

**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 TERESA A. WOODY IN SUPPORT OF PLAINTIFFS’
MOTION FOR ATTORNEYS’ FEES AND EXPENSES**

Teresa A. Woody declares as follows:

1. I am the Litigation Director for Kansas Appleseed Center for Law and Justice, Inc., a statewide non-profit advocacy organization devoted to building thriving, inclusive, and just communities throughout Kansas. I submit this declaration and attached exhibits in support of Plaintiffs’ Motion for Attorneys’ Fees and Expenses in the above-referenced matter. I have personal knowledge of the facts set forth in this declaration.

2. I am Lead Counsel for Kansas Appleseed in this matter, representing the Plaintiffs and their Next Friends. I am licensed to practice law in the state courts of Kansas, Missouri, and California. I have been admitted to practice in the Eighth, Tenth, Eleventh and Federal Circuit Courts of Appeals. I have been admitted to practice in the District Courts for the Western District of Missouri, the District of Kansas, the Southern District of Illinois, and the Northern and Central Districts of California. I have also been admitted to practice in the United States Court of International Trade. I graduated from the University of California Hastings College of Law in 1985.

Qualifications and Roles of Kansas Appleseed Attorneys and Staff

3. Kansas Appleseed conducts policy research and analysis and works with community partners to understand the root causes of problems, support grassroots coalitions, and advocate for comprehensive solutions. When necessary, Kansas Appleseed pursues impact litigation to protect Kansans' rights and wellbeing. Current issue areas include child welfare, hunger, fighting voter suppression, voter engagement, supporting the merit selection system for Kansas courts, juvenile and criminal justice reform, and the 2020 Census.

4. In addition to its longstanding statewide work to eliminate childhood hunger, Kansas Appleseed's work around child welfare has included forming and staffing the Strengthen Families Rebuild Hope coalition (SFRH), an independent statewide coalition of organizations, advocates, and those directly impacted by the child welfare system. SFRH has conducted research and events across the state to engage Kansans in advocating for systemic change in foster care. In the statehouse, Kansas Appleseed worked with legislators to introduce a bill to form an Office of the Child Advocate, an

independent oversight entity that would assure Kansas children receive adequate protection and care through the services offered by Kansas state agencies. Additionally, Kansas Appleseed advocated for legislation establishing a “report card” on educational outcomes for children in foster care, including racial and ethnic disparities within those outcomes.

5. I joined Kansas Appleseed in March 2019 as its first litigation director. I develop litigation to supplement Kansas Appleseed’s advocacy, and work with counsel from other firms and agencies in advancing Kansas Appleseed’s goals for communities throughout Kansas. Since I joined Kansas Appleseed, I have overseen this matter as Kansas counsel of record, and have been actively involved in all aspects of the case.

6. Prior to joining Kansas Appleseed, I was a trial lawyer for over thirty years, specializing in complex business and environmental litigation, with cases throughout the country, but primarily in Kansas and Missouri. I have practiced in law firms in the Kansas City area throughout my career. I clerked for the Honorable Ross T. Roberts, United States District Court for the Western District of Missouri. I was partner and Chair of the Litigation Department at Spencer Fane LLP, supervising more than fifty attorneys and paralegals in multiple offices; partner at the litigation boutique of Stueve, Siegel, Hanson & Woody; and for the decade before joining Kansas Appleseed, practiced at The Woody Law Firm PC. I have been recognized by my peers in Best Lawyers in America in the areas of business, environmental, and intellectual property litigation.

7. I have served as lead counsel or co-lead counsel in numerous class actions. A representative sample is set forth below:

- *Cecil Mallot, individually, and on behalf of class of others similarly situated, v. Lexington Manor Healthcare Group, Inc., and Saber Healthcare*

Group, LLC., Case No. 4:12-CV-00446, United States District Court for the Western District of Missouri. I was lead counsel in this FLSA action brought on behalf of a nationwide class of maintenance directors against a corporation that owns or manages nursing home facilities throughout the eastern and southern areas of the United States, for misclassification as exempt rather than hourly workers. The District Court certified the class, allowing the maintenance directors' claims for payment for overtime to proceed. Thereafter, the class claims were resolved by settlement.

- **Mark Clark and Roman Trice, on behalf of themselves and all others similarly situated v. Remanufactured Office Systems, Inc.**, Case No. 0916-CV-19421, Sixteenth Circuit Court, Jackson County, Missouri. I represented plaintiffs, a class of laborers who worked for defendant, assembling and delivering modular office furniture. Plaintiffs were misclassified by defendant as independent contractors rather than employees, and were denied overtime wages and health care and pension benefits that were made available to employees of defendant. The Court granted plaintiffs' motion for certification; thereafter, plaintiffs' claims were resolved by settlement.
- **Katherine Sparks, et al. v. The Premcor Refining Group, Inc., et al.**, Case No. 03-L-1053, Circuit Court, Third Judicial Circuit, Madison County, Illinois. I was co-lead counsel for plaintiffs in a toxic torts class action brought against Premcor Refining Group and other oil and gas companies for contamination of plaintiffs' residential properties in the Village of Hartford, Illinois, and the groundwater underlying the Village, due to poor practices and the leaking of gasoline from pipelines underlying the Village. After several years of litigation, the case was resolved by a settlement as a class action, with over \$35 million in damages paid by defendants.
- **Henry, et al. v. The Dow Chemical Company**, Case No. 136298, Michigan Supreme Court. I was co-lead counsel for plaintiffs-appellees, a class of property owners in Saginaw, Michigan, whose residential properties had been contaminated with dioxin by defendant-appellant Dow. The Circuit Court of Saginaw, Michigan certified a class of property owners whose property Dow had contaminated with dioxin and who brought claims for nuisance and negligence for damage to their properties. Dow appealed the class certification to the Michigan Court of Appeals, Case No. 266433, alleging that the Circuit Court erred in applying a lenient standard in certifying the class. I represented plaintiffs on the brief and in oral argument at the Michigan Court of Appeals. The Court of Appeals affirmed the Circuit Court's order certifying the class, and Dow then appealed to the Michigan Supreme Court. I argued the case before the Michigan Supreme Court, which clarified the standard for class certification in Michigan, and held that the Circuit Court had properly applied the standard. *See Henry v. Dow Chemical Co.*, 772 N.W.2d 301 (Mich. 2009).

8. Through my professional involvement in the foregoing and other class actions, I have participated in numerous class-wide settlements, including direct involvement in negotiation and approval of these settlements.

9. After I joined Kansas Appleseed, I was the lead counsel with respect to plaintiffs' representation before the Court, and was one of the primary contacts with Defendants' counsel. I worked with co-counsel to develop case strategy, including developing an affirmative discovery plan and addressing Defendants' discovery issues and delays. I was assisted in this case by experienced attorneys affiliated with Kansas Appleseed. The resumé of each Kansas Appleseed attorney is attached as Ex. A.

10. Larry Rute is a member of the Board of Directors and Chair of the Litigation Committee for Kansas Appleseed. Until I joined Kansas Appleseed, Mr. Rute acted as lead Kansas counsel for Plaintiffs. Mr. Rute is admitted to practice in the courts for the State of Kansas, the United States District Court for the District of Kansas, the United States District Court for the Western District of Missouri, and the Court of Appeals for the Tenth Circuit. He graduated from Washburn School of Law in 1973, and received a Master's in Law Degree from the University of Washington Law School in 1976.

11. Since 1999, Mr. Rute has been Managing Member of Associates in Dispute Resolution, LLC (ADR). ADR provides comprehensive alternative dispute resolution services including mediation, arbitration, investigation and training throughout the Kansas and Missouri regions. Arbitration and mediation matters which he has personally conducted include: civil rights, consumer fraud, consumer protection violations, constitutional law, employment discrimination, personal injury, Section 1981

and Section 1983, regular education, special education, and wage and hour, including multi-party and class settlements. He has served as a mediator and/or arbitrator in more than 4,500 matters arising in federal and state courts, as well as administrative agencies.

12. Prior to his current employment, Mr. Rute was employed with Kansas Legal Services, Inc., initially as a Staff Attorney, and in the capacity of Deputy Director and Litigation Director beginning in May 1984. He served as Executive Director of the Legal Aid Society of Topeka, Inc. from 1973 to 1984. Throughout his 27 years of practice with Kansas Legal Services, he developed experience and expertise in impact litigation in support of low-income Kansans. As Litigation Director for Kansas Legal Services, he had direct oversight of all cases filed by Kansas Legal Services attorneys in the state appellate system and in the federal courts. As Litigation Director, he personally participated in strategy discussions, motion practice, discovery, negotiation and enforcement of multi-party cases. In addition, he was directly responsible for training, supervision and quality of litigation produced by more than fifty (50) attorneys in twelve (12) field offices.

13. In the course of his practice with Legal Services, he acquired significant experience in the conduct of class action litigation under 42 U.S.C. § 1983. Section 1983 class actions filed in this court in which he has served as lead counsel or played a primary role include:

- *Powell, et al. v. Harder* – Case No. 78-4217 (which challenged the placement of individuals in mental health institutions without due process of law).
- *Woodson, et al. v. Quinn* – Case No. 85-3049 (which challenged conditions of confinement at the Wyandotte County Jail and resulted in a Consent Decree requiring construction of a new jail).

- *TY, et al. v. Board of County Commissioners, et al.* – Case No. 94-4079 (which challenged conditions of confinement at the Shawnee County Youth Center and resulted in a Consent Decree requiring construction of a new Youth Center).

In addition, he has participated in a number of Section 1983 class actions in state court, including *Beaver v. Kingman*, 246 Kan. 145, 785 P.2d 998 (1990), which challenged conditions of confinement at the Shawnee County Jail and resulted after trial in a Consent Decree requiring construction of a new jail. Plaintiffs prevailed in all of the above cases. Mr. Rute's litigation and mediation experience, and his familiarity with the Kansas courts, were essential in the resolution and settlement of this case.

14. Martha Hodgesmith is a member of the Board of Directors of Kansas Appleseed. Ms. Hodgesmith graduated from the University of Kansas School of Law in 1978, and recently retired from the KU Lifespan Institute, where she developed resource materials and tools to use in making laws regarding disability, public benefits, and Medicaid more effective. She continues to participate in Kansas state and national policy initiatives. Her primary legal resource materials on key disability, health, and public benefits laws and policies have been used in continuing professional education, peer training, direct advocacy, public testimony, and in an international exchange program. Ms. Hodgesmith developed collaborative systems for distribution and training that have been implemented at local, regional, and national levels on vocational rehabilitation, special education, social security disability, public benefits law, elder law, Americans With Disabilities Act (ADA) application to the state court system and other public entities, health care fraud, patient/abuse neglect, and public financing of community-based services. She participated in the drafting of legislation and lobbying efforts that resulted in passage of the Kansas Developmental Disabilities Reform Act, the primary

state law affecting the rights of persons with developmental disabilities, and the Kansas Medicaid Fraud Control Act, the first comprehensive Kansas criminal statute on health care fraud. Ms. Hodgesmith's vast knowledge of the complex and convoluted Kansas health care system was integral to developing, litigating, and resolving Plaintiffs' Medicaid Act claims for mental health assessment and treatment. Ms. Hodgesmith's expertise was especially critical to negotiating the substantive remedies addressing mental health assessment and treatment in the Settlement Agreement.

15. Benet Magnuson was the executive director of Kansas Appleseed from August 2013 until October 2019. Mr. Magnuson earned his law degree from Harvard Law School in 2009. Prior to joining Kansas Appleseed in August 2013, Mr. Magnuson worked as an attorney for the Texas Criminal Justice Coalition, the Texas Access to Justice Commission, and national Appleseed's immigration financial justice project. His pro bono representations include immigration, criminal, public housing, domestic violence, and family law cases. Mr. Magnuson also is a certified mediator who has conducted over a hundred mediations of public housing, family, and small claims disputes and provided dispute resolution trainings to a wide range of clients. During the pre-filing investigation phase of the litigation, Mr. Magnuson was instrumental in assisting co-counsel in identifying and making connections with stakeholders, agencies, and other organizations in Kansas whose knowledge and cooperation were necessary in the fact gathering that resulted in the lawsuit. Mr. Magnuson continued to be a key connection to those stakeholders and a key participant in the strategic analysis of the case throughout his tenure with Kansas Appleseed.

16. Kansas Appleseed also made effective use of staff as paralegals during the course of case investigation, litigation, and settlement. Lori Johns, Kansas Appleseed's Director of Operations, has a Masters in Social Work from Wayne State University. Christina Ostmeyer, Kansas Appleseed's Director of Communications, has a B.S. in Journalism with an emphasis in Strategic Communications, and a Masters in Public Affairs and Administration, both from the University of Kansas. Ms. Johns and Ms. Ostmeyer functioned as paralegals with respect to intake, interviews, and analyses of potential claimants and witnesses. Their skills were uniquely suited to intake and interviews with many potential class members and potential witnesses. The work they performed was essential to the case, but was performed at far lower rates than had attorneys undertaken that work.

17. The number of hours for each attorney, and each staff member or paralegal for which Kansas Appleseed seeks reimbursement are summarized below and attached as a part of Ex. B to this declaration:

Name	Total Billed Time¹	Rates	Totals
Teresa Woody	629.4	\$500	\$314,700
Larry Rute	184.5	\$500	\$92,250
Martha Hodgesmith	129.7	\$345	\$44,747
Benet Magnuson	42	\$300	\$12,600
Lori Johns	70.9	\$200	\$14,180
Christina Ostmeyer	46.6	\$200	\$9,320
<u>TOTAL</u>	1,103.1		\$487,797

¹ Listed individuals all billed more than 50 hours; any shown below 50 have been reduced in an exercise of billing judgment.

Kansas Appleseed's Role in Pre-Filing and Litigation Activities

18. In May 2018, Kansas Appleseed was contacted by Children's Rights ("CR") and the National Center for Youth Law ("NCYL") regarding the copious failures of the Kansas foster care system, and potential litigation aimed at the unconstitutionality of treatment of foster care children as a result of those failures. Kansas Appleseed was aware of the systemic problems within the foster care system, and had organized the SFRH coalition to advocate for systemic change to improve the foster care system, and protect the approximately 7,500 Kansas children in the system. Kansas Appleseed agreed to partner with CR, NCYL, and Loretta Burns-Bucklew, an attorney with expertise in the child welfare systems of Kansas and Missouri, in the investigation and potential lawsuit. Kansas Appleseed then became involved in the continued investigation of the case, the strategy behind the development of the claims, and the decision to file the complaint. Kansas Appleseed in fact made the decision to hire a litigation director—the role I ultimately filled—to pursue this case and other impact litigation. Recognizing that the workload to be expected on a case of this magnitude would require significant time and expense, co-counsel reached out to DLA Piper, a nationwide firm with extensive experience in class action litigation and all facets of electronic discovery, including document production, coding, and storage. DLA Piper agreed to join as co-counsel to support the team in these critical areas.

19. Kansas Appleseed has devoted significant resources to this case from pre-filing research through finalization of the parties' settlement agreement. Kansas Appleseed's work has included, *inter alia*, working closely with co-counsel; interviewing

class members and potential witnesses; investigation and research into potential allegations and defenses; drafting portions of the pleadings; drafting discovery requests and reviewing discovery responses; meeting and conferring with Defendants' counsel regarding discovery concerns; meeting with Plaintiffs' consulting experts; engaging in intensive settlement negotiations and mediation; representing Plaintiffs in court proceedings; and generally being actively involved in all aspects of the litigation.

20. Kansas Appleseed devoted significant time and resources to Plaintiffs intensive discovery efforts, which included pursuing discovery regarding Defendants and their contractors. The parties exchanged requests for production and interrogatories, and Plaintiffs issued a significant 30(b)(6) notice to Defendants, noticing several fact-intensive topics for depositions. Both Defendants and their contractors at times took the position that Defendants did not have control over their contractors' files and information, necessitating discovery directed specifically to the contractors. Discovery was made more difficult due to the split of responsibilities between each Defendant agency over the foster care and Medicaid-delivery systems at issue. Due to Defendants' repeated delays in producing discovery materials and concerns raised by Defendants' responses to discovery, in the spring and summer of 2020 Plaintiffs set up a weekly meet and confer with Defendants to address discovery issues as they arose or continued.

21. At the same time that the parties were engaged in discovery and motion practice, Plaintiffs initiated early settlement discussions, recognizing the need to secure a favorable result for the Plaintiffs as efficiently as possible. In May 2019, Plaintiffs served Defendants with their initial settlement terms sheet. In July 2019, Defendants responded with their settlement counter-proposal. The parties engaged in lengthy, arms-length

negotiations, which were at times contentious. The parties 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. The parties made substantial progress in negotiating a settlement during these sessions. In order to focus on mediation, the parties agreed to a forty-five day stay of general discovery during this time period. 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, which ultimately produced the settlement agreement that was filed with the Court.

22. The settlement agreement is an excellent result for Kansas foster children. It provides for practice improvements and agreed upon outcomes that will vastly improve service to them, especially in the areas, *inter alia*, of banning office stays and night-to-night placements, providing placement stability—which will allow for better medical and mental health treatment and school attendance outcomes—and requiring timely mental health assessments and follow-up treatment. The settlement further provides for the appointment of an agreed upon Neutral who will have access to Defendants’ performance data and will validate the achievement of the improvements and outcomes. I do not believe, based on my experience and Kansas Appleseed’s advocacy experience around

the foster care system, that the Defendant agencies would have made the rigorous commitments to these positive changes had this litigation not been brought.

23. Kansas Appleseed's time investment in this case significantly limited its ability to engage in other litigation to bring systemic change to the areas of child welfare, criminal justice reform, and voter suppression, among other areas of emphasis, during the pendency of this litigation.

Reasonableness of Time Charged and Rates Sought

24. It was my responsibility to oversee and manage the time spent by Kansas Appleseed on this case. Each attorney with Kansas Appleseed had specific responsibilities, and we made every effort not to duplicate tasks. I made every effort to ensure the number of Kansas Appleseed staff assigned to the case was kept at a minimum. To further ensure we did not unnecessarily duplicate efforts, we reduced the time of one or more of us where multiple team members participated in a task or event, in order to be as efficient and cost-saving as possible. We have not submitted time for tasks after the filing of Plaintiffs' unopposed motion for preliminary approval of the Settlement Agreement on July 27, 2020, nor do we seek reimbursement for time to prepare this motion for fees and expenses. I have carefully reviewed the hours spent by all Kansas Appleseed attorneys and staff functioning as paralegals, and believe, based on my professional experience, that the time charged by Kansas Appleseed to this case is necessary, efficient, and reasonable.

25. In addition, Plaintiffs' co-counsel worked cooperatively to reduce duplication and to litigate the case as efficiently as possible. While all co-counsel organizations were involved in strategic decisions, each organization took the lead on

certain tasks and responsibilities. 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. For example, CR and NCYL led legal research and drafting throughout the litigation while serving as the main points of contact with clients and experts. CR and NYCL's broad experience in litigating foster care reform cases in other jurisdictions was crucial to the representation of the Plaintiffs in this case. DLA Piper took the lead on handling discovery productions and was integral to electronic -discovery efforts throughout the litigation, such as negotiating ESI search terms and taking a 30(b)(6) deposition on electronic discovery. Kansas Appleseed served as an interface with the Court, and took responsibility for addressing discovery disputes with Defendants. Ms. Burns-Bucklew provided expertise and knowledge regarding the Kansas child welfare system and the operation of the Kansas agencies and their contractors. Ms. Burns-Bucklew and Kansas Appleseed also served as local experts on litigation practice and court rules and procedures, and were critical to litigation strategy and analyzing and achieving the substantive remedies in the settlement agreement, informing strategic decisions throughout the litigation given their deep familiarity with Kansas state government and its child welfare and Medicaid delivery systems.

26. In my opinion, based on my over thirty years of practice in this jurisdiction, no other firms in Kansas could have taken on this case without partnering with out-of-state co-counsel, especially because of their deep

experience in litigating class actions with respect to child welfare systems throughout the United States.

27. In my professional judgment, and based on my experience in class action litigation, I believe that all of the co-counsel's expertise and involvement were essential to our ability to adequately represent the approximately 7,500 Plaintiffs in the Class in this very complex and highly specialized litigation, and the time charged was reasonable and necessary to achieve this successful result.

28. The rates sought for attorney time are likewise reasonable. I am familiar with rates sought and received in class action matters in Kansas through my more than thirty years of practice in this jurisdiction. Counsel for New York-based CR and California-based NYCL have limited their request for fees to the prevalent rates in Kansas, rather than their much higher New York and San Francisco rates that they could seek. The rates sought are well within what are considered reasonable ranges in Kansas, and are generally significantly lower than the market rates that attorneys of this level of experience could expect to charge in this jurisdiction.

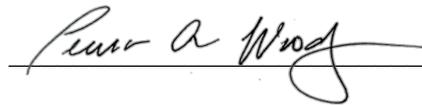
29. Plaintiffs' counsel further consulted with an independent expert, J. Nick Badgerow, a local, experienced attorney who has substantial knowledge and experience in this area. Mr. Badgerow has conducted an independent review of the time charged and rates sought in this matter, and finds both to be reasonable. *See* Declaration of J. Nick Badgerow, submitted concurrently.

30. Kansas Appleseed took on this litigation with the understanding that it would not charge any individual Plaintiff for its time or expenses, and that any such fees or reimbursements it obtained would need to be approved by the Court in the event of a

successful resolution of the case. No individual attorney, staff person, or paralegal will personally benefit from any fees awarded; instead, any fees awarded to Kansas Appleseed will be used to fund its future efforts to bring about positive systemic change for the benefit of all Kansans.

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

Executed this 20th day of November 2020 in Lawrence, Kansas.

A handwritten signature in cursive script, reading "Teresa A. Woody", is written over a horizontal line.

Teresa A. Woody

EXHIBIT A



TERESA A. WOODY

(785) 251-8160
twoody@kansasappleseed.org

LAW-RELATED EXPERIENCE

KANSAS APPLESEED CENTER FOR LAW AND JUSTICE, INC.

