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

<b>M.B.</b> and <b>S.E.</b> through their next friend	
Katharyn McIntyre, <b>R.M.</b> through his next	)
friend Allan Hazlett, C.A. through his next	)
friend Allan Hazlett, <b>E.B.</b> through his next	)
friend Allan Hazlett, J.P. through her next	)
friend Allan Hazlett, <b>Z.Z.</b> through her next	) Case No. 2:18-cv-02617-DDC-GEB
friend Ashley Thorne, and <b>M.A.</b> through his	)
next friend Ashley Thorne, for themselves and	)
those similarly situated,	)
	)
Plaintiffs,	)
	)
v.	)
	)
Laura Howard in her official capacity as	)
Kansas Department for Children and Families	)
Secretary, <b>Dr. Lee A. Norman</b> 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.	)
	)

### **NOTICE OF ERRATA**

On November 30, 2020, Plaintiffs filed the Declaration of Ira Lustbader in Support of Plaintiffs' Motion for Attorneys' Fees and Expenses (ECF No. 144). Plaintiffs attached to that declaration Exhibit C (ECF No. 144-3), a spreadsheet of Children's Rights' Itemized Time Entries. Plaintiffs inadvertently uploaded the wrong document for Exhibit C (ECF No. 144-3), which contains incorrect numbers in the "Hourly Rate" and "Payment" columns. Plaintiffs attach the Corrected Exhibit C herewith, which should be substituted for Docket Number 144-3 to correct this inadvertent clerical error.

Dated: December 17, 2020

Respectfully submitted,

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### ATTORNEYS FOR PLAINTIFFS

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was filed electronically with the Clerk of the Court on December 17, 2020, to be served by the operation of the Court's CM/ECF electronic filing system upon all parties.

DATED: December 17, 2020

/s/ Teresa A. Woody

Teresa A. Woody Attorney for Plaintiffs

# EXHIBIT C [ERRATA]

### Case 2:18-cv-02617-DDC-GEB Document 158-1 Filed 12/17/20 Page 2 of 247

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

Attorney/Paralegal	Date	Case	Description	Hours	<b>Hourly Rate</b>		Payment
Claire Glasspiegel	7/17/2019	Kansas	Discuss discovery strategy with MN, DA, CC	0.83	\$ 310.00	\$	258.33
Claire Glasspiegel	7/17/2019	Kansas	Edit draft 30(b)(6) notice	1.00	\$ 310.00	\$	310.00
Claire Glasspiegel	8/2/2019	Kansas	Review subpoena language for CSAs	0.58	\$ 310.00	\$	180.83
			Meeting to discuss draft subpoena language with IL,				
Claire Glasspiegel	8/5/2019	Kansas	JK, EM	0.47	\$ 310.00	\$	144.67
			Research DG v. Strickland district court decision				
Claire Glasspiegel	8/14/2019	Kansas	relevant to case	0.45	\$ 310.00	\$	139.50
			Meeting to discuss doc review of NP files with MN,				
Claire Glasspiegel	8/19/2019	Kansas	EM, JK, DA, CC	0.30	\$ 310.00	\$	93.00
			Conduct legal research on standard applied for foster				
Claire Glasspiegel	9/4/2019	Kansas	care SDP cases	3.10	\$ 310.00	\$	961.00
			Draft paragraphs on standard applied for SDP foster				
Claire Glasspiegel	9/5/2019	Kansas	care cases	1.08	\$ 310.00	\$	335.83
Claire Glasspiegel	9/12/2019	Kansas	Revise draft mediation statement	2.57	\$ 310.00	\$	795.67
			Conduct detailed review with simultaneous written				
			analysis of Named Plaintiff VA case file documents				
Claire Glasspiegel	9/18/2019		(hereinafter "review of VA case file documents")	2.98	<u>'</u>		924.83
Claire Glasspiegel	9/23/2019		Review of VA case file documents	3.00	\$ 310.00		930.00
Claire Glasspiegel	9/24/2019		Review of VA case file documents	7.00	\$ 310.00		2,170.00
Claire Glasspiegel	9/25/2019		Review of VA case file documents	7.17	\$ 310.00		2,221.67
Claire Glasspiegel	9/26/2019		Review of VA case file documents	7.00	\$ 310.00		2,170.00
Claire Glasspiegel	9/27/2019		Review of VA case file documents	1.55	\$ 310.00	-	480.50
Claire Glasspiegel	9/30/2019	Kansas	Review of VA case file documents	5.40	\$ 310.00		1,674.00
Claire Glasspiegel	10/1/2019	Kansas	Review of VA case file documents	2.00	\$ 310.00	\$	620.00
			Conduct detailed review with corresponding written				
			analysis of Named Plaintiff ZZ case file (hereinafter				
Claire Glasspiegel	10/2/2019	Kansas	"review of ZZ case file documents")	5.00	\$ 310.00	\$	1,550.00
Claire Glasspiegel	10/3/2019	Kansas	Review of ZZ case file documents	5.92	\$ 310.00	\$	1,834.17
Claire Glasspiegel	10/4/2019	Kansas	Review of ZZ case file documents	4.50	\$ 310.00	\$	1,395.00
Claire Glasspiegel	10/7/2019	Kansas	Review of ZZ case file documents	5.00	\$ 310.00	\$	1,550.00

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Claire Glasspiegel	10/8/2019	Kansas	Review of ZZ case file documents	6.63	\$	310.00	\$	2,056.33
Claire Glasspiegel	10/9/2019	Kansas	Review of ZZ case file documents	2.00	\$	310.00	\$	620.00
Claire Glasspiegel	10/10/2019	Kansas	Review of ZZ case file documents	5.00	\$	310.00	\$	1,550.00
Claire Glasspiegel	10/11/2019	Kansas	Review of ZZ case file documents	4.17	\$	310.00	\$	1,291.67
Claire Glasspiegel	10/12/2019	Kansas	Review of ZZ case file documents	3.00	\$	310.00	\$	930.00
Claire Glasspiegel	10/13/2019	Kansas	Review of ZZ case file documents	3.00	\$	310.00	\$	930.00
Claire Glasspiegel	10/14/2019	Kansas	Review of ZZ case file documents	3.00	\$	310.00	\$	930.00
Claire Glasspiegel	10/14/2019	Kansas	Review of ZZ case file documents	4.00	\$	310.00	\$	1,240.00
Claire Glasspiegel	10/23/2019	Kansas	team meeting with co-counsel and CR KS team re discovery strategy	0.68	\$	310.00	\$	211.83
Claire Glasspiegel	11/1/2019	Kansas	Draft language for deposition notice for Defendant Laura Kelly	2.50	\$	310.00	\$	775.00
Claire Glasspiegel	11/4/2019	Kansas	Review draft subpoena and its udpated language	0.75	\$	310.00	\$	232.50
Claire Glasspiegel	11/6/2019	Kansas	Prepare supboena response to share with co-counsel	0.50	\$	310.00	\$	155.00
Claire Glasspiegel	11/21/2019	Kansas	Meeting to discuss settlement/mediation draft outcomes	1.50	\$	310.00	\$	465.00
Claire Glasspiegel	11/25/2019	Kansas	Meeting to discuss draft mediation agreement	1.00	\$	310.00	\$	310.00
Claire Glasspiegel	11/25/2019	Kansas	Review with concurrent analysis of documents produced by Defendants for purposes of preparing team for mediation (hereinafter "review documents produced by Defs in preparation for mediation")	3.37	\$	310.00	\$	1,043.67
Claire Glasspiegel	12/4/2019	Kansas	Meeting re: proposed settlement	0.90	\$	310.00	\$	279.00
			Review proposed settlement agreement to assist					
Claire Glasspiegel	12/4/2019	Kansas	with editting key provision	1.03	\$	310.00	\$	320.33
	10/0/05:5		Review documents produced by Defs in preparation		_	040.55	_	
Claire Glasspiegel	12/9/2019	Kansas	for mediation	1.50	\$	310.00	\$	465.00
Claire Glasspiegel	12/11/2019	Kansas	Review documents produced by Defs in preparation for mediation	1.00	\$	310.00	\$	310.00

