducted extensive outreach to knowledgeable stakeholders, including through both telephonic and in-person interviews; and identified representative Named Plaintiffs and suitable Next Friends. *Id.* ¶ 30.

b. Commencement of Lawsuit

On June 12, 2017, Plaintiffs, by their Next Friends and through counsel, commenced this action—which they say is the first of its kind—against the Director of the Children's Division

(“CD”) of the Department of Social Services (“DSS”) and the Acting Director of the Department of Social Services, each in their official capacities. Doc. 1. The complaint was over 45 pages in length. As amended on July 3, 2017, the complaint alleged substantive and procedural due process violations and sought declaratory and injunctive relief regarding at least three alleged deficiencies in Defendants’ policies, procedures, practices, and customs with respect to the administration of psychotropic drugs: (1) failure to maintain, and to furnish to caregivers and prescribing physicians, up-to-date medical records detailing each child’s physical and mental health history; (2) failure to ensure informed consent to the administration of psychotropic medication, both at the outset and as treatment continues; and (3) failure to ensure secondary review of all outlier prescriptions by a qualified, independent child psychiatrist. Doc. 22.

c. Motion to Dismiss

On August 21, 2017, Defendants filed a motion to dismiss on the grounds of failure to state a claim and on the basis of the federal abstention doctrine articulated in *Younger v. Harris*, 401 U.S. 37 (1971). Doc. 33. After the matter was fully briefed (Docs. 35, 57, 67), the Court scheduled oral argument. Doc. 76. On January 8, 2018, the Court granted in part and denied in part the motion to dismiss, concluding that: (1) the *Younger* abstention doctrine did not apply; (2) Plaintiffs stated a plausible procedural due process claim; (3) Plaintiffs stated a plausible substantive due process claim, except that claims relating to informed consent in that cause of action were dismissed without prejudice; and (4) the claim for violation of the Federal Adoption Assistance and Child Welfare Act required dismissal because the statutes at issue did not confer a private right of action. Doc. 91.

d. Motions Concerning Appropriate Parties

Separately, Defendants moved to dismiss certain unknown plaintiffs on the grounds that those plaintiffs were unidentifiable. Doc. 34. Plaintiffs opposed that motion. Doc. 46. Upon learning the identities of those Named Plaintiffs, however, Defendants subsequently moved to withdraw their motion to dismiss those plaintiffs. Doc. 48.

On August 23, 2017, Plaintiffs filed a motion to appoint Next Friends for the Named Plaintiffs. Doc. 36. Defendants filed a response in partial opposition, challenging the appointment of two of the Plaintiffs' proposed Next Friends. Doc. 45. After fully briefing Defendants' motion, including through a supplemental response in opposition filed by Defendants, Doc. 59, and a sur-reply filed by Plaintiffs, Doc. 66, the parties filed stipulations agreeing to the appointment of all Next Friends. Docs. 50, 56, 61, 68. The Court appointed Next Friends for the Named Plaintiffs per the stipulations. Doc. 69.

Defendants also challenged Plaintiffs' motion to dismiss a Named Plaintiff who inadvertently had been joined to the suit. Docs. 111, 124. After that motion was fully briefed (*see* Doc. 133), the Court granted Plaintiffs' motion for dismissal of the Named Plaintiff. Doc. 168.

e. Class Certification and Interlocutory Appeal

On March 16, 2018, Plaintiffs filed their motion for class certification. Doc. 113. Defendants opposed the motion, challenging Plaintiffs' arguments regarding commonality, typicality, and adequacy as to each proposed class representative, including on the basis of each minor child's trauma history. Doc. 144. On July 19, 2018, following full briefing and oral argument, the Court granted Plaintiffs' motion for class certification, certifying a class consisting of "all children in Children Division foster care custody who presently are, or in the future will be,

prescribed or administered one or more psychotropic medications while in state care.” Doc. 183, p. 19.

On August 2, 2018, Defendants requested permission from the Eighth Circuit to appeal the class certification order. Doc. 192-1. Plaintiffs timely opposed Defendants’ efforts to challenge class certification. Still, the Eighth Circuit granted Defendants’ petition for interlocutory appeal. Doc. 195 (Order, *M.B. v. Corsi*, No. 18-8009 (8th Cir. Aug. 22, 2018)).

Thereafter, Defendants moved to stay all proceedings and deadlines in this Court pending the Eighth Circuit’s ruling on their forthcoming appeal of the class certification decision. Doc. 201. Defendants argued that they would be irreparably harmed absent a stay because “the enormous amount of work that [would need to] be done to complete discovery and get ready for trial [would] be wasted if the Eighth Circuit decide[d] to decertify or narrow the proposed class,” and that, in contrast, “Plaintiffs have not shown a stay will inflict irreparable harm.” Doc. 202, pp. 7-8. In response, Plaintiffs’ counsel identified specific examples of class members—children in Defendants’ custody—who had experienced and would continue to experience direct harm as a result of Defendants’ alleged policies or procedures, or lack thereof. Doc. 210. After the motion was fully briefed, and after oral argument (Doc. 223), the Court denied Defendants’ motion for a stay, finding that Defendants failed to show a likelihood of success on the appeal, failed to establish that they would be irreparably harmed absent a stay, failed to overcome Plaintiffs’ showing that a stay would subject Plaintiffs to a greater risk of harm, and failed to show that a stay was in the public interest. Doc. 226.

Beginning on November 1, 2018 and continuing for three months, the parties fully briefed the appeal in the Eighth Circuit from the Court’s class certification decision. *M.B. v. Corsi*, No. 18-2798 (8th Cir.). Per Defendants’ formal request, the case was set for oral argument. Plaintiffs’

attorneys traveled to St. Louis for the oral argument on April 18, 2019. Attorney Schuster argued the case on behalf of the Plaintiffs-Appellees.

f. Fact Discovery

In the interim, discovery continued. Defendants produced approximately 1.5 million pages of documents, which Plaintiffs reviewed. Bartosz Decl. ¶ 31. Many of the pages were maintained in hard copy and produced in formats that were not easily searched. *Id.* Moreover, the productions were disorganized, duplicative, and nonsequential. *Id.* Many of the files were produced as pages spanning hundreds or thousands of pages that needed to be manually disaggregated for review. *Id.* Plaintiffs also obtained and analyzed tens of thousands of pages produced from third parties. *Id.* Plaintiffs reviewed and produced approximately 50,000 pages of documents to Defendants. *Id.* ¶ 34.

For the fifty-four interrogatories (not including subparts) that Defendants propounded, Plaintiffs’ drafted approximately one-hundred pages of responses. *Id.*

Plaintiffs took 15 depositions—six 30(b)(6) depositions and 9 other fact depositions—on topics including medical records, informed consent, and secondary review of psychotropic medications. *Id.* ¶ 35. Plaintiffs also defended the depositions of three Next Friends. *Id.*

Counsel for both sides participated in dozens of meet-and-confer conference calls to address such topics as the selection of email search terms and custodians as well as what Plaintiffs describe as “numerous delays and deficiencies in Defendants’ responses to Plaintiffs’ discovery requests,” including “Defendants’ fail[ure] to timely produce . . . clearly responsive emails for one of the Named Plaintiff’s case managers.” *Id.* ¶ 34.

Defendants sought the Court’s intervention to compel the production of notes of confidential therapy sessions conducted between Named Plaintiff A.H. and her Next Friend, her

psychotherapist, after the parties' efforts to confer on the subject were unsuccessful. Doc. 127. Upon oral argument, the Court denied Defendants' request, holding that the psychotherapist-patient privilege applied and was not waived, and that any probative value in the material sought would be outweighed by the very serious harm to the child if the material were disclosed. *Id.* Following the ruling, Defendants availed themselves of the opportunity that the Court afforded (*see id.*) to submit limited briefing further arguing the issue. Doc. 138. Defendants also concurrently filed a motion for leave to create an appellate record regarding their request to compel production of A.H.'s therapy notes. Doc. 136. Both motions were fully briefed. Docs. 148, 151, 152, 153.

The Court denied Defendants' motion to compel production of the therapy notes in full, in two parts. First, the Court denied the motion to compel production of the therapy notes, except that the Court ordered Plaintiffs to furnish for *in camera* inspection notes from three specific dates. Doc. 161. Following its *in camera* review of those documents, the Court denied Defendants' motion to compel in full. Doc. 164. The Court granted in part and denied in part Defendants' motion to create an appellate record. Doc. 160.

g. Expert Discovery

To bolster their case, Plaintiffs retained four experts in the fields of child and adolescent psychiatry and pharmaceutical sciences. Bartosz Decl. ¶ 47. Each expert produced a detailed report covering topics of informed consent, oversight of psychotropic medication, medical records, and an in-depth review of voluminous Named-Plaintiff case files. *Id.* ¶ 38. Collectively, the Plaintiffs' experts' reports totaled more than one-hundred pages. *Id.* Plaintiffs' attorneys and paralegals gathered relevant materials for the experts to review, conferred in person and by

telephone with the experts to discuss their opinions, reviewed draft reports, and prepared the accompanying productions—thousands of pages of reliance materials and communications. *Id.*

h. Settlement Efforts

The parties first undertook mediation efforts, in accordance with the Notice of Inclusion in the Mediation and Assessment Program (“MAP”), with Professor James Levin at the University of Missouri School of Law in Columbia, Missouri, on October 2, 2017. Doc. 3. Although Plaintiffs prepared settlement proposals and materials in anticipation of the meeting, that first mediation session ultimately was not productive. *Id.* ¶ 40.