Litigation Director
Lawrence, Kansas March 2019-Present

THE WOODY LAW FIRM PC

President and Shareholder
Kansas City, Missouri May 2007-March 2019

STUEVE SIEGEL HANSON WOODY, LLP

Partner
Kansas City, Missouri April 2004-May 2007

SPENCER FANE BRITT & BROWNE LLP

Kansas City, Missouri 1986-2004
Associate 1986-1992
Partner 1993-May 2004
Chair of Litigation/Trial Department January 2001-May 2004

LAW CLERK TO THE HONORABLE ROSS T. ROBERTS

United States District Court for the Western District of Missouri
1985-1986

JUDICIAL EXTERN TO THE HONORABLE HOWARD F. SACHS

United States District Court for the Western District of Missouri
Spring 1985

BAR ADMISSIONS

The Missouri Bar; State Bar of California; The Kansas Bar; United States Court of Appeals for the Eighth, Tenth, Eleventh and Federal Circuits; United States District Court for the District of Kansas, Western District of Missouri, the Southern District of Illinois, and the Northern and Central Districts of California; The United States Court of International Trade

EDUCATION

UNIVERSITY OF CALIFORNIA HASTINGS COLLEGE OF THE LAW

San Francisco, California

J.D., May 1985, Magna Cum Laude

Editor, *Hastings Law Journal*

Thurston Honor Society (Academic Honors)

Clara Foltz Society (Women Law Students' Association)

UNIVERSITY OF CALIFORNIA

Berkeley, California

B.A., March 1982, Political Science

Graduated with High Distinction

Lida Hayes/Emma Benedict Scholar, 1981-1982

Phi Beta Kappa

UNIVERSITY OF MISSOURI - COLUMBIA

Columbia, Missouri, August 1978-May 1980

Honors Student; National Merit Scholar

PROFESSIONAL ASSOCIATIONS

THE MISSOURI BAR

1985-Present

Editorial Board, *Journal of the Missouri Bar*, 1992-2004; Chair, 1998-2000

Civil Practice and Procedure Committee, 1986-2004

KANSAS CITY METROPOLITAN BAR ASSOCIATION

1985-Present

Chair, Women in the Profession Committee, 1998

LAWYERS ASSOCIATION OF KANSAS CITY

Board of Directors, 2003-2007

KANSAS BAR ASSOCIATION

1995-Present

THE STATE BAR OF CALIFORNIA

1986-Present

ASSOCIATION OF WOMEN LAWYERS OF GREATER KANSAS CITY

1985-Present

Board of Directors, 1989-1994; President, 1992-1993

ASSOCIATION FOR WOMEN LAWYERS FOUNDATION

AWLF Connections Program Mentor, 2012-2017

Board of Directors, 2019-Present

KANSAS WOMEN ATTORNEYS ASSOCIATION

2019-Present

SIXTEENTH CIRCUIT JUDICIAL COMMISSION

2011-2017

Elected lawyer member of the Jackson County, Missouri judicial nominating commission pursuant to the Missouri Non-Partisan Court Plan

NATIONAL CONFERENCE OF WOMEN'S BAR ASSOCIATIONS

Board of Directors, 1993-1994; Chair of Midyear Meeting Program, 1994

AMERICAN BAR ASSOCIATION

1985-Present

Chair, Committee on Environmental Litigation and Toxic Torts, Section of Natural Resources, Energy and Environmental Law (SONREEL), 1996-1997

CIVIC ORGANIZATIONS

WOMEN'S FOUNDATION OF GREATER KANSAS CITY

Board Directors, 2003-2010; President, 2007-2009

Advisory Board, 2011-Present

KANSAS COALITION AGAINST THE DEATH PENALTY

Board of Directors, 2020-Present

MATTIE RHODES COUNSELING & ART CENTER

Board of Directors, 1990-1996; President, 1994-1995

CENTURIONS LEADERSHIP PROGRAM, KANSAS CITY, MISSOURI

1991-1993; Alumni 1994-Present

Steering Committee, 1992-1993

Alumni Programs Chair, 1996-1997

WESTPORT BALLET THEATRE

Board of Directors, 1987-1990; President, 1988-1989

PROFESSIONAL AND CIVIC RECOGNITION

ASSOCIATION OF WOMEN LAWYERS OF GREATER KANSAS CITY
Outstanding Service Award, 1998; President's Award, 2013

KANSAS CITY BUSINESS JOURNAL WOMEN WHO MEAN BUSINESS
One of 25 awardees, 2001

THE MISSOURI BAR THOMAS D. COCHRAN COMMUNITY SERVICE AWARD
Awarded jointly with husband Rik Siro, 2003

DAILY RECORD LEGAL LEADERS OF THE YEAR
2004

**CENTURIONS BERNARD POWELL MEMORIAL AWARD FOR EXTRAORDINARY
LEADERSHIP AND ACTION IN KANSAS CITY**
2005

**KANSAS CITY BUSINESS MAGAZINE: *50 + 1 INFLUENTIAL WOMEN WHO
CHANGED AND INSPIRED KANSAS CITY***
2007

BEST LAWYERS IN AMERICA
Environmental Litigation, Business Litigation, Intellectual Property Litigation
2009-Present

**KANSAS CITY METROPOLITAN BAR ASSOCIATION
DISTINGUISHED COUNSELOR AWARD**
2015

MISSOURI LAWYERS WEEKLY LITIGATION PRACTITIONER AWARD
Women's Justice Awards, 2015

KANSAS CITY BEST OF THE BAR
Multiple Inclusions

SUPER LAWYERS
Multiple Inclusions



Larry R. Rute

Associates in Dispute Resolution LLC
212 S.W. 8th Ave., Suite 207, Topeka, KS 66603
(785)357-1800 (785)357-0002 (fax)
e-mail: larry@adrmediate.com

Profession:

Mediator, Arbitrator, Approved Trainer, Hearing Officer & Adjunct Law Professor

Work History:

Partner and Co-founder, Associates in Dispute Resolution LLC, 1999-present; Adjunct Professor, Alternative Dispute Resolution (Interviewing & Counseling, Negotiation, Mediation and Arbitration) Washburn University School of Law, Spring Semesters 2007-2012; Special General Counsel/Legislative Liaison, Midland Group, 1990-03; General Counsel/Litigation Director, Kansas Legal Services, Inc., 1973-01; Litigation Director, Farmer Assistance Counseling and Training Service (FACTS), 1984-01; Director/Mediation Coordinator, Midland Mediation & Settlement Services, 1995-01; Officer, United States Air Force, 1966-70.

Alternative Dispute Resolution Experience:

Has served as a Mediator/Arbitrator in more than 4,500 matters arising in federal, state and administrative agencies. These matters include civil rights, commercial law, consumer fraud, consumer protection violations, contract law, constitutional law, construction law, copyright infringement, corporate dissolution, domestic relations, domestic relations division of assets, employment law, environmental law, fair debt collection practices, fair housing, FSLA, insurance claims/bad faith, international disputes, material and latent defects, malpractice, labor law, lemon law, personal injury, public policy residential construction, real estate, truth-in-lending, workers' compensation, Section 1981 and 1983, toxic tort, regular education/special education disputes, securities, water law issues, wills, trusts and estates, zoning disputes, and design and development of internal dispute resolution systems. Settlements have ranged from a few thousand dollars to several million dollars.

Approved by the Kansas Supreme Court as a mediator and mediator trainer in all categories. Serves on arbitration panels for the American Arbitration Association, FINRA, National Arbitration & Mediation (NAM). Certified by the Kansas Department of Education as an approved special education mediator and due process hearing officer.

Multi-Party Dispute Resolution Experience:

Resolved numerous collective/class actions involving consumer/merchandising practices act violations, employment discrimination; FSLA; multi-party cases involving asbestos contaminants, personal injury, toxic tort, product liability and contract/construction disputes.

Litigation Experience:

More than 27 years' civil litigation experience in state and federal courts. Primary areas of practice include civil rights, constitutional law, and general civil litigation. Has successfully litigated several class action civil rights matters in both state and federal court, including the establishment of due process rights for individuals facing mental health commitment, and conditions-of-confinement in state and local institutions. Has served as lead trial counsel in hundreds of federal and state trial proceedings and administrative law matters including: civil rights, contract law, consumer fraud, consumer protection violations, corporate liability issues, constitutional law, domestic relations, fair debt collection practices, fair housing, material and latent defects, lemon law, Native American law, residential contract and construction, real estate law, truth-in-lending, Section 1983, and special education disputes.

Professional Licenses:

Admitted to the Bar: Kansas and Missouri
U.S. Court of Appeals, Tenth Circuit
U.S. District Court: District of Kansas
U.S. District Court: Western District of Missouri
Kickapoo Tribal Court

Professional Associations:

American Bar Association (Dispute Resolution, Labor & Employment, Tort Trial & Insurance Section, Trial Tort & Insurance Sections, Immediate Past-Chair Family Law Section ADR Committee)
American Arbitration Association (Commercial & Employment Panels);
FINRA Dispute Resolution;
International Academy of Mediators (Distinguished Fellow & Governor)
International Mediation Institute
Chair, Kansas Supreme Court's Council on Dispute Resolution
Kansas Appleseed (Board of Directors)
Kansas Bar Association (Alternative Dispute Resolution Section, Past-President);
Kansas Association of Counsel for Children (Past-President);
Kansas Trial Lawyers Association;
Topeka Bar Association (Alternative Dispute Resolution Committee, Past-Chair);
Kansas Supreme Court Advisory Committee on Dispute Resolution
Kansas Supreme Court Advisory Committee on Child Support Guidelines
Kansas Supreme Court Advisory Committee on High-Conflict Dispute Resolution
Kansas City Metropolitan Bar Association;
Heartland Mediators Association
Mediators Without Borders, Charter Member
National Academy of Distinguished Neutrals, Charter Member
National Arbitration Forum

Education:

Washburn University (BBA, 1966);
Washburn University School of Law (JD, 1973);
University of Washington School of Law (LLM, 1976).

Recent Publications:

Author, *AC Resolution, Developing Opportunities for Experienced Mediators to Improve the Mediation Profession*, Summer 2015, Vol. 14, No. 3.
Co-author, *Mediating the Multi-Party Fair Labor Standards Act Case: Terminology, Tactics & Traps*, American Bar Association Spring Section Meeting, 2014.
Author, *Successful Settlements that Last: How Mediation Best Practices Techniques Can Improve Your Settlement Strategy*, Trial Tort & Insurance Section Committee News, Fall 2011.
Co-author, *Discrimination in the Workplace: How Mediation Can Help* American Arbitration Association Journal, February-April, 2000 (republished as a Chapter in the Handbook on Employment Arbitration in ADR, Second Edition, Jurist, LLC 2010)
Author, *The Evolution of Commercial Mediation in the Midwest: Best Practices, Confidentiality and Good Faith*, Journal of the Kansas Bar Association, January 2010;
Co-author, *Mediation Round Table: Improving the Quality and Effectiveness of Mediation*, Kansas Trial Lawyers Association Journal, Volume 26, Number 4, March 2003.
Co-author, *The Changing Face of Arbitration: What Once Was Old is New Again*, Journal of the Kansas Bar Association, August, 2003

Recent Awards:

Has received the Governor's Award for Exemplary and Distinguished Service to Children and Families.

He was elected in 2011 as Chair of the Kansas Supreme Court's Dispute Resolution Council

He has twice received the Kansas Bar Association's Outstanding Service Award.

He is a 2009-2019 *Super Lawyer* in Kansas and Missouri.

He is a 2011-2019 Who's Who of International Commercial Mediators

Best Attorneys in America 2015-2019

U.S. News "Best Law Firm" 2015-2019

Speaking Engagements (2019-2014):

Adjunct Professor, Alternative Dispute Resolution (3-hour Course), Washburn University

School of Law, Winter-Spring, 2007, 2008, 2009, 2010, 2011 and 2012.

2019

- Washburn University School of Law, *Alternative Dispute Resolution & Child Advocacy*, Topeka, Kansas, January 11, 2019.
- IAM Mentee Webinar, *Utilizing Co-Mediation to Enhance Mediation*, January 30, 2019.
- University of Kansas School of Law, *Mediation Preparation & Pre-Mediation Conferences*, Lawrence, Kansas, March 6, 2019.
- Heartland Mediator's Association 2019 Annual Meeting, *Mediation Ethics*, Johnson County Community College, Overland Park, Kansas, April 12, 2019.
- Washburn University School of Law, *Dispute Resolution and the Guardian ad Litem*, Topeka, Kansas, May 17, 2019.
- Volunteers and Assistants to America, Speaker Series, *Mediation: The Basics*, Kansas City, Missouri, June 12, 2019.
- ADR, LLC Annual Training, *Arbitration in Family Law: Has its Time Come?*, Topeka, Kansas, September 20, 2019.
- Topeka Bar Association, *Mediation Preparation: Investing in a Successful Outcome*, Topeka, Kansas, October 18, 2019.
- Kansas Bar Association Dispute Resolution Section CLE, *The Ethical Negotiator: Professional Responsibility When Pursuing Settlement*, Topeka, Kansas, November 8, 2019.
- Kansas City Metropolitan Bar Association CLE, *Successful Mediation Practice Tips*, Kansas City, Missouri, November 22, 2019.

2018

- Washburn University School of Law, *Alternative Dispute Resolution & Child Advocacy*, Topeka, Kansas, January 19, 2018.
- International Academy of Mediators – Mentee Webinar, *Utilizing Co-Mediation to Enhance Settlement Opportunities*, online training, March 28, 2018.
- Kansas Bar Association, *Swimming with the Sharks: Negotiation Ethics for Guppies*, Topeka, Kansas, November 9, 2018.
- International Academy of Mediators, *Mediation Preparation and Pre-Mediation Conferences*, Zurich, Switzerland, November 15, 2018.

2017

- ABA Dispute Resolution Spring Conference, *The Challenge: Achieving Uniformity in State ADR Law*, April 21, 2017, San Francisco, California.
- Kansas Women Attorneys Association, Annual Conference, *Attorneys Currently in the Kansas Senate*, Wichita, Kansas, July 21, 2017.
- Kansas Bar Association, *Lawyer to Legislator*, Topeka, Kansas, August 23, 2017.
- Associates in Dispute Resolution, Annual CLE/CME, *Dispute Resolution Outside the Box*, Topeka, Kansas, September 29, 2017.
- Missouri Bar Association, *Swimming with the Sharks: Negotiation Ethics for Guppies*, Webinar, Topeka, Kansas, October 18, 2017.
- Missouri Bar Association, *ADR 101: Helping your Client Succeed without Going to Court – Arbitration 101*, Webinar, Topeka, Kansas, November 15, 2017.

- Kansas Bar Association, *Strategic Decision-Making in Preparing to Mediate Multi-Party Disputes*, Topeka, Kansas, December 1, 2017.
- Washburn School of Law, *Update on Dispute Resolution and Case Management Rules*, Topeka, Kansas, December 8, 2017.

2016

- Washburn University School of Law, *Alternative Dispute Resolution and Child Advocacy*, Topeka, Kansas, January 8, 2016.
- Heartland Mediators Association, *Scope and Design of Modern Corporate Dispute Resolution Systems*, Kansas City, Missouri, February 5, 2016,
- Arbitration and Mediators Institute of New Zealand, Inc., *Mediating Multi-Party Disputes, 21st Century Problem Solving*, AMINZ/IAM Conference, New Zealand, March 5, 2016.
- ABA Section of Dispute Resolution Spring Meeting, *Family Law Arbitration: An Idea Whose Time Has Come?* New York, New York, April 8, 2016.
- Heartland Mediator's Association, *Ethics in Parenting Coordination and Parenting Plans*, Topeka, Kansas, April 29, 2016.
- Missouri Bar Association, *Employment Mediation Secrets*, Lawrence, Kansas, June 17, 2016.
- Missouri Bar Association, *Mediation Secrets, Understanding the Special Dynamics of Employment Litigation*, Independence, Kansas, June 26, 2016.
- Kansas City Metropolitan Bar Association, *Maximizing your Effectiveness in Mediation*, Kansas City, Missouri, June 30, 2016.
- Kansas Bar Association, ADR CLE, *Taming the Octopus: What Litigators and Mediators Need to Know to Successfully Mediate the Multi-Party Fair Labor Standards Act Case*, November 18, 2016, Topeka, Kansas.
- Washburn Case Management Training, *Family Law ADR According to the Robed Ones*, November 10, 2016, Topeka, Kansas.
- Wichita Bar Association, *An Overview of Arbitration*, December 7, 2016, Wichita, Kansas.

2015

- Washburn University School of Law, Topeka, Kansas, presenting *Parenting-Time Dispute Resolution Techniques*, January 16, 2015.
- University of Kansas School of Law, presenting *Commercial Mediation Best Practices*, Lawrence, Kansas, March 6, 2015.
- American Bar Association, Dispute Resolution Section Spring Meeting, presenting *Access to Justice Family Law Dispute Resolution Techniques*, Seattle, Washington, April 15-19, 2015.
- Washburn University School of Law, Children and Family Law Center, 9th Annual Case Management Training, *The Mediation Half of Case Management*, Topeka, Kansas, August 13, 2015.
- Kansas Bar Association, Dispute Resolution Section, *A Litigators Guide: Preparing for Mediation* (webinar), Topeka, Kansas, August 27, 2015.
- National Employment Lawyers Association of KC, *Employment Mediation: A Mediator's Perspective*, October 1, 2015, Kansas City, Missouri.
- Associates in Dispute Resolution LLC Fall Conference, *Hot Topics in Dispute Resolution*, presenting *Considerations When Mediating the Complex Multi-Party FLSA Case*, Topeka, Kansas, October 9, 2015.
- Kansas City Chapter of National Employment Lawyers Association, *Preparing for Litigation*, Panel Discussion, Kansas City, Missouri, October 15, 2015.
- KIPCOR, Limited Case Management Review, Newton, Kansas, October 28, 2015.

2014 and Prior Years

For additional speaking engagement events, please visit our web site at www.adrmediate.com.

Advanced Dispute Resolution Training:

Has completed three separate 40-hour civil mediation training programs provided by the Kansas Bar Association; Kansas Department of Education, Special Education Mediation Training and Due Process Hearing Officer Training. U.S. Postal Service "Redress" Mediation Training, St. Louis, Missouri; U.S. Department of Justice, ADA Mediation Training, St. Louis, Missouri; U.S. District Court, Western District of Missouri, Advanced Mediation Training; and, Topeka Bar Association, Arbitration Training (40-hour).

Other advanced dispute resolution training events in which he has participated:

2019

International Academy of Mediators, 2019 Spring Meeting, Banff, Alberta, Canada, May 29-June 1, 2019.
Federal District Court for the Western District of Missouri, *Mediation Assessment CLE*, June 27, 2019.
American Arbitration Association, *Arbitration & Mediation Round Table*, Kansas City, Missouri, October 15, 2019.
International Academy of Mediators, 2019 Fall Meeting, Scottsdale, Arizona, November 7-9, 2019.

2018

International Academy of Mediators, 2018 Spring Meeting, Edinburgh, Scotland, May 20-22, 2018.
International Academy of Mediators, 2018 Fall Meeting, Cleveland, Ohio, October 4-5, 2018.
American Arbitration Association, *Health Care Dispute Resolution*, Nashville, Tennessee, October 12, 2018.

2017

U.S. District Court, Western District of Missouri, Mediation & Assessment Program—Advanced Training for Outside Mediators, October 27, 2017.
International Academy of Mediators, 2017 Fall Meeting, *The Future is Here*, Austin, Texas, November 2-4, 2017.
Lathrop & Gage LLP, Labor & Employment – Executive Briefing, Kansas City, Missouri, November 16, 2017.

2016

International Academy of Mediators, 2016 Fall Meeting, *Perspective is Everything*, Vancouver, Canada, September 22-24, 2016.
Tri-State Regional Special Education Conference, Omaha, Nebraska, November 3-4, 2016.

2015

American Bar Association, Dispute Resolution Section Spring Meeting, Seattle, Washington, April 15-19, 2015.
Lathrop & Gage Continuing Legal Education Program, Kansas City, Kansas, March 6, 2015.

2014

International Academy of Mediators, 2014 Spring Conference, Chicago, Illinois, October 23-25, 2014.
Tri-State Regional Special Education Law Conference, Omaha, Nebraska, November 6-7, 2014.

2013 and Prior Years

For additional training events for 2011 and prior years, please visit our web site at www.adrmediate.com.

BIOGRAPHICAL SKETCH

NAME		Retired from University of Kansas	
Martha J. Hodgesmith			
EDUCATION/TRAINING (<i>Begin with baccalaureate or other initial professional education, such as nursing, and include postdoctoral training.</i>)			
INSTITUTION AND LOCATION	DEGREE (if applicable)	YEAR(s)	FIELD OF STUDY
University of Kansas	B.A.	1974	Anthropology, Sociology, Women's Studies
University of Kansas	J.D.	1978	Law

A. Positions and Honors. List in chronological order previous positions, concluding with your present position. List any honors. Include present membership on any Federal Government public advisory committee.