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			Review and summarize potential hot docs recently			
Claire Glasspiegel	12/12/2019	Kansas	produced by Defendants for purposes of mediation	1.00	\$ 310.00	\$ 310.00
			Internal meeting with MN on upcoming discovery			
Claire Glasspiegel	2/5/2020	Kansas	strategy and projects	0.33	\$ 310.00	\$ 103.33
			Review RFP information on record reviews in order			
Claire Glasspiegel	2/5/2020	Kansas	to draft second RFP	2.00	\$ 310.00	\$ 620.00
Claire Glasspiegel	2/6/2020	Kansas	Phone call with EG re: drafting RFP	0.50	\$ 310.00	\$ 155.00
Claire Glasspiegel	2/10/2020	Kansas	Draft RFPs for case record review	2.00	\$ 310.00	\$ 620.00
			Draft RFPs for other additional documents requested			
Claire Glasspiegel	2/11/2020	Kansas	during mediation	3.00	\$ 310.00	\$ 930.00
Claire Glasspiegel	2/12/2020	Kansas	Review and draft RFP re: case record review	2.00	\$ 310.00	\$ 620.00
Claire Glasspiegel	2/14/2020	Kansas	Draft interrogatory re: database information	1.50	\$ 310.00	\$ 465.00
			Edit second RFPs including instructions and			
Claire Glasspiegel	2/14/2020	Kansas	definitions sections	1.00	\$ 310.00	\$ 310.00
			Conduct issue review of documents produced by			
Claire Glasspiegel	2/25/2020	Kansas	Defendants	1.92	\$ 310.00	\$ 594.17
Claire Glasspiegel	2/25/2020	Kansas	Draft first set of interrogatories	2.77	\$ 310.00	\$ 857.67
Claire Glasspiegel	2/25/2020	Kansas	Draft second set of RFPs	2.25	\$ 310.00	\$ 697.50
Claire Glasspiegel	2/26/2020	Kansas	Discuss RFPs with EPG	0.23	\$ 310.00	\$ 72.33
Claire Glasspiegel	2/26/2020	Kansas	Edit current draft of second set of RFPs	1.52	\$ 310.00	\$ 470.17
			Conduct issue review of documents produced by			
Claire Glasspiegel	2/26/2020	Kansas	Defendants	3.17	\$ 310.00	\$ 981.67
			Meeting with Kansas team meeting to discuss			
Claire Glasspiegel	2/27/2020	Kansas	mediation	0.50	\$ 310.00	\$ 155.00
Claire Glasspiegel	2/27/2020	Kansas	Edit operative draft second set of RFPs	1.35	\$ 310.00	\$ 418.50
Claire Glasspiegel	2/27/2020	Kansas	Issue review of documents produced by Defendants	3.45	\$ 310.00	\$ 1,069.50
			Meeting with IL, MN, and EPG re: edits to rogs and			
Claire Glasspiegel	2/28/2020	Kansas	RFPs	0.50	\$ 310.00	\$ 155.00

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			Revise second RFPs per discussion with IL, MN, and					
Claire Glasspiegel	2/28/2020	Kansas	EPG in preparation for serving	2.47	\$	310.00	\$	764.67
			Revise first set of Rogs to finalize in preparation for					
Claire Glasspiegel	3/2/2020	Kansas	serving	4.00	\$	310.00	\$	1,240.00
			Review federal and local rules relating to responses					
Claire Glasspiegel	3/3/2020	Kansas	to RFPs and Rogs	0.50	\$	310.00	\$	155.00
Claire Glasspiegel	3/3/2020	Kansas	Begin drafting third set of RFPs to Defs	3.00	\$	310.00	\$	930.00
Claire Glasspiegel	3/4/2020	Kansas	Edit definitions section in third set of RFPs	2.00	\$	310.00	\$	620.00
Claire Glasspiegel	3/5/2020	Kansas	Continue drafting third set of RFPs to Defs	4.00	\$	310.00	\$	1,240.00
Claire Glasspiegel	3/9/2020	Kansas	Edit draft of third set of RFPs based on suggestions	2.42	\$	310.00	\$	749.17
Claire Glasspiegel	3/10/2020	Kansas	Edit draft third set of RFPs per MN's suggestions	1.00	\$	310.00	\$	310.00
Claire Glasspiegel	3/11/2020	Kansas	Check-in meeting with MN re third set of RFPs	0.63	\$	310.00	\$	196.33
Claire Glasspiegel	3/11/2020	Kansas	Edit third RFPs to share with co-counsel team	1.00	\$	310.00	\$	310.00
			Conduct issue review of documents produced by					
Claire Glasspiegel	3/13/2020	Kansas	Defendants	1.50	\$	310.00	\$	465.00
			Conduct issue review of Defendants' produced					
Claire Glasspiegel	3/16/2020	Kansas	documents	2.68	\$	310.00	\$	831.83
Claire Glasspiegel	3/17/2020	Kansas	Draft and edit the third RFPs re: 30(b)(6) documents	1.85	\$	310.00	\$	573.50
Claire Glasspiegel	3/17/2020	Kansas	Conduct issue review of Defendants' produced documents	2.62	\$	310.00	\$	811.17
Claire Glasspiegel	3/18/2020	Kansas	Draft and edit third RFPs per feedback by co-counsel	0.17	\$	310.00	\$	51.67
elane diasspiegei	3/ 10/ 2020	Kansas	Meeting with Internal CR team re discovery strategy,	0.17	<u> </u>	310.00	<u> </u>	31.07
Claire Glasspiegel	3/18/2020	Kansas	ESI	0.50	\$	310.00	\$	155.00
			Summarize key findings from hot docs identified during my issue review of select documents					
Claire Glasspiegel	3/18/2020	Kansas	produced by Defendants	1.00	\$	310.00	\$	310.00
Claire Glasspiegel	3/20/2020	Kansas	Draft certificate of service for third RFPs	0.50	\$	310.00	\$	155.00
			Review key hot documents identified by others in					
			their doc review of other documents produced by					
Claire Glasspiegel	3/23/2020	Kansas	Defs	1.87	\$	310.00	\$	578.67

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Claire Glasspiegel	3/23/2020	Kansas	Edit latest set of RFPs in preparation for service	2.00	\$	310.00	\$	620.00
			Incorporate final suggestions by co-counsel into RFPs					
Claire Glasspiegel	3/24/2020	Kansas	to finalize for service	2.35	\$	310.00	\$	728.50
			Review new hot documents from doc review of					
Claire Glasspiegel	3/25/2020	Kansas	general discovery docs produced by Defs	0.28	\$	310.00	\$	87.83
Claire Glasspiegel	3/26/2020	Kansas	Draft fourth set of RFPs based on letter re: COVID-19	1.42	\$	310.00	\$	439.17
			Continue drafting fourth RFP set based on letter re:					
Claire Glasspiegel	3/27/2020	Kansas	COVID-19	4.00	\$	310.00	\$	1,240.00
Claire Glasspiegel	3/30/2020	Kansas	Edit RFPs per comments from MN	1.50	\$	310.00	\$	465.00
Claire Glasspiegel	3/30/2020	Kansas	Continue revising 4th set of RFPs to DCF	2.00	\$	310.00	\$	620.00
			Edit RFPs per new comments from MN and other					
Claire Glasspiegel	4/1/2020	Kansas	team members	2.50	\$	310.00	\$	775.00
			Finalize fourth RFPs and certificates of services to					
Claire Glasspiegel	4/2/2020	Kancac	three defendants	4.50	\$	310.00	ć	1,395.00
Claire Glasspiegel	4/2/2020		Edit discovery letter to defendants	1.50	\$	310.00	۶ \$	465.00
Ciaire Giasspiegei	4/3/2020	Kalisas	Review COVID-related RFPs to preparing talking	1.50	٠	310.00	٠	403.00
			points re same for meet and confer with defendants					
Claire Classpiegel	4/13/2020	Vancac	re: COVID-19	0.50	ć	310.00	Ļ	155.00
Claire Glasspiegel	4/13/2020	Kalisas	Te: COVID-19	0.50	Ş	310.00	Ş	155.00
Claire Glasspiegel	4/17/2020	Kansas	Review and edit outline on 30(b)(6) depositions	1.50	\$	310.00	\$	465.00
			Review Def's responses and objections to Covid-19					
Claire Glasspiegel	4/20/2020	Kansas	RFPs	0.75	\$	310.00	\$	232.50
			Review Defendants' R+Os to RFPs re: case record					
Claire Glasspiegel	4/21/2020	Kansas	review and others	1.00	\$	310.00	\$	310.00
			Draft talking points re R+Os in preparation for meet					
Claire Glasspiegel	4/21/2020	Kansas	and confer	1.00	\$	310.00	\$	310.00
			Review all info re: potential expert PF to draft letter					
Claire Glasspiegel	4/23/2020	Kancac	regarding engagement letter upcoming meeting	1.00	\$	310.00	ċ	310.00
Ciaire Giasspiegei	4/23/2020	Vq112q2	regarding engagement letter upcoming meeting	1.00	Ą	310.00	Ą	310.00