On June 14, 2018, this Court directed the parties to participate in mediation with Jill Morris, the Director of MAP for the Western District of Missouri. Doc. 174. Thereafter, under Director Morris’s guidance, through four in-person meetings in Kansas City and dozens of telephone conferences between Plaintiffs’ counsel on the one hand and Defendants, DSS, and CD staff on the other, the parties engaged in extensive mediation efforts over the course of nearly a year, covering every issue raised in the Complaint. Bartosz Decl. ¶ 41. Plaintiffs also held several internal meetings to review settlement proposals and discuss strategy. *Id.* Both sides brought in subject matter experts at various points to help address some of the clinical and technical aspects of the Agreement, and Plaintiffs’ counsel expended time and effort consulting with these experts. *Id.* ¶ 42. The telephonic and in-person negotiation sessions typically included one or more counsel from the Missouri Attorney General’s Office and one or more counsel from DSS’s General Counsel’s Office as well as at least two members of the DSS and CD leadership team. *Id.* ¶ 43. The parties exchanged approximately thirty drafts of various sections of the settlement agreement. *Id.* Finally, the parties reached a comprehensive Settlement Agreement. *Id.*

On May 28, 2019, the parties notified the Court that they had reached an agreement in principle to settle the case. Doc. 270. The Settlement Agreement, which resolves the remaining substantive and procedural due process claims that Plaintiffs and class members brought under the Fourteenth Amendment of the U.S. Constitution, was executed by the parties as of June 10, 2019. Doc 280-1. The Court preliminarily approved the Settlement Agreement on July 15, 2019. Doc. 282.

The parties notified the Eighth Circuit that a settlement agreement had been reached, resulting in an order from the Eighth Circuit staying the appeal pending this Court's decision on approval of the Settlement Agreement. Order, *M.B. v. Corsi*, No. 18-2798 (8th Cir. July 9, 2019).

The Court entered an order finally approving the class action settlement in December 2019. Docs. 317, 320. On January 31, 2020, the Eighth Circuit entered judgment dismissing the appeal in light of the settlement. Doc. 324.

i. Terms of the Settlement

Through the Settlement Agreement, Defendants made substantive commitments in the following areas:

- Initial and ongoing training of case management staff and resource providers;
- Medication monitoring, including regular mental health assessments, medical examinations, and concurrent non-pharmacological treatment for Class members;
- Medical records, including system and reporting capabilities and commitments to comply with CD policy on the collection and distribution of medical and mental health records;
- Secondary review of designated prescriptions of psychotropic medications to Class members by a qualified, independent child and adolescent psychiatrist to ensure safety and appropriateness;
- Informed consent and youth assent to the administration of psychotropic medications to Class members, including specific policies and processes governing the provision of consent and assent and periodic review of consent;

- Establishment of a Psychotropic Medication Advisory Committee to provide professional and technical consultation and policy advice to DSS, CD, and the MO HealthNet Division of DSS on issues related to psychotropic medication; and
- Establishment of excessive dosage guidelines based on advice from and consultation with medical and clinical experts.

Doc. 280-1 (Settlement Agreement). Plaintiffs’ counsel states that the Settlement Agreement “fully address[es] the concerns set forth in the Amended Complaint.” Bartosz Decl. ¶ 44.

III. ANALYSIS

The Court may allow “the prevailing party” in certain civil rights actions to recover “a reasonable attorney’s fee” 42 U.S.C. § 1988. A litigant is a “prevailing party” for attorneys’ fees purposes “if they succeed on any significant issue in litigation which achieves some of the benefit the parties sought in bringing suit” *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983); *see also Jenkins by Jenkins v. State of Mo.*, 127 F.3d 709, 714 (8th Cir. 1997) (“It is generally true that status as a prevailing party is determined on the outcome of the case as a whole, rather than by piecemeal assessment of how a party fares on each motion along the way.”). Because Plaintiffs have prevailed on significant issues in this litigation they are entitled to attorneys’ fees.

Defendants argue that the amount of the fees and expenses that Plaintiffs seek is unreasonable¹. The Court therefore turns to the issue of reasonableness.

a. Fees

The basis for any fee award under § 1988 is the lodestar calculation, the product of a reasonable hourly rate and the number of hours reasonably expended on the litigation. *See Hensley*, 461 U.S. at 433 (“The most useful starting point for determining the amount of a reasonable fee is the number of hours reasonably expended on the litigation multiplied by a

¹ Defendants reserved their right to contest the amount of the fees. Settlement Agreement, Section II.P.

reasonable hourly rate.”); *Hanig v. Lee*, 415 F.3d 822, 825 (8th Cir. 2005) (“The starting point in determining attorney fees is the lodestar, which is calculated by multiplying the number of hours reasonably expended by the reasonable hourly rates.”). Thus, to determine whether the fees that Plaintiffs seek are reasonable, the Court must determine (1) a reasonable rate for the attorneys’ time and (2) the number of hours reasonably expended on the litigation.

1. Reasonable Hourly Rates

A. Applicable Law

In the Eighth Circuit, “a reasonable hourly rate generally means the ordinary fee for similar work in the community.” *Little Rock Sch. Dist. v. State Ark. Dep’t of Educ.*, 674 F.3d 990, 997 (8th Cir. 2012) (quotation marks and citations omitted). The goal of the lodestar method is to “roughly approximate[] the fee that the prevailing attorney would have received if he or she had been representing a paying client who was billed by the hour in a comparable case.” *Perdue v. Kenny A.*, 559 U.S. 542, 551 (2010).

The burden of establishing the appropriate rate rests on the fee applicant. *See Blum v. Stenson*, 465 U.S. 886, 895 n.11, 104 S. Ct. 1541, 1547 (1984) (“To inform and assist the court in the exercise of its discretion, the burden is on the fee applicant to produce satisfactory evidence—in addition to the attorney’s own affidavits—that the requested rates are in line with those prevailing in the community for similar services by lawyers of reasonably comparable skill, experience, and reputation.”).

B. The Rates Proposed

The parties dispute whether Plaintiffs’ proposed rates are in keeping with local rates. The rates that Plaintiffs request and those that Defendants propose are shown below, from highest to lowest:

Attorneys	Plaintiffs' Requested Rate	Defendants' Proposed Rate
Samantha Bartosz	\$500	\$382
Bill Grimm	\$500	\$382
Scott T. Schutte	\$500	\$382
Leecia Welch	\$450	\$338
John Ammann	\$400	\$300
Stephen Dixon	\$375	\$281
Elizabeth Gretter	\$375	\$281
Poonam Juneja	\$375	\$281
Aaron Finch	\$325	\$244
Catherine Frizell	\$325	\$244
Jonathan King	\$325	\$244
Courtney J. McCormick	\$325	\$244
Stephanie Schuster	\$325	\$244
Daniele Girard	\$300	\$225
Freya Pitts	\$300	\$225
Danielle Rosenthal	\$300	\$225
Ning He	\$275	\$206
Amanda Grill	\$225	\$169
Erin McGuinness	\$225	\$169
Jacqueline Stolzenberg	\$225	\$169
Paralegals	Plaintiffs' Requested Rate	Defendants' Proposed Rate
Genevieve Caffrey	\$150	\$134
Hailey Cherepon	\$150	\$134
Meghan Kacsmar	\$150	\$134
Kira Setren	\$150	\$134

In short, Plaintiffs seek rates between \$400 and \$500 per hour for their most senior litigators, rates between \$225 and \$375 per hour for associates and staff attorneys, and the rate of \$150 per hour for paralegals. Defendants seek to cap the attorney rates at \$382 per hour and to reduce the other rates correspondingly.

C. Comparable Rates and Other Evidence

In support of their position that their proposed rates are reasonable, Plaintiffs cite the *Missouri Lawyers Weekly* publication regarding billing rates. In August 2018, the publication

showed that the median rate for partners across all practice areas was \$440 per hour in Kansas City and \$380 per hour in St. Louis, with the highest rate for partners at \$865 in Kansas City and \$660 in St. Louis. Doc. 285-4. For civil rights and class action litigation specifically, the rates listed in the publication for partners range from \$350 to \$865 in Kansas City. *Id.* Of course, a partner might have just ten years of experience, while many of the plaintiffs' attorneys in this case have more than 30 years of experience.