Positions

2005 to 2018	Associate Director of Disability Policy and Knowledge Translation Manager, Research and Training Center on Independent Living, University of Kansas
2003 -2005	Research Associate, Research and Training Center on Independent Living, University of Kansas
1999-2003	Director, Community Supports and Services, Kansas Department of Social and Rehabilitation Services
1995-1999	Deputy Attorney General and Director of Medicaid Fraud Control Unit, Office of the Kansas Attorney General
1994-1995	Associate Director, Kansas Association of Rehabilitation Facilities
1991-1994	Policy and Research Analyst, Kansas Association of Rehabilitation Facilities
1991	Professional Services Administrator, Davis, Graham, and Stubbs
1984-1991	Coordinator, Senior Citizen Law Projects and Public Benefits Specialist, Kansas Legal Services
1978-1984	Staff Attorney, Kansas Department of Social and Rehabilitation Services

Honors

2015-16	University of Kansas Women of Distinction
2012	Chief Justice Kay McFarland Attorney of Achievement, Women Attorneys Association of Topeka
2011	Kansas Supreme Court Blue Ribbon Commission
2011-2012	Convener-Elect – Kansas Big Tent Coalition

- 2005 Jenny Mitchell Kellogg Attorney of Achievement Award, Kansas Women Attorneys Association
- 2005-2006 Senator, Unclassified Senate, University of Kansas
- 2001-2003 Board of Directors, National Association State Directors of Developmental Disabilities Services
- 2002 Chair, National Policy Work Group, National Association State Directors of Developmental Disabilities Services
- 2002 Distinguished Government Service Award, Kansas Bar Association
- 2000-2002 Gubernatorial Appointee to Kansas Legislature Long Term Care Task Force
- 1998-1999 National Association Medicaid Fraud Control Units appointed representative to Health Care Financing Administration Technical Assistance Group
- 1992-1998 Chief Justice Kansas Supreme Court Appointee to Access to the Courts-Commission on Opening the Courthouses
- 1991-1995 Manuscript Reviewer, Journal of Disability Policy Studies
- 1993-1995 Gubernatorial Appointee Kansas Statewide Independent Living Council
- 1992-1994 Member at Large, Board of Directors, National Council on Independent Living
- 1974 Phi Beta Kappa

Collaboration and Funded Research

Principal Investigator

- 2010 – 2012 “The Prepared Lifestyle: Seasonal and Pandemic Planning and People with Disabilities Part I and II.” Funding from Bureau of Public Health Preparedness, Kansas Department of Health and Environment.
- 2010 – 2011 “Train-The-Trainer Course on Disaster Preparedness and People with Disabilities.” Funding from Hospital Preparedness Program, Kansas Department of Health and Environment.
- 2008 - 2009 “What Health and Safety Professionals Need to Know for Service and Companion Animal Preparedness and Sheltering for Persons with Disabilities.” Funding from Hospital Preparedness Program, Kansas Department of Health and Environment.
- 2004 – 2007 “Comprehensive Training for Personnel of Hospitals, Public Health, Emergency Preparedness, and Emergency Responder Agencies in Disaster Preparedness and Emergency Response for Persons with Disabilities.” Funding from Kansas Hospital Bioterrorism Program-Center for Public Health Preparedness, Kansas Department of Health and Environment.
- 2004 – 2006 An Assessment of Community Change and Economic Impact Fostered by Centers For Independent Living.” Funding from United States Department of Education, National Institute on Disability and Rehabilitation Research.

Advisor

- 2018- present “Galveston Brain Injury Conference – Knowledge Transfer – Moving Recommendations to Actions for Young Persons with Brain Injury
- 2016-2018 “Improving the Health of People with Mobility Limitations and Intellectual Disabilities through State-based Public Health Programs” CDC-RFA-DD16-1603
- 2015-2018 “Medicaid Functional Eligibility Tool Development and Training” Funding from Kansas Department of Aging and Disability Services
- 2015- 2016 “Rehabilitation Access and Outcome after Severe Traumatic Brain Injury – A TBI Model System-Sponsored Stakeholder Summit” Spaulding-Harvard Traumatic Brain Injury Model System
- 2009- 2012 “Weight Loss Among People with Physical Disabilities.” Funding from United States Department of Education, National Institute on Disability and Rehabilitation Research.
- 2006 – 2012 “Implementing Evidence-Based Interventions.” Funding from the Centers for Disease Control, subcontracted through the Kansas Department of Health and Environment.
- 2006 – 2011 “HCBS Waiver: Economic Utility and Health Outcomes.” Funding from United States Department of Education, National Institute on Disability and Rehabilitation Research.
- Measuring Health Care Expenditures and Utilization Among the Aged, Blind and Disabled Medicaid Population.” Funding from United States Department of Education, National Institute on Disability and Rehabilitation Research.
- “Community Engagement Evaluation Project.” Funding from United States Department of Education, National Institute on Disability and Rehabilitation Research.

BENET MAGNUSON

2115 Tennessee St.
Lawrence, KS 66046
785-760-4454
a.benet.magnuson@gmail.com

EDUCATION

HARVARD LAW SCHOOL, J.D. 2009, *cum laude*

Work experience at Harvard Law School:

Teaching Assistant and Consultant for Harvard Law School, 2007-2009

- Taught working groups at the Harvard Negotiation Institute and Negotiation Workshop
- Trained local governments, including a school district, public housing authorities, and an energy task force

Student Attorney for Wilmer-Hale Legal Services Center, 2008

- Represented domestic violence victims and mediated divorce settlements

Summer Policy Attorney for MASSPIRG, 2008

- Managed state legislative advocacy on topics of prescription drug reform, tax fairness, and consumer rights

Summer Policy Attorney for Center for Responsible Lending, 2007

- Created consumer lending policy reports and drafted Congressional testimony on subprime mortgage lending

Officer for Harvard Tenant Advocacy Project, Harvard Negotiators, and Harvard Mediation Program, 2006-2009

- Served as Outreach Director and Trainings Director for student-led organizations

HARVARD UNIVERSITY, A.B. in Classics Greek & English 2006, *magna cum laude*

Thesis: *Back to Aristotle: The Influence of the Poetics on the Early Criticism and Poetry of T.S. Eliot*

Work experience at Harvard University:

News Director for WHRB Radio

- Led the news department for the college radio station

Volunteer and paid positions for DCAP, Boys' and Girls' Club, Taft Middle School, St. James's Homeless Shelter

- Served as HIV prevention outreach worker, tutor for homeless youth, children's camp leader, and overnight supervisor for local nonprofit organizations

WORK EXPERIENCE

APPLESEED

2009-present

Interim Executive Director, Appleseed Foundation, 2020-present

- Lead the organization's work to launch new Appleseed centers and to coordinate advocacy among the sixteen centers in the Appleseed Network

Executive Director, Kansas Appleseed Center for Law & Justice, 2013-2019

- Grew the nonprofit social justice organization from a staff of one (\$65,000 annual budget) to a statewide staff of twelve (\$900,000 annual budget) in seven years.
- Secured substantial policy victories, including comprehensive juvenile justice reform legislation that reduced juvenile incarceration in Kansas by 63% and invested more than \$30,000,000 in state funding for new community-based programs for high-risk youth. Other key achievements include filing a class-action lawsuit to protect the rights of children in foster care, raising Kansas from 50th to 39th in the nation for feeding hungry kids in the summer, and creating offices across the state to increase voter turnout and census participation in underrepresented communities.
- Received the national 2019 Andy Hyman Award for Advocacy from Grantmakers in Health.

Harvard Law School Kaufman-Skirnick Fellow, Appleseed Foundation, 2009-2010

- As member of four-person Appleseed team, negotiated and drafted federal remittance disclosure legislation
- Managed team of over 60 pro bono attorneys on the production of a deportation assets manual
- Researched immigrant health insurance and developed remittance certification

TEXAS CRIMINAL JUSTICE COALITION, Austin, TX

2011-2013

Juvenile Justice Policy Attorney

- Monitored county and state secure juvenile facilities for compliance with safety standards
- Advocated on juvenile justice policies at the Texas legislature and the Juvenile Justice Department
- Supported families of incarcerated youth through educational outreach and advocacy organizing

TEXAS ACCESS TO JUSTICE COMMISSION, Austin, TX

2010-2011

Policy Attorney

- Developed and implemented statewide policy to address legal problems in low-income Texas communities
- Managed financial development, outreach, and education on access to justice issues in Texas

AMERICAN GATEWAYS, Austin, TX

2010-2013

Pro Bono Immigration Attorney

- Represented low-income immigrants in U Visa applications

TRAVIS COUNTY CORRECTIONAL COMPLEX, Del Valle, TX

2009-2013

Creative Writing Director and Financial Literacy Instructor

- Created and oversaw a new creative writing course, which grew to include 10 volunteer writing instructors
- Developed and implemented arts-based dispute resolution curriculum for incarcerated youth

FINANCIAL LITERACY COALITION OF CENTRAL TEXAS, Austin, TX

2009-2013

Certified Financial Literacy Instructor

- Taught financial literacy classes for low-income families

ARRANGE CARE, Austin, TX

2011-2012

Elder Public Housing Dispute Resolution Consultant

- Developed and implemented dispute resolution curriculum for elderly public housing tenants

GARZA HIGH SCHOOL, Austin, TX

2010-2012

Volunteer English Language Learner Tutor

- Tutored English language learners who had previously dropped out of high school

EXHIBIT B

MB v. Howard**Kansas Appleseed's Itemized Time Entries**

Date	Name	Case	Description	Time
5/15/2018	Benet Magnuson	Kansas	Meeting with Martha Hodgesmith re. potential litigation	1
5/16/2018	Benet Magnuson	Kansas	Meeting with Stephen Dixon, Children's Rights re. potential litigation	1
6/19/2018	Benet Magnuson	Kansas	Meeting with Stephen Dixon and Leecia Welch with Children's Rights re. potential litigation	1
7/24/2018	Benet Magnuson	Kansas	Call with Children's Rights attorneys re search for clients	1
7/26/2018	Benet Magnuson	Kansas	Strategy call re Children's Rights' investigation status and next steps	1
7/27/2018	Benet Magnuson	Kansas	review of documents re. joining as co-counsel	0.5
7/30/2018	Benet Magnuson	Kansas	internal email discussion re. KS Appleseed as co-counsel	0.5
7/30/2018	Benet Magnuson	Kansas	correspondence with CR, NCYL, and key stakeholder JA re Medicaid claims	0.3
7/30/2018	Benet Magnuson	Kansas	Kansas Appleseed litigation committee call re. potential litigation	1
7/30/2018	Benet Magnuson	Kansas	email and phone calls with community stakeholders re. mental health and foster care	0.5
8/1/2018	Benet Magnuson	Kansas	Follow up meeting with Kansas Appleseed to discuss potential foster care litigation	1
8/14/2018	Benet Magnuson	Kansas	Call with Leecia Welch re. potential litigation	0.5
8/22/2018	Benet Magnuson	Kansas	email re. update on KS Appleseed involvement in case	0.3
9/10/2018	Benet Magnuson	Kansas	call for update on potential litigation	0.5
9/12/2018	Benet Magnuson	Kansas	email from PS re. foster care in Kansas	0.3
9/12/2018	Benet Magnuson	Kansas	Check in call with Ira Lustbader and Larry Rute re. potential litigation.	0.5
9/13/2018	Benet Magnuson	Kansas	correspondence re. personal testimony of relevant stakeholder Stovers	0.3
9/20/2018	Benet Magnuson	Kansas	Litigation conference call with co-counsel re. potential litigation next steps	1
9/26/2018	Benet Magnuson	Kansas	review co-counsel agreement	0.5
9/26/2018	Benet Magnuson	Kansas	Kansas co-counsel partnership call	1
9/28/2018	Benet Magnuson	Kansas	email re. interview with stakeholder RT	0.5
10/1/2018	Benet Magnuson	Kansas	email with co-counsel re. strategy re. KS Governor as defendant	0.3
10/1/2018	Benet Magnuson	Kansas	research on holding KS gov as defendant	3.5
10/3/2018	Benet Magnuson	Kansas	correspondence re. contact note with NZ	0.2
10/8/2018	Benet Magnuson	Kansas	email re. edits to complaint outline	0.3
10/8/2018	Benet Magnuson	Kansas	multiple emails re. developments with RT and concerns about "the Wall"	0.3
10/10/2018	Benet Magnuson	Kansas	Meeting at Larry Rute's KC office with co-counsel to discuss and edit complaint	4
10/15/2018	Benet Magnuson	Kansas	correspondence and review of recent press re. foster care in KS	0.5
10/15/2018	Benet Magnuson	Kansas	correspondence re. potential named plaintiffs	0.2
10/22/2018	Benet Magnuson	Kansas	emails re. KORA requests	0.5
10/22/2018	Benet Magnuson	Kansas	emails re. child welfare task force meetings	0.5
11/2/2018	Benet Magnuson	Kansas	email re. DCF contracts	0.3
11/2/2018	Benet Magnuson	Kansas	meeting with two CASAs from Manhattan, Kansas re claims investigated here	1

MB v. Howard**Kansas Appleseed's Itemized Time Entries**

11/9/2018	Benet Magnuson	Kansas	email re Kansas Outreach	0.3
11/9/2018	Benet Magnuson	Kansas	review of draft complaint	2
12/10/2018	Benet Magnuson	Kansas	correspondence re. abstention research	0.2
12/11/2018	Benet Magnuson	Kansas	email re. intake process re search for NPs and NFs	0.5
12/11/2018	Benet Magnuson	Kansas	emails re filing Pro Hac Vice forms	0.5
12/11/2018	Benet Magnuson	Kansas	drafting Pro Hac Vice forms	1
12/13/2018	Benet Magnuson	Kansas	email re. possible interested co-counsel	0.3
1/4/2019	Benet Magnuson	Kansas	email re. appointment of new public official with foster care duties	0.5
1/11/2019	Benet Magnuson	Kansas	email re. discovery order	0.2
1/18/2019	Benet Magnuson	Kansas	emails re. draft protective order	0.5
1/18/2019	Benet Magnuson	Kansas	Kansas litigation conference call with co-counsel re. litigation strategy, including discovery	0.5
2/5/2019	Benet Magnuson	Kansas	DLA/Kansas Litigation team conference call re. litigation status and next steps	1
2/9/2019	Benet Magnuson	Kansas	Email with co-counsel team re. concerns with group home	0.3
2/11/2019	Benet Magnuson	Kansas	Meeting with KGIH re. Medicaid claims in litigation	1.5
2/13/2019	Benet Magnuson	Kansas	Call with SW re. KS Medicaid system	0.3
2/14/2019	Benet Magnuson	Kansas	Email re. factual concern re foster youth	0.2
2/14/2019	Benet Magnuson	Kansas	email re. St. Francis lobbyist	0.4
2/21/2019	Benet Magnuson	Kansas	Review of draft settlement terms sheet	1
2/25/2019	Benet Magnuson	Kansas	email re. opposing counsel	0.2
2/25/2019	Benet Magnuson	Kansas	correspondence re. the addition of DLA Piper to Plaintiffs' Counsel	0.2
2/26/2019	Benet Magnuson	Kansas	email re letter preserving case documents	0.2
2/27/2019	Benet Magnuson	Kansas	email re. open records request	0.3
3/6/2019	Benet Magnuson	Kansas	correspondence re. agenda for co-counsel call	0.2
3/11/2019	Benet Magnuson	Kansas	email re 3.20 meeting with DLA Piper	0.2
3/12/2019	Benet Magnuson	Kansas	email re. discovery document production and maintenance	0.2
3/19/2019	Benet Magnuson	Kansas	Email re. factual and legal question raised by DLA Piper	0.3
3/20/2019	Benet Magnuson	Kansas	Kansas Foster Care litigation strategy meeting with National Center for Youth Law	3
3/21/2019	Benet Magnuson	Kansas	email re. a client on the case	0.2
11/1/2018	Christina Ostmeier	Kansas	call with stakeholder biological parent of multiple classmembers re fact issues relevant to litigation	2
11/29/2018	Christina Ostmeier	Kansas	Call with stakeholder grandmother of classmember re factual issues in litigation	1
12/10/2018	Christina Ostmeier	Kansas	Develop of draft intake process, including form, for stakeholders expressing concerns re foster care who may become NFs or witnesses	2
12/11/2018	Christina Ostmeier	Kansas	Meet w/ Larry Rute to go over intake process for potential NFs and witnesses in litigation	2

MB v. Howard**Kansas Appleseed's Itemized Time Entries**

12/13/2018	Christina Ostmeyer	Kansas	Meeting to discuss intake process for potential NFs and witnesses in litigation with Benet Magnuson, Lori Johns, Trinity Carpenter, myself	1
12/17/2018	Christina Ostmeyer	Kansas	2nd call with birth father re. concerns for children in care.	1
12/19/2018	Christina Ostmeyer	Kansas	call with young adult who wanted to share their experience with Kansas foster care system related to litigation	1.5
12/20/2018	Christina Ostmeyer	Kansas	call with young adult who was in foster care along with her four sisters and wished to share info re issues in litigation	2
12/20/2018	Christina Ostmeyer	Kansas	intake call re. child in foster care with issues related to litigation	1
12/24/2018	Christina Ostmeyer	Kansas	call with grandmother with concerns about grandson in foster care relevant to litigation	2
1/10/2019	Christina Ostmeyer	Kansas	Meeting with KS Appleseed staff re intake updates re stakeholders with issues relevant to litigation and potential NFs	1
1/15/2019	Christina Ostmeyer	Kansas	Call with birth father of foster parent with factual info he wishes to share re. the lawsuit.	1
1/21/2019	Christina Ostmeyer	Kansas	call with grandmother with placement concerns for grandson in foster care	2
2/4/2019	Christina Ostmeyer	Kansas	Meeting with Appleseed legal team re updates relevant to litigation from intake process	1
2/6/2019	Christina Ostmeyer	Kansas	call with birth father with concerns re. several classmembers related to litigation	2
2/6/2019	Christina Ostmeyer	Kansas	intake call re. stakeholder concerns re mental health in foster care	0.5
2/15/2019	Christina Ostmeyer	Kansas	intake follow up with stakeholder KS with knowledge relevant to litigation	1
2/18/2019	Christina Ostmeyer	Kansas	call with relative of classmember with factual info they wished to share with respect to foster care system and litigation	1.5
2/18/2019	Christina Ostmeyer	Kansas	Intake meeting re foster care system with potential NF	1
2/27/2019	Christina Ostmeyer	Kansas	Internal meeting re. factual updates relevant to litigation from foster care intake process	0.5
3/21/2019	Christina Ostmeyer	Kansas	call with potential NFs re concerns about foster care system relevant to litigation	2.5
4/19/2019	Christina Ostmeyer	Kansas	Call with birth father of foster children with concerns re placements and mental health	1
5/20/2019	Christina Ostmeyer	Kansas	call with grandmother of classmember concerning systemic foster care issues	1
11/18/2019	Christina Ostmeyer	Kansas	Meeting with Appleseed team re: update on foster care litigation	1
11/19/2019	Christina Ostmeyer	Kansas	Meeting w/ Erin McGuinness re latest information learned from intake calls relating to systemic mental health and placement issues in foster care	0.5
12/2/2019	Christina Ostmeyer	Kansas	Call with step parent with concerns about class member failing to receive mental health treatment while in foster care and who has been moved often while in foster care	0.8
12/2/2019	Christina Ostmeyer	Kansas	Call with birth parent of two classmembers with concerns for the lasting damage done to her children while in foster care for over a year	1.3

MB v. Howard**Kansas Appleseed's Itemized Time Entries**

12/4/2019	Christina Ostmeyer	Kansas	Call with grandmother dealing with problems by contractor St. Francis overseen by Defs	1
12/4/2019	Christina Ostmeyer	Kansas	Meeting with foster parent regarding her concerns about the foster care system relevant to litigation.	3.5
12/20/2019	Christina Ostmeyer	Kansas	Call with potential NF regarding child who received inadequate and inappropriate mental health treatment while in foster care	2
12/20/2019	Christina Ostmeyer	Kansas	Call with licensed professional counselor concerned about foster care system issues related to litigation	3
2/13/2020	Christina Ostmeyer	Kansas	internal meeting to discuss mediation progress	1
3/16/2020	Christina Ostmeyer	Kansas	Meet with internal Appleseed team to discuss progress and key fact updates related to litigation from recent intakes	1
7/30/2018	Larry Rute	Kansas	Meeting with Appleseed Executive Director, Benet Magnuson, to discuss my potential involvement in behalf of Appleseed in helping draft a Complaint and representing a Class of Foster Care Children	1.8
7/30/2018	Larry Rute	Kansas	Litigation Committee telephone conference to consider potential litigation regarding the Kansas Foster Care System	1
8/14/2018	Larry Rute	Kansas	Review email from Kansas Health Institute re inappropriate mental health treatment for children in KS foster care system	0.1
8/22/2018	Larry Rute	Kansas	Telephone conference with co-counsel re additional foster care claims and concerns	1.1
9/14/2018	Larry Rute	Kansas	Meeting with Kansas Appleseed Board of Directors to discuss potential litigation and receive approval and authorization to file complaint	1.2
9/24/2018	Larry Rute	Kansas	Email to Benet re litigation strategy	0.2
9/26/2018	Larry Rute	Kansas	Telephone conference with co-counsel re draft complaint	1
10/3/2018	Larry Rute	Kansas	Team meeting re potential plaintiffs and factual claims	0.5
10/5/2018	Larry Rute	Kansas	Review revised retainer for potential "next friends"	0.4
10/8/2018	Larry Rute	Kansas	Review LBB's memorandum re edits to complaint outline	0.2
10/9/2018	Larry Rute	Kansas	Analyze closely team materials re draft Complaint	3.8
10/10/2018	Larry Rute	Kansas	Co-Counsel in person team strategy meeting re class structure, mental health services, placement array, systemic failures, remedies and anticipated experts	4.5
10/17/2018	Larry Rute	Kansas	Team meeting conference call re proposed Complaint legal strategy	1
10/22/2018	Larry Rute	Kansas	Team emails re potential named plaintiffs and "next friends"	0.2
10/24/2018	Larry Rute	Kansas	Team meeting; review draft Complaint materials	1
10/30/2018	Larry Rute	Kansas	Review team emails re foster care educational placement, medical care and placement turnover	0.1
10/31/2018	Larry Rute	Kansas	Team meeting re draft complaint	1
11/1/2018	Larry Rute	Kansas	Review updated materials re draft Complaint	2.6