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			Review attorney notes from document review					
			specific to technical issues in production in order to					
			draft letter to Defs re: missing attachments from					
Claire Glasspiegel	4/23/2020	Kansas	Defs' productions	1.50	\$	310.00	\$	465.00
			Draft letter to Defs re: Defs' production deficiencies					
Claire Glasspiegel	4/24/2020	Kansas	of missing attachments/families	3.00	\$	310.00	\$	930.00
			Continue review of identified ESI errors in KS					
Claire Glasspiegel	4/27/2020	Kansas	productions to draft letter to defendants	3.25	\$	310.00	\$	1,007.50
			Following up communication with potential expert re					
Claire Glasspiegel	4/28/2020	Kansas	brain science	0.33	\$	310.00	\$	103.33
			Chat with MN re: production issues and					
Claire Glasspiegel	4/28/2020	Kansas	corresponding letter to defendants	0.50	\$	310.00	\$	155.00
	4/20/2020		Continue review of technical errors in KS productions	4 55		240.00		400 50
Claire Glasspiegel	4/28/2020	Kansas	to revise draft letter to defendants	1.55	\$	310.00	\$	480.50
Clater Classition	4/20/2020	17	Meeting with Internal team re discovery items for	0.22	<b>.</b>	240.00	_	402.22
Claire Glasspiegel	4/29/2020		next meet and confer	0.33	•	310.00		103.33
Claire Glasspiegel	4/29/2020	Kansas	Draft email to defendants re: technical issues	1.50	\$	310.00	\$	465.00
	4/20/2020		Review documents to confirm categorizations of	4.00		240.00		4 222 47
Claire Glasspiegel	4/30/2020	Kansas	technical issues	4.32	\$	310.00	\$	1,338.17
	- / / /		Follow up communication with potential expert re		1		_	
Claire Glasspiegel	5/1/2020	Kansas	brain science	0.50	\$	310.00	\$	155.00
	_ , , , ,		Review and analyze COVID-19 production by Defs in					
Claire Glasspiegel	5/4/2020	Kansas	response to Pls' COVID-19 RFPs	3.00	\$	310.00	\$	930.00
			Review COVID-19 Docs produced by Defs to advise					
			team re content and deficiencies in preparation for					
Claire Glasspiegel	5/5/2020	Kansas	meet and confer	3.17	\$	310.00	\$	981.67
			Electronic email with potential expert to set up catch-					
Claire Glasspiegel	5/6/2020	Kansas	up call	0.50	\$	310.00	\$	155.00
			Meeting with MN and NT to discuss research related					
Claire Glasspiegel	5/6/2020	Kansas	to named plaintiff discovery	0.67	\$	310.00	\$	206.67

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			Draft talking points for meet and confer re: COVID 19					
Claire Glasspiegel	5/7/2020	Kansas	production deficiencies	3.50	\$	310.00	\$	1,085.00
			Reviewing notes on COVID19 production to advise					
Claire Glasspiegel	5/8/2020	Kansas	MN on this topic for meet and confer re this issue	1.00	\$	310.00	\$	310.00
			Draft email to potential brain science expert re					
Claire Glasspiegel	5/11/2020	Kansas	collaboration	0.07	\$	310.00	\$	20.67
			Draft email identifying Defendants' gaps in COVID-19					
Claire Glasspiegel	5/12/2020	Kansas	production	0.95	\$	310.00	\$	294.50
			Read email discussing next steps on COVID-19					
Claire Glasspiegel	5/14/2020	Kansas	production deficiencies	0.17	\$	310.00	\$	51.67
			Draft detailed email on recommendations for					
Claire Glasspiegel	5/14/2020	Kansas	handling Defs' failures in COVID-19 production	0.60	\$	310.00	\$	186.00
			Meeting with CR policy experts about settlement					
Claire Glasspiegel	5/14/2020	Kansas	offer terms	0.75	\$	310.00	\$	232.50
			Chat with PJ to prep for meet and confer re COVID-					
Claire Glasspiegel	5/15/2020	Kansas	19	0.03	\$	310.00	\$	10.33
			Call with MN re items Defs have not yet produced in					
Claire Glasspiegel	5/15/2020	Kansas	discovery	0.05	\$	310.00	\$	15.50
Claire Glasspiegel	5/20/2020	Kansas	Identify additional COVID-19 production issues	0.33	\$	310.00	Ś	103.33
	3, 23, 2323		Draft email re: 30(B)(6) depositions and contract					
Claire Glasspiegel	5/20/2020	Kansas	oversight	0.75	\$	310.00	Ś	232.50
Claire Glasspiegel	5/26/2020		Review settlement notes from IL	0.20	\$	310.00		62.00
cian e diasspreger	3/20/2020	Ransas	neview settlement notes from 12	0.20	Υ	310.00	Υ	02.00
Claire Glasspiegel	5/28/2020	Kansas	Prepare for call with potential expert re brain science	0.50	\$	310.00	\$	155.00
			Meeting with brain science expert re litigation and					
Claire Glasspiegel	6/1/2020	Kansas	scope of potential expert report	0.72	\$	310.00	\$	222.17
			Closely read draft settlement terms sheet outline in					
Clare Connaughton	2/4/2019	Kansas	preparation for internal CR group discussion	0.68	\$	200.00	\$	136.67
Ciare Commangnitori	2/4/2019	Karisas	Discuss Kansas settlement terms sheet with KS CR	0.00	٠	200.00	٠	130.07
Clare Connaughton	2/8/2019	Kancac	internal team (IL MN JK EM DA)	1.50	\$	200.00	\$	300.00
Ciare Commanginton	2/0/2019	Kalisas	IIILEITIAI LEAITI (IL IVIIV JK EIVI DA)	1.30	Ą	200.00	٦	300.00

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			Meet to discuss potential edits to Kansas settlement				
			terms sheet with CR internal team (IL MN DA SD EM				
Clare Connaughton	2/11/2019	Kansas	JK and intern DO)	1.50	\$	200.00	\$ 300.00
			Provide requested analysis of relevant Kansas SB 122				
Clare Connaughton	2/28/2019	Kansas	transcript to internal CR KS team	0.82	\$	200.00	\$ 163.33
			Collect prior relevant legal research memorandum re				
Clare Connaughton	3/22/2019	Kansas	SDP for MN	0.50	\$	200.00	\$ 100.00
Clare Connaughton	5/8/2019		Proofread updated draft terms sheet	0.33	\$	200.00	 66.67
	, ,		incorporate each of CR team's edits into operative		•		
Clare Connaughton	5/9/2019	Kansas	draft term sheet for mediation	1.33	\$	200.00	\$ 266.67
			Review draft of DLA Piper letter retainer for Next				
Clare Connaughton	5/28/2019	Kansas	Friends	0.73	\$	200.00	\$ 146.67
			Correspond with SD and PJ re retainers for potential				
Clare Connaughton	5/30/2019	Kansas	new clients	0.58	\$	200.00	\$ 116.67
			Factual research re latest news articles re KS foster				
			care placements and MH delivery relevant to the				
Clare Connaughton	5/31/2019	Kansas	litigation	0.17	\$	200.00	\$ 33.33
			Email with internal team re acknowledgments to				
Clare Connaughton	6/5/2019	Kansas	protective order	0.18	\$	200.00	\$ 36.67
			Email with PJ and internal CR team re planned NP				
Clare Connaughton	6/6/2019	Kansas	chronologies to accompany NP file review	0.77	\$	200.00	\$ 153.33
Clare Connaughton	6/13/2019	Kansas	Email NCYL paralegal re NP file review	0.08	\$	200.00	\$ 16.67
			Kansas internal team meetin debrief re medicaid				
Clare Connaughton	6/19/2019	Kansas	claim with IL EM JK and legal intern Hannah	0.18	\$	200.00	\$ 36.67
· ·			Email internal CR team re litigation deadlines from				
Clare Connaughton	7/10/2019	Kansas	scheduling order	0.25	\$	200.00	\$ 50.00
			Analyze intake call re KS child mistreatment relevant				
Clare Connaughton	8/7/2019	Kansas	to litigation	0.22	\$	200.00	\$ 43.33
			Internal meeting of CR NP file review team to discuss				
Clare Connaughton	8/19/2019	Kansas	new findings from NP document review	0.30	\$	200.00	\$ 60.00

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			Email factual research to MN to prepare draft				
Clare Connaughton	8/30/2019	Kansas	mediation statement	0.12	\$	200.00	\$ 23.33
			Edit citations in mediation statement to conform to				
Clare Connaughton	9/4/2019	Kansas	Bluebook Rules	0.52	\$	200.00	\$ 103.33
			Identify factual support for exhibits for Kansas				
Clare Connaughton	9/9/2019	Kansas	mediation statement	3.35	\$	200.00	\$ 670.00
Clare Connaughton	9/10/2019	Kansas	Finalize all exhibits for Kansas mediation statement	2.25	\$	200.00	\$ 450.00
Clare Connaughton	9/16/2019	Kansas	Conduct comprehensive factual research regarding potential expert (including review of publications, monitoring reports, and press regarding expert) to email to MN and IL	3.50	\$	200.00	\$ 700.00
			Internal meeting of CR NP file review team to discuss				
Clare Connaughton	9/18/2019	Kansas	new findings from NP document review	0.43	\$	200.00	\$ 86.67
			Incorporate latest findings from file review and other				
			factual research into new draft of KS mediation				
Clare Connaughton	9/18/2019	Kansas	statement	3.25	\$	200.00	\$ 650.00
			Edit citations in new mediation statement to				
Clare Connaughton	9/19/2019		conform to Bluebook Rules	2.30	\$	200.00	\$ 460.00
Clare Connaughton	9/20/2019	Kansas	Proofread KS mediation statement	1.08	\$	200.00	\$ 216.67
	0/22/2010	17	Summarize research re potential KS expert to share	4 47	_	200.00	222.22
Clare Connaughton	9/23/2019	Kansas	with MN and entire co-counsel team	1.17	\$	200.00	\$ 233.33
			Identify key monitoring documents from GL v				
Class Carrier ships	0/20/2040	17	Sherman docket to share with IL and LBB for	0.77	_	200.00	452.22
Clare Connaughton	9/30/2019		purposes of mediation	0.77		200.00	 153.33
Clare Connaughton	10/2/2019	kansas	Discuss new NP file review findings with DA	0.30	\$	200.00	\$ 60.00
Clare Connaughton	10/2/2019	Kansas	Closely analyze portion of Named Plaintiff ZZ's file	0.33	\$	200.00	\$ 66.67
			Closely analyze different portion of Named Plaintiff				
Clare Connaughton	10/2/2019	Kansas	ZZ's file	0.50	\$	200.00	\$ 100.00