For associates, the *Missouri Lawyers Weekly* study shows that the median rate across all practice areas was \$333 per hour in Kansas City and \$225 in St. Louis, with the highest rate at \$475 per hour in Kansas City and \$300 in St. Louis. *Id.* For civil rights and class action litigation, the rates listed in the publication for associates range from \$290 to \$475 in Kansas City. *Id.* The 2019 publication concerning rates shows that attorneys practicing "public interest class action" charged between \$320 and \$770 per hour, depending on their experience, and attorneys practicing class action/MDL charge rates ranging from \$225 to \$495. Doc. 299-2 (Supplemental Declaration of John J. Ammann), Ex. A. The median rate for attorneys (not broken down by partners and associates) for the entire state is \$318. Doc. 285-4.

For support staff, the median rate in 2018 was \$120 throughout the state, with the highest rate at \$275. Doc. 285-4. Notably, however, the broad term "support staff" includes not just paralegals, but also administrative or legal assistants. Rates listed for paralegals who work on class action or civil rights cases specifically are between \$215 and \$275. *Id.*

Plaintiffs also submit declarations of local attorneys attesting that their proposed rates are within the range of fees that local attorneys charge for comparable civil rights class action litigation. John M. Kilroy, Jr., an attorney with more than forty years of experience, including in numerous class actions, who retired from Polsinelli, P.C. in 2019, states that he has "been involved

in many class action lawsuits . . . and in fairness hearings on reasonable rates charged by other lawyers in Kansas City and in other jurisdictions around the country,” and also has “been involved in setting the rates charged by lawyers” at the two law firms at which he worked. Kilroy Declaration ¶¶ 2-6. Mr. Kilroy states that “[t]he standard hourly rate for lawyers and paralegals at Polsinelli, P.C. of similar years of experience is higher than the rates sought by plaintiffs.” *Id.* ¶ 10. His own rate prior to his 2018 retirement was \$585 per hour. *Id.* Mr. Kilroy further states that he “believe[s] the rates submitted by lawyers and paralegals with St. Louis Legal Clinic, the National Center for Youth Law, Children’s Rights and Morgan Lewis & Bockius to be reasonable and consistent with standard rates charged by lawyers and paralegals of similar age and experience in the Kansas City area.” *Id.* ¶ 11.

Similarly, Thomas Kennedy, an attorney with more than forty years of experience in civil rights, education rights, and public benefits cases in both Missouri and Illinois, states that his firm charges between \$400 and \$450 per hour for his time, between \$300 and \$350 for a partner with seven years of experience, \$200 per hour for associates with one year of experience, and \$125 to \$150 for paralegals. His firm charges higher rates in contingent-fee cases because the attorney assumes the risk (as Plaintiffs’ counsel did here) that he will not be compensated if the suit is unsuccessful. Mr. Kennedy’s rates also, he says, are lower than those charged by Missouri lawyers because rates in Southern Illinois, where half of his firm’s work is done, are lower than those in Missouri.

Plaintiffs also point out that courts have approved comparable or even higher rates in class actions and civil rights suits. *See Pollard v. Remington Arms Co., LLC*, 320 F.R.D. 198 (W.D. Mo. Mar. 14, 2017) (finding “average hourly fees” for class counsel that ranged from \$261 to \$897 to be reasonable because, although high, they were “not dissimilar to those hourly rates charged in

the Kansas City area” and were “indicative of counsel’s extensive national experience in class action lawsuits”), *aff’d*, 896 F.3d 900 (8th Cir. 2018); *Albright v. Bi-State Dev. Agency of Missouri-Illinois Metro. Dist.*, No. 11CV01691 AGF, 2013 WL 4855304, at **8-9 (E.D. Mo. Sept. 11, 2013) (setting rates in class action at \$500 per hour for each of the three lead counsel, \$245 to \$395 per hour for other attorneys, and \$150 per hour for paralegals); *D.L. v. St. Louis City Pub. Sch. Dist.*, No. 17 CV 1773 RWS, 2019 WL 1359282, at *2 (E.D. Mo. Mar. 26, 2019) (approving rates of \$300 and \$400 where plaintiff had submitted evidence “demonstrating billing rates of \$200-\$350 for ‘attorneys’ or ‘associates’ practicing employment or civil rights law in the St. Louis metropolitan area and billing rates of \$350-\$500 for ‘partners’ practicing employment or civil rights law in the St. Louis metropolitan area”) (citation omitted)).

Defendants have not submitted any declarations by local attorneys who deem Plaintiffs’ fees unreasonably high. *Cf. Trinity Lutheran Church of Columbia, Inc. v. Comer*, No. 2:13-cv-4022-NKL, 2018 U.S. Dist. LEXIS 190824, at *15 (W.D. Mo. Nov. 7, 2018) (discussing declaration submitted by counsel for the defendants who had argued before the U.S. Supreme Court showing that his rates in private practice were substantially lower than those proposed by plaintiffs’ counsel).

Defendants’ argument that the Court should use rates from 2017 to determine the appropriate rates for Plaintiffs’ counsel in this case because most of the litigation was conducted in 2017 ignores the facts and the law. First, the parties were litigating—including by briefing and arguing the class certification motion and then the appeal from the class certification decision, conducting discovery, and taking depositions—and actively negotiating the very complex settlement between 2017 and 2019. Indeed, the active litigation and negotiation post-dating 2017 is evidenced by the stark difference in hours billed before and after December 31, 2017. Plaintiffs

seek compensation for 3,116.0 hours of work in 2016 and 2017 and, in contrast, 8,301.6 hours of work in 2018 and 2019.

Moreover, the Supreme Court has noted that “compensation received several years after the services were rendered—as it frequently is in complex civil rights litigation—is not equivalent to the same dollar amount received reasonably promptly as the legal services are performed,” *Missouri v. Jenkins*, 491 U.S. 274, 283 (1989), and paying current rates compensates for this different in dollar value. *See id.* at 283-84 (“We agree, therefore, that an appropriate adjustment for delay in payment—whether by the application of current rather than historic hourly rates or otherwise—is within the contemplation of the statute.”); *Tussey v. ABB Inc.*, No. 06-CV-04305-NKL, 2015 WL 8485265, at *7 (W.D. Mo. Dec. 9, 2015) (“The Supreme Court has recognized that where there is a delay in an award of fees, ‘[c]ompensation for this delay is generally made “either by basing the award on current rates or by adjusting the fee based on historical rates to reflect its present value.”’” (quoting *Perdue*, 559 U.S. at 556)), *vacated and remanded on other grounds*, 850 F.3d 951 (8th Cir. 2017).

Not only do Defendants ask for application of an older set of rates in this case, but they also ask the Court “to use the *average* rates of Missouri attorneys to cap Plaintiffs’ counsels’ maximum hourly rate.” Doc. 298, pp. 5-6 (emphasis added). Defendants do not explain why the average rate—which encompasses the rates of those with extensive experience and specialized knowledge and those who are fresh law school graduates—should be the ceiling for multiple attorneys who have more than 30 years of experience and, as discussed further below, specialized knowledge concerning children’s and youth law, the complicated field of psychotropic drugs, and complex class action litigation. Defendants’ argument for application of the average rate as a ceiling is contrary to the law on the subject. *See Hendrickson v. Branstad*, 934 F.2d 158, 164 (8th

Cir. 1991) (“In determining whether a fee is reasonable, ‘the special skill and experience of counsel should be reflected in the reasonableness of the hourly rates.’”) (citation omitted). The Court therefore will not cap rates at the “average” Missouri rate, but will consider each attorney’s rate in light of his or her experience and Missouri fees for civil rights and class action litigation.

D. Challenges in the Case Requiring Special Knowledge, Expertise, and Additional Resources

Plaintiffs’ counsel argue that they would have been justified in seeking out-of-state, specialist rates for their work in this litigation. Determination of the appropriate rate by reference to “a national market or a market for a particular legal specialization” is permitted where local community rates would “not be ‘sufficient to attract experienced counsel’ in a specialized legal field” *Perdue*, 559 U.S. at 551. However, if “a local lawyer, adequately versed in civil rights litigation, would have sufficed to attain the result that [the party’s attorney] received while charging the ordinary [local] rate,” or if the party’s attorney “did not display the excellence, or achieve the time savings, implied by [his] higher rate,” the Court would be justified in basing a fee award on local market rates. *Id.*

While acknowledging that Missouri counsel was involved in the litigation, Plaintiffs argue that counsel specializing in representing children in the custody of state child welfare systems and with knowledge of psychotropic drugs, including its effects on children and oversight of the administration of the drugs, was critical. Local counsel, Attorney John Ammann of the St. Louis University School of Law, has attested that the law school had neither the resources nor the expertise to undertake this litigation on its own: specialized co-counsel was necessary. Doc. 285-4 (Declaration of John J. Ammann (“Ammann Decl.”)) ¶¶ 9-10.