MB v. Howard**Kansas Appleseed's Itemized Time Entries**

11/5/2018	Larry Rute	Kansas	Team meeting re Complaint draft	2
11/7/2018	Larry Rute	Kansas	Review file documents including latest draft Complaint in preparation for team meeting	0.9
11/9/2018	Larry Rute	Kansas	Team Meeting re named plaintiffs and review of Complaint	1
11/9/2018	Larry Rute	Kansas	Team Meeting re Complaint draft	1.1
11/9/2018	Larry Rute	Kansas	Review and comment re draft Complaint	2.3
11/14/2018	Larry Rute	Kansas	Telephone conference re Complaint, including discussion of EPSDT claims	1
11/16/2018	Larry Rute	Kansas	Email to Clerk of Court re summons for each of the defendants in M.B., et al v. Coyler, et al.	0.3
11/20/2018	Larry Rute	Kansas	Review closely drafts of all documents to be filed with complaint besides complaint	1.4
11/21/2018	Larry Rute	Kansas	Team Meeting re pseudonyms, co-counsel, pro hac vice applications	1
11/28/2018	Larry Rute	Kansas	Review team emails and attend team meeting re: Attorney General's involvement; potential co-counsel; potential experts	1.1
11/29/2018	Larry Rute	Kansas	Prepare for and participate in telephone conference with Attorney General's office re extension of time	1.1
11/29/2018	Larry Rute	Kansas	Telephone conference with team to discuss potential local experts	1.5
11/30/2018	Larry Rute	Kansas	Create detailed written analysis of potential experts to share in memo with co-counsel	2.8
12/5/2018	Larry Rute	Kansas	Team conference call to discuss litigation strategy, including experts and potential amendment of complaint	1.2
12/6/2018	Larry Rute	Kansas	Team conference call re agreement of extension of time	0.8
12/7/2018	Larry Rute	Kansas	Telephone conference with Dennis Depew re proposed extension	0.3
12/10/2018	Larry Rute	Kansas	Interview with stakeholder AC	1.3
12/11/2018	Larry Rute	Kansas	Appleseed team meeting re Foster Care Intake and latest findings	2.4
12/12/2018	Larry Rute	Kansas	Team conference call re litigation strategy	1.1
12/14/2018	Larry Rute	Kansas	Meet with potential expert witness WC	1.5
12/18/2018	Larry Rute	Kansas	Telephone call with Dennis Depew re extension of time issues	0.9
12/18/2018	Larry Rute	Kansas	Memorandum to team re communications with opposing counsel	0.3
12/19/2018	Larry Rute	Kansas	Team meeting re respondent's request for extension and experts	0.8
12/20/2018	Larry Rute	Kansas	Discussion with co-counsel including Leecia and Ira re meeting with AG's office	1.4
12/21/2018	Larry Rute	Kansas	Email exchange re conference call with Dennis Depew	0.4
12/27/2018	Larry Rute	Kansas	Telephone conference with Dennis Depew; Leecia and Ira	1.2
12/28/2018	Larry Rute	Kansas	Telephone conference with Dennis Depew re form of extension motion and discussion of federal court funding cutoff likely on January 11, 2019	0.6
1/2/2019	Larry Rute	Kansas	Telephone conference with potential expert witnesses, re. Kansas foster care system	1.2

MB v. Howard**Kansas Appleseed's Itemized Time Entries**

1/3/2019	Larry Rute	Kansas	Discuss with team consulting experts, new DCF administration, and plaintiff's opposition to respondent's motion for extension	0.8
1/4/2019	Larry Rute	Kansas	Continue review of plaintiff's opposition to respondent's motion for extension	0.6
1/9/2019	Larry Rute	Kansas	Co-counsel team meeting re Dennis Depew correspondence; pseudonym issue and Protection Order	1
1/10/2019	Larry Rute	Kansas	Team conference call re litigation strategy with respect to discovery and motion	1
1/11/2019	Larry Rute	Kansas	Team meeting re telephone hearing and motion for extension of time	0.4
1/14/2019	Larry Rute	Kansas	Email exchange with Leecia Welch re motion for extension of time	0.2
1/15/2019	Larry Rute	Kansas	Read ABA Children's Litigation article relevant to foster care litigation issues for circulation to co-counsel	0.8
1/16/2019	Larry Rute	Kansas	Team conference call	1
1/17/2019	Larry Rute	Kansas	Review closely motion for litigation hold re draft Protective Order	0.8
1/18/2019	Larry Rute	Kansas	Review email from Dennis Depew re Pseudonym Motion and revisions to Protective Order	0.3
1/21/2019	Larry Rute	Kansas	Review Freya Pitts analysis of KSA 38-2209(a)	0.4
1/22/2019	Larry Rute	Kansas	Review draft Protective Order	0.6
1/23/2019	Larry Rute	Kansas	Team conference call re: Protective Order; experts, and updated stakeholder information	0.6
1/25/2019	Larry Rute	Kansas	Review closely several updated drafts of Protection Order for group discussion	1.4
1/28/2019	Larry Rute	Kansas	Review final proposed Protection Order	0.2
1/29/2019	Larry Rute	Kansas	Team meeting re expert witnesses	1
1/30/2019	Larry Rute	Kansas	Team meeting re: Protection Order, possible expert witnesses and legislative activity	0.4
2/1/2019	Larry Rute	Kansas	Review proposed expert witness list	0.3
2/4/2019	Larry Rute	Kansas	Email to Terry Campbell re automatic substitution of parties/research provided by Jonathan King	0.3
2/7/2019	Larry Rute	Kansas	Review Judge Birzer's proposed paragraph no. 18	0.4
2/13/2019	Larry Rute	Kansas	Team meeting re possible new witnesses, co-counsel and named-plaintiff update	1.3
2/20/2019	Larry Rute	Kansas	Team meeting discussion re named plaintiffs, DLA Piper, experts, plaintiff identification	1
2/26/2019	Larry Rute	Kansas	Review litigation hold proposal	0.2
2/27/2019	Larry Rute	Kansas	Team meeting re: DLA Piper communication, case management; and named client files	1
2/28/2019	Larry Rute	Kansas	Closely analyze proposed settlement term sheet	1.6
3/1/2019	Larry Rute	Kansas	Telephone conference with Terry Campbell	0.4
3/6/2019	Larry Rute	Kansas	Team meeting re: named plaintiff files; litigation timeline; litigation strategy	0.8
3/7/2019	Larry Rute	Kansas	Closely review class certification research	1.2

MB v. Howard**Kansas Appleseed's Itemized Time Entries**

3/13/2019	Larry Rute	Kansas	Team meeting re prospective additional named plaintiffs	1
3/20/2019	Larry Rute	Kansas	Team meeting re discovery; possible complaint amendment; file certification issues; telephone conference with Terry Campbell re extension of time	3
3/21/2019	Larry Rute	Kansas	Review legal research on bifurcation and MTD	1.3
3/22/2019	Larry Rute	Kansas	Compare draft settlement agreement from similar litigation with our proposed term sheet	1.6
3/22/2019	Larry Rute	Kansas	Review retainer and counsel agreements	1.3
3/27/2019	Larry Rute	Kansas	Team Meeting re respondent's request for a stay	1
3/28/2019	Larry Rute	Kansas	research possible MTD	1.8
3/29/2019	Larry Rute	Kansas	Closely review and approve draft order	1.1
4/3/2019	Larry Rute	Kansas	Team meeting re litigation and settlement strategy	1
4/10/2019	Larry Rute	Kansas	Review draft discovery requests	1.1
4/12/2019	Larry Rute	Kansas	Review email correspondence re defendant's meeting on April 19	0.2
4/15/2019	Larry Rute	Kansas	Review outline for defendant's meeting on April 19, 2019	0.6
4/17/2019	Larry Rute	Kansas	Team Meeting re: preparing talking points and strategy for mtg with Defs; settlement strategy; discovery	0.8
4/24/2019	Larry Rute	Kansas	Team meeting re discovery update	0.6
4/26/2019	Larry Rute	Kansas	Review 9th Circuit decision re substantive due process and Medicaid claims	0.8
5/2/2019	Larry Rute	Kansas	Team meeting re possible amendment to complaint; settlement strategy; defendant's answer	1
5/7/2019	Larry Rute	Kansas	Review email chain re Rule 26(f) and rough draft scheduling order	0.5
5/8/2019	Larry Rute	Kansas	Team meeting: re amendment to the Complaint; scheduling order and settlement strategy	0.9
5/9/2019	Larry Rute	Kansas	Review draft term sheet	0.4
5/14/2019	Larry Rute	Kansas	Co-counsel meeting with Teresa, Martha and LLB re discuss plaintiff's Rule 26 disclosures and Medicaid class issues	1.5
5/15/2019	Larry Rute	Kansas	Team meeting	1
5/16/2019	Larry Rute	Kansas	Draft email re mtg with stakeholder TM	0.4
5/17/2019	Larry Rute	Kansas	Review proposed term sheet	0.6
5/20/2019	Larry Rute	Kansas	Team mtg re litigation strategy and next steps	1
5/24/2019	Larry Rute	Kansas	review draft scheduling order	0.4
5/29/2019	Larry Rute	Kansas	Team Meeting re additional plaintiffs; discovery; potential case scheduling dates	0.8
5/31/2019	Larry Rute	Kansas	Review proposed settlement term sheet	1.1
6/6/2019	Larry Rute	Kansas	Review email re study on mental health services for children in foster care	0.6
6/11/2019	Larry Rute	Kansas	Review email from Leecia re possible new plaintiffs	0.1
6/13/2019	Larry Rute	Kansas	Draft email to team re reports from KU School of Social Work	0.2
6/14/2019	Larry Rute	Kansas	Meeting in Topeka office to discuss Medicaid issues with consulting experts	2

MB v. Howard**Kansas Appleseed's Itemized Time Entries**

6/21/2019	Larry Rute	Kansas	Telephone conference with consulting experts re foster care institutional placements	0.4
6/24/2019	Larry Rute	Kansas	Telephone conference call with stakeholder MW re placement issues	1.6
7/1/2019	Larry Rute	Kansas	Review and comment on draft 30(b)(6) notice	0.8
7/22/2019	Larry Rute	Kansas	Meeting with stakeholder TM re Foster Care data delivery	0.5
7/26/2019	Larry Rute	Kansas	Analyze David Sager's comments re extension for written discovery	0.6
8/14/2019	Larry Rute	Kansas	Closely review updated second amended complaint	1.4
8/21/2019	Larry Rute	Kansas	Team meeting re litigation and settlement strategy	0.8
8/21/2019	Larry Rute	Kansas	Review factual description re named plaintiffs	0.4
9/16/2019	Larry Rute	Kansas	Telephone conference with potential expert witness in mental health	0.2
9/17/2019	Larry Rute	Kansas	Review closely draft mediation statement	1
9/24/2019	Larry Rute	Kansas	Review written analysis of discovery issues	0.4
10/8/2019	Larry Rute	Kansas	Analyze team settlement proposal	1.7
10/9/2019	Larry Rute	Kansas	Review full mediation statement and exhibits	1.2
10/16/2019	Larry Rute	Kansas	team meeting re discovery and ESI	0.9
10/17/2019	Larry Rute	Kansas	Review other settlement agreements for preparation of our settlement	1.1
10/24/2019	Larry Rute	Kansas	Email analysis of potential mh expert's cv to co-counsel	0.4
11/1/2019	Larry Rute	Kansas	Travel to Kansas City for mediation	1
11/12/2019	Larry Rute	Kansas	Participate in mediation	7.8
11/13/2019	Larry Rute	Kansas	Review Kevin Ryan email	0.2
11/22/2019	Larry Rute	Kansas	Review drafts of plaintiff's settlement agreement	1.8
11/25/2019	Larry Rute	Kansas	Redraft proposed safety and well-being section	2.5
12/2/2019	Larry Rute	Kansas	Review closely new proposed draft settlement	1.8
12/9/2019	Larry Rute	Kansas	Review Ira's edits to respondent's draft	0.4
12/9/2019	Larry Rute	Kansas	Review LBB's edit suggestions	0.2
12/13/2019	Larry Rute	Kansas	Review "hotdocs" relevant to mediation shared with co-counsel	1.6
12/15/2019	Larry Rute	Kansas	Participate in mediation	6
12/16/2019	Larry Rute	Kansas	Participate in mediation	3.5
12/16/2019	Larry Rute	Kansas	Travel to Kansas City for mediation	1
12/15/2019	Larry Rute	Kansas	Travel to Kansas City for mediation	1
12/17/2019	Larry Rute	Kansas	Review settlement agreement edits	0.4
12/27/2019	Larry Rute	Kansas	Review memorandum from Kevin Ryan re recap and next steps	0.4
1/28/2020	Larry Rute	Kansas	Review proposed settlement provisions	0.9
2/7/2020	Larry Rute	Kansas	Participate in mediations and breakout sessions with team	8.5
2/13/2020	Larry Rute	Kansas	Review Poonam's spreadsheet re discovery deadlines	0.3
2/25/2020	Larry Rute	Kansas	Participate in mediation and corresponding team (face-to-face) breakout meetings	8.8
2/26/2020	Larry Rute	Kansas	Participate in mediation and corresponding team (face-to-face) breakout meetings	5.2

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2/27/2020	Larry Rute	Kansas	Review objections and responses re RFP	0.9
3/26/2020	Larry Rute	Kansas	Review closely golden rule letter	0.8
4/2/2020	Larry Rute	Kansas	Review and comment on letter re respondent's production for documents	0.7
4/9/2020	Larry Rute	Kansas	Review respondent's counsel's 3/25/2020 response to plaintiff's golden rule letter	0.3
4/28/2020	Larry Rute	Kansas	Review Defendant Laura Howard's response and objections	0.5
5/20/2020	Larry Rute	Kansas	Review settlement proposal re contract oversights/definitions for 30(b)(6) depositions	0.3
5/27/2020	Larry Rute	Kansas	Team meeting re outstanding discovery	0.6
5/28/2020	Larry Rute	Kansas	Review Ira's email re settlement strategy discussion	0.5
5/29/2020	Larry Rute	Kansas	Review settlement language	0.6
6/4/2020	Larry Rute	Kansas	Prepare for and participate in Zoom settlement discussions	5
6/8/2020	Larry Rute	Kansas	Review memorandum by Stephen Dixon re GAL and possible named plaintiffs	0.1
6/10/2020	Larry Rute	Kansas	Comment on settlement draft	0.4
6/18/2020	Larry Rute	Kansas	Review revised settlement agreement	0.5
7/1/2020	Larry Rute	Kansas	Team meeting re litigation and settlement strategy	1.1
7/3/2020	Larry Rute	Kansas	Review email re preliminary settlement approval	0.2
7/15/2020	Larry Rute	Kansas	Team meeting re settlement and next steps	1
1/8/2019	Lori Johns	Kansas	Call with potential NF re foster care placement issues	1.2
1/8/2019	Lori Johns	Kansas	Intake re.class member who has concerns relevant to litigation	1.3
1/9/2019	Lori Johns	Kansas	call with grandmother concerned about placement issues for two grandchildren in foster care.	1.2
1/9/2019	Lori Johns	Kansas	Intake re. potential Named Plaintiff	1.3
1/10/2019	Lori Johns	Kansas	Call from birth mother regarding concerns about inappropriate treatment of child who is currently foster care.	1
1/10/2019	Lori Johns	Kansas	Call from woman who aged out of Kansas foster care system to share experiences relevant to litigation	1.5
1/14/2019	Lori Johns	Kansas	Call from social worker, and former CPS worker, regarding detailed concerns about DCF	3
1/17/2019	Lori Johns	Kansas	Call from birth mother regarding placement and mental health concerns for her children in foster care	1
1/17/2019	Lori Johns	Kansas	Call from birthfather regarding relevant concerns for children in foster care	1
1/18/2019	Lori Johns	Kansas	Call with grandmother who is concerned for her grandson who is in foster care.	2
1/18/2019	Lori Johns	Kansas	Call with concerned older sibling of younger kids who are in foster care and may experience harms alleged in complaint.	2.5
1/18/2019	Lori Johns	Kansas	Intake telephone call from concerned stakeholder about potential NP	2
1/21/2019	Lori Johns	Kansas	Call with birth mother regarding son, who is now 22, who was in foster care and had many bad outcomes related to issues in complaint	1

MB v. Howard**Kansas Appleseed's Itemized Time Entries**

1/21/2019	Lori Johns	Kansas	Intake re. child in foster care experiencing relevant harms	1
1/28/2019	Lori Johns	Kansas	call with adult who was in the Kansas foster care as a child and wished to share information re systemic issues	1
2/18/2019	Lori Johns	Kansas	Call from adoptive/former foster parent regarding repeated moves her children experienced while in care.	0.5
2/21/2019	Lori Johns	Kansas	Call from foster parent, referred to us by former social worker, regarding one child in her care who has had 85 placements.	2
2/26/2019	Lori Johns	Kansas	Call with foster mother who has concerns about her foster daughter subject to select issues in complaint.	1
3/1/2019	Lori Johns	Kansas	call with birth parent with two kids in foster care who were moved often.	0.5
3/1/2019	Lori Johns	Kansas	Call from grandmother regarding her son's kids who are in foster care and may experience issues in complaint.	2
4/3/2019	Lori Johns	Kansas	Call from former employee of foster care contractor who expressed concerns about contractor and foster care oversight.	2
4/4/2019	Lori Johns	Kansas	Call from birth parent whose three children are in foster care and who believes her children are harmed.	2
4/5/2019	Lori Johns	Kansas	Call from foster parent, also licensed social worker, with concerns about boy she has been fostering for 2+ years.	5
4/5/2019	Lori Johns	Kansas	Call from birth mother regarding concerns for her kids who have been moved to many different homes while in foster care.	0.5
4/16/2019	Lori Johns	Kansas	Call from person wanting to submit relevant complaints re. DCF.	3
4/17/2019	Lori Johns	Kansas	Call with birth father who has 5 kids in state custody with harms related to litigation.	3.3
4/22/2019	Lori Johns	Kansas	Call from birth father referred to us regarding his kids in foster care who may be appropriate NPs	2
4/23/2019	Lori Johns	Kansas	call with birth mother who is concerned about her two children's placement move	0.5
5/15/2019	Lori Johns	Kansas	Call with 28 yo woman who aged out of Kansas foster care and wished to share concerns relevant to litigation	2
5/15/2019	Lori Johns	Kansas	Call with birth mother, concerned about her two kids who were removed from her care two weeks ago and may not be at stable placements	0.4
5/15/2019	Lori Johns	Kansas	Intake re. classmember with relevant experiences to litigation	2
6/10/2019	Lori Johns	Kansas	Call with birth mother complaining of her two children in foster care's mistreatment and lack of oversight while in foster care	1.5
6/27/2019	Lori Johns	Kansas	Call with birth mother with four children in foster care who experienced lack of oversight failures by the state	1.5
8/2/2019	Lori Johns	Kansas	Call with woman who is concerned for her nephew who is in foster care and not getting mental health services that he needs.	1

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8/20/2019	Lori Johns	Kansas	Call with birth mother whose daughters were in foster care and had about 15 case managers through KVC.	0.6
9/9/2019	Lori Johns	Kansas	Intake with stakeholder who has concerns about oversight failures in foster care system.	0.5
9/19/2019	Lori Johns	Kansas	Call with birth mother who is concerned for her kids in foster care due to lack of supervision.	0.5
10/16/2019	Lori Johns	Kansas	Call with grandmother whose grandchild's medical needs did not appear to be addressed while in foster care	3
12/18/2019	Lori Johns	Kansas	Call with grandparents concerned that TFI ignored concerns that their 7-yo grandson, placed with them, has been similingly harmed before entering their placement	1
1/29/2020	Lori Johns	Kansas	Call with birthfather regarding his 4 yo child taken into custody who has since been moved about nine time	1
2/3/2020	Lori Johns	Kansas	Call with birth father re concerns re classmember	0.8
2/18/2020	Lori Johns	Kansas	call with birth parent whose daughter is in foster care and has been moved over two dozen times	0.8
2/18/2020	Lori Johns	Kansas	Call with woman who has kinship placement of her great nephew and has concerns about foster care contractor.	0.5
2/18/2020	Lori Johns	Kansas	Call with birth mother who has one child in foster care she is concerned about.	1
2/24/2020	Lori Johns	Kansas	Call with birth mother with concerns for her kids languishing in foster care.	1
2/25/2020	Lori Johns	Kansas	Call with birth parents with concerns about their foster children's placements, which included separating the siblings and placing them in various parts of the state.	1
4/9/2020	Lori Johns	Kansas	Call with birth parents of a boy in foster care who is currently missing from his group home.	1
4/9/2020	Lori Johns	Kansas	Call with Grandmother whose teenage daughter in foster care is now missing from her other placement.	1
4/13/2020	Lori Johns	Kansas	Step-parent called regarding concerns for her teenage daughter in foster care relevant to this litigation.	1.5
5/19/2020	Lori Johns	Kansas	Call with birth mother with three children in foster care, reporting that her two boys were "homeless" for their first three months in care.	1
7/5/2018	Martha Hodgesmith	Kansas	Appleseed Litigation team call with national litigators re possible Foster Care Litigation	0.5
7/30/2018	Martha Hodgesmith	Kansas	Call with national child advocates for follow-up discussion re possible Foster Care Litigation	0.5
8/1/2018	Martha Hodgesmith	Kansas	Appleseed Litigation team follow up in Topeka to analyze potential litigation and claims together	1.5