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

Clare Connaughton	10/4/2019	Kansas	Closely analyze portion of Named Plaintiff ZZ's files	2.47	\$	200.00	\$	493.33
			Identify relevant preparatory documents for MN and					
Clare Connaughton	10/7/2019	Kansas	IL's discussion with Mediator	0.17	\$	200.00	\$	33.33
Clare Connaughton	10/7/2019	Kansas	Review and index Named Plaintiff ZZ's files	5.77	\$	200.00	\$	1,153.33
Clare Connaughton	10/8/2019	Kansas	Review and index Named Plaintiff ZZ's files	5.85	\$	200.00	\$	1,170.00
Clare Connaughton	10/9/2019	Kansas	Review and index Named Plaintiff ZZ's files	8.85	\$	200.00	\$	1,770.00
Clare Connaughton	10/10/2019	Kansas	Review and index Named Plaintiff ZZ's files	5.37	\$	200.00	\$	1,073.33
Clare Connaughton	10/11/2019	Kansas	Review and index Named Plaintiff ZZ's files	2.23	\$	200.00	\$	446.67
Clare Connaughton	10/15/2019	Kansas	Review and index Named Plaintiff ZZ's files	3.50	\$	200.00	\$	700.00
			Proofread and edit final draft of Named Plaintiff					
Clare Connaughton	10/16/2019	Kansas	document review chronology and spreadsheets	2.17	\$	200.00	\$	433.33
			Conduct factual research into new potential expert				•	
Clare Connaughton	10/21/2019	Kansas	re mental health	1.13	\$	200.00	\$	226.67
<u> </u>			Prepare factual materials for MN, TW, LBB, and LW		<u> </u>		•	
Clare Connaughton	10/22/2019	Kansas	in-person meetings with potential experts	2.28	\$	200.00	\$	456.67
			Email research findings on potential expert to MN for				•	
Clare Connaughton	10/23/2019	Kansas	her review	0.20	\$	200.00	\$	40.00
			Research potential expert for entire co-counsel team					
Clare Connaughton	10/31/2019	Kansas	in advance of pre-mediation meeting	0.55	\$	200.00	\$	110.00
ciare connaughton	10/31/2013	Kurisus	Factual research into potential expert in advance of	0.55	· ·	200.00	· ·	110.00
Clare Connaughton	11/4/2019	Kansas	mediation	1.95	\$	200.00	\$	390.00
ciare comitagneon	11/ 1/2013	Ransas	Continue conducting factual research on potential	1.33	<u> </u>	200.00	Υ	330.00
Clare Connaughton	11/5/2019	Kansas	expert	1.77	\$	200.00	\$	353.33
Clare Connaughton	11/6/2019		Continue factual research re potential expert	2.30	\$	200.00	\$	460.00
			Meeting with MN and DA re collecting factual		т		т	
Clare Connaughton	11/7/2019	Kansas	support in opposition to Defs' MTD	0.20	\$	200.00	\$	40.00
			Review and finalize drafts of motion to extend					
Clare Connaughton	11/7/2019	Kancac	deadline to respond to Defs' MTD governor	1.65	ċ	200.00	\$	330.00
Ciare Commanginton	11/7/2019	1/411242	deading to respond to Dels WITD governor	1.65	Ą	200.00	Ą	550.00

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			Factual research re relevant settlement agreements					
			and consent decrees to send to MN and co-counsel					
Clare Connaughton	11/18/2019	Kansas	team in drafting settlement	0.63	\$	200.00	\$	126.67
			Closely review documents from Defs. for mediation					
Clare Connaughton	11/25/2019	Kansas	purposes	0.37	\$	200.00	\$	73.33
			Closely review and summarize highlights of					
			documents from Defs. specifically for mediation					
Clare Connaughton	11/26/2019	Kansas	purposes	3.50	\$	200.00	\$	700.00
			Continue closely reviewing and summarizing					
Clare Connaughton	11/26/2019	Kansas	documents from Defs. for mediation purposes	4.17	\$	200.00	\$	833.33
			Review and index materials produced by Defs. in					
Clare Connaughton	11/27/2019	Kansas	preparation for mediation	1.50	\$	200.00	\$	300.00
			Closely review documents produced by Defendants					
Clare Connaughton	12/9/2019	Kansas	to inform aspects of mediation	5.53	\$	200.00	\$	1,106.67
			Review and index portions of Named Plaintiff ML's					
Clare Connaughton	12/10/2019	Kansas	file produced by Defs	4.37	\$	200.00	\$	873.33
			Factual research into potential brain science expert					
Clare Connaughton	12/11/2019		for circulation to entire KS co-counsel team	1.50	\$	200.00		300.00
Clare Connaughton	12/11/2019		Review and index ML Named Plaintiff file	3.75	\$	200.00	•	750.00
Clare Connaughton	12/12/2019	Kansas	Review and index ML Named Plaintiff file	1.53	\$	200.00	\$	306.67
Clare Connaughton	12/13/2019	Kansas	Review and index portions of ML Named Plaintiff file	5.50	¢	200.00	¢	1,100.00
ciare connaughton	12/13/2013	Kulisus	neview and mack portions of ME Named Flamen me	3.30	· ·	200.00	· ·	1,100.00
Clare Connaughton	12/16/2019	Kansas	Review and index portions of ML Named Plaintiff file	4.05	\$	200.00	\$	810.00
	10/10/10010	.,		2.22		222.22		500.00
Clare Connaughton	12/16/2019		Continue review and index ML Named Plaintiff file	3.00	\$	200.00		600.00
Clare Connaughton	12/17/2019	Kansas	Review and index ML Named Plaintiff file	5.88	\$	200.00	\$	1,176.67
	12/12/2010		Take notes for contact memo at in-person meeting	2.25	_	200.00		450.00
Clare Connaughton	12/18/2019		with potential expert at CR	2.25	\$	200.00		450.00
Clare Connaughton	12/18/2019	kansas	Review and index ML Named Plaintiff file	4.50	\$	200.00	\$	900.00
	42/40/2010		Create timeline of significant, relevant events from	0.00		200.00		4 000 00
Clare Connaughton	12/19/2019	Kansas	file review of Named Plaintiff ML file	9.00	<b>\</b>	200.00	<b>\</b>	1,800.00

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			Edit index of Named Plaintiff file spreadsheets to					
Clare Connaughton	12/20/2019	Kansas	send to MN for review	1.50	\$	200.00	\$	300.00
			Identify new factual materials to prepare attorney					
Clare Connaughton	2/4/2020	Kansas	team in advance of mediation sessions	0.42	\$	200.00	\$	83.33
			Conduct class review of decuments produced by					
			Conduct close review of documents produced by					
	2/4/2020	14	Defendants for attorney team's preparation in	4.07		200.00	_	242.22
Clare Connaughton	2/4/2020	Kansas	advance of 2/7 mediation session with Defendants	1.07	\$	200.00	\$	213.33
			KS internal meeting re MTD opp and					
Clare Connaughton	2/5/2020	Kansas	discovery/workplan with IL MN EPG JK CG and NT DA	0.33	\$	200.00	\$	66.67
ciare connaugnton	2/3/2020	Karisas	Call with DA re refining factual materials for opp to	0.55	· ·	200.00	٠,	00.07
Clare Connaughton	2/12/2020	Kansas	Defs' MTD	0.87	\$	200.00	\$	173.33
ciare connaughton	2,12,2020	Ransas	Dels Wild	0.07	Ψ	200.00	Υ	173.33
			Update factual materials in support of PIs' MTD					
Clare Connaughton	2/12/2020	Kansas	Governor	3.00	\$	200.00	\$	600.00
Clare Connaughton	2/13/2020		Edit cites in MTD opposition	2.50	\$	200.00	\$	500.00
			Edit oppn table of authorities and table of contents					
Clare Connaughton	2/13/2020	Kansas	with DA	3.50	\$	200.00	\$	700.00
			Telephone call with DA, PJ, and FP re updates from					
Clare Connaughton	2/19/2020	Kansas	ongoing document review and discovery	0.50	\$	200.00	\$	100.00
			Begin reviewing and simultaneously indexing RM					
Clare Connaughton	2/25/2020	Kansas	named plaintiff file	4.05	\$	200.00	\$	810.00
Clare Connaughton	2/26/2020	Kansas	Index portions of RM named plaintiff file	7.00	\$	200.00	\$	1,400.00
			Meeting with IL MN JK EPG JK NT DA CG re mediation					
Clare Connaughton	2/27/2020	Kansas	and next steps re strategy	0.50	\$	200.00	\$	100.00
Clara Cannaught	2/27/2020	<b>Vanas</b> a	Complete detailed review of DNA News of DI-intiff file	0.00	<b>,</b>	200.00	۲	1 000 00
Clare Connaughton	2/27/2020	Kansas	Complete detailed review of RM Named Plaintiff file	9.00	\$	200.00	<b>&gt;</b>	1,800.00
Claus Cammanalatan	2/20/2020	Vana	Conduct review of Defs.' latest production of general	4 4 7	۲	200.00	۲.	222.22
Clare Connaughton	2/28/2020	kansas	discovery	1.17	\$	200.00	\$	233.33
Claus Casas III	2/22/222	1/	Complete chronology of key events from RM's	4		200.00		250.00
Clare Connaughton	2/28/2020	Kansas	Named Plaintiff file	1.75	\$	200.00	\$	350.00