Mr. Ammann’s co-counsel included attorneys from Children’s Rights (“CR”), based in New York, New York, and the National Center for Youth Law (“NCYL”), based in Oakland,

California, each a nonprofit organization recognized as having a wealth of experience representing children in the custody of state child welfare systems. *See* Bartosz Decl. ¶¶ 2-4; Doc. 285-3 (Declaration of Leecia Welch in Support of Plaintiffs’ Motion for Fees and Expenses (“Welch Decl.”)) ¶¶ 2-4. In granting Plaintiffs’ motion for class certification, the Court stated that “Plaintiffs’ counsel . . . are qualified and experienced, including with respect to issues surrounding children’s rights and class actions.” Doc. 183, p. 17. Both organizations have successfully prosecuted numerous federal class action suits aimed at large-scale reform to ensure that child welfare systems are properly serving the needs of children in their care. CR and NCYL also have been among the leading advocates in the country focused on ensuring that children in foster care who are prescribed psychotropic medications are treated safely and are protected from the harmful effects of overmedication. Welch Decl. ¶¶ 4, 9-10, 30; Bartosz Decl. ¶ 3. CR has resolved multiple cases through settlements that directly address, among other issues, the oversight of psychotropic medications for foster youth. Bartosz Decl. ¶¶ 3-4. NCYL has led efforts to enact numerous laws increasing oversight in this area. Welch Decl. ¶ 9. NCYL also has used class action litigation to enforce children’s rights regarding oversight of psychotropic medications in other custodial settings, including in immigration detention. *See Flores v. Sessions*, Case No. 85-CV-4544 (C.D. Cal. July 30, 2018), Doc. 470 (Order re: Plaintiffs’ Motion to Enforce Class Action Settlement); *Lucas R. v. Azar*, 18-cv-5741 (C.D. Cal. Sept. 7, 2018), Doc. 81 (First Amended Complaint).

Local counsel, Mr. Ammann, states that “[t]he level of expertise that the attorneys from Children’s Rights and the National Center for Youth Law have in issues involving children in foster care is unmatched in the country.” Amman Decl. ¶ 8. He further states that “[n]one of the attorneys in our Clinic, including me, had the expertise in psychotropic medication to have undertaken this action without assistance from the other law offices.” *Id.* ¶ 10. Similarly, counsel

from the law firm of Morgan Lewis stated that he “would not have felt comfortable prosecuting a case of this complexity without the subject matter expertise of [his] co-counsel from [CR] and [NCYL] as well as the expertise of John Ammann from the St. Louis University School of Law.” Schutte Decl. ¶ 11.

Mr. Kennedy, the attorney unaffiliated with this case who has more than forty years of experience in civil rights, education rights, and public benefits cases in Missouri, attested that he is “aware of no law office in Missouri[] which could have brought this action without partnering with attorneys who have substantial experience in representing children in foster care and addressing systemic issues with child welfare systems.” Kennedy Decl. ¶ 10.

Despite their expertise, the rates that the attorneys from each of these organizations propose to charge are lower than the rates they could reasonably claim in their home markets. *See, e.g.*, Welch Decl. ¶¶ 25-29 (noting that in 2014, a federal court approved the rate of \$695 per hour for a NCYL attorney with 29 years of experience and \$450 for an attorney with 6 years of experience, and collecting information regarding reasonable market rates in the San Francisco Bay Area); Bartosz Decl. ¶¶ 27-28 (noting that the National Law Journal’s survey of billing rates shows national and New York City rates ranging from an average of \$295 to \$1,320 for partners and an average of between \$200 and \$1,025 for associates). Defendants’ argument that Plaintiffs’ counsel should not be permitted to “recruit” Missouri clients and then demand out-of-state rates (Doc. 298, p. 5) is not logical because Plaintiffs are not demanding out-of-state rates.

Because of the limited time and monetary resources at the disposal of the law clinic and nonprofit counsel and the burdens of class action litigation, Plaintiffs’ counsel made efforts to partner with a private law firm capable of devoting additional time and resources to successfully litigate the case. Welch Decl. ¶ 31; Ammann Decl. ¶ 9. However, Plaintiffs’ efforts to secure

counsel in Missouri or nationally that would take this case on either a *pro bono* or contingency basis were unavailing. Bartosz Decl. ¶ 53; Welch Decl. ¶ 31; *see also* Kennedy Decl. ¶¶ 10-11 (attesting that his firm was not available for this litigation and noting that the high demands for resources and time in this case, including expert costs that could not be recovered, made it highly undesirable from the perspective of private, for-profit law firms); *cf. Trinity Lutheran*, 2018 U.S. Dist. LEXIS 190824, at *9 (rejecting argument that plaintiffs’ counsel were entitled to national, rather than local, rates where there was no suggestion that plaintiffs tried and failed to obtain local counsel). Ultimately, Plaintiffs retained the national firm of Morgan, Lewis & Bockius, through a partner based in Chicago, Illinois, as co-counsel. The Morgan Lewis attorneys propose rates for their time that are substantially lower than the rates they charge private clients. Declaration of Scott T. Schutte (Doc. 285-5) ¶¶ 17, 18.²

In light of the uniquely technical and complex issues involving science, policy and governance, civil rights law, and class action lawsuits that this case involved, it was not only reasonable, but appropriate for Plaintiffs to utilize counsel with specialized experience and knowledge in these areas, and it therefore is appropriate for that counsel to be compensated in accordance with the value they brought to the case. *See Stallsworth v. Staff Mgmt. SMX, LLC*, No. 17-CV-4178-NKL, 2018 WL 2125952, at *3 (W.D. Mo. May 8, 2018) (“The rate charged should also take into account the experience, skill, and expertise of the attorneys as well as the complexity, significance, and undesirability of the case”). Counsel without adequate resources, expertise, and experience would not have been able to reach the comprehensive settlement that Plaintiffs’ counsel

² Retaining Morgan Lewis also came with some cost-savings, as the law firm provided infrastructure that Plaintiffs’ counsel used to house, organize, and review the massive document productions in this case. Schutte Decl. ¶ 14. Morgan Lewis is not seeking reimbursement for those costs. *Id.*

reached here—a settlement that will improve the processes by which children in foster care are administered psychotropic drugs, reducing the risk of inappropriate and excessive medication. Thus, although the Court’s rulings regarding rates will be in keeping with Missouri rates, they will take into account any unique experience, knowledge, or specialization that a given attorney brought to bear on this case.

E. Rulings on Attorneys’ and Paralegals’ Reasonable Rates

Attorney Samantha Bartosz has more than 30 years of litigation experience. Currently CR’s Deputy Director of Litigation Strategy, her experience includes serving as General Counsel of the Office of Administration within the Executive Office of the President and as a partner in the Chicago litigation firm Cahill, Christian & Kunkle Ltd. She has worked at CR, where her practice focuses exclusively on child welfare cases, for more than 16 years. She has served as counsel in a number of class actions alleging constitutional and federal statutory violations. Given her experience and expertise, and in light of the information presented regarding local rates in civil rights and class action matters—particularly the fact that partners working on class action suits in Missouri command over \$550 an hour, and other federal courts in Missouri have awarded fees of \$500 in class actions (*see Pollard*, 320 F.R.D. at 198; *Albright*, 2013 WL 4855304, at *8)—the Court finds Attorney Bartosz’s proposed rate of \$500 reasonable. *See Trinity Lutheran* (adopting Missouri Attorney General’s proposed rate of \$450 for opposing First Amendment litigator with 21 years of experience).

Attorney Bill Grimm was part of the “core team” from NCYL to work on this case. He was admitted to practice law in 1975, and thereafter worked for the Maryland Legal Aid Bureau, where he created a specialized child advocacy unit and served as director of the statewide program. He joined NCYL in 1988. He represented foster children in both individual juvenile court dependency proceedings and child welfare class action litigation, in federal district and appellate

courts. He was recognized as one of the preeminent children’s law attorneys in the country. He was a leading advocate focused on ensuring that children in foster care are safely prescribed psychotropic medication and protected from the harmful effects of overmedication. He led multiple projects relating to psychotropic medication policy, resulting in the State of California enacting five NCYL-sponsored bills. In 2019, he was awarded the Mark Hardin Award by the American Bar Association Center on Children and The Law. In light of his depth of experience and expertise, Mr. Grimm’s proposed rate of \$500 is eminently reasonable.

Attorney Scott T. Schutte has been practicing law for nearly 25 years. After completing a federal district court clerkship, he worked at Jenner & Block and then Howrey LLP before joining Morgan Lewis in 2011. He has spent much of his legal career handling class actions and other complex litigation. He frequently lectures on issues relating to Federal Rule of Civil Procedure 23 and state law analogs. He and two of his partners co-authored the American Bar Association’s “Practitioner’s Guide to Class Actions.” Given his experience and expertise, but in light of the fact that Mr. Schutte is not as experienced as the two most senior attorneys in this case, the Court finds that a rate of \$475—which is markedly lower than his standard rate of \$935—reasonable.