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8/15/2018	Martha Hodgesmith	Kansas	Call with Erin Children's Rights re Kansas Social Services/Medicaid	1
8/22/2018	Martha Hodgesmith	Kansas	National Litigation Team (NLT) litigation strategy meeting re Foster Care Litigation (Topeka)	1
9/19/2018	Martha Hodgesmith	Kansas	Team call re complaint, potential plaintiffs and next friends	0.8
10/1/2018	Martha Hodgesmith	Kansas	Meeting with Leecia Welch in Person for Ks mental health and Medicaid analysis for purposes of framing litigation (Topeka)	1
11/21/2018	Martha Hodgesmith	Kansas	Team call re logistics, pseudonyms, community connections	1
11/28/2018	Martha Hodgesmith	Kansas	Team call re research, community outreach, potential experts	1.1
12/12/2018	Martha Hodgesmith	Kansas	Team call re community contacts, experts, defendants' request for extension to answer	1.3
1/2/2019	Martha Hodgesmith	Kansas	Team call re opposition to defendants' motion to extend time to answer and potential experts	1
1/16/2019	Martha Hodgesmith	Kansas	Team call re litigation strategy, protective order, use of pseudonyms	1
1/23/2019	Martha Hodgesmith	Kansas	Team call re protective order, potential experts, stakeholder updates	0.7
2/12/2019	Martha Hodgesmith	Kansas	In person meeting with Leecia and Freya re litigation strategy and next steps	1.8
2/27/2019	Martha Hodgesmith	Kansas	Team call re staffing, named plaintiffs, case management	1
4/17/2019	Martha Hodgesmith	Kansas	Team call re discussion of meeting with defendants, early settlement strategy	0.8
4/19/2019	Martha Hodgesmith	Kansas	Review of Kansas policies and practices with Litigation Partners in person	1
5/22/2019	Martha Hodgesmith	Kansas	Team call re new clients, term sheet, Medicaid claim	1
7/12/2019	Martha Hodgesmith	Kansas	Team call re scheduling conference and order, complaint amendment, stakeholder interviews	1.3
7/24/2019	Martha Hodgesmith	Kansas	Team call re experts, mediation, discovery	0.9
8/7/2019	Martha Hodgesmith	Kansas	Meeting with Teresa and LBB re litigation strategy and next steps	1
8/7/2019	Martha Hodgesmith	Kansas	Team call re ADR, complaint amendment, discovery	0.7
8/14/2019	Martha Hodgesmith	Kansas	Team call re ADR, complaint amendment, discovery	0.8
8/16/2019	Martha Hodgesmith	Kansas	Meeting Teresa, LBB, and stakeholder with deep knowledge on child welfare policies to gather information for litigation (Topeka)	2
8/28/2019	Martha Hodgesmith	Kansas	Team call re ADR, amended complaint, local updates	0.9
9/4/2019	Martha Hodgesmith	Kansas	Team call re ADR, 30(b)(6) depositions	1
9/11/2019	Martha Hodgesmith	Kansas	Team call re mediation statement, discovery, experts	0.8
9/25/2019	Martha Hodgesmith	Kansas	Team call re discovery issues, possible KORA request, experts	1
10/2/2019	Martha Hodgesmith	Kansas	Team call re discovery letter, mediation, amended 30(b)(6) notice, potential experts	1
10/30/2019	Martha Hodgesmith	Kansas	Team call re motion to dismiss, discovery, ADR	1.3
11/1/2019	Martha Hodgesmith	Kansas	Mediation preparation	1
11/8/2019	Martha Hodgesmith	Kansas	Mediation preparation	1
11/11/2019	Martha Hodgesmith	Kansas	Mediation Preparation (Kansas City)	2.5

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11/12/2019	Martha Hodgesmith	Kansas	Mediation	8
11/15/2019	Martha Hodgesmith	Kansas	NLT Meeting re mediation analysis and next steps	1
11/20/2019	Martha Hodgesmith	Kansas	Team call re document production issues, mediation, experts	0.7
11/25/2019	Martha Hodgesmith	Kansas	NLT Meeting re case strategy, including mediation	1
12/2/2019	Martha Hodgesmith	Kansas	NLT Meeting re litigation strategy, including experts and mediation	1
12/12/2019	Martha Hodgesmith	Kansas	Video call with expert re. brain trauma	1
12/15/2019	Martha Hodgesmith	Kansas	Mediation	7.5
12/16/2019	Martha Hodgesmith	Kansas	Mediation	7
12/18/2019	Martha Hodgesmith	Kansas	NLT Meeting re litigation strategy including mediation	1
1/6/2020	Martha Hodgesmith	Kansas	NLT meeting re settlement agreement	1.5
1/7/2020	Martha Hodgesmith	Kansas	NLT Meeting re strategy for next steps	0.5
1/15/2020	Martha Hodgesmith	Kansas	NLT meeting re settlement agreement	1.5
1/23/2020	Martha Hodgesmith	Kansas	NLT Meeting re litigation strategy	1
2/7/2020	Martha Hodgesmith	Kansas	Mediation	8.5
2/19/2020	Martha Hodgesmith	Kansas	Team call re discovery, mediation, budget process, potential witnesses	1
2/21/2020	Martha Hodgesmith	Kansas	NLT Meeting re mediation strategy	1
2/24/2020	Martha Hodgesmith	Kansas	Pre mediation meeting to discuss plan for mediation and talking points	1.8
2/25/2020	Martha Hodgesmith	Kansas	Mediation	9
2/26/2020	Martha Hodgesmith	Kansas	Mediation	7.2
3/4/2020	Martha Hodgesmith	Kansas	Co-counsel meeting re mediation, ESI, third party discovery, stakeholder/local updates	0.8
3/11/2020	Martha Hodgesmith	Kansas	Team call re experts, settlement negotiations, discovery	1
3/18/2020	Martha Hodgesmith	Kansas	Team call re discovery updates, COVID issues, experts, local stakeholder updates	0.9
3/25/2020	Martha Hodgesmith	Kansas	Team call COVID response, discovery disputes, experts	0.7
4/1/2020	Martha Hodgesmith	Kansas	Team call re COVID response, discovery, experts, named plaintiffs	0.8
4/3/2020	Martha Hodgesmith	Kansas	NLT Meeting re litigation strategy, including experts, mediation, and discovery	1
4/8/2020	Martha Hodgesmith	Kansas	Team call re meet and confer with defendants, client updates, discovery issues, experts	1
4/15/2020	Martha Hodgesmith	Kansas	Team call re discovery meet and confer, named plaintiffs aging out, experts, local updates	1.2
4/22/2020	Martha Hodgesmith	Kansas	Team call re discovery, experts	0.9
4/29/2020	Martha Hodgesmith	Kansas	Team call re defendants' productions, experts, third-party subpoenas	1.5
5/6/2020	Martha Hodgesmith	Kansas	Team call re case schedule, meet and confer, settlement strategy	1.2
5/11/2020	Martha Hodgesmith	Kansas	Medicaid Expert call preparation for interview	1
5/12/2020	Martha Hodgesmith	Kansas	Medicaid Expert interview	1
5/13/2020	Martha Hodgesmith	Kansas	Team call re potential settlement, depositions, responses to defendants' discovery	1.3
5/14/2020	Martha Hodgesmith	Kansas	Medicaid Expert interview	1

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5/20/2020	Martha Hodgesmith	Kansas	Team call re discovery, mediation, experts	1.1
5/27/2020	Martha Hodgesmith	Kansas	Team call re case schedule, depositions, third party discovery, responding to defendants' discovery	0.8
5/29/2020	Martha Hodgesmith	Kansas	NLT meeting re settlement response from defendants	1.5
6/4/2020	Martha Hodgesmith	Kansas	mediation	5
6/10/2020	Martha Hodgesmith	Kansas	mediation	3
6/11/2020	Martha Hodgesmith	Kansas	Mediation	3
6/17/2020	Martha Hodgesmith	Kansas	NLT Meeting re ongoing mediation	1
6/18/2020	Martha Hodgesmith	Kansas	Mediation	1
6/22/2020	Martha Hodgesmith	Kansas	Call with Monitor	1
6/25/2020	Martha Hodgesmith	Kansas	NLT meeting re Defs' proposed settlement	1.5
6/29/2020	Martha Hodgesmith	Kansas	Preparation for potential deposition of foster care contractors	1
7/8/2020	Martha Hodgesmith	Kansas	Co-counsel call re settlement approval process and next steps	1
3/5/2019	Teresa Woody	Kansas	Review complaint and key docs	2.1
3/6/2019	Teresa Woody	Kansas	Team call, including discussion of: gathering named plaintiff files and litigation timeline/strategy	0.8
3/7/2019	Teresa Woody	Kansas	Emails re review of named plaintiff files	0.2
3/7/2019	Teresa Woody	Kansas	Emails re foster parent concerned about DCF	0.2
3/7/2019	Teresa Woody	Kansas	Research and circulate D. Kan. and 10th Cir. law re Rule 23 class certification	0.9
3/12/2019	Teresa Woody	Kansas	Review key docs	5.5
3/12/2019	Teresa Woody	Kansas	Meeting with BM re key docs and issues in case	1.3
3/13/2019	Teresa Woody	Kansas	Call with co-counsel including discussion of file management and prospective additional named plaintiffs	0.9
3/13/2019	Teresa Woody	Kansas	Research and review info re potential expert	0.5
3/13/2019	Teresa Woody	Kansas	Review memo re defendants' potential defenses	0.5
3/13/2019	Teresa Woody	Kansas	Additional review of key documents and background materials	1.4
3/14/2019	Teresa Woody	Kansas	Emails re documents from next friends	0.2
3/15/2019	Teresa Woody	Kansas	Conference with QR re KORA requests to DCF re foster care statistics and review timeline of noncompliance; prepare response to DCF	1.3
3/15/2019	Teresa Woody	Kansas	Confer with MH re DCF child welfare stakeholder interview	0.8
3/18/2019	Teresa Woody	Kansas	Research re AG contract with Barber Emerson	1
3/18/2019	Teresa Woody	Kansas	Draft and circulate BM motion to withdraw as plaintiffs' counsel	0.4
3/18/2019	Teresa Woody	Kansas	Circulate AG contract to co-counsel with comments	0.2
3/19/2019	Teresa Woody	Kansas	Emails with DS (DLA) re litigation strategy	0.3
3/19/2019	Teresa Woody	Kansas	Revise and circulate BM withdrawal as counsel for plaintiffs	0.4

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3/19/2019	Teresa Woody	Kansas	Meet with Appleseed staff to standardize intake information from parents to parallel legal claims, foster parents, GALs and others, and standardize reporting and responses	1
3/19/2019	Teresa Woody	Kansas	Review DCF responses to KORA request re foster care statistics and discuss with Q.R.	1.1
3/20/2019	Teresa Woody	Kansas	Team strategy meeting, including discussion of claims and strategy for complaint amendment, class certification, and discovery	3
3/20/2019	Teresa Woody	Kansas	Emails re meeting with defense counsel	0.3
3/20/2019	Teresa Woody	Kansas	Emails re defendants' anticipated motion to dismiss	0.4
3/20/2019	Teresa Woody	Kansas	Review legal research re bifurcation and discovery decisions	0.8
3/20/2019	Teresa Woody	Kansas	Review legal research re class cert and ESPDT claims	0.7
3/22/2019	Teresa Woody	Kansas	Review co-counseling agreement	0.4
3/22/2019	Teresa Woody	Kansas	Review materials re trauma screening	1
3/22/2019	Teresa Woody	Kansas	Review recent settlement docs in similar case re potential remedies	1.3
3/26/2019	Teresa Woody	Kansas	Review motion for extension filed by defendants	0.2
3/27/2019	Teresa Woody	Kansas	Team call, including discussion of Defendants' proposed stay and client updates	0.9
3/27/2019	Teresa Woody	Kansas	Research re likelihood of stay being granted by court in D.Kan.; email conclusions and case law	2.8
3/27/2019	Teresa Woody	Kansas	Review legal research re potential abstention argument	0.8
3/28/2019	Teresa Woody	Kansas	Additional research to counter defendants' anticipated motion to dismiss	1.2
3/28/2019	Teresa Woody	Kansas	Review court order re motion for extension	0.1
3/29/2019	Teresa Woody	Kansas	Review defendants' proposed stip for joint motion for extension; email comments re same; review redline of response to defendants	0.9
4/1/2019	Teresa Woody	Kansas	Review recent case re bifurcation in Rule 23 action	0.3
4/3/2019	Teresa Woody	Kansas	Team call, including re: 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint	1
4/3/2019	Teresa Woody	Kansas	Review interview with Governor Kelly re potential admissions	0.6
4/3/2019	Teresa Woody	Kansas	Review court order re extension of times	0.1
4/4/2019	Teresa Woody	Kansas	Emails re next steps with respect to meeting with defendants' counsel and early discovery issues	0.4
4/4/2019	Teresa Woody	Kansas	Review and analyze potential settlement terms and interim relief	1.3
4/5/2019	Teresa Woody	Kansas	Emails re strategy to approach defendants' counsel, and report of call Def counsel	1
4/8/2019	Teresa Woody	Kansas	Review KS Child Welfare Task Force Progress Report and Gov. Kelly's remarks re same	1.2
4/9/2019	Teresa Woody	Kansas	Emails re strategy of adding additional plaintiffs and amending complaint	0.4
4/10/2019	Teresa Woody	Kansas	Team call, including discussion of 4/19/19 meeting with defendants, proposed additional substantive due process claim, and document management	1

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4/10/2019	Teresa Woody	Kansas	Update on Plaintiff JM	0.1
4/10/2019	Teresa Woody	Kansas	Review Appleseed intake report to meet with L.J. re same	1
4/10/2019	Teresa Woody	Kansas	Review proposed agreement re settlement negotiation period	0.4
4/10/2019	Teresa Woody	Kansas	Review final co-counsel agreement with DLA	0.4
4/11/2019	Teresa Woody	Kansas	Review initial terms and settlement procedural issues and drafting comments re same	2.1
4/11/2019	Teresa Woody	Kansas	Review and circulate KC Star article re Kansas Child Welfare reforms	0.4
4/12/2019	Teresa Woody	Kansas	Emails re response to defendants' counsel re early settlement negotiations;	0.7
4/15/2019	Teresa Woody	Kansas	Review foster care intake list with LJ re potential source material for discovery	1
4/17/2019	Teresa Woody	Kansas	Team call, including discussion of 4/19/19 meeting with defendants and early settlement strategy	0.8
4/18/2019	Teresa Woody	Kansas	Meet with L.W. re case strategy and prep for 4/19 meeting	2
4/19/2019	Teresa Woody	Kansas	Review email re strategic implication of FFPA	0.1
4/19/2019	Teresa Woody	Kansas	Prep for meeting with co-counsel re nego strategy	0.5
4/19/2019	Teresa Woody	Kansas	Pre-negotiation meeting among plaintiffs' counsel	1
4/19/2019	Teresa Woody	Kansas	Meeting with Defense counsel Campbell, Depew, Britton, Lawson, and co-counsel re potential settlement and discovery issues	2
4/19/2019	Teresa Woody	Kansas	Meeting with co-counsel re debrief of conference with defendants' counsel and next steps	1.5
4/24/2019	Teresa Woody	Kansas	Team call, including discussion of local/stakeholder updates	0.6
4/25/2019	Teresa Woody	Kansas	Review Defendants' answer to complaint	1.2
4/26/2019	Teresa Woody	Kansas	Review 9th Circuit case allowing Medicaid claims	0.7
5/1/2019	Teresa Woody	Kansas	Conference with B.M. re KORA request to KDADS re PRTF report	0.4
5/2/2019	Teresa Woody	Kansas	Team call, including re: Defendants' answer, possible amendments to complaint, and settlement strategy	0.9
5/2/2019	Teresa Woody	Kansas	Review legal research re motions to dismiss governor from claims	1.4
5/7/2019	Teresa Woody	Kansas	Review Court Order re initial scheduling, circulate local Rule 26 forms	0.4
5/8/2019	Teresa Woody	Kansas	Team call, including discussion of scheduling order, complaint amendments, and terms sheet	0.9
5/8/2019	Teresa Woody	Kansas	Review legal research re opposition to MTD	0.7
5/8/2019	Teresa Woody	Kansas	confer with B.M. and LBB re same re analysis initial settlement terms ;	0.5
5/9/2019	Teresa Woody	Kansas	Follow up on intake information re. biological parent with info re treatment of two children in the system	0.4
5/9/2019	Teresa Woody	Kansas	Review research from NHELP re potential amendments to Medicaid claims	0.6
5/9/2019	Teresa Woody	Kansas	Review notes of LW call with defense counsel Campbell	0.5
5/13/2019	Teresa Woody	Kansas	draft initial of plaintiffs' Rule 26 disclosures	3.1

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5/13/2019	Teresa Woody	Kansas	Emails with team re local practice re Rule 26 disclosures, deadlines, court willingness to move date of scheduling conference	0.7
5/14/2019	Teresa Woody	Kansas	Confer with team re defendants' failure to produce named plaintiff files and broad theory of redaction for formulating position	0.6
5/14/2019	Teresa Woody	Kansas	Meet with LR, MH, and LBB re Plaintiffs' Rule 26 Disclosures	1.5
5/14/2019	Teresa Woody	Kansas	Conference with QR re individuals to include in Plaintiffs' Rule 26 disclosures	0.5
5/14/2019	Teresa Woody	Kansas	Review and revise final settlement term sheet;	0.7
5/15/2019	Teresa Woody	Kansas	Conference with Christina Ostmeier and Mike Fonkert re intakes and potential witnesses	1
5/15/2019	Teresa Woody	Kansas	Team call, including re: scheduling conference, term sheet, and complaint amendments	1
5/15/2019	Teresa Woody	Kansas	Review proposed amended complaint	1.2
5/15/2019	Teresa Woody	Kansas	Review revised settlement term sheet	0.5
5/16/2019	Teresa Woody	Kansas	Conference with Christina Ostmeier re intakes and response to article	0.5
5/16/2019	Teresa Woody	Kansas	Email from SD re fact witness re one night placement	0.1
5/17/2019	Teresa Woody	Kansas	Review notes from SD re potential additional plaintiffs	0.4
5/17/2019	Teresa Woody	Kansas	Review KDADS draft report on PRTFs	0.7
5/20/2019	Teresa Woody	Kansas	Conference with team re addition of new plaintiff	0.4
5/20/2019	Teresa Woody	Kansas	Emails to confer with team re timing of amendment adding additional plaintiffs	0.5
5/20/2019	Teresa Woody	Kansas	Emails re reviews of KDADS PRTF draft report and outline potential admissions	0.9
5/20/2019	Teresa Woody	Kansas	Telephone conference with medicaid stakeholders re Medicaid claims	0.6
5/21/2019	Teresa Woody	Kansas	Emails with Ms. Lomas re dates for Rule 26(f) conference and initial disclosures	0.2
5/21/2019	Teresa Woody	Kansas	Emails re review of term sheet to be submitted to defendants	0.2
5/21/2019	Teresa Woody	Kansas	Review of Court's order setting scheduling conference	0.1
5/21/2019	Teresa Woody	Kansas	Email to defendants with agenda for meet and confer	0.2
5/22/2019	Teresa Woody	Kansas	Team call, including discussion of new clients, term sheet, and Medicaid claim	1
5/23/2019	Teresa Woody	Kansas	Email defendants' re recap of 4/21 meet and confer	0.3
5/28/2019	Teresa Woody	Kansas	Review emails from source stakeholder, potential witness against DCF and KVc	2
5/29/2019	Teresa Woody	Kansas	Team call, including re: case scheduling, adding plaintiffs, and discovery strategy	0.8
5/29/2019	Teresa Woody	Kansas	Emails re transmittal of settlement terms to defendants	0.2
5/31/2019	Teresa Woody	Kansas	Emails with defendants' counsel re Rule 26 (f) conference	0.5
6/5/2019	Teresa Woody	Kansas	Weekly call with counsel re strategy on discovery request planning	1
6/5/2019	Teresa Woody	Kansas	Team call re medicaid issues, discovery strategy	0.4
6/5/2019	Teresa Woody	Kansas	Confer with team re term sheet, initial disclosures, RFPs, and case file reviews	0.5
6/5/2019	Teresa Woody	Kansas	Email from SD re new plaintiffs	0.1
6/5/2019	Teresa Woody	Kansas	Emails with defendants' counsel re Rule 26 (f) conference	0.5
6/7/2019	Teresa Woody	Kansas	Emails re new attorney at Barber Emerson and potential for conflicts	0.5

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6/10/2019	Teresa Woody	Kansas	Emails re use of pseudonyms	0.1
6/10/2019	Teresa Woody	Kansas	Review complaint and analyze possibility of preliminary injunction	2.2
6/11/2019	Teresa Woody	Kansas	Emails from SD re new plaintiffs	0.2
6/12/2019	Teresa Woody	Kansas	Team call, including discussion of possible preliminary injunction motion and discovery management	0.7
6/12/2019	Teresa Woody	Kansas	Outline potential 30(b)(6) topics	2.1
6/12/2019	Teresa Woody	Kansas	Emails with BM re KORA requests to DCF and strategy	0.3
6/12/2019	Teresa Woody	Kansas	Emails re delinquency of production of files and potential meet and confer	0.3
6/12/2019	Teresa Woody	Kansas	Review draft file review protocol for plaintiffs' files	0.4
6/13/2019	Teresa Woody	Kansas	Review child welfare article written by potential local expert	0.4
6/13/2019	Teresa Woody	Kansas	TCW potential witness - bio parent with evidence of churning of placement and office stays	0.6
6/15/2019	Teresa Woody	Kansas	Meeting stakeholders re Kansas intersection of child welfare and Kansas medicaid	1.6
6/15/2019	Teresa Woody	Kansas	Research background of potential local experts re medicaid	1.4
6/18/2019	Teresa Woody	Kansas	Emails re defendants' production of plaintiff files	0.2
6/18/2019	Teresa Woody	Kansas	Review draft RFPs re placement, caseworkers, and CFSR	1.5
6/19/2019	Teresa Woody	Kansas	Team call, including re: 30(b)(6) notice, RFPs, initial disclosures, case file review, and possible preliminary injunction motion	1.2
6/19/2019	Teresa Woody	Kansas	Review FP notes of meeting with stakeholders re discovery info	0.4
6/20/2019	Teresa Woody	Kansas	Review draft of case schedule	0.5
6/20/2019	Teresa Woody	Kansas	Review NCYL's edits to initial disclosures	0.5
6/21/2019	Teresa Woody	Kansas	Emails re locating mental health/medicaid expert	0.2
6/21/2019	Teresa Woody	Kansas	Review draft proposed case schedule; comments re same	0.9
6/22/2019	Teresa Woody	Kansas	TCW stakeholders re Kansas Medicaid and caseworker/contractor issues	1.5
6/22/2019	Teresa Woody	Kansas	Review draft RFPs re individual plaintiffs, contractor and MCO oversight	1
6/24/2019	Teresa Woody	Kansas	Draft notes re 6/22 meeting with stakeholders on medicaid system issues	0.7
6/24/2019	Teresa Woody	Kansas	Review and revise RFPs, and circulate	1.5
6/24/2019	Teresa Woody	Kansas	Emails re local practice re scheduling order	0.4
6/25/2019	Teresa Woody	Kansas	TCW with LBB re meeting with foster care and adoption advocate	0.4
6/25/2019	Teresa Woody	Kansas	Review draft of parties' planning conference report and further comment	1.1
6/26/2019	Teresa Woody	Kansas	Team call, including re: 26(f) conference and statement, prospective mediators, and discovery	1.2
6/26/2019	Teresa Woody	Kansas	Emails with IL and LW re 26(f) meeting strategy	0.2
6/26/2019	Teresa Woody	Kansas	Review finalized initial disclosures and documents to be produced at 26 (f) meeting, ESI protocol, Planning Report, and proposed schedule	2.1
6/26/2019	Teresa Woody	Kansas	Review draft ESI protocol	0.8
6/26/2019	Teresa Woody	Kansas	Review and comment/revise outline for 26(f) meeting	1.2