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			Edit citations in Pls.' responses to Defs.' objections to					
Clare Connaughton	2/28/2020	Kansas	Pls.' First Requests for Production	0.75	\$	200.00	\$	150.00
			Meeting with MN and DA re review of NP and					
Clare Connaughton	3/3/2020	Kansas	general discovery files	0.47	\$	200.00	\$	93.33
			Review all recent discovery / discovery					
			correspondence to calculate all upcoming and past-					
			due deadlines (based on Federal Rules and					
			agreements by counsel) to advise co-counsel team					
Clare Connaughton	3/12/2020	Kansas	for communications with Defs	1.75	\$	200.00	\$	350.00
Clare Connaughton	3/18/2020	Kansas	KS internal call with MN IL JK NT CG re ESI	0.50	\$	200.00	\$	100.00
Clare Connaughton	3/23/2020	Kansas	Closely review documents produced by KS DCF	1.95	\$	200.00	\$	390.00
-								
Clare Connaughton	3/24/2020	Kansas	Proofread Plaintiffs' 3rd set of RFPs and COS	0.93	\$	200.00	\$	186.67
			Review and index documents produced by KS DCF for					
Clare Connaughton	3/25/2020	Kansas	hot documents	2.00	\$	200.00	\$	400.00
			Review and index documents produced by KS DCF for					
Clare Connaughton	3/26/2020	Kansas	hot documents	2.75	\$	200.00	\$	550.00
			Review and index documents produced by KS DCF for					
Clare Connaughton	3/27/2020	Kansas	hot documents	3.57	\$	200.00	\$	713.33
			Analyze and summarize hot documents from DCF					
Clare Connaughton	3/30/2020	Kansas	batch	0.75	\$	200.00	\$	150.00
			Review and index documents produced by KS DCF for					
Clare Connaughton	3/30/2020	Kansas	hot documents	5.75	\$	200.00	\$	1,150.00
			Draft list of Defendants' past due discovery deadlines					
Clare Connaughton	4/1/2020	Kansas	to send to MN for TW's letter to Defs	0.25	\$	200.00	\$	50.00
Clare Collinaughton	4/ 1/ 2020	Karisas	Conduct factual research re local child advocates'	0.25	٠,	200.00	٧	30.00
			new concerns re KS foster children experiencing					
Clare Connaughton	4/20/2020	Kansas	night to night placements	1.17	\$	200.00	\$	233.33
 I					•		•	
			Conduct news monitoring to send press relevant to					
Clare Connaughton	4/21/2020	Kansas	this litigation to entire co-counsel team	0.67	\$	200.00	\$	133.33

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			Prepare written summary of findings of factual				
Clare Connaughton	4/21/2020	Kansas	research findings re concerns re night to nights	0.75	\$ 200.00	\$	150.00
Clare Connaughton	4/22/2020	Kansas	Edit letter for CG to potential brain science expert	0.33	\$ 200.00	\$	66.67
			Factual research for MN re job titles of KS				
Clare Connaughton	5/1/2020	Kansas	government staff that Defs named in privilege log	0.33	\$ 200.00	\$	66.67
_			Conduct detailed review of MA's Named Plaintiff file				
Clare Connaughton	5/12/2020	Kansas	on Relativity platform	2.50	\$ 200.00	\$	500.00
Clare Connaughton	5/13/2020	Kansas	Review MA Named Plaintiff files on Relativity	2.27	\$ 200.00	\$	453.33
			Conduct factual research on potential foster care				
Clare Connaughton	5/15/2020	Kansas	systems expert for NT	1.75	\$ 200.00	\$	350.00
Clare Connaughton	5/18/2020	Kansas	Review MA Named Plaintiff files on Relativity	3.00	\$ 200.00	\$	600.00
			Factual research on 30(b)(6) deponent Melinda Kline				
			to prepare attorney team for Plaintiffs' 30(b)(6)				
Clare Connaughton	5/21/2020	Kansas	deposition	0.68	\$ 200.00	\$	136.67
			Factual research for publications, affilations, prior				
			litigations, and CVs of potential child welfare system				
Clare Connaughton	5/26/2020	Kansas	experts	2.67	\$ 200.00	\$	533.33
			Conduct detailed review of MA Named Plaintiff files				
Clare Connaughton	5/28/2020	Kansas	on Relativity	5.00	\$ 200.00	\$	1,000.00
			Research to identify key factual materials for				
Clare Connaughton	6/1/2020	Kansas	preparation of Melinda Kline deposition	2.77	\$ 200.00	\$	553.33
			Research specifically re organizational structure of				
Clare Connaughton	6/3/2020	Kansas	DCF for Melinda Kline deposition	0.40	\$ 200.00	\$	80.00
			Continue conducting factal research for NT in				
Clare Connaughton	6/3/2020	Kansas	preparation for 30(b)(6) deposition of Melinda Kline	2.05	\$ 200.00	Ş	410.00

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			Conduct search of all materials produced by					
			Defendants for references to "on for the night" and					
			night-to-night placements to share with NT for					
Clare Connaughton	6/3/2020	Kansas	preparation of 30(b)(6) deposition of M. Kline	2.85	\$	200.00	\$	570.00
			Index and review MA Named Plaintiff files in					
Clare Connaughton	6/4/2020	Kansas	Relativity	4.50	\$	200.00	\$	900.00
			Identify sources to potentially incorporate into					
Clare Connaughton	6/16/2020	Kansas	Settlement Agreement	2.00	\$	200.00	\$	400.00
			Advise MN re which versions of settlement					
Clare Connaughton	6/17/2020	Kansas	agreement materials to incorporate into settlement	0.25	\$	200.00	\$	50.00
 	, ,				·			
			Assist MN in finalizing Settlement Agreement					
Clare Connaughton	6/17/2020	Kansas	materials	2.17	\$	200.00	\$	433.33
			Conduct search in Relativity re PEFCAS and CAFAS,					
Clare Connaughton	6/18/2020	Kansas	the assessment tools cited in Settlement Agreement	0.80	\$	200.00	\$	160.00
			Finalize all materials for KS settlement agreement for					
Clare Connaughton	6/18/2020	Kansas	MN's review and to share with Defs	1.22	\$	200.00	\$	243.33
			Review all recent correspondence with NFs and NPs					
Clare Connaughton	6/22/2020	Kancac	to track approval of settlement agreement	0.83	ć	200.00	ċ	166.67
Ciare Connaugnion	6/22/2020	Nalisas	to track approval of settlement agreement	0.65	Ą	200.00	Ą	100.07
			Factual research re KS state finance council in re					
Clare Connaughton	6/25/2020	Kansas	settlement approval process	0.42	\$	200.00	\$	83.33
			Meeting to discuss draft findings of fact with MN, EM	-	<u> </u>		•	
Daniel Adamek	6/21/2018	Kansas	and HC.	1.00	\$	200.00	\$	200.00
Daniel Adamek	6/25/2018	Kansas	Review documents for our Finding of Facts	0.22	\$	200.00	\$	43.33
Daniel Adamek	6/25/2018	Kansas	Review documents for our Finding of Facts	1.42	\$	200.00	\$	283.33
			Review and summarize factual documents for					
Daniel Adamek	7/3/2018	Kansas	finding of facts	1.17	\$	200.00	\$	233.33

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			Review and summarize factual documents for					
Daniel Adamek	7/10/2018	Kansas	finding of facts	2.48	\$	200.00	\$	496.67
			Review and summarize factual documents for					
Daniel Adamek	7/11/2018	Kansas	finding of facts	2.02	\$	200.00	\$	403.33
			Review and summarize factual documents for					
Daniel Adamek	7/16/2018	Kansas	finding of facts	0.73	\$	200.00	\$	146.67
Daniel Adamek	7/18/2018	Kansas	Email MN re finding of fact update	0.18	\$	200.00	\$	36.67
			Review and summarize factual documents for					
Daniel Adamek	7/19/2018	Kansas	finding of facts	1.48	\$	200.00	\$	296.67
			Compile and organize team members' review of					
Daniel Adamek	7/23/2018	Kansas	factual research for the finding of facts document	3.45	\$	200.00	\$	690.00
	1, 20, 2020		Email to MN and SD re factual updates from co-		т		т	
Daniel Adamek	7/24/2018	Kansas	counsel call	0.17	\$	200.00	\$	33.33
			Review and summarize factual documents for					
Daniel Adamek	7/24/2018	Kansas	finding of facts	0.62	\$	200.00	\$	123.33
			Review and summarize factual documents for					
Daniel Adamek	7/24/2018	Kansas	finding of facts (cont'd)	0.67	\$	200.00	\$	133.33
			Draft a master finding of facts incorporating all team					
Daniel Adamek	7/25/2018	Kansas	members' document reviews	2.25	\$	200.00	\$	450.00
			Review and summarize factual documents for					
Daniel Adamek	7/26/2018	Kansas	finding of facts	0.25	\$	200.00	\$	50.00
			Draft a master finding of facts incorporating all team					
Daniel Adamek	7/26/2018	Kansas	members' document reviews	2.35	\$	200.00	\$	470.00
			Draft a master finding of facts incorporating all team					
Daniel Adamek	7/27/2018	Kansas	members' document reviews	1.67	\$	200.00	\$	333.33
			Email to co-counsel team with completed finding of					
Daniel Adamek	7/30/2018	Kansas	facts document	0.12	\$	200.00	\$	23.33
			Organize and compile contact memos from					
Daniel Adamek	7/31/2018	Kansas	stakeholders for EM	0.22	\$	200.00	\$	43.33
			Incorporate co-counsel edits to findings of fact					
Daniel Adamek	8/7/2018	Kansas	document	1.23	Ş	200.00	\$	246.67