Attorney Leecia Welch is the Senior Director of Child Welfare and Legal Advocacy at NCYL. She graduated from law school in 1996. Prior to joining NCYL in 2004, she worked as a senior associate at Morrison & Foerster LLP in San Francisco, California, and as an associate at Perkins Coie in Seattle, Washington. She has spent most of her career representing children and youth in cases enforcing their statutory and constitutional rights. She has been lead or co-counsel in multiple federal court class actions. She has received court-approved legal fees in a class action filed in the United States District Court for the Western District of Washington at the rate of \$595. She is part of the “core team” at NCYL to have worked on this case. In light of her extensive

experience and expertise in children’s law and class actions, and in view of Missouri rates for partners in class action and civil rights litigation, Ms. Welch’s proposed rate of \$450—which is significantly lower than the \$595 court-approved rate at which she was compensated in another case—is reasonable.

Attorney John Ammann has practiced litigation for more than 30 years. He completed two state appellate court clerkships after law school before working as a staff attorney with Land of Lincoln Legal Assistance Foundation in Illinois. He worked as a supervisor for 25 years and served as Director for 17 years in the Legal Clinic at Saint Louis University School of Law, which has five full-time attorney faculty members and 200 law students each year. Until his recent retirement, he served as the McDonnell Professor of Justice in America Society, a chaired full professorship, at the university. He has been co-counsel for plaintiffs in numerous civil rights cases, most of which sought injunctive relief, in both federal and state court. Given his lengthy civil litigation experience and qualifications, his proposed rate of \$400, which is around the median rate for St. Louis partners, and lower than the median rate for Kansas City partners, is reasonable.

Attorney Stephen Dixon has practiced law for over 30 years, including more than ten years with CR. He has worked as an adjunct professor, having co-founded the juvenile law clinic at the Louisiana State University Law Center. However, his efforts in this case were directed primarily at recruiting, retaining, and maintaining relationships with the Named Plaintiffs and their Next Friends. As such, although his years of experience would suggest a higher rate, Plaintiffs have proposed a rate of \$375 per hour for Mr. Dixon’s time. Although Mr. Dixon’s efforts may have been important to Plaintiffs’ success, given that his work involved more client relations than pure litigation, the Court finds that \$300 is an appropriate hourly rate for his time. *See Gonzales v. United States*, No. 00-CV-60 WPJ/RS ACE, 2006 WL 8444388, at *13 (D.N.M. Mar. 13, 2006)

(reducing attorney’s rate where “she was primarily doing client development work”); *Trinity Lutheran*, 2018 U.S. Dist. LEXIS 190824, at *22 (finding \$300 rate appropriate for attorney who focused principally on public relations matters rather than litigation).

Attorney Elizabeth Gretter has practiced litigation for over ten years, first at Bingham McCutchen LLP in New York, New York, and then, since 2011, with CR. At CR, she has litigated federal civil rights cases and negotiated multiple settlements and worked with public officials to design, monitor, and measure systemic reform. Given her experience and expertise, and prevailing rates for civil rights attorneys in Missouri, the Court finds a rate of \$350 reasonable for Ms. Gretter’s time.

Attorney Poonam Juneja is part of the “core team” from NCYL to work on this case. Including federal district court and appellate clerkships, she has been practicing law for more than ten years, focusing on class action litigation. Prior to joining NCYL, she worked at Public Counsel and the Southern Poverty Law Center. Ms. Juneja received court-approved legal fees in a class action filed in the United States District Court for the Western District of Washington at the rate of \$425. Given Ms. Juneja’s experience and expertise, and rates charged by civil rights and class action attorneys in Missouri, the Court finds that the rate of \$350—which is lower than the court-approved \$425 rate she received in another case—is reasonable for Ms. Juneja’s time.

Attorney Stephanie Schuster has been practicing law for eight years. Since the filing of the motion for attorneys’ fees, Ms. Schuster has been promoted to partner in Morgan Lewis’s Appellate Practice Group. Her practice covers complex appellate, class action and regulatory matters. She has worked on appeals in the Second, Fourth, Fifth, Eighth, Ninth, and Eleventh Circuits. Her primary role in this litigation was to work on Defendants’ interlocutory appeal of the Court’s class certification ruling. She argued the appeal in this case before the Eighth Circuit.

Given her appellate practice expertise and the fact that her role was limited to appellate work, her proposed rate of \$325—which is far lower than her standard rate of \$700 per hour—is reasonable.

Attorney Aaron Finch has practiced law for more than seven years with CR, litigating federal civil rights class actions and negotiating and monitoring settlements. Given his experience and specialization, and the fact that the median rate across all practice areas in Kansas City was \$333 per hour and rates in civil rights and class action litigation range from \$225 to \$475 per associate, the Court finds that a rate of \$300 is reasonable for Mr. Finch's time.

Attorney Catherine Frizell also has been practicing law for more than seven years, including more than six years as a staff attorney for the Legal Aid Society in Brooklyn, where she has represented children and young adults in family court proceedings and monitored agency compliance with court orders. In light of her experience and specialization in law relating to children and youth, but considering the range of associates' rates in civil rights and class action matters, the Court finds that a rate of \$300 is reasonable for Ms. Frizell's time.

Attorney Jonathan King has practiced law for more than six years, with five years of experience at the New York office of Venable LLP. Mr. King also has a Master's Degree in Childhood Education. He has worked at Children's Rights since 2018. In light of his years of experience in legal practice and his special knowledge of children's issues, the Court finds that a rate of \$300 is reasonable for Mr. King's time.

Immediately after attorney Daniele Girard graduated from law school in 1989, she practiced law at Cravath, Swaine & Moore LLP in New York, New York. She then worked as a staff attorney at North Carolina Prisoner Legal Services, Inc., where she litigated class action and civil rights claims. Since 2016, she has worked as a staff attorney with CR. Because she did not actively practice law for several years, Plaintiffs have reduced her rate relative to her years since

graduation from law school. In light of Ms. Girard's qualifications and prevailing rates in Missouri, the Court finds Ms. Girard's proposed rate of \$300 to be reasonable.

Attorney Freya Pitts is part of the "core team" from NCYL to have worked on this case. She began her legal career clerking for federal district and appellate court judges. She has been practicing law since for more than six years, focusing on class action litigation. Prior to joining NCYL, she worked at Disability Rights Advocates, where she sought to advance the rights of children and youth with disabilities through impact litigation. Given her experience and expertise, her proposed rate of \$300 is reasonable.

Attorney Danielle Rosenthal completed federal district court and appellate clerkships following her 2013 graduation before practicing appellate and trial litigation in Washington, D.C., for three years. Since she joined CR in 2018, she has worked on investigations and class actions on behalf of foster-care children. Given her experience, the Court finds Ms. Rosenthal's proposed rate of \$300 reasonable.

Attorney Courtney J. McCormick has practiced law for nine years. She practices primarily in Morgan Lewis's toxic tort defense practice. Because her role in this litigation involved primarily document review and deposition preparation, the Court finds that a rate of \$275—which is lower than the \$375 rate she ordinarily commands, as well as the \$325 rate Plaintiffs propose—is reasonable for Ms. McCormick's time.

Attorney Ning He graduated from law school in 2015. He practices primarily in Morgan Lewis's Securities Enforcement and Litigation Group, managing complex government investigations. He was the lead Morgan Lewis associate in this litigation. Given his experience and in light of prevailing rates for Missouri civil rights and class actions, the Court finds that a rate

of \$250—which is significantly lower than his standard rate of \$550—is reasonable for Mr. He’s time.

Attorney Erin McGuinness graduated from law school in 2012. She also has a Master’s Degree in Public Administration. Prior to joining CR in 2016, she worked as a staff attorney for the Frank H. Hiscock Legal Aid Society in Syracuse, New York, and also worked in private practice. Because Plaintiffs have already reduced her proposed rate in light of the fact that, although she uses her skills in active litigation, she works principally as a senior policy analyst, and in light of her legal experience, her proposed rate of \$225 is reasonable.

Attorney Amanda Grill has been practicing law since 2017, when she joined NCYL. As a law student, she participated in the Child Advocacy Law Clinic, working as guardian ad litem for parents and youth in Child Protective Services cases. Before her legal career, she worked as a high school teacher through Teach for America. Because Ms. Grill’s legal experience is not extensive, the Court reduces her rate to \$200.

Attorney Jacqueline Stolzenberg has worked at NCYL since her 2018 graduation. In law school, she was a Bergstrom Child Welfare Law Fellow and participated in several clinics focused on protecting the rights of children and families. Although Ms. Stolzenberg has some experience in children’s law, because she has practiced law for less than two years, the Court reduces her rate to \$200.

Because The 2018 *Missouri Lawyers Weekly* survey concerning billing rates shows that paralegals who work on class action or civil rights cases specifically receive between \$215 and \$275 and hour, and because the median rate of \$120 for support staff in Missouri includes not only paralegals but other types of support staff that may be less skilled, the Court finds that Plaintiffs’ proposed rate of \$150 for each paralegal is reasonable.