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6/26/2019	Teresa Woody	Kansas	Review CR's edits to initial disclosures and add additional commetns and edits	1.3
6/26/2019	Teresa Woody	Kansas	Review revisions to RFPs	0.7
6/26/2019	Teresa Woody	Kansas	Review draft of 30(b)(6) notice	0.5
6/27/2019	Teresa Woody	Kansas	Confer with LW and MN re proposed scheduling dates	0.5
6/27/2019	Teresa Woody	Kansas	Rule 26(f) meeting with defendants' counsel	2.2
6/27/2019	Teresa Woody	Kansas	Review notes of Rule 26(f) meeting	0.5
6/28/2019	Teresa Woody	Kansas	meeting with local foster Foster Adopt Connect, LBB, and team members	3.3
7/1/2019	Teresa Woody	Kansas	finalize, transmit initial disclosures to defendants and Court's chambers	2.1
7/1/2019	Teresa Woody	Kansas	Review defendants' initial disclosures	0.7
7/2/2019	Teresa Woody	Kansas	Review and revise final RFPs for service on defendants	1
7/2/2019	Teresa Woody	Kansas	Review 30(b)(6) draft and propose additional topic	0.6
7/7/2019	Teresa Woody	Kansas	Confer with LW re points of disagreement in prep for CMC	0.8
7/7/2019	Teresa Woody	Kansas	Meet with LBB and MN re strategy for CMC	1.5
7/8/2019	Teresa Woody	Kansas	Represent plaintiffs in CMC	1
7/8/2019	Teresa Woody	Kansas	Debrief with team re CMC	1
7/8/2019	Teresa Woody	Kansas	Confer with LJ re potential foster care witness	0.4
7/8/2019	Teresa Woody	Kansas	Meet with LBB, LW, and MN in prep for CMC	0.5
7/8/2019	Teresa Woody	Kansas	Review outline and documents in prep for CMC	1
7/9/2019	Teresa Woody	Kansas	Review ESI Order	0.3
7/9/2019	Teresa Woody	Kansas	Review Scheduling Order and calendar	0.6
7/12/2019	Teresa Woody	Kansas	Team call, including re: scheduling conference & order, complaint amendment, and stakeholder interviews	1.3
7/16/2019	Teresa Woody	Kansas	Confer with LW re mediator and approach to mediation	0.3
7/16/2019	Teresa Woody	Kansas	Confer with LR re number of mediators to use	0.6
7/16/2019	Teresa Woody	Kansas	Review defendants good faith mediation counter-proposal and IL's comments	0.6
7/17/2019	Teresa Woody	Kansas	Team call, including re: mediation, 30(b)(6) notice, and stakeholder conversations	0.9
7/17/2019	Teresa Woody	Kansas	Confer with IL, LW and DS re potential response to defendants' settlement "proposal", and potential mediators	0.5
7/18/2019	Teresa Woody	Kansas	Review and edit draft 30(b)(6) notices;	1.4
7/22/2019	Teresa Woody	Kansas	Confer w LW re Review of defendants' request to extend time to produce documents until September 3;	0.5
7/22/2019	Teresa Woody	Kansas	Email from IL re potential expert re effect of trauma on brain development in children in foster care	0.2
7/22/2019	Teresa Woody	Kansas	Research re potential subpoena duces tecum on KVC and St. Francis, and other contractors	1.3
7/23/2019	Teresa Woody	Kansas	Review and edit draft of third-party subpoenas duces tecum	2.2

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7/24/2019	Teresa Woody	Kansas	Team call, including re: mediation, experts, discovery, and information from stakeholders	0.9
7/25/2019	Teresa Woody	Kansas	Emails from Mr. Campbell re discovery issues; request for extensions of deadlines	0.5
7/26/2019	Teresa Woody	Kansas	Review and revise response to Campbell re discovery issues;	0.6
7/28/2019	Teresa Woody	Kansas	TCW w potential foster care / bio parent witness	0.8
7/29/2019	Teresa Woody	Kansas	Review spreadsheet of defendants' counterproposal where they did not respond to plaintiffs	0.4
7/29/2019	Teresa Woody	Kansas	confer with MH and LBB re KS Child Welfare Task Force Progress Report;	0.6
7/30/2019	Teresa Woody	Kansas	Review CR revisions to 3rd Party subpoenas	1
7/31/2019	Teresa Woody	Kansas	Team call, including re: mediation, discovery, and Task Force	0.7
7/31/2019	Teresa Woody	Kansas	Draft and circulate email to Mr. Campbell re defendants' delayed discovery	0.4
7/31/2019	Teresa Woody	Kansas	Review report from KS Child Welfare Task Force	1.3
8/1/2019	Teresa Woody	Kansas	Reviewing potential mediators and CV	0.5
8/6/2019	Teresa Woody	Kansas	Review recently approved child welfare settlement on related claims	1
8/7/2019	Teresa Woody	Kansas	Team call, including re: work plan, ADR, complaint amendment, and discovery	0.7
8/7/2019	Teresa Woody	Kansas	Meeting with MH and LBB in prep for LBB meeting with local foster care stakeholder, KA	1
8/7/2019	Teresa Woody	Kansas	Review recently approved child welfare settlement cont'd re related claims	1
8/7/2019	Teresa Woody	Kansas	Review Named Plaintiff document review protocol	0.3
8/8/2019	Teresa Woody	Kansas	Review and comment re 30(b)(6) notice	1.3
8/9/2019	Teresa Woody	Kansas	TCW LR re Campbell response to proposed mediators	0.6
8/9/2019	Teresa Woody	Kansas	reviewing potential mediators and bios contd	0.5
8/10/2019	Teresa Woody	Kansas	Review KDADS Strategic Plan and testimony re PRTF funding	0.3
8/12/2019	Teresa Woody	Kansas	Email from Campbell accepting Kevin Ryan as a mediator	0.1
8/13/2019	Teresa Woody	Kansas	Draft potential ADR report to Court in light of defendants' delay in responding to plaintiffs' proposed settlement terms	0.9
8/14/2019	Teresa Woody	Kansas	Team call, including re: ADR, discovery, and complaint amendment	0.8
8/14/2019	Teresa Woody	Kansas	Revise 30(b)(6) notice to include initiatives and implementation that defendants claim to be currently involved in	0.7
8/14/2019	Teresa Woody	Kansas	Emails re mediation strategy	0.2
8/14/2019	Teresa Woody	Kansas	reviewing motion to amend complaint and memo in support	0.3
8/14/2019	Teresa Woody	Kansas	Emails re defendants' response/refusal to address plaintiffs' request for statewide assessment and agreement to interim relief	0.4
8/14/2019	Teresa Woody	Kansas	Review KS Guidance re LGBTQ foster children relating re possible settlement issues	1.3
8/15/2019	Teresa Woody	Kansas	Draft email to defendants' counsel re failure to respond to settlement terms	0.4
8/15/2019	Teresa Woody	Kansas	Meet with LBB, SD, LW, MH re strategy re mediation and continued discovery	1.2

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8/15/2019	Teresa Woody	Kansas	Review email from IL and MN re complaint amendments and review cited cases	2
8/15/2019	Teresa Woody	Kansas	Review Legislative budget issues re inclusion in 30(b)(6) topics	0.4
8/15/2019	Teresa Woody	Kansas	Review foster care re-entry numbers from June 2018 -2019	0.2
8/16/2019	Teresa Woody	Kansas	Revise 30(b)(6) notice Topic VI	0.4
8/16/2019	Teresa Woody	Kansas	Review 10th Cir cases re complaint amendment	0.5
8/19/2019	Teresa Woody	Kansas	Review and approve defendants' draft of ADR report to Court	0.3
8/19/2019	Teresa Woody	Kansas	Review state documents re foster care initiatives on KS public websites re mediation	2.3
8/20/2019	Teresa Woody	Kansas	Emails re strategy to filing amended complaint	0.2
8/20/2019	Teresa Woody	Kansas	Review info re St. Francis caseworker accused of sex crimes	0.3
8/21/2019	Teresa Woody	Kansas	TCW with IL and LW re mediation strategy	0.5
8/21/2019	Teresa Woody	Kansas	Team call, including re: complaint amendment, ADR, communications strategy, and discovery	0.9
8/21/2019	Teresa Woody	Kansas	Research and circulate D.Kan and 10th Cir. caselaw re change of class definition	0.6
8/21/2019	Teresa Woody	Kansas	Review factual assertions re new named plaintiffs	0.8
8/22/2019	Teresa Woody	Kansas	Review and sign off on Mediation Agreement	0.3
8/23/2019	Teresa Woody	Kansas	Emails with LW and IL re amended complaint strategy	0.4
8/23/2019	Teresa Woody	Kansas	Review and sign off on 30(b)(6) notice; send to defendants	0.6
8/25/2019	Teresa Woody	Kansas	Email from SD re stakeholder contact summary	0.2
8/26/2019	Teresa Woody	Kansas	Email from SD re contacts re stakeholder contact summary	0.4
8/26/2019	Teresa Woody	Kansas	Research re rebid of contracts with privatized foster care entities	1
8/27/2019	Teresa Woody	Kansas	Review and revise early draft of mediation statement	0.8
8/28/2019	Teresa Woody	Kansas	Team call, including re: ADR, amended complaint, local updates	0.9
8/28/2019	Teresa Woody	Kansas	Confer with PJ and LW regarding call with defendants' counsel	0.2
8/28/2019	Teresa Woody	Kansas	TCW defendants' counsel re production of documents and requests re further extensions	0.8
8/28/2019	Teresa Woody	Kansas	Review and comment on updated draft amended complaint	1
8/29/2019	Teresa Woody	Kansas	Emails with LW re priorities in conference call with defendants' counsel	0.2
8/29/2019	Teresa Woody	Kansas	Review SD stakeholder memo summaries contd	0.5
8/30/2019	Teresa Woody	Kansas	Review and finalize motion to amend and attached first amended complaint	2.5
8/30/2019	Teresa Woody	Kansas	Draft letter to defendants' counsel re issues with discovery	2.8
8/30/2019	Teresa Woody	Kansas	Draft and email proposed order re motions to Court	0.6
9/3/2019	Teresa Woody	Kansas	Revise motion for extension	0.4
9/3/2019	Teresa Woody	Kansas	Emails with defense counsel re motion for extension to produce documents	0.2
9/3/2019	Teresa Woody	Kansas	Email re defendants' production of VA documents	0.1
9/3/2019	Teresa Woody	Kansas	Emails with defense counsel re pseudonyms for new plaintiffs	0.2
9/3/2019	Teresa Woody	Kansas	Review defendants' motion for extension	0.2

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9/3/2019	Teresa Woody	Kansas	Review notice of errata and corrected amended complaint	0.4
9/4/2019	Teresa Woody	Kansas	Team call, including re: notice of errata for FAC, 30(b)(6), and ADR	1
9/4/2019	Teresa Woody	Kansas	Draft summary of conversation with stakeholder / provider	0.4
9/4/2019	Teresa Woody	Kansas	Emails re number of kids in office stays for mediation	0.5
9/4/2019	Teresa Woody	Kansas	Telephone call from stakeholder provider employee re conditions of foster care system, potential witness	1.2
9/5/2019	Teresa Woody	Kansas	Review letter from stakeholder provider employee foster care conditions	0.6
9/6/2019	Teresa Woody	Kansas	Emails re filing amended complaint after Court order granting motion	0.2
9/6/2019	Teresa Woody	Kansas	Review letter from defense counsel re defendants' redaction procedures	0.3
9/6/2019	Teresa Woody	Kansas	confer with LJ and QR on info from stakeholder intake	0.2
9/6/2019	Teresa Woody	Kansas	Review and comment on defendants' letter responding to plaintiffs' inquiry re redaction	0.5
9/9/2019	Teresa Woody	Kansas	Review, analyze, and annotate draft mediation statement and exhibits	3.1
9/10/2019	Teresa Woody	Kansas	Cont. review and annotation of mediation statement and exhibits	2.1
9/11/2019	Teresa Woody	Kansas	Team call, re: mediation statement, discovery, experts	0.8
9/11/2019	Teresa Woody	Kansas	Review named plaintiff documents discussing kid zones	1
9/12/2019	Teresa Woody	Kansas	Confer with LW, IL and DLA re case strategy in mediation	0.7
9/12/2019	Teresa Woody	Kansas	Confer with CO re intake stakeholder with foster parent	0.4
9/12/2019	Teresa Woody	Kansas	Review CV of potential expert	3
9/13/2019	Teresa Woody	Kansas	Review LBB notes of intake with potential witness - kin placement	0.2
9/14/2019	Teresa Woody	Kansas	Review article re DCF family first grants to private providers	0.3
9/16/2019	Teresa Woody	Kansas	Review info provided by foster parent stakeholder re one night placements	0.2
9/16/2019	Teresa Woody	Kansas	Review intake foster parent stakeholder, potential witnesses	0.2
9/17/2019	Teresa Woody	Kansas	Review and comment on proposed edits to mediation statement	2.3
9/17/2019	Teresa Woody	Kansas	Review input from foster parent stakeholders re new DCF provider	0.2
9/18/2019	Teresa Woody	Kansas	Team call, including re: ADR, discovery, and experts	1.1
9/18/2019	Teresa Woody	Kansas	Confer with CO re intake re stakeholder in St. Francis system	0.3
9/18/2019	Teresa Woody	Kansas	Emails re defendants' failure to provide documents and respond to discovery	0.2
9/18/2019	Teresa Woody	Kansas	Review medicaid claims info re named plaintiffs	0.4
9/18/2019	Teresa Woody	Kansas	Review NCYL's revisions to mediation statement	0.5
9/20/2019	Teresa Woody	Kansas	Review final mediation statement	0.3
9/21/2019	Teresa Woody	Kansas	TCW LW and IL re mediation strategy	0.5
9/24/2019	Teresa Woody	Kansas	Review Magistrate Judge order in case where DCF objected to production of metadata; circulate and confer with team	0.8
9/24/2019	Teresa Woody	Kansas	Analyze defendants' responses to discovery and draft initial letter to defendants re discovery concerns	1.3
9/25/2019	Teresa Woody	Kansas	Team call, including re: discovery issues, possible KORA request, experts	1

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9/25/2019	Teresa Woody	Kansas	Review intake info from foster parent and former provider worker re night to night placements	0.4
9/26/2019	Teresa Woody	Kansas	Review ct order re withdrawal of Barber Emerson and entry of appearance by Lathrop Gage as counsel for defendants; email from Jean Paul Bradshaw introducing as new counsel and asking for extension of time to answer and respond	0.9
9/26/2019	Teresa Woody	Kansas	Telephone call from JPB re answer; respond with concerns re discovery and further delays	0.8
9/26/2019	Teresa Woody	Kansas	Email co-counsel summary of TCW JPB; confer on response to requests for extensions	0.6
9/27/2019	Teresa Woody	Kansas	Draft response to defendants' new counsel re 10 day extension for answer; forward files 30(b)(6) notice and other discovery	0.7
9/27/2019	Teresa Woody	Kansas	Review intakes info from stakeholder foster parent and bio grandparent	0.4
9/28/2019	Teresa Woody	Kansas	Review intake infor from stakeholder re children in daycare where DCF did not tell parents one of caregivers accused of sexual moestation	0.2
9/28/2019	Teresa Woody	Kansas	Review intake from stakeholder bio grandmother resystem conerns	0.4
9/29/2019	Teresa Woody	Kansas	Email to JPB re conference call with new counsel	0.2
9/30/2019	Teresa Woody	Kansas	Confer with co-counsel re revisions to discovery letter based on entry of new counsel	0.4
9/30/2019	Teresa Woody	Kansas	Intake from stakeholder bio parent re systemic PRTF issues and inapprop use of detention detention for 4 months	0.7
10/1/2019	Teresa Woody	Kansas	TCW co-counsel in prep for discovery call with new defense counsel	0.3
10/1/2019	Teresa Woody	Kansas	TCW with new defense counsel and co-counsel	1
10/1/2019	Teresa Woody	Kansas	Conference with co-counsel re dates to reschedule mediation	0.4
10/1/2019	Teresa Woody	Kansas	Emails with co-counsel re call with new defense counsel	0.2
10/1/2019	Teresa Woody	Kansas	Review revisions to letter re discovery issues	0.5
10/2/2019	Teresa Woody	Kansas	Team call, including re: discovery letter, mediation, amended 30(b)(6), and potential experts	1
10/2/2019	Teresa Woody	Kansas	Draft email to defense counsel re mediation; confer-co- counsel re same	0.4
10/2/2019	Teresa Woody	Kansas	Review draft amended 30(b)(6) notice	0.5
10/3/2019	Teresa Woody	Kansas	Emails re co-counsel call in prep for call with the mediator	0.2
10/3/2019	Teresa Woody	Kansas	Emails re rescheduling mediation for 11/12	0.3
10/3/2019	Teresa Woody	Kansas	Review email from JPB in response to email transmitting discovery letter and attachments and amended 30(b)(6) notice	0.2
10/4/2019	Teresa Woody	Kansas	Call with co-counsel re potential experts	0.8
10/7/2019	Teresa Woody	Kansas	Emails among co-counsel re issues to be discussed with mediator	0.4
10/7/2019	Teresa Woody	Kansas	Review mediation materials in prep for plaintiffs' call with mediator	1.2

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10/8/2019	Teresa Woody	Kansas	Plaintiffs only call with mediator	1.4
10/8/2019	Teresa Woody	Kansas	Review Defendants' motion for leave to file answer to amended complaint and attached answer	1.4
10/8/2019	Teresa Woody	Kansas	Telephone calls to/from defendants' counsel re defendants' failure to answer amended complaint	0.7
10/9/2019	Teresa Woody	Kansas	Team meeting re defs answer, statement of non-opp, ADR, discovery incl ESI	0.8
10/9/2019	Teresa Woody	Kansas	confer with co-counsel not objecting to defendants' motion to file answer day late	0.3
10/11/2019	Teresa Woody	Kansas	Review research re different approaches to settlement frames in child welfare cases	1
10/14/2019	Teresa Woody	Kansas	Intake with stakeholder former foster parent and social worker re safety issues in care, potential witness	0.7
10/15/2019	Teresa Woody	Kansas	Emails re meeting with defense counsel re ESI issues	0.4
10/15/2019	Teresa Woody	Kansas	Research re class cert in similar child welfare litigation	0.7
10/16/2019	Teresa Woody	Kansas	Confer with co-counsel in prep for ESI meeting	0.8
10/16/2019	Teresa Woody	Kansas	ESI conference with defendants' counsel	0.5
10/16/2019	Teresa Woody	Kansas	Team phone call re discovery, mediation, etc.	0.5
10/16/2019	Teresa Woody	Kansas	Confer with co-counsel re potential spoliation issues	0.4
10/16/2019	Teresa Woody	Kansas	Review spreadsheets fact summaries re documents for two named plaintiffs	0.5
10/17/2019	Teresa Woody	Kansas	Review defendants' position and outline plaintiffs' response to overbroad redaction protocol	1.4
10/17/2019	Teresa Woody	Kansas	Draft and send to defendants' counsel follow up email re ESI and discovery issues discussed on 10/16	1.3
10/17/2019	Teresa Woody	Kansas	Review intake stakeholder foster child's neighbor re systemic problems in the system	0.3
10/18/2019	Teresa Woody	Kansas	TCW with stakeholder foster parent re KVC and problems within the system -- failure to monitor that \$\$ provided are actually spent on children; inability of contractors to meet requirements, no oversight by DCF	2
10/18/2019	Teresa Woody	Kansas	Review stakeholder intake re bio parent concerns with foster care issue in case	0.2
10/18/2019	Teresa Woody	Kansas	Review and analyze protective order in light of defendants' redaction procedures;	0.9
10/18/2019	Teresa Woody	Kansas	Review of responses and objections to RFPs	3.8
10/21/2019	Teresa Woody	Kansas	Review materials provided to potential expert on medicaid issues	1
10/22/2019	Teresa Woody	Kansas	Review annotated First Amended Complaint	2
10/22/2019	Teresa Woody	Kansas	Review information in prep for meeting with potential experts	0.6
10/23/2019	Teresa Woody	Kansas	Co-counsel call re discovery, ADR, meetings with experts, etc	0.7
10/23/2019	Teresa Woody	Kansas	Confer with MN and LBB in preparation for meeting with potential experts	1
10/23/2019	Teresa Woody	Kansas	Meeting with MN, LW, LBB, and LR with two potential expert witnesses	5.8