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			Incorporate co-counsel edits to findings of fact			
Daniel Adamek	8/8/2018	Kansas	document	0.48	\$ 200.00	\$ 96.67
			Draft memo to internal CR team re evidence gaps in			
Daniel Adamek	8/16/2018	Kansas	our finding of facts	0.87	\$ 200.00	\$ 173.33
			Review factual documents to enter into the finding			
Daniel Adamek	8/16/2018	Kansas	of facts	0.98	\$ 200.00	\$ 196.67
			Compile and organize factual documents for the			
Daniel Adamek	8/16/2018	Kansas	finding of facts	1.85	\$ 200.00	\$ 370.00
			Analyze factual research in order to input research			
Daniel Adamek	8/17/2018	Kansas	into the finding of facts	1.78	\$ 200.00	\$ 356.67
l			Incorporate information from contact memos with			
Daniel Adamek	8/20/2018	Kansas	stakeholders into finding of facts	0.18	\$ 200.00	\$ 36.67
			Incorporate information from contact memos with			
Daniel Adamek	8/21/2018	Kansas	stakeholders into finding of facts	1.68	\$ 200.00	\$ 336.67
Daniel Adamek	8/22/2018	Kansas	Call with MN re findings of fact evidence gaps	0.15	\$ 200.00	\$ 30.00
			Update and edit finding of facts to include new			
Daniel Adamek	8/22/2018	Kansas	factual research	0.15	\$ 200.00	\$ 30.00
			Meeting with MN, EM & JK re investigation updates			
Daniel Adamek	9/12/2018	Kansas	and complaint drafting strategy	0.25	\$ 200.00	\$ 50.00
			Compile and organize legal research memos to			
			desseminate to co-counsel to inform complaint			
Daniel Adamek	9/12/2018	Kansas	drafting strategy	0.53	\$ 200.00	\$ 106.67
			Meeting with IL, EM and JK re co-counsel meeting			
Daniel Adamek	9/26/2018	Kansas	and upcoming Kansas trip	0.48	\$ 200.00	\$ 96.67
			Monitor press re Kansas child welfare system to			
Daniel Adamek	9/27/2018	Kansas	incorporate facts into findings of fact	0.03	\$ 200.00	\$ 6.67
			Draft memo for IL re Children's Rights cases that			
			name governor as a named defendant to use when			
			crafting the named defendant section of our			
Daniel Adamek	9/27/2018	Kansas	complaint	5.43	\$ 200.00	\$ 1,086.67
			Draft complaint outline to include new factual			
Daniel Adamek	10/1/2018	Kansas	research and team drafting assignments	0.98	\$ 200.00	\$ 196.67

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			Work on adding edits from the co-counsel into the				
Daniel Adamek	10/5/2018	Kansas	retainer agreement for next friends	1.17	\$	200.00	\$ 233.33
			Email to co-counsel team regarding DCF documents				
Daniel Adamek	10/10/2018	Kansas	necessary for drafting the annotated complaint	0.27	\$	200.00	\$ 53.33
			Edit contact memo from meeting with confidential				
Daniel Adamek	10/11/2018	Kansas	stakeholder.	0.03	\$	200.00	\$ 6.67
			Draft memo for internal team regarding DCF				
			responses to Child Welfare System Task Force				
Daniel Adamek	10/11/2018		questions.	0.37	•	200.00	 73.33
Daniel Adamek	10/15/2018	Kansas	Research background of potential next friend	0.33	\$	200.00	\$ 66.67
			Meeting with IL, MN, JK, and EM re case updates and				
Daniel Adamek	10/17/2018	Kansas	discussion of suggested complaint revisions	1.00	\$	200.00	\$ 200.00
			Draft Children's Rights' version of the complaint				
Daniel Adamek	10/18/2018	Kansas	outline with assignments for external co-counsel.	2.42	\$	200.00	\$ 483.33
			Draft complaint with team members' complaint				
Daniel Adamek	10/26/2018	Kansas	sections	2.28	\$	200.00	\$ 456.67
			Draft paragraphs on named plaintiffs in order to use				
Daniel Adamek	10/29/2018	Kansas	in complaint for factual allegations section.	0.55	\$	200.00	\$ 110.00
			Draft complaint with Children's Rights' sections in				
Daniel Adamek	10/29/2018	Kansas	order to send to co-counsel for review.	8.70	\$	200.00	\$ 1,740.00
			Edit complaint sections in order to send to co-				
Daniel Adamek	10/30/2018	Kansas	counsel.	4.00	\$	200.00	\$ 800.00
			Edit citations and footnotes within the complaint				
Daniel Adamek	10/30/2018	Kansas	draft in order to send to co-counsel	4.00	\$	200.00	\$ 800.00
			Work on combining, formatting, and editing CR and				
Daniel Adamek	10/31/2018	Kansas	NCYL's sections of the complaint.	2.95	\$	200.00	\$ 590.00
			Edit and circulate meeting notes for yesterday's				
Daniel Adamek	11/1/2018	Kansas	team meeting.	0.33	\$	200.00	\$ 66.67

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			Meeting with IL and EM re complaint edits to			
Daniel Adamek	11/1/2018	Kansas	incorporate into draft being sent to NCYL.	0.75	\$ 200.00	\$ 150.00
			Edit draft complaint to incorporate all changes			
			suggested by the internal CR team and to circulate to			
Daniel Adamek	11/1/2018	Kansas	NCYL.	4.52	\$ 200.00	\$ 903.33
			Meeting re complaint drafting with EM, IL, MN and			
Daniel Adamek	11/5/2018	Kansas	JK	0.50	\$ 200.00	\$ 100.00
			Edit draft complaint and add new sources to			
Daniel Adamek	11/5/2018	Kansas	placement array facts.	5.50	\$ 200.00	\$ 1,100.00
			Edit draft complaint in order to incorporate new			
Daniel Adamek	11/6/2018	Kansas	factual sources	5.88	\$ 200.00	\$ 1,176.67
Daniel Adamek	11/7/2018	Kansas	Edit and cite-check draft complaint.	5.07	\$ 200.00	\$ 1,013.33
			Meeting with IL, EM and MN re complaint drafting			
Daniel Adamek	11/8/2018	Kansas	updates and stakeholder updates	0.88	\$ 200.00	\$ 176.67
			Edit draft complaint in order to incorporate new			
			sources found through researching evidence gaps			
Daniel Adamek	11/8/2018	Kansas	and conversations with confidential stakeholders.	1.00	\$ 200.00	\$ 200.00
			Research evidence gaps in the draft Kansas			
			complaint in order to find sources that fit into the			
Daniel Adamek	11/8/2018	Kansas	complaint.	2.57	\$ 200.00	\$ 513.33
			Compile and organize sources from complaint in			
Daniel Adamek	11/8/2018	Kansas	order to create an annotated complaint.	5.25	\$ 200.00	\$ 1,050.00
			Edit and cite check the current version of the draft			
Daniel Adamek	11/9/2018	Kansas	complaint.	3.78	\$ 200.00	\$ 756.67
			Draft complaint in order to incorporate new factual			
Daniel Adamek	11/9/2018	Kansas	sources.	4.60	\$ 200.00	\$ 920.00
			Compile and organize sources from complaint in			
Daniel Adamek	11/10/2018	Kansas	order to have them on file for initial disclosures.	4.00	\$ 200.00	\$ 800.00
			Cite-check draft complaint in order to circulate to the			
Daniel Adamek	11/10/2018	Kansas	co-counsel group.	5.00	\$ 200.00	\$ 1,000.00
			Edit and proofread complaint before circulating to co-			
Daniel Adamek	11/11/2018	Kansas	counsel.	1.00	\$ 200.00	\$ 200.00