The table below shows the Court's rulings concerning the rates for each biller:

Name	Law School Grad. Year	Requested Hourly Rate	Rates Set by Court
Samantha Bartosz	1986	\$500	\$500.00
Bill Grimm	1975	\$500	\$500.00
Scott T. Schutte	1995	\$500	\$475.00
Leecia Welch	1996	\$450	\$450.00
John Ammann	1984	\$400	\$400.00
Elizabeth Gretter	2009	\$375	\$350.00
Poonam Juneja	2009	\$375	\$350.00
Stephanie Schuster	2011	\$325	\$325.00
Stephen Dixon	1987	\$375	\$300.00
Aaron Finch	2012	\$325	\$300.00
Catherine Frizell	2012	\$325	\$300.00
Jonathan King	2012	\$325	\$300.00
Daniele Gerard	1990	\$300	\$300.00
Danielle Rosenthal	2013	\$300	\$300.00
Freya Pitts	2013	\$300	\$300.00
Courtney J. McCormick	2010	\$325	\$275.00
Ning He	2015	\$275	\$250.00
Erin McGuinness	2012	\$225	\$225.00
Amanda Grill	2017	\$225	\$200.00
Jacqueline Stolzenberg	2018	\$225	\$200.00
Genevieve Caffrey	Paralegal	\$150	\$150.00
Hailey Cherepon	Paralegal	\$150	\$150.00
Meghan Kacsmar	Paralegal	\$150	\$150.00
Kira Setren	Paralegal	\$150	\$150.00

2. Whether the Hours Expended Were Reasonable

The Court next must review the hours expended by the attorneys to ensure that they are reasonable. “The party seeking an award of fees should submit evidence supporting the hours worked and rates claimed.” *Hensley*, 461 U.S. at 433. Inadequate documentation requires reduction of the fee award. *Id.* Furthermore, the Court “should exclude from this initial fee calculation hours that were not ‘reasonably expended.’ Cases may be overstaffed, and the skill and experience of lawyers vary widely.” *Id.*, at 434 (citation omitted).

“Billing judgment” is just as important here as it is in the private sector. *Id.* (stating movant must make “a good faith effort to exclude from [the] fee request hours that are excessive, redundant, or otherwise unnecessary, just as a lawyer in private practice ethically is obligated to exclude such hours from his fee submission”) *Hensley*, 461 U.S. at 434. “Hours that are not properly billed to one’s client also are not properly billed to one’s *adversary* pursuant to statutory authority.” *Id.*

Here, Plaintiffs have made several efforts to ensure that the time for which they seek compensation is neither redundant nor unreasonable. They engaged outside consultant Sterling Analytics, at their own expense, to assess and audit the fees they billed in order to try to submit “only those fees and costs that would be considered reasonable in accordance with the Model Rules of Professional Conduct, ABA Formal Opinions, and judicial decisions from the state of Missouri and the Eighth Circuit.” Declaration of Sterling Analytics, Doc. 285-1 ¶ 1.

Even prior to submitting time and expense slips to Sterling, Plaintiffs’ attorneys “removed a significant number of hours and expenses from their slips based on their own professional knowledge and sound judgment regarding a reasonable fee submission and billing practices.” *Id.* ¶ 4. CR removed over 2,500 hours, amounting to \$616,341 in billing entries, from its time and travel slips. *Id.* For example, Attorney Frizell reviewed a class certification memo drafted by an

intern, but the intern's time has not been billed. Doc. 285-1, p. 46. Attorney Amman removed entries for time he spent on regular team phone calls to reduce overstaffing concerns. NCYL did not bill for several timekeepers and reduced its timeslips by approximately 275 hours.

Plaintiffs' counsel also encouraged paralegals to do work that even a lower-level attorney might have been asked to complete, such as cite-checking drafting of purely administrative filings, such as motions for extensions, and even research.

Because Plaintiffs did not know if they would be compensated for their efforts in this case, they had an incentive to be efficient. *See Moreno v. City of Sacramento*, 534 F.3d 1106, 1112 (9th Cir. 2008) ("It must also be kept in mind that lawyers are not likely to spend unnecessary time on contingency fee cases in the hope of inflating their fees. The payoff is too uncertain, as to both the result and the amount of the fee. It would therefore be the highly atypical civil rights case where plaintiff's lawyer engages in churning. By and large, the court should defer to the winning lawyer's professional judgment as to how much time he was required to spend on the case; after all, he won, and might not have, had he been more of a slacker."); *Tussey v. ABB, Inc.*, Case No. 06-4305-NKL, 2019 WL 3859763, at *5 (W.D. Mo. Aug. 16, 2019) ("Class Counsel brought this case without guarantee of reimbursement or recovery, so they had a strong incentive to keep costs to a reasonable level, and they did so.").

Still, Defendants raise multiple issues in arguing for a reduction in the hours. The Court considers these arguments below.

A. The Number of Attorneys

Defendants argue that Plaintiffs' hours should be reduced because they seek compensation for twenty attorneys from four organizations, which "reflects significant overstaffing, inefficiency and redundancy of effort." Doc. 298, p. 7. However, after Defendants' counsel suggested at oral argument that Plaintiffs had employed far more attorneys to work on this case than had Defendants,

Defendants acknowledged in a supplemental response that more than 30 attorneys worked on this matter in some capacity on behalf of one or more of the Defendants. Doc. 310. Defendants argue that that number was inflated because of turnover at the office, that most of their attorneys participated to only a “limited” extent, and that only four attorneys “actively” worked on this case at a time. *Id.* However, the fact that Defendants had five “temporary document review attorneys,” five other Assistant or Deputy Attorneys General who were involved with depositions, discovery disputes, answering the complaint, and details of the settlement agreement, and eleven additional attorneys who served as representatives and “subject matter experts” for the defendants demonstrates that this case was sufficiently complicated and time-intensive as to warrant the participation of numerous attorneys, including several who were “experts” in the relevant issues and fields.

Nonetheless, while staffing a case with multiple attorneys across multiple organizations is not unreasonable, it necessarily carries inefficiencies that should be addressed through the exercise of billing judgment. One of the natural consequences of so many lawyers working on a single case is a large volume of times entries for coordination between and consultation among counsel. Plaintiffs conducted team teleconferences, including attorneys from each of the organizations representing Plaintiffs, weekly. Defendants’ complain that these meetings are an example of Plaintiffs’ spending “excessive” hours discussing case status and strategy.

Plaintiffs’ counsel also have billed time spent preparing attorney engagement agreements and co-counsel agreements. *See, e.g.*, Doc. 285-2, p. 52; Doc. 285-3, p. 42. New attorneys brought into the case spent time getting up to speed on the facts. *See, e.g.*, Doc. 285-3, p. 42 (multiple time entries discussing the review of background materials); Doc. 285-5, p. 10 (same).

Because of these inefficiencies inherent in cases that are staffed by multiple attorneys from multiple organizations—inefficiencies reflected in the time entries—the Court applies a 10% reduction to the hours (outside of time spent traveling) of the attorneys alone.³ See *Quigley v. Winter*, 598 F.3d 938, 958–59 (8th Cir. 2010) (reducing hours by one third for “duplicative work, in part caused by transitions in the attorneys of record”); *Albright v. Bi-State Dev. Agency of Missouri-Illinois Metro. Dist.*, No. 11CV01691 AGF, 2013 WL 4855304, at *4 (E.D. Mo. Sept. 11, 2013) (reducing hours “to account for the inefficiencies engendered by the involvement of three law firms in the case”).

B. Attorney Stephen Dixon’s Time Entries

Defendants object to being billed for the 378.1 hours, including approximately 80 hours of travel time, that Attorney Dixon billed to this matter, which time largely was spent recruiting, retaining, and maintaining Named-Plaintiff and Next-Friend relationships.

Plaintiffs reply that Attorney Dixon’s work was “vital,” ranging from “(a) initially being retained by the Named Plaintiffs and their Next Friends and capturing the facts surrounding their experiences, (b) countering legal challenges by Defendants to the adequacy of the Named Plaintiffs or Next Friends to appear in this litigation on behalf of the class, (c) addressing Defendants’ unilateral decision to deny certain of the Next Friends access to the child on whose behalf they appeared and ameliorating the potential harmful impact of that state action, (d) preparing certain Next Friends for their appearances at depositions and mediation sessions, (e) continually apprising the Next Friends of the status of ongoing mediation efforts and proposals, consulting on strategy, and obtaining authority as needed along the way to reach agreement on terms, and (f) routinely advising and consulting with the Next Friends as to the status of the litigation and strategic

³ Because Attorney Ammann stated that he did not bill for the weekly team conferences, the Court will not reduce his time on this basis.

decisions being made to propel it forward.” Plaintiffs argue that “skilled interviewing and trust building is vital to creating and maintaining relationships with Next Friends in this type of litigation involving sensitive knowledge and the power of the state,” and that in-person meetings and phone calls are required for these purposes.

Given the sensitive nature of the issues at the center of this litigation—including not only children’s health and the often-taboo subject of psychiatric and psychological issues, but also complicated and even fragile relationships between, on the one hand, “stakeholders,” whether they are foster care givers, healthcare providers, family members, or case managers—and, on the other hand, the State, which holds the power to sever the relationships between the adults and the vulnerable children for whom they care, Plaintiffs’ efforts to meet with “stakeholders” in person to gain their trust and collect information relevant to this lawsuit were reasonable and appropriate.