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10/24/2019	Teresa Woody	Kansas	Draft letter to defendants' counsel re meet and confer re production and other discovery issues	1.1
10/25/2019	Teresa Woody	Kansas	Emails from mediator re defendants' good faith settlement proposal and response	0.4
10/25/2019	Teresa Woody	Kansas	Review intake of stakeholder former foster parents with information regarding problems with system	0.2
10/26/2019	Teresa Woody	Kansas	Review defendants' motion to dismiss governor for lack of jurisdiction and memo in support and review specific case law	2.1
10/28/2019	Teresa Woody	Kansas	Co-counsel strategy meeting with DLA Piper	1.9
10/30/2019	Teresa Woody	Kansas	Call with co-counsel re MTD, discovery and ADR	1.3
10/30/2019	Teresa Woody	Kansas	Draft email to JPB regarding defendants' failure to respond to plaintiffs' request for a meet and confer re discovery issues	0.7
10/30/2019	Teresa Woody	Kansas	clarifying last date of defendants' production and number of documents produced	0.2
10/31/2019	Teresa Woody	Kansas	Email to JPB re meet and confer	0.6
10/31/2019	Teresa Woody	Kansas	Email to defendants' counsel re protective order	0.1
10/31/2019	Teresa Woody	Kansas	Review letter from defendants re redactions and other production problems	0.4
11/1/2019	Teresa Woody	Kansas	Confer with co-counsel in prep for meet and confer	0.4
11/1/2019	Teresa Woody	Kansas	Debrief of meet and confer with co-counsel	0.3
11/1/2019	Teresa Woody	Kansas	Meeting with LR in prop for meet and confer with defendants	0.3
11/1/2019	Teresa Woody	Kansas	Meet and confer with defendants' counsel	1.5
11/1/2019	Teresa Woody	Kansas	Review of draft motion for extension re MTD	0.3
11/1/2019	Teresa Woody	Kansas	Review discovery and outline issues for meet and confer	1
11/3/2019	Teresa Woody	Kansas	Draft email to JPB re commitments made in meet and confer	1.6
11/3/2019	Teresa Woody	Kansas	Review alternative drafts of extension for resposne to MTD	0.4
11/4/2019	Teresa Woody	Kansas	Revise and finalize email re meet and confer	0.4
11/5/2019	Teresa Woody	Kansas	Draft Emails re lack of response or acknowledgement from defendants on disc matters and strategy on next steps	0.4
11/6/2019	Teresa Woody	Kansas	Team call re: ADR, MTD, discovery, experts	1
11/6/2019	Teresa Woody	Kansas	Review alternative settlement models -- plaintiffs only conference with mediator Kevin Ryan	1
11/6/2019	Teresa Woody	Kansas	review of notice of deposition to Gov. Kelly; emails re same	0.7
11/6/2019	Teresa Woody	Kansas	Email JPB with deadline of noon Nov. 7 or plaintiffs' will file for extension stating that defendants' have not responded	0.2
11/6/2019	Teresa Woody	Kansas	Review defendants' counsel's response and final motion for extension	0.5
11/7/2019	Teresa Woody	Kansas	Draft motion for extension to file motion to compel and proposed order	0.9
11/7/2019	Teresa Woody	Kansas	Emails re concerns re defendants' failure to provide names or designees or proposed dates for 30(b)(6) topics	0.3
11/7/2019	Teresa Woody	Kansas	Review materials re potential expert former position in litigation	2.1

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11/8/2019	Teresa Woody	Kansas	Mediation prep call with co-counsel	0.9
11/8/2019	Teresa Woody	Kansas	Review and revise response to defendants' email re design of IL/6	0.7
11/8/2019	Teresa Woody	Kansas	Review documents alternative settlement models for mediation	1.5
11/11/2019	Teresa Woody	Kansas	Meeting of plaintiffs' counsel to strategize re mediation	2.5
11/11/2019	Teresa Woody	Kansas	Review plaintiffs' settlement terms, mediation statement and related documents, and settlement models in prep for mediation	3.4
11/12/2019	Teresa Woody	Kansas	Pre-mediation meeting of plaintiffs' counsel	1
11/12/2019	Teresa Woody	Kansas	Debrief after mediation	0.6
11/12/2019	Teresa Woody	Kansas	Participate in mediation	8
11/13/2019	Teresa Woody	Kansas	Telephone call from Magistrate's clerk re mediation and response	0.4
11/13/2019	Teresa Woody	Kansas	Meeting with potential expert	2.2
11/13/2019	Teresa Woody	Kansas	Review Court order re postponing mediation report	0.1
11/15/2019	Teresa Woody	Kansas	Team call re: mediation, expert strategy	0.9
11/18/2019	Teresa Woody	Kansas	Meet with LBB and draft settlement prohibitions section, circulate to co-counsel	4.8
11/19/2019	Teresa Woody	Kansas	Continue to draft settlement prohibitions;	2.8
11/19/2019	Teresa Woody	Kansas	Email re strategy on document production issues	0.2
11/20/2019	Teresa Woody	Kansas	Team call, including re: mediation, document production issues, and experts	0.7
11/21/2019	Teresa Woody	Kansas	Draft and circulate email to defendants' counsel re document production deficiencies	0.5
11/21/2019	Teresa Woody	Kansas	Review draft of settlement outcomes and annotate	1.8
11/23/2019	Teresa Woody	Kansas	Review draft process section of settlement agreement	1.5
11/24/2019	Teresa Woody	Kansas	Review draft of all sections of proposed settlement agreement; review IL suggested edits	2.5
11/25/2019	Teresa Woody	Kansas	Review settlement draft re proposed changes	1.5
11/25/2019	Teresa Woody	Kansas	Team call re: settlement drafting strategy	1
11/25/2019	Teresa Woody	Kansas	Review IL suggested changes to settlement draft	0.2
12/2/2019	Teresa Woody	Kansas	TCW co-counsel re settlement/mediation strategy	1.3
12/2/2019	Teresa Woody	Kansas	Review mediator comments on settlement draft	0.8
12/3/2019	Teresa Woody	Kansas	Review LBB comments re mediator's input	0.3
12/3/2019	Teresa Woody	Kansas	Additional review of mediator comments and outline responses	1
12/4/2019	Teresa Woody	Kansas	Team call re mediation strategy	0.9
12/4/2019	Teresa Woody	Kansas	Review co counsel revisions to settlement draft and add additional comments	3.5
12/4/2019	Teresa Woody	Kansas	Review additional edits to settlement draft	0.4
12/5/2019	Teresa Woody	Kansas	Emails re defendants' settlement draft/ strategy	0.2
12/5/2019	Teresa Woody	Kansas	Emails re proposed monitor (neutral) selection	0.2
12/5/2019	Teresa Woody	Kansas	Review defendants' settlement draft	1.3
12/6/2019	Teresa Woody	Kansas	Drafting Mediation follow up to do list re drafting	0.3

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12/6/2019	Teresa Woody	Kansas	Review mediation hot docs from discvoery re strategy on terms	0.5
12/6/2019	Teresa Woody	Kansas	Review discovery letters and emails re defendants' responses re lack of discovery	0.7
12/9/2019	Teresa Woody	Kansas	Review proposed order re 2nd motion for extension to chambers	0.1
12/9/2019	Teresa Woody	Kansas	Review LBB research re extreme recruitment re settlement	0.3
12/10/2019	Teresa Woody	Kansas	Call with co-counsel re defendants' settlement draft	0.9
12/11/2019	Teresa Woody	Kansas	Review of redline of defendants' settlement proposal	0.8
12/12/2019	Teresa Woody	Kansas	Co-counsel call in prep for mediation	0.4
12/12/2019	Teresa Woody	Kansas	Conference with co-counsel and potential expert re brain trauma	2
12/12/2019	Teresa Woody	Kansas	Review hot docs from disvoery in prep for mediaion	0.2
12/12/2019	Teresa Woody	Kansas	Review CV and information re potential expert on brain trauma	0.4
12/12/2019	Teresa Woody	Kansas	Review portions of new DCF policy and procedures manual for mediation	0.4
12/13/2019	Teresa Woody	Kansas	Prep for mediation and outline issues contd	1.5
12/13/2019	Teresa Woody	Kansas	Review defendants' redline of plaintiffs' settlement proposal	2.3
12/13/2019	Teresa Woody	Kansas	Review compilation of hot docs for mediation contd	0.4
12/15/2019	Teresa Woody	Kansas	Debrief re mediation	1
12/15/2019	Teresa Woody	Kansas	attend mediation	7.5
12/15/2019	Teresa Woody	Kansas	Mediation and revised drating w co-counsel	7
12/16/2019	Teresa Woody	Kansas	Mediation and revised drating w co-counsel	7
12/17/2019	Teresa Woody	Kansas	Draft letter to defendants' re targeted discovery re MTD	1.8
12/18/2019	Teresa Woody	Kansas	Team call, including re: mediation, discovery, and motion to stay	0.8
12/18/2019	Teresa Woody	Kansas	Review and revise joint motion for stay for 45 days	0.9
12/18/2019	Teresa Woody	Kansas	Emails re follow up with potential expert re brain trauma	0.2
12/18/2019	Teresa Woody	Kansas	Review draft of settlement with both parties agreements and disagreements and comment	3.6
12/20/2019	Teresa Woody	Kansas	Finalize joint motion for stay	0.5
12/20/2019	Teresa Woody	Kansas	Finalize proposed order on stay	0.4
12/20/2019	Teresa Woody	Kansas	Review and revise ADR report for court	0.5
12/23/2019	Teresa Woody	Kansas	attend conference (Mag) by phone	1
12/23/2019	Teresa Woody	Kansas	Review Email from CJ (defendants' counsel) responding to letter re targeted discovery and attaching list of documents	0.3
12/27/2019	Teresa Woody	Kansas	Reviewing potential neutral and mediator re settlement agreement	0.2
12/29/2019	Teresa Woody	Kansas	Review intake stekholder bio parent, potential witness	0.4
1/5/2020	Teresa Woody	Kansas	Review redline of combined settlement draft	4.2
1/6/2020	Teresa Woody	Kansas	TCW co-counsel re settlement draft and edits	1.5
1/6/2020	Teresa Woody	Kansas	Review docs produced by defendants in response to request for targeted discovery	0.9
1/7/2020	Teresa Woody	Kansas	TCW MN re defendants' docs re MTD and further steps	0.4
1/7/2020	Teresa Woody	Kansas	Review letter re discovery to governor, and revise	2

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1/7/2020	Teresa Woody	Kansas	review Emails from defendants re neutral and mediator	0.4
1/7/2020	Teresa Woody	Kansas	TCW Defendants, co-counsel and Judy Metzler as potential neutral in settlement agreement	1
1/7/2020	Teresa Woody	Kansas	Review draft email transmitting proposed settlement doc to defendants	0.3
1/7/2020	Teresa Woody	Kansas	Review settlement draft for clarity	0.3
1/8/2020	Teresa Woody	Kansas	Email to defendants transmitting draft settlement agreement	0.1
1/8/2020	Teresa Woody	Kansas	Review mails re strategy around neutral and mediator positions	0.4
1/8/2020	Teresa Woody	Kansas	Review Email from JPB re governor's announcement of combining DCF and KDADS	0.2
1/8/2020	Teresa Woody	Kansas	Review and analyze governor's desire to combine DCF and KDADS	0.5
1/9/2020	Teresa Woody	Kansas	TCW PJ re discovery on governor	0.3
1/9/2020	Teresa Woody	Kansas	Review and finalize letter re discovery to governor	0.7
1/9/2020	Teresa Woody	Kansas	Review interview with the governor re changes to foster care system	0.3
1/10/2020	Teresa Woody	Kansas	Confer with co-counsel re discovery to governor	0.4
1/30/2020	Teresa Woody	Kansas	Finalize letter to defendants re discovery to governor	0.9
1/13/2020	Teresa Woody	Kansas	Send Email re lack of response from defendants re neutral and failure to respond to request to meet and confer	0.8
1/13/2020	Teresa Woody	Kansas	Review Email from JPB re defendants hedging on agreement re mediator and mediator role	0.7
1/14/2020	Teresa Woody	Kansas	analyzing strategy on doc to Gov going forward	1.2
1/14/2020	Teresa Woody	Kansas	Review response re discovery from CJ	0.8
1/14/2020	Teresa Woody	Kansas	Analyzing emails corr on logistics of mediation and neutral role	0.6
1/15/2020	Teresa Woody	Kansas	Confer with co-counsel re continued delay by defendants	0.5
1/15/2020	Teresa Woody	Kansas	Team call, including re: mediation strategy, jurisdictional discovery, and discovery planning in advance of stay pending settlement discussions (partial)	0.9
1/15/2020	Teresa Woody	Kansas	Review Gov. Kelly's state of the state address	0.6
1/16/2020	Teresa Woody	Kansas	Draft response to defendants' position re discovery relating to the governor	0.7
1/16/2020	Teresa Woody	Kansas	Review Email from LW to defendants re postponing mediation and defendants' renegeing on neutral agreement	0.1
1/17/2020	Teresa Woody	Kansas	Telephone call from stakeholder re foster care reforms	1.5
1/23/2020	Teresa Woody	Kansas	Team call re: mediation and discovery planning	1.1
1/23/2020	Teresa Woody	Kansas	Review updated mediafion materials	0.5
1/23/2020	Teresa Woody	Kansas	Review work guide for case responsibilities re mediation	0.3
1/24/2020	Teresa Woody	Kansas	Review defendants revisions of proposed settlement document	1.4
1/24/2020	Teresa Woody	Kansas	Review draft of plaintiffs' opposition to MTD	1.1
1/25/2020	Teresa Woody	Kansas	Analyzing info from call with mediator to discuss defendant's revisions to proposed settlement agreement	0.3
1/27/2020	Teresa Woody	Kansas	Email from IL re analysis of defendants' settlement position	0.1

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1/28/2020	Teresa Woody	Kansas	Review IL memo re mediation positions	0.7
1/29/2020	Teresa Woody	Kansas	Team call, including re: mediation and opposition to motion to dismiss	0.8
1/29/2020	Teresa Woody	Kansas	Plaintiffs' call with mediator	0.4
1/29/2020	Teresa Woody	Kansas	Telephone call from stakeholder re foster care system issues	1.5
2/3/2020	Teresa Woody	Kansas	review email from mediator re status of mediation;	0.4
2/3/2020	Teresa Woody	Kansas	Email with LW and IL re case strategy on mediation	0.3
2/3/2020	Teresa Woody	Kansas	Review NCYL's edits to opposition to MTD and draft comments re same	1.4
2/5/2020	Teresa Woody	Kansas	TCW LW and IL re mediation strategy	0.5
2/5/2020	Teresa Woody	Kansas	Team call, including re: mediation, discovery, and opposition to motion to dismiss	0.7
2/5/2020	Teresa Woody	Kansas	Review docs in mediation zip drive in prep for mediation	0.5
2/6/2020	Teresa Woody	Kansas	Review and analyze defendants' guides re where the parties are in agreement and where not in prep for mediation	1.6
2/7/2020	Teresa Woody	Kansas	Meet with co-counsel re mediation prep	1
2/7/2020	Teresa Woody	Kansas	Review IL analysis of defendants' guide	0.1
2/7/2020	Teresa Woody	Kansas	Mediation with mediator and defendants	7.5
2/7/2020	Teresa Woody	Kansas	Review chart of states that meet federal standards for placement	0.4
2/7/2020	Teresa Woody	Kansas	Email QR and review stats on crossover youth or mediation	0.3
2/10/2020	Teresa Woody	Kansas	review Email from mediator re recap and additional mediation dates	0.3
2/12/2020	Teresa Woody	Kansas	Team call, including re: mediation strategy, jurisdictional discovery, and discovery planning in advance of stay pending settlement discussions	1.1
2/12/2020	Teresa Woody	Kansas	Review notes of stakeholder intake with former employee of provider; possible witness	0.4
2/12/2020	Teresa Woody	Kansas	Review clean draft of opposition to motion to dismiss	0.5
2/12/2020	Teresa Woody	Kansas	Review settlement draft with all changes, agreements, and disagreements and attached list of documents referenced by defendants which we need to request	1.1
2/13/2020	Teresa Woody	Kansas	Confer with CO and QR re studies of crossover youth in prep for mediation	0.6
2/14/2020	Teresa Woody	Kansas	Review notice of recusal and case reassignment to Judge Crabtree	0.7
2/14/2020	Teresa Woody	Kansas	Review settlement draft to be shared with defendant	0.4
2/17/2020	Teresa Woody	Kansas	Email from JPB re request for extension to file defendants' reply to MTD	0.4
2/18/2020	Teresa Woody	Kansas	Review intake stakeholder bio parent concerned race is issue in Kansas foster care treatment	0.3
2/18/2020	Teresa Woody	Kansas	TCW pediatrician potential witness and summarize	1.2
2/19/2020	Teresa Woody	Kansas	Team call, including re: mediation, discovery, budget process, and potential witnesses	1
2/21/2020	Teresa Woody	Kansas	Pre-mediation strategy team call	1
2/21/2020	Teresa Woody	Kansas	Emails re plaintiffs strategy on crossover youth and review attachments	0.3
2/23/2020	Teresa Woody	Kansas	Confer with LR re latest settlement draft	0.4

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2/24/2020	Teresa Woody	Kansas	Review alternatives presented by IL, outline thoughts re same in prep for mediation	2.3
2/24/2020	Teresa Woody	Kansas	review proposed settlement documents re potential alt strategy	1.3
2/25/2020	Teresa Woody	Kansas	Confer with co-counsel in prep for mediation	1
2/25/2020	Teresa Woody	Kansas	Review latest offer and outline potential response	1.5
2/25/2020	Teresa Woody	Kansas	Mediation with defendants and mediator	8
2/26/2020	Teresa Woody	Kansas	Analyzing counter-proposal for mediation	2.5
2/26/2020	Teresa Woody	Kansas	Debrief mediation with co-counsel and review discovery strategy	1.7
2/26/2020	Teresa Woody	Kansas	Confer with co-counsel and mediator re deadline to keep proposal open	0.3
2/26/2020	Teresa Woody	Kansas	Mediation with defendants and mediator	3
2/28/2020	Teresa Woody	Kansas	Review 30(b)(6) notice and correspondence with defendants' counsel and draft letter re immediate scheduling of deposition dates	2.3
2/29/2020	Teresa Woody	Kansas	Review and comment on draft of 2nd RFPs and 1st ROGS	3
3/1/2020	Teresa Woody	Kansas	Emails with LW and MN re renewed discovery strategy	1
3/1/2020	Teresa Woody	Kansas	Emails with IL, MN, and LW re case strategy dual track	0.5
3/1/2020	Teresa Woody	Kansas	Review edits to RFPs and ROGS	0.8
3/2/2020	Teresa Woody	Kansas	Review info re Crabtree cert decision	0.2
3/2/2020	Teresa Woody	Kansas	Finalize letters re discovery issues, 2nd RFPs and 1st ROGS,	2.6
3/2/2020	Teresa Woody	Kansas	Review and comment re draft expansive letter re response to defendants' insufficient responses to RFPs	1.8
3/3/2020	Teresa Woody	Kansas	Review interview notes re 65 intakes of contacts with potential claimants and witnesses	4
3/4/2020	Teresa Woody	Kansas	Co-counsel meeting re mediation, ESI, third party discovery, stakeholder/local updates	0.8
3/5/2020	Teresa Woody	Kansas	Initial drafting of subpoenas to contractors	4.1
3/6/2020	Teresa Woody	Kansas	Emails strategy re potential pediatrician expert	0.4
3/6/2020	Teresa Woody	Kansas	Review draft of ESI terms and proposed letter to defendants	0.6
3/9/2020	Teresa Woody	Kansas	Conference with QR re foster care data and additional updated research	1
3/9/2020	Teresa Woody	Kansas	Meeting with former legislator re concerns from governor's office re lawsuit	1.2
3/9/2020	Teresa Woody	Kansas	Summarize and updated local foster care data for team	0.4
3/10/2020	Teresa Woody	Kansas	Meeting with LW and LBB re case strategy concerns	1.2
3/10/2020	Teresa Woody	Kansas	Review memo re potential statistician expert	0.4
3/11/2020	Teresa Woody	Kansas	Co-counsel call re experts, settlement negotiations, discovery	1
3/12/2020	Teresa Woody	Kansas	Emails re defendants' missed discovery deadlines	0.1
3/12/2020	Teresa Woody	Kansas	Review defendants' reply in support of MTD and comments re same	0.6
3/12/2020	Teresa Woody	Kansas	Review defendants' draft of ADR report and comments	0.4
3/12/2020	Teresa Woody	Kansas	Review revisions rd Party subpoenas to MCOs	0.5

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3/13/2020	Teresa Woody	Kansas	Continued work on subpoenas to contractors	2.3
3/13/2020	Teresa Woody	Kansas	Emails re revision to defendants' ADR report	0.1
3/13/2020	Teresa Woody	Kansas	Review memo re continued foster care failures re placement	0.4
3/13/2020	Teresa Woody	Kansas	Review draft of 3rd RFPs and comments	1.1
3/13/2020	Teresa Woody	Kansas	Review COVID recommendations and outline concerns re COVID management re foster care	1.3
3/14/2020	Teresa Woody	Kansas	Research and review CDC guidance re child welfare systems	1
3/16/2020	Teresa Woody	Kansas	Meet with internal team re intake procedures and review potential witnesses	1.5
3/16/2020	Teresa Woody	Kansas	Review D. Kan. AO re COVID procedures	0.2
3/17/2020	Teresa Woody	Kansas	Email re defendants' continued failure to respond to discovery; meet and confer	0.3
3/17/2020	Teresa Woody	Kansas	Review emails re potential expert witness call	0.1
3/17/2020	Teresa Woody	Kansas	Review KS governor EO	0.2
3/18/2020	Teresa Woody	Kansas	Co-counsel call re discovery updates, coronavirus issues, experts, local/stakeholder updates	0.9
3/18/2020	Teresa Woody	Kansas	Review revised letter and ESI terms	0.2
3/19/2020	Teresa Woody	Kansas	Email re defendants' additional missed discovery deadlines	0.1
3/19/2020	Teresa Woody	Kansas	Review and comment re letter to defendants re COVID protocols	0.2
3/20/2020	Teresa Woody	Kansas	Finalize and send letter to defendants re COVID protocol	0.5
3/20/2020	Teresa Woody	Kansas	Draft and circulate letter to defendants re expectations re production of 30(b)(6) witnesses	0.8
3/20/2020	Teresa Woody	Kansas	Review and edit letter re ESI	0.6
3/20/2020	Teresa Woody	Kansas	Email to team re ABAWD waivers available to KS	0.2
3/20/2020	Teresa Woody	Kansas	Emails re concerns about placements during COVID and potential emergency action	0.3
3/23/2020	Teresa Woody	Kansas	Finalize and send letter to defendants re ESI and ESI terms	0.3
3/23/2020	Teresa Woody	Kansas	Review opinion re Arizona foster case class certification	0.7
3/24/2020	Teresa Woody	Kansas	Finalize and prepare third party subpoenas for service	2.7
3/25/2020	Teresa Woody	Kansas	Team call re COVID-19 response, discovery disputes, and experts	0.8
3/25/2020	Teresa Woody	Kansas	Review and comment re letter on COVID protocol	0.3
3/26/2020	Teresa Woody	Kansas	Review and circulate memo on McKinney Vento obligations re learning at home during COVID	0.6
3/27/2020	Teresa Woody	Kansas	Confer with co-counsel re response to defendants' letter re RFPs and discovery	0.4
3/28/2020	Teresa Woody	Kansas	Review HHS memo re COVID protocols for children	0.3
3/30/2020	Teresa Woody	Kansas	Review CV of potential expert on child welfare systems for contract oversight	0.3
3/31/2020	Teresa Woody	Kansas	TCW potential expert on child welfare systems for contract oversight	0.7
4/1/2020	Teresa Woody	Kansas	Email from defendants re covid discovery delay request and confer with co-counsel re same	0.4