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			Cite-check complaint in order to circulate to co-				
Daniel Adamek	11/11/2018	Kansas	counsel	3.00	\$ 200.00	\$	600.00
			Email to IL re number of class members and sourcing				
Daniel Adamek	11/12/2018	Kansas	for this.	0.42	\$ 200.00	\$	83.33
			Compile and organize documents from Sheila A.				
			docket regarding dismissing the governor as a named				
Daniel Adamek	11/12/2018	Kansas	defendants.	0.62	\$ 200.00	\$	123.33
			Verify that sources used in the complaint use the				
Daniel Adamek	11/12/2018	Kansas	most recent data available.	1.78	\$ 200.00	\$	356.67
			Edit complaint draft in order to incorporate edits				
Daniel Adamek	11/12/2018	Kansas	from the co-counsel call	6.65	\$ 200.00	\$	1,330.00
Daniel Adamek	11/13/2018	Kansas	Review sources in complaint and fix cites.	2.00	\$ 200.00	•	400.00
Daniel Adamek	11/14/2018	Kansas	Edit and cite-check draft complaint.	4.10	\$ 200.00	\$	820.00
			Telephone call with confidential stakeholder re				
Daniel Adamek	11/15/2018	Kansas	sourcing in complaint.	1.17	\$ 200.00	\$	233.33
			Research effects of caseworker shortages on				
Daniel Adamek	11/15/2018	Kansas	permanency for citing in the complaint	1.23	\$ 200.00	\$	246.67
			Combine edits from NCYL and CR into one				
Daniel Adamek	11/15/2018	Kansas	consolidated complaint	2.03	\$ 200.00	\$	406.67
Daniel Adamek	11/15/2018	Kansas	Edit and cite check complaint in advance of filing.	11.57	\$ 200.00	\$	2,313.33
Daniel Adamek	11/19/2018	Kansas	Prepare documents to serve on defendants.	1.00	\$ 200.00	\$	200.00
			Organize courtesy emails to defendants with recently				
Daniel Adamek	11/20/2018	Kansas	filed documents.	1.25	\$ 200.00	\$	250.00
Daniel Adamek	11/20/2018	Kansas	Draft CR's pro hac vice applications.	4.50	\$ 200.00	\$	900.00
Daniel Adamek	11/26/2018	Kansas	Draft and edit pro hac vice applications for CR team.	0.63	\$ 200.00	\$	126.67
5	11/25/2010			2.50	202.00		500.00
Daniel Adamek	11/26/2018		Annotate complaint with sources for allegations.	2.50	\$ 200.00		500.00
Daniel Adamek	11/27/2018		File pro hac vice applications for CR team.	0.17	\$ 200.00	\$	33.33
Daniel Adamek	11/27/2018	Kansas	Add sources to annotated complaint.	2.08	\$ 200.00	\$	416.67

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			Edit draft motions for confirmation of summons					
			service to defendants to include recently received					
Daniel Adamek	11/28/2018	Kansas	return receipts.	1.50	\$	200.00	\$	300.00
Daniel Adamek	11/28/2018	Kansas	Edit and compile sources for annotated complaint.	3.92	\$	200.00	\$	783.33
Daniel Adamek	11/29/2018		Edit annotated complaint.	3.70	\$	200.00		740.00
Daniel Adamek	11/23/2018	Karisas	Latt annotated complaint.	3.70	Υ	200.00	<u>,                                     </u>	740.00
			Draft service of summonses delivery confirmation					
Daniel Adamek	11/30/2018	Kansas	filing for Colyer, Keck, Meier-Hummel, and Andersen.	4.13	\$	200.00	\$	826.67
			Compile and organize documents to circulate to					
Daniel Adamek	12/3/2018	Kansas	confidental stakeholder re placement instability.	1.43	\$	200.00	\$	286.67
			Edit proofs of service for service of the complaint to					
Daniel Adamek	12/4/2018	Kansas	defendants.	0.75	\$	200.00	\$	150.00
			Meeting with IL, MN, JK, and EM re debrief from co-					
			counsel meeting in order to divide up internal CR					
Daniel Adamek	12/5/2018	Kansas	litigation tasks.	0.50	\$	200.00	\$	100.00
			Meeting with IL, JK, EM, MN and CC re appearances					
			from defendants' counsel and consequential					
Daniel Adamek	12/6/2018	Kansas	litigation strategy.	0.28	\$	200.00	\$	56.67
Daniel Adamek	12/6/2018	Kansas	File proofs of service on defendants with court.	0.50	\$	200.00	\$	100.00
			Telephone call with confidential stakeholder in		<u> </u>			
			Kansas regarding additional evidence for claims in					
Daniel Adamek	12/6/2018	Kansas	complaint.	0.50	\$	200.00	\$	100.00
			Mail certificates of service and corresponding filing					
			to defendants who do not yet receive ECF					
Daniel Adamek	12/6/2018	Kansas	notifications electronically.	1.00	\$	200.00	\$	200.00
			Edit draft proofs of service in order to file with the					
Daniel Adamek	12/6/2018	Kansas	Court.	1.42	\$	200.00	\$	283.33
Daniel Adamek	12/11/2018	Kansas	Edit pro hac vice application for Benet Magnuson.	2.15	\$	200.00	\$	430.00
Daniel Adamek	12/12/2018	Kansas	File Benet Magnuson's pro hac vice application.	0.50	\$	200.00	\$	100.00

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			Edit resistance to defs' motion for time extension on					
Daniel Adamek	1/3/2019	Kansas	answering complaint.	0.50	\$	200.00	\$	100.00
	1/1/2212					222.22		
Daniel Adamek	1/4/2019	Kansas	Email to co-counsel re filing appearance on case.	0.20	\$	200.00	Ş	40.00
			Edit and proofread our resistance to defendants'					
			request for an extension to file a responsive					
Daniel Adamek	1/4/2019	Kansas	pleading.	0.52	\$	200.00	\$	103.33
			Meeting with MN re edits to opposition to					
			defendants' motion for extension of time to answer					
Daniel Adamek	1/4/2019		complaint.	0.57	•	200.00		113.33
Daniel Adamek	1/4/2019	Kansas	File opposition to motion for extension.	1.08	\$	200.00	\$	216.67
			Meeting with CC, JK, EM, and MN re co-counsel					
Daniel Adamek	1/9/2019		meeting agenda items	0.08	•	200.00	•	16.67
Daniel Adamek	1/10/2019	Kansas	Draft notice of appearance for co-counsel LBB.	0.58	\$	200.00	\$	116.67
			File and circulate stipulated confidentiality order to					
Daniel Adamek	2/8/2019	Kansas	team.	0.25	\$	200.00	\$	50.00
			Meeting with MN, IL, CC, EM, SD re draft settlement					
Daniel Adamek	2/8/2019	Kansas	terms sheet.	1.50	\$	200.00	\$	300.00
			Meeting re settlement terms with MN, JK, EM, CC, IL					
Daniel Adamek	2/11/2019	Kansas	and SD.	1.50	\$	200.00		300.00
Daniel Adamek	2/12/2019	Kansas	Edit settlement terms sheet.	0.77	\$	200.00		153.33
Daniel Adamek	2/13/2019	Kansas	Edit notice of appearance for LBB.	0.20	\$	200.00	\$	40.00
Daniel Adamek	2/14/2019	Kansas	File notice of appearance for LBB.	0.28	\$	200.00	\$	56.67
Daniel Adamek	2/21/2019	Kansas	Edit and proofread settlement terms sheet.	0.05	\$	200.00	\$	10.00
			Meeting with IL, MN, CC, JK, and EM re internal					
Daniel Adamek	2/27/2019	Kansas	litigation strategy.	0.33	\$	200.00	\$	66.67
			Research model settlement agreements for similar					
Daniel Adamek	3/5/2019	Kansas	cases to base model settlement terms upon.	1.00	\$	200.00	\$	200.00
Daniel Adamek	3/5/2019	Kansas	Edit draft settlement terms agreement.	2.00	\$	200.00	\$	400.00
Daniel Adamek	3/6/2019	Kansas	Edit and proofread annotated complaint.	3.48	\$	200.00	\$	696.67
			Meeting with JK, MN, CC, and IL re settlement					
Daniel Adamek	3/13/2019	Kansas	strategy.	0.20	\$	200.00	\$	40.00