Because the Court has already reduced Mr. Dixon’s proposed hourly rate to account for the fact that he spent most of his time on client development and management efforts, the Court sees no need to reduce on the same basis the number of hours he worked.

Nonetheless, several of Mr. Dixon’s time entries are vague. *See, e.g.*, Doc. 285-2, p. 67 (“Electronic mail to MO legal team”), p. 96 (“Electronic mail with client”), p. 105 (“Telephone call with client”), p. 115 (same), p. 121 (“Legal analysis and email to team”), p. 140 (“Electronic mail to co-counsel”), p. 141 (“Telephone call with team”), p. 144 (“Electronic mail to co-counsel”). Because Plaintiffs bear the burden of establishing that the fees they seek are reasonable, failure to submit sufficiently detailed descriptions for such entries warrants reducing the associated time. *See, e.g., Trinity Lutheran*, 2018 U.S. Dist. LEXIS 190824, at *41 (reducing hours where “multiple time entries . . . reference[d] communications with other attorneys without specifying the subject”); *Craig v. District of Columbia*, 197 F. Supp. 3d 268, 280 (D.D.C. 2016) (finding

“insufficiently detailed” “many entries perfunctorily stat[ing] that counsel ‘e-mailed’ or sent an ‘email to’ someone, had a ‘phone discussion w/’ someone, or ‘reviewed and responded to’ an e-mail or a document”) (citations omitted). Accordingly, the Court reduces Attorney Dixon’s hours by 25%.

C. Travel Time

Defendants argue that the Court should disallow the New York and California attorneys’ 814.4 hours spent traveling to and from Missouri. Plaintiffs seek only half of their proposed rates for their travel time. Still, the travel time alone, according to Defendants, amounts to \$158,822.88. Defendants argue that “it was unnecessary for out-of-state attorneys to litigate this wholly Missouri case” and that the out-of-state attorneys should have relied on local counsel to take the numerous depositions conducted in Missouri.

Because this case involved complicated and sensitive factual matters involving science, including medicine, psychiatry, pharmacology, psychology, behavioral sciences, and health, as well as privacy, children’s and youth-related issues, social services, and public policy, Plaintiffs’ attorneys’ decisions to rely on attorneys from the organizations with experience and expertise in these topics was reasonable. Nor could local counsel at Saint Louis University reasonably have been expected to singlehandedly take some fifteen depositions. Moreover, Plaintiffs have limited their fee and expense reimbursement requests to no more than two attorneys for each deposition.

CR indicates that it is “customary and routine” for its attorneys to devote travel time to preparing for or following up on the work that they traveled to Missouri to complete. *See* Supplemental Declaration of Samantha M. Bartosz (Doc. 299-4) ¶ 6. Still, if travel time were devoted to other case-related tasks, the Court would expect that the billing entries would so reflect.

On the other hand, some portion of the travel time—such as passing through security, checking into flights or hotels, or car travel to or from airports—will not be conducive to working

at all and the attorney should be compensated for the time that she is not able to devote to legal work.

The Eighth Circuit has “long recognized a presumption that a reasonable attorney’s fee includes reasonable travel time billed at the same hourly rate as the lawyer’s normal working time, absent a showing the award would be unreasonable, for example, because the lawyer did not customarily charge clients for travel time.” *Ludlow v. BNSF Ry. Co.*, 788 F.3d 794, 803-04 (8th Cir. 2015) (internal quotation marks and citations omitted). Similarly, the Eighth Circuit recently stated that where, as here, “out-of-state counsel have their fees reduced to a local rate, such a rate may be awarded for all legal work including travel time when that is the practice in the relevant market.” *Safelite Grp., Inc. v. Rothman*, 759 F. App’x 533, 536 (8th Cir. 2019). Defendants have not presented evidence that local attorneys do not bill for travel time. *See id.*

In light of the fact that Plaintiffs have already halved their bill rate for travel time, and their consultant has reduced the number of travel-related hours for which they seek compensation, the Court finds that no additional reduction in travel time is warranted.

D. Block Billing and Vague Entries

Defendants argue that, “even after Sterling Analytics recommended various eliminations, reductions and limitations, the request for attorney fees is still problematic in that there are numerous incidents of block billing (especially in the billing entries of Morgan Lewis) [and] vague or non-specific entries generally (and specifically in the billing entries of Children’s Rights regarding ‘stakeholders’)” Doc. 298, p. 11.

The practice of block-billing—putting multiple tasks in one time entry without specifying how much time was devoted to each task—is not necessarily problematic in and of itself. *See Nassar v. Jackson*, 779 F.3d 547, 554 (8th Cir. 2015) (finding no abuse of discretion where district court did not reduce award for “block-bill[ing],” despite the defendant’s argument that the practice

prevented “meaningful analysis of the time spent on each discrete task”). This Court previously has stated that “block-billing is problematic only where the hours billed for multiple tasks appears excessive, or where billed time needs to be eliminated for certain tasks” *Washington v. Denney*, No. 14-CV-6118-NKL, 2017 WL 4399566, at *6 (W.D. Mo. Oct. 3, 2017); *see also Nathanson v. Diversified Adjustment Serv., Inc.*, No. 18-CV-3102 (PJS/ECW), 2019 WL 4387960, at *5 (D. Minn. Sept. 13, 2019) (same) (quoting *Washington*, 2017 WL 4399566, at *6). Plaintiffs’ counsel have already engaged a consultant to identify problematic billing practices of this sort. *See* Doc. 285-1, ¶ 3 (“Sterling submitted to Clients our expert opinions regarding which tasks were improperly billed, unreasonable, or required additional detail to justify and substantiate the work performed.”). In the face of Plaintiffs’ compelling showing, Defendants have not pointed to any examples of Plaintiffs’ counsel spending an inordinate amount of time on any given task. They claim only that the billing entries of Morgan Lewis “especially” contain numerous incidents of block billing. The Court, having reviewed in detail the Morgan Lewis time entries for block billing, has found nothing to suggest that the billers allocated an unreasonable period of time to any group of tasks.

As for Defendants’ complaints about Plaintiffs’ use of the term “stakeholders,” Plaintiffs explained their wording choice as follows:

This approach to time entries is intentional to protect attorney work product gathered over the course of the litigation and to reduce the possibility that some form of retaliation – as occurred here in the instance of children’s access to certain Next Friends being denied by Children’s Division officials – is exacted on individuals who have provided information to support the reform effort.

Doc. 299-4 (Supplemental Declaration of Samantha M. Bartosz in Support of Plaintiffs’ Motion for Fees and Expenses) ¶ 8. Particularly in light of Plaintiffs’ statement that children’s access to certain Next Friends was denied by Children’s Division officials, possibly in retaliation for the

Next Friends' cooperation in this case, Plaintiffs' efforts to protect the identities of the Next Friends and potential witnesses with whom they spoke are reasonable.

Still, some additional information, even in general terms, concerning the subject of the communications with stakeholders would have made evaluation of some of the time entries easier. For example, Plaintiffs might have explained the purpose as "intake," or "gathering information concerning potential witnesses" or "collecting information for purposes of discovery." Instead, many entries merely mention a call, correspondence, or meeting with a stakeholder without specifying the purpose or subject of the communication. *See, e.g.*, Doc. 285-2, p. 80 ("Call with stakeholder re: case."), p. 98 ("stakeholder meeting with CF"), .p. 121 ("Call w stakeholder"); Doc. 285-3, p. 45 ("Attend Stakeholder Meetings"); p. 82 ("Conversation with stakeholder"). In light of the vagueness in some descriptions of the subjects of the stakeholder communications, the Court reduces the attorneys' hours, outside of travel time, by an additional 5%.

E. Specific Time Entries Modified by the Court

Although Defendants have not identified any specific time entries that warrant reduction or elimination, the Court, having reviewed Plaintiffs' time entries, has identified a handful of instances in which reductions are warranted.

First, matters relating to "press" releases are not appropriately billed to Defendants. *See, e.g.*, Doc. 285-2, p. 61 ("Meet with HA and EGH to discuss MO press release"); *id.*, p. 62 ("Work on complaint and complaint-related press issues - incorporate edits, conversations with SB"). While such efforts may be an important component of the work that the children's and youth law organizations perform, because they may be useful in effecting public policy change, they are not properly billable to Defendants as litigation costs. *See Trinity Lutheran*, 2018 U.S. Dist. LEXIS 190824, at *29 ("Fees for time spent discussing media matters cannot be shifted to Defendant."); *Halderman v. Pennhurst State School & Hosp.*, 49 F.3d 939, 942 (3d Cir. 1995) (noting that "the

proper forum for litigation is the courtroom, not the media,” and precluding recovery for “hours of ‘work related to writing press releases, speaking with reporters and otherwise publicizing’” matters under litigation). Accordingly, the Court has reduced the hours in the lodestar calculation slightly to exclude time spent working on press releases (.5 hours on 8/24/16, .3 on 5/30/17, .5 on 6/7/17).