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4/1/2020	Teresa Woody	Kansas	Call with co-counsel re COVID-19 response, discovery, experts, and named plaintiffs	0.8
4/1/2020	Teresa Woody	Kansas	Review hot docs summary for mediation	0.8
4/1/2020	Teresa Woody	Kansas	Review reports and opinion of potential expert	0.5
4/1/2020	Teresa Woody	Kansas	Analyze prior emails and correspondence re defendants' discovery to identify all deadlines missed by defendants	1.3
4/1/2020	Teresa Woody	Kansas	Review and edit letter re discovery deficiencies	0.5
4/2/2020	Teresa Woody	Kansas	Draft response to defendants' request for COVID delay in discovery	2.1
4/2/2020	Teresa Woody	Kansas	Review and comment on 4th RFPs	0.8
4/2/2020	Teresa Woody	Kansas	Review docs from defendants' website re COVID protocols	0.4
4/3/2020	Teresa Woody	Kansas	Call with co-counsel re COVID-19 response, discovery, and next friends	1
4/3/2020	Teresa Woody	Kansas	Finalize and send response to defendants and serve 4th RFPs	0.4
4/3/2020	Teresa Woody	Kansas	Emails re next friends re case status	0.5
4/3/2020	Teresa Woody	Kansas	Email to co-counsel re matters to address in next meet and confer	0.2
4/3/2020	Teresa Woody	Kansas	Email to defendants requesting meet and confer	0.7
4/3/2020	Teresa Woody	Kansas	Review subpoenas to MCOs	0.4
4/3/2020	Teresa Woody	Kansas	Review hot docs from defendants' production	0.4
4/4/2020	Teresa Woody	Kansas	Email re potential conflict with medicaid expert	0.2
4/6/2020	Teresa Woody	Kansas	Telephone calls re service of subpoenas to MCOs	0.7
4/7/2020	Teresa Woody	Kansas	Confer with co-counsel re video conference for meet and confer	0.3
4/7/2020	Teresa Woody	Kansas	Review spreadsheet of potential extension dates to scheduling order	0.2
4/8/2020	Teresa Woody	Kansas	Telephone call to court re question re mailed service of subpoenas sufficient because of COVID; telephone call from clerk of D. Kan. re same,	1
4/8/2020	Teresa Woody	Kansas	Call with co-counsel re meet and confer with defendants, discovery issues, next friend/client updates, experts,	1
4/8/2020	Teresa Woody	Kansas	Prep for meet and confer	0.3
4/9/2020	Teresa Woody	Kansas	Finalize subpoenas to MCOs for service	0.3
4/9/2020	Teresa Woody	Kansas	Emails with defendants' counsel re meet and confer	0.2
4/10/2020	Teresa Woody	Kansas	Draft outline re response to defendants' March 25 letter re RFPs	2.1
4/10/2020	Teresa Woody	Kansas	Emails with co-counsel re next friends and status	0.3
4/13/2020	Teresa Woody	Kansas	Confer with co-counsel re named plaintiff who has aged out	0.2
4/13/2020	Teresa Woody	Kansas	Review and edit recap of meet and confer, send to defendants	0.2
4/13/2020	Teresa Woody	Kansas	Review Email from defendants' counsel re last settlement proposal draft	0.1
4/13/2020	Teresa Woody	Kansas	Meet and confer with Defendants re COVID-19 RFPs	0.7
4/14/2020	Teresa Woody	Kansas	Follow up to confirm named plaintiff has aged out	0.1
4/14/2020	Teresa Woody	Kansas	Review letter from defendants in response to April 3 letter re responses to RFPs	0.4
4/15/2020	Teresa Woody	Kansas	Confer with co-counsel re defendants' proposed changes to scheduling order	0.3

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4/15/2020	Teresa Woody	Kansas	Call with co-counsel re discovery meet and confer, named plaintiffs aging out, next friends, and potential experts	1.2
4/16/2020	Teresa Woody	Kansas	Email to defendants re timing for Daubert challenge	0.1
4/16/2020	Teresa Woody	Kansas	Call with co-counsel to prepare for 4/17 meet and confer re discovery issues	1.9
4/16/2020	Teresa Woody	Kansas	Email to defendants' counsel re agenda for 4/17 meet and confer	0.1
4/17/2020	Teresa Woody	Kansas	Meet and confer with defendants re discovery issues	1.5
4/20/2020	Teresa Woody	Kansas	confer with co-counsel re information sought re counsel representing MCO Sunflower Health Plan,	0.3
4/20/2020	Teresa Woody	Kansas	Review defendants additional responses to RFPs	0.5
4/20/2020	Teresa Woody	Kansas	Review and edit recap of 4/17 meet and confer	0.4
4/21/2020	Teresa Woody	Kansas	Meet and confer with defendants re responses to COVID-19 RFPs	0.7
4/21/2020	Teresa Woody	Kansas	Prep with co-counsel for meet and confer	1
4/22/2020	Teresa Woody	Kansas	Call with co-counsel re discovery, experts, next friends	1
4/22/2020	Teresa Woody	Kansas	TCW next friend re lack of COVID protocols in foster placements	0.5
4/22/2020	Teresa Woody	Kansas	Review letter to retain expert	0.1
4/23/2020	Teresa Woody	Kansas	Email defendants' re recap of 4/21 meet and confer	0.3
4/24/2020	Teresa Woody	Kansas	Review Email from counsel representing MCO Amerigroup Kansas	0.1
4/24/2020	Teresa Woody	Kansas	Review defendants' responses to 3rd RFPs	0.5
4/27/2020	Teresa Woody	Kansas	Meet and confer with defendants re ESI search terms	1
4/27/2020	Teresa Woody	Kansas	Prep with co-counsel for meet and confer	0.5
4/28/2020	Teresa Woody	Kansas	TCW counsel for contractor Amerigroup re response to subpoena	0.4
4/29/2020	Teresa Woody	Kansas	Review draft of second motion for extension to file motion to compel	0.2
4/29/2020	Teresa Woody	Kansas	Emails with counsel for Amerigroup Kansas re extension to respond to subpoena	0.2
4/29/2020	Teresa Woody	Kansas	Call with co-counsel re defendants' productions, third party subpoenas, experts, and next friends	1.5
4/29/2020	Teresa Woody	Kansas	Review analysis of defendants' privilege and redaction logs	0.4
4/29/2020	Teresa Woody	Kansas	Review research re confidentiality issues	0.2
4/30/2020	Teresa Woody	Kansas	Email defendants re motion for extension	0.1
4/30/2020	Teresa Woody	Kansas	Email defendants re agenda for meet and confer	0.1
4/30/2020	Teresa Woody	Kansas	Email re missing docs in defendants' production	0.1
5/1/2020	Teresa Woody	Kansas	Email to chambers proposed order re 2nd extension re time to file motion to compel	0.1
5/1/2020	Teresa Woody	Kansas	Call with co-counsel re prep for meet and confer with Defendants and discussion of proposed revisions to case schedule	1.3
5/1/2020	Teresa Woody	Kansas	Meet and confer with defendants regarding discovery issues	1.3
5/1/2020	Teresa Woody	Kansas	Review responses and objections to subpoena duces tecum from Amerigroup	0.4
5/1/2020	Teresa Woody	Kansas	Review defendants' RFPs and ROGs to each named plaintiff	2.3

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5/1/2020	Teresa Woody	Kansas	Review defendants' proposed changes to case schedule	0.3
5/4/2020	Teresa Woody	Kansas	Review draft and edits to email to defendants recapping meet and confer, and send	0.3
5/4/2020	Teresa Woody	Kansas	Review and confer re counterproposal re changes to case schedule	0.4
5/5/2020	Teresa Woody	Kansas	Review defendants' settlement proposal	0.6
5/5/2020	Teresa Woody	Kansas	Review updated list of named plaintiffs who have or will age out	0.2
5/6/2020	Teresa Woody	Kansas	Call with co-counsel re case schedule, meet and confer with Defendants, and settlement strategy	1.2
5/6/2020	Teresa Woody	Kansas	Review updated list of named plaintiffs who have or will age out	0.2
5/7/2020	Teresa Woody	Kansas	Confer with co-counsel re updates counterproposal re case schedule	0.1
5/7/2020	Teresa Woody	Kansas	Review Email from defendants re designee for 30(b)(6) depo	0.1
5/8/2020	Teresa Woody	Kansas	Confer with co-counsel re timeline for resumption of settlement negotiations	0.2
5/8/2020	Teresa Woody	Kansas	Email defendants re agenda for meet and confer	0.1
5/8/2020	Teresa Woody	Kansas	Meet and confer with defendants re discovery issues	0.5
5/8/2020	Teresa Woody	Kansas	Review research re discovery to minors	0.3
5/11/2020	Teresa Woody	Kansas	Telephone call from bio parent stakeholder re injury in group home	0.4
5/11/2020	Teresa Woody	Kansas	Call with co-counsel re response to defendants' latest settlement proposal	2.5
5/11/2020	Teresa Woody	Kansas	Review settlement agreement and identify issues that are unacceptable to plaintiffs	1.4
5/11/2020	Teresa Woody	Kansas	Consider language in settlement agreement to prevent short term placements	0.2
5/12/2020	Teresa Woody	Kansas	Email defendants with recap of 3/8 meet and confer	0.2
5/12/2020	Teresa Woody	Kansas	Review plaintiffs' draft settlement doc in response to defendants' proposal	0.5
5/13/2020	Teresa Woody	Kansas	Call with co-counsel re settlement, depositions, and responding to Defendants' discovery requests	1.3
5/13/2020	Teresa Woody	Kansas	Review Email from defendants re amended scheduling order	0.1
5/14/2020	Teresa Woody	Kansas	Discussion with co-counsel re proposal regarding short term placement language	0.4
5/14/2020	Teresa Woody	Kansas	Confer with PJ re compromise to propose on amended scheduling order	0.2
5/14/2020	Teresa Woody	Kansas	Review Update on research re discovery to minors	0.3
5/14/2020	Teresa Woody	Kansas	Review edits to settlement proposal to be sent to defendants	0.2
5/15/2020	Teresa Woody	Kansas	Email to defendants re gaps in COVID production	0.3
5/15/2020	Teresa Woody	Kansas	Email to defendants re extension of time to respond to discovery to named plaintiffs	0.2
5/15/2020	Teresa Woody	Kansas	Email defendants re agenda for meet and confer and proposed amended scheduling order	0.2
5/15/2020	Teresa Woody	Kansas	review Email from defendants purportedly identifying document custodians for KDHE and KDADS	0.3
5/15/2020	Teresa Woody	Kansas	Meet and confer with defendants re discovery issues	0.5

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5/15/2020	Teresa Woody	Kansas	Consider and comment on revised language in settlement agreement	0.2
5/17/2020	Teresa Woody	Kansas	Review article re Kansas withholding \$21 M from contractors and considering how that could affect settlement negotiations	0.4
5/18/2020	Teresa Woody	Kansas	TCW with QR and MH re foster care data re Medicaid claim	1.1
5/18/2020	Teresa Woody	Kansas	Review email agreeing to extension on response to defendants' propounded discovery	0.1
5/20/2020	Teresa Woody	Kansas	Email defendants' counsel re postponement of meet and confer and confirm deposition	0.1
5/20/2020	Teresa Woody	Kansas	Call with co-counsel re discovery, mediation, and experts	1.1
5/21/2020	Teresa Woody	Kansas	Email to defendants re 30(b)(6) issues	0.4
5/22/2020	Teresa Woody	Kansas	Prepare contractor subpoenas duces tecum for service	0.5
5/22/2020	Teresa Woody	Kansas	Review DCF's new contract for placement management system	0.3
5/26/2020	Teresa Woody	Kansas	Review transcript of defendants' 30(b)(6) designee	1.3
5/27/2020	Teresa Woody	Kansas	Call with co-counsel re case schedule, depositions, third party discovery, responding to Defendants' discovery requests, and experts	1
5/28/2020	Teresa Woody	Kansas	Review IL memo in prep for discussion re response to defendants' additional proposals	0.3
5/28/2020	Teresa Woody	Kansas	Review research re aging out named plaintiffs	0.5
5/29/2020	Teresa Woody	Kansas	Call with co-counsel re response to settlement proposal from Defendants	1.5
6/1/2020	Teresa Woody	Kansas	Emails re effect of veto of foster care report card on settlement negotiations	0.3
6/1/2020	Teresa Woody	Kansas	Review settlement proposal in response to defendants' proposal	1
6/1/2020	Teresa Woody	Kansas	Email to JPB re agenda for meet and confer June 5	0.2
6/2/2020	Teresa Woody	Kansas	Review intake notes re potential witnesses	0.5
6/2/2020	Teresa Woody	Kansas	Review revised settlement proposal	0.4
6/3/2020	Teresa Woody	Kansas	Team call re MTD order, settlement prep, and discovery	1
6/3/2020	Teresa Woody	Kansas	Revise and send email to JPB re 30(b)(6) designees	0.2
6/3/2020	Teresa Woody	Kansas	Review and finalize subpoenas to contractors for filing	0.7
6/3/2020	Teresa Woody	Kansas	Review EPSDT data provided by defendants in prep for settlement conference	0.4
6/3/2020	Teresa Woody	Kansas	Review order granting motion to dismiss; co-counsel call re same	0.8
6/4/2020	Teresa Woody	Kansas	Correspond with HPS re service of subpoenas to contractors	0.2
6/4/2020	Teresa Woody	Kansas	Emails to team re questions about EPSDT data	0.2
6/4/2020	Teresa Woody	Kansas	Settlement conference with defendants	5
6/4/2020	Teresa Woody	Kansas	Review counterproposal for settlement	0.9
6/4/2020	Teresa Woody	Kansas	Review settlement proposals and prior mediation notes in prep for mediation	1.3
6/5/2020	Teresa Woody	Kansas	meet and confer with defendants' counsel re same	1
6/5/2020	Teresa Woody	Kansas	Review plaintiffs' revised settlement package	0.5
6/10/2020	Teresa Woody	Kansas	Review revised proposed settlement agreement and submit edits	1.1

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6/10/2020	Teresa Woody	Kansas	review letter from counsel for contractor KVC	0.1
6/10/2020	Teresa Woody	Kansas	Settlement conference with Defendants	3
6/10/2020	Teresa Woody	Kansas	Review memo re potential witness re contractors	0.1
6/10/2020	Teresa Woody	Kansas	Review memo re potential next friend	0.1
6/10/2020	Teresa Woody	Kansas	Review and comment on proposed definitions in settlement agreement and new settlement agreement language	0.9
6/11/2020	Teresa Woody	Kansas	Settlement conference with defendants	3
6/12/2020	Teresa Woody	Kansas	Letter from counsel for contractor Amerigroup	0.1
6/12/2020	Teresa Woody	Kansas	Review talking points re settlement	0.1
6/15/2020	Teresa Woody	Kansas	Confer with external counsel re D. Kan. preliminary approval motions; review and circulate same	0.7
6/16/2020	Teresa Woody	Kansas	Review suggested changes to settlement language provided by agreed upon neutral;	0.3
6/16/2020	Teresa Woody	Kansas	Review draft of stip re dismissal of aged out named plaintiffs	0.1
6/17/2020	Teresa Woody	Kansas	Call with co-counsel re settlement and stay of discovery	1.2
6/17/2020	Teresa Woody	Kansas	TCW counsel for contractor St. Francis Ministries re discovery stay	0.3
6/17/2020	Teresa Woody	Kansas	confer with co-counsel re attachment to settlement	2
6/17/2020	Teresa Woody	Kansas	TCW counsel for contractor Cornerstones of Care re discvoery stay	0.3
6/17/2020	Teresa Woody	Kansas	Review contractor motion for extension of time to produce documents and respond	0.2
6/18/2020	Teresa Woody	Kansas	review Emails from counsel for contractors re business record production	0.3
6/18/2020	Teresa Woody	Kansas	Settlement conference with defendants	1
6/18/2020	Teresa Woody	Kansas	Review draft email confirming call with defendants and edit	0.2
6/18/2020	Teresa Woody	Kansas	Review settlement agreement with neutral's changes	0.1
6/22/2020	Teresa Woody	Kansas	Call with co-counsel and neutral re settlement agreement	0.6
6/22/2020	Teresa Woody	Kansas	Call with co-counsel and mediator re settlement agreement	0.5
6/23/2020	Teresa Woody	Kansas	Confer with co-counsel re defendants' email requesting change in language to the settlement	1.2
6/23/2020	Teresa Woody	Kansas	Review Emails re deposition of Ms. Kline	0.1
6/23/2020	Teresa Woody	Kansas	Prep for call with Judge Crabtree	0.4
6/23/2020	Teresa Woody	Kansas	TCW Judge Crabtree, co-counsel and defendants' counsel re case status	0.3
6/23/2020	Teresa Woody	Kansas	Review Harper preliminary approval papers and order (Crabtree case), at Court's suggestion	1
6/24/2020	Teresa Woody	Kansas	Call with co-counsel re AG's proposed settlement revisions	1.6
6/24/2020	Teresa Woody	Kansas	Review other settlements for SFC approval and research re tort settlement statutes;	2.4
6/24/2020	Teresa Woody	Kansas	Review, revise, email to defendants' re AG request for approval by SFC	0.2

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6/25/2020	Teresa Woody	Kansas	Emails with co-counsel about need to continue with discovery until settlement is approved	0.2
6/25/2020	Teresa Woody	Kansas	Review defendants' response re change to settlement language	0.1
6/26/2020	Teresa Woody	Kansas	Draft and send email to defendants re continuation of discovery	0.2
6/27/2020	Teresa Woody	Kansas	Emails re strategy re SFC approval	0.4
6/29/2020	Teresa Woody	Kansas	TCW Defendants' counsel re continued discovery	0.3
6/29/2020	Teresa Woody	Kansas	Call with co-counsel re third-party discovery	0.5
6/29/2020	Teresa Woody	Kansas	TCW with third party contractor counsel re extension regarding production of documents	0.4
6/30/2020	Teresa Woody	Kansas	Co-counsel call re next steps in settlement approval/SFC	0.6
6/30/2020	Teresa Woody	Kansas	Confer with team re issue without final settlement language for SFC meeting	1
7/1/2020	Teresa Woody	Kansas	Team call re next steps re settlement approval, dismissal of aged out Named Plaintiffs, preliminary approval motion, and press strategy	1.1
7/1/2020	Teresa Woody	Kansas	Review defendants' communication re next steps and SFC hearing;	0.5
7/1/2020	Teresa Woody	Kansas	Review and edit stipulation with counsel for contractors re subpoenas	0.5
7/1/2020	Teresa Woody	Kansas	Review approval declarations from MO litigation	0.4
7/2/2020	Teresa Woody	Kansas	Draft and circulate email to Judge Crabtree; email to defendants	0.3
7/6/2020	Teresa Woody	Kansas	draft/edit Email to defendants re will not accept new language in settlement	0.2
7/6/2020	Teresa Woody	Kansas	Review of preliminary approval papers and comment re same	1.7
7/7/2020	Teresa Woody	Kansas	Confer re timing of filing to dismiss aged-out named plaintiffs	0.2
7/7/2020	Teresa Woody	Kansas	Review edits to preliminary approval papers	0.8
7/7/2020	Teresa Woody	Kansas	Email re AG acceptance of plaintiffs' alternative language	0.1
7/8/2020	Teresa Woody	Kansas	Confirm re AG has attached incorrect settlement agreement to SFC and contact defendants' counsel re same	0.3
7/8/2020	Teresa Woody	Kansas	Co-counsel call re State Finance Council hearing; dismissals of aged out named plaintiffs; press release; preliminary approval motion	1
7/8/2020	Teresa Woody	Kansas	Follow SFC meeting on audio	2.5
7/8/2020	Teresa Woody	Kansas	Receive and review settlement agreement; gather signatures and file	1.1
7/9/2020	Teresa Woody	Kansas	Confer with MN, LBB and MH re settlement and SFC	0.5
7/9/2020	Teresa Woody	Kansas	Emails to third party contractors and MCOs re stand down on subpoenas b/c of settlement	0.5
7/10/2020	Teresa Woody	Kansas	Draft email to defendants re July 10 status conference	0.1
7/15/2020	Teresa Woody	Kansas	Team call, including re: preliminary approval, RR's case file, fee motion, and Appleseed briefings on settlement	1.5
7/16/2020	Teresa Woody	Kansas	Draft declaration in support of motion for preliminary approval	3.1
7/20/2020	Teresa Woody	Kansas	Review LR's declaration; incorporate into Kansas Appleseed declaration	0.9

MB v. Howard**Kansas Appleseed's Itemized Time Entries**

7/22/2020	Teresa Woody	Kansas	Team call re preliminary approval, fee motion, and contact with families and other stakeholders	0.7
7/22/2020	Teresa Woody	Kansas	Revise declaration in support of preliminary approval	0.5
7/24/2020	Teresa Woody	Kansas	Review final of preliminary approval documents and attachments for filing	2