On one occasion, an attorney billed .8 hour for “Attention to state request for additional pages for MTD.” *Id.*, p. 69. The Court has reduced the time billable for this simple, administrative task. *See Trinity Lutheran*, 2018 U.S. Dist. LEXIS 190824, at *37 (“The Court reduced time billed that seemed excessive for the listed task(s).”).

F. Volume Discount

Finally, Defendants ask the Court to apply a “volume discount” of 50% to the remaining hours. The primary reason Defendants cite in requesting a volume discount is that the fees are paid by state and local taxpayers. Taxpayers of some sort typically bear the cost of litigation in civil rights cases when the plaintiff succeeds. If a special discount were warranted for that reason alone, then the legislature would have built a discount into Section 1983. However, the legislature did not do so.

The Court sees no basis for further discounts. Plaintiffs have already reduced their fees—in consultation with a hired consultant—by more than 22%. Plaintiffs spent significant time investigating and researching this case even before it was filed,⁴ reviewed or indexed 1.5 million

⁴ Notably, “Section 1988 does not limit fee awards to work performed after the complaint is filed, but allows recovery of fees for time spent beforehand investigating facts and researching the viability of potential legal claims.” *McDonald v. Armontrout*, 860 F.2d 1456, 1462 (8th Cir. 1988). The Eighth Circuit expressly permits recovery of fees “for ‘research or investigation done in connection with’ a related proceeding, to the extent it ‘proved directly relevant to the successful prosecution of the later civil rights’ action.” *Id.* (citation omitted). Plaintiffs’ having initiated this action with a detailed, 45-page complaint, flush with facts specific to the Named Plaintiffs, the alleged policies and practices at issue, medical information, and complex theories of constitutional

pages of documents, conducted multiple depositions, drafted 100 pages of interrogatory responses, engaged in extensive motion practice (much of which was necessitated by Defendants' strategic choices), and worked with experts whose opinions are summarized in reports exceeding 100 pages. This case, a class action alleging constitutional violations based on state policies and procedures, or lack thereof, regarding the administration of psychotropic medications to children in the state's foster care system, was complex both in procedure and substance. A case of this duration, complexity, scope, and importance is bound to be time-intensive.

The fact that CR and NCYL now seek fees that exceed the total fees they were awarded in prior years does not indicate that a fair award of fees in this case would represent a windfall. As Defendants themselves point out, this case, which Plaintiffs describe as the first of its kind, required three years of work, including two years of pre-filing investigation and research (only one of which is being billed here). The reason the fees are so high is because the case was unusually challenging and vigorously defended. Defendants were entitled to vigorously defend themselves, but they cannot now reasonably complain that the hours Plaintiffs expended to counter Defendants' efforts were ill spent. *See Weitz Co. v. MH Washington*, 631 F.3d 510, 530 (8th Cir. 2011) (stating that defendants "cannot litigate tenaciously and then be heard to complain about the time necessarily spent overcoming [their] vigorous defense") (quotation marks and citation omitted).

liability that largely survived a motion to dismiss presenting issues of first impression is proof that their pre-filing efforts were an important part of their success in this case. *See* Doc. 1 (Complaint for Injunctive Relief and Declaratory Relief and Request for Class Action). The Court previously noted that counsel's having "spent nearly two years investigating the oversight of psychotropic medications in the Missouri child welfare system" was "testament to their diligence and dedication." Doc. 183, p. 17.

Nonetheless, Plaintiffs have billed for only one of the two years they spent preparing to initiate this case.

3. Lodestar Calculation

With the adjustments to the billing rates and hours of Plaintiff's counsel discussed above, the lodestar calculation is as follows:⁵

Name	Law School Grad. Year	Rates Set by Court	Non-travel Hours (before discount)	Travel Hours (before discount)	Total Fees (after discount)
Samantha Bartosz	1986	\$500.00	1333.97	92.43	\$590,044.75
Bill Grimm	1975	\$500.00	415.00	85.60	\$197,775.00
Scott T. Schutte	1995	\$475.00	314.20	0.00	\$126,858.25
Leecia Welch	1996	\$450.00	628.89	9.41	\$242,668.38
John Ammann	1984	\$400	185.90	0.00	\$70,642.00
Elizabeth Gretter	2009	\$350.00	2217.54	167.26	\$727,795.86
Poonam Juneja	2009	\$350.00	618.50	39.50	\$190,916.25
Stephanie Schuster	2011	\$325.00	87.20	0.00	\$24,089.00
Stephen Dixon	1987	\$300.00	298.00	80.10	\$70,125.15
Aaron Finch	2012	\$300.00	244.86	23.64	\$65,984.82
Catherine Frizell	2012	\$300.00	433.19	105.71	\$126,320.30
Jonathan King	2012	\$300.00	386.87	39.03	\$104,506.00
Daniele Gerard	1990	\$300.00	291.80	46.60	\$81,399.00
Danielle Rosenthal	2013	\$300.00	800.72	17.18	\$206,760.25
Freya Pitts	2013	\$300.00	262.50	40.30	\$72,982.50
Courtney J. McCormick	2010	\$275.00	51.20	0.00	\$11,968.00
Ning He	2015	\$250.00	175.90	0.00	\$37,378.75
Erin McGuinness	2012	\$225.00	148.47	0.23	\$28,420.50
Amanda Grill	2017	\$200.00	463.30	9.40	\$79,701.00
Jacqueline Stolzenberg	2018	\$200.00	92.00	0.00	\$15,640.00
Genevieve Caffrey	Paralegal	\$150.00	345.74	0.06	\$51,865.50
Hailey Cherepon	Paralegal	\$150.00	236.99	-0.09	\$35,542.00
Meghan Kacsmar	Paralegal	\$150.00	453.21	0.09	\$67,988.00
Kira Setren	Paralegal	\$150.00	175.20	0.00	\$26,280.00
TOTALS			10,661.15	756.45	\$3,253,651.25

⁵ Although Plaintiffs offered to charge half of their rates for travel time, they did not break the hours they presented to the Court down into travel time and non-travel time. The Court used the following algebraic equation to determine the hours attributable to travel and to other billable time:

$$\text{non-travel time} = \frac{\text{total proposed fee}}{(.5 \times \text{proposed hourly rate})} - \text{total proposed hours}$$

The Court finds that the fee produced through the lodestar calculation, with the specific discounts discussed and reflected above, is fair. *See Stallsworth*, 2018 WL 2125950, at *1 (“There is a strong presumption that the lodestar calculation represents a reasonable fee award.”) (citing *City of Burlington v. Dague*, 505 U.S. 557, 562 (1992)); *see also Perdue*, 559 U.S. at 552 (stating that “the lodestar method yields a fee that is presumptively sufficient to achieve [the] objective” of “induc[ing] a capable attorney to undertake the representation of a meritorious civil rights case”). This case was both important and complicated, in terms of the facts and associated sensitivities, the science and associated complexities, and the law. Plaintiffs who have “won excellent results,” as Plaintiffs have done here, are “entitled to a fully compensatory fee award” *Jenkins*, 127 F.3d at 716.

b. Expenses

Defendants acknowledge that “Plaintiffs are entitled to reimbursement for ‘[r]easonable expenses of the kind a law firm would ordinarily bill to its client.’” Doc. 298, p. 14 (quoting *Barrett v. Claycomb*, No. 11–CV–4242–NKL, 2013 WL 6920860 at *4 (W.D. Mo. Dec. 9, 2013); *see also Sapa Najin v. Gunter*, 857 F.2d 463, 465 (8th Cir. 1988) (“Reasonable expenses of litigation incurred by counsel on the prevailing side can be awarded as part of the fees due under Section 1988.”).

Plaintiffs’ counsel seek \$132,907.56 in expenses. This figure was reduced by \$98,518.04—42.6%—following review by Sterling Analytics.

Defendants ask that all of the travel expenses be disallowed. However, Defendants provide neither legal nor factual grounds to discount Plaintiffs’ travel expenses. The Eighth Circuit has expressly held that “travel expenses for attorneys” are among “expenses that a law firm normally would bill to its client” and therefore are “properly characterized as part of an attorney’s fees

award.” *Williams v. ConAgra Poultry Co.*, 113 F. App’x 725, 728 (8th Cir. 2004). Plaintiffs therefore are entitled to reimbursement of their reasonable travel expenses.

Having reviewed the itemized lists of expenses submitted by Plaintiffs’ counsel, the Court sees no reason for disallowing any expense.

IV. CONCLUSION

For the reasons discussed above, the Court grants in part and denies in part the motion for fees and expenses. The Court awards to Plaintiffs’ counsel a total of \$3,253,651.25 in fees and \$132,907.56 in expenses.

s/ Nanette K. Laughrey
NANETTE K. LAUGHREY
United States District Judge

Dated: April 3, 2020
Jefferson City, Missouri