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			File, scan, and obtain confidentiality order			
Daniel Adamek	3/14/2019	Kansas	acknowledgements.	0.50	\$ 200.00	\$ 100.00
			Electronic mail to IL re retainer agreements and co-			
Daniel Adamek	3/18/2019	Kansas	counsel agreements.	0.25	\$ 200.00	\$ 50.00
			Edit and circulate Benet M.'s motion to withdraw as			
Daniel Adamek	3/18/2019	Kansas	counsel of record.	0.50	\$ 200.00	\$ 100.00
Daniel Adamek	3/19/2019	Kansas	Edit Benet M.'s notice of withdrawal.	0.15	\$ 200.00	\$ 30.00
			Meeting with co-counsel, EM, JK, MN, SD, CC, and IL			
			re litigation and settlement strategy and substantive			
Daniel Adamek	3/20/2019	Kansas	due process claims analysis.	3.75	\$ 200.00	\$ 750.00
Daniel Adamek	3/21/2019	Kansas	File Benet M.'s motion to withdrawal.	0.25	\$ 200.00	\$ 50.00
Daniel Adamek	4/1/2019	Kansas	Read and analyze legislative post-audit.	0.08	\$ 200.00	\$ 16.67
Daniel Adamek	4/1/2019	Kansas	File and circulate motion for extension.	0.22	\$ 200.00	\$ 43.33
			Electronic mail to co-counsel team re previous first			
			RFPs, initial disclosures, and settlement agreements			
Daniel Adamek	5/15/2019	Kansas	for foster care system cases.	0.45	\$ 200.00	\$ 90.00
			Meeting with MN, JK, CC, EM re follow-up editiing to			
Daniel Adamek	7/31/2019	Kansas	third party subpoenas.	0.10	\$ 200.00	\$ 20.00
	- 1 - 1		Meeting with CC, MN, EM, CG, and JK re named			
Daniel Adamek	8/19/2019	Kansas	plaintiff file review protocol and strategy.	0.30	\$ 200.00	\$ 60.00
			Edit file review excel template for named plaintiff file			
Daniel Adamek	8/20/2019		review.	0.50	\$ 200.00	 100.00
Daniel Adamek	8/20/2019	Kansas	Draft and populate production tracker.	0.62	\$ 200.00	\$ 123.33
			Meeting with MN, EM, JK, CC, CG, SD, and co-counsel			
			re case developments and litigation/settlement			
Daniel Adamek	8/21/2019	Kansas	strategy.	0.83	\$ 200.00	\$ 166.67
			Listen to and take notes to interview with Laura			
Daniel Adamek	8/26/2019	Kansas	Howard for memo to circulate to team.	0.72	\$ 200.00	\$ 143.33
			Research and edit factual cites in mediation			
Daniel Adamek	9/3/2019	Kansas	statement.	1.63	\$ 200.00	\$ 326.67
Daniel Adamek	9/4/2019	Kansas	Edit Kansas mediation statement to add factual cites.	4.42	\$ 200.00	\$ 883.33

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			Review mediation statement to ensure factual			
Daniel Adamek	9/5/2019	Kansas	accuracy.	5.92	\$ 200.00	\$ 1,183.33
Daniel Adamek	9/9/2019	Kansas	Cite-check mediation statement.	3.03	\$ 200.00	\$ 606.67
Daniel Adamek	9/10/2019	Kansas	Review and index named plaintiff file for ML.	1.43	\$ 200.00	\$ 286.67
Daniel Adamek	9/10/2019	Kansas	Collect sources for mediation statement.	1.87	\$ 200.00	\$ 373.33
			Research references to Kids Zones in named plaintiffs			
Daniel Adamek	9/11/2019	Kansas	files for MN.	0.80	\$ 200.00	\$ 160.00
			Telephone call with CC re mediation statement cite-			
Daniel Adamek	9/18/2019	Kansas	checking strategy.	0.22	\$ 200.00	\$ 43.33
			Meeting with IL, MN, CC, JK, and CG re document			
			review progress and discussion of hot documents			
Daniel Adamek	9/18/2019	Kansas	that have been found.	0.43	\$ 200.00	\$ 86.67
Daniel Adamek	9/18/2019	Kansas	Edit and cite-check mediation statement.	7.78	\$ 200.00	\$ 1,556.67
Daniel Adamek	9/19/2019	Kansas	Edit and cite-check mediation statement.	6.27	\$ 200.00	\$ 1,253.33
Daniel Adamek	9/20/2019	Kansas	Proofread mediation statement.	1.07	\$ 200.00	\$ 213.33
			Meeting with JK, CC, IL, and CG re meeting follow-up,			
Daniel Adamek	9/25/2019	Kansas	upcoming tasks, and case strategy.	0.10	\$ 200.00	\$ 20.00
			Edit and proofread letter to Defendants re discovery			
Daniel Adamek	9/25/2019	Kansas	dificiencies.	0.12	\$ 200.00	\$ 23.33
Daniel Adamek	10/2/2019	Kansas	Review and index ZZ's named plaintiff file.	2.17	\$ 200.00	\$ 433.33
Daniel Adamek	10/3/2019	Kansas	Review and index ZZ's named plaintiff file.	6.72	\$ 200.00	\$ 1,343.33
Daniel Adamek	10/4/2019	Kansas	Review and index ZZ's named plaintiff file.	2.60	\$ 200.00	\$ 520.00
Daniel Adamek	10/7/2019	Kansas	Review and index ZZ's named plaintiff file.	6.78	\$ 200.00	\$ 1,356.67
Daniel Adamek	10/8/2019	Kansas	Review and index ZZ's named plaintiff file.	7.22	\$ 200.00	\$ 1,443.33
Daniel Adamek	10/9/2019	Kansas	Email team re recent fact patterns in ZZ case file.	0.20	\$ 200.00	\$ 40.00
Daniel Adamek	10/9/2019	Kansas	Review and index ZZ's named plaintiff file.	4.87	\$ 200.00	\$ 973.33
Daniel Adamek	10/10/2019	Kansas	Draft ZZ's chronology based on document review.	2.55	\$ 200.00	\$ 510.00
			Review and annotate ZZ's case file produced by			
Daniel Adamek	10/10/2019	Kansas	Defendants.	2.67	\$ 200.00	\$ 533.33
			Research motion to dismiss re governor procedural			
Daniel Adamek	10/11/2019	Kansas	history in CR's Oklahoma case.	0.38	\$ 200.00	\$ 76.67

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			Draft ZZ's chronology based on document review of					
Daniel Adamek	10/11/2019	Kansas	their case file.	1.25	\$	200.00	\$	250.00
Daniel Adamek	10/11/2019	Kansas	Review documents re ZZ from their case file.	3.30	\$	200.00	\$	660.00
Daniel Adamek	10/15/2019	Kansas	Edit document review spreadsheet re VA.	0.47	\$	200.00	\$	93.33
			Combine and edit document review spreadsheets re					
Daniel Adamek	10/15/2019	Kansas	ZZ.	1.23	\$	200.00	\$	246.67
			Meeting with MN, CC, and JK to debrief on					
			outstanding tasks from meet and confer with					
Daniel Adamek	10/16/2019	Kansas	defendants.	0.28	\$	200.00	\$	56.67
			Draft list of outstanding discovery issues that have					
			not yet been addressed by Defendants in order to					
Daniel Adamek	10/16/2019	Kancac	raise on meet and confer with defendants.	0.30	\$	200.00	\$	60.00
Daniel Adamek	10/10/2019	Kaiisas	raise on meet and comer with defendants.	0.30	۲	200.00	٦	00.00
			Combine and edit document review spreadsheets					
Daniel Adamek	10/16/2019	Kansas	and chronologies for Named Plaintiffs' case files.	2.18	\$	200.00	\$	436.67
Daniel Adamek	10/17/2019		Review named plaintiff documents.	0.67	\$	200.00		133.33
Daniel Adamek	10/17/2019		Annotate first amended complaint.	1.73	\$	200.00		346.67
			Research motion to dismiss governor pleadings from					
Daniel Adamek	10/23/2019	Kansas	prior litigation in Massachusetts and Missouri.	1.50	\$	200.00	\$	300.00
Daniel Adamek	10/25/2019	Kansas	Review and index ML's case file.	5.08	\$	200.00	\$	1,016.67
Daniel Adamek	10/29/2019	Kansas	Review and index ML's case file.	1.25	\$	200.00	Ś	250.00
			Research sample motion for extensions from other		т		т	
			litigations, local rules re same, and deposition					
Daniel Adamek	10/30/2019	Kansas	notices.	2.00	\$	200.00	\$	400.00
Daniel Adamek	11/4/2019		Draft deposition notice for governor.	1.00	\$	200.00	\$	200.00
			Draft email for MN to opposing counsel re discovery					
Daniel Adamek	11/7/2019	Kansas	deficiencies.	1.00	\$	200.00	\$	200.00
Daniel Adamek	11/7/2019	Kansas	Cite-check and file motions for extension.	4.00	\$	200.00	\$	800.00
			Compile and create binders for IL and MN for					
Daniel Adamek	11/8/2019	Kansas	mediation and vetting of potential expert.	6.00	\$	200.00	\$	1,200.00

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			Research statutes re governor's power over DCF,					
Daniel Adamek	11/14/2019	Kansas	KDHE, and KDADS.	1.17	\$	200.00	\$	233.33
Daniel Adamek	11/18/2019	Kansas	Identify flaws in defendants' productions.	1.63	\$	200.00	\$	326.67
Daniel Adamek	11/19/2019	Kansas	Review defendants' production.	0.30	\$	200.00	\$	60.00
Daniel Adamek	11/20/2019	Kansas	Review documents from latest production.	0.87	\$	200.00	\$	173.33
			Meeting with IL, MN, CC, EM, EPG, and CG re					
Daniel Adamek	11/21/2019	Kansas	outcomes section of settlement agreement draft.	1.50	\$	200.00	\$	300.00
			Draft email to JK, MN, and EPG re governor's					
Daniel Adamek	11/21/2019	Kansas	involvement in foster care and medicaid delivery.	1.50	\$	200.00	\$	300.00
Daniel Adamek	11/21/2013	Karisas	Review documents from Defendants' most recent	1.50	٠,	200.00	<u> </u>	300.00
Daniel Adamek	11/26/2019	Vancac	productions.	3.75	\$	200.00	\$	750.00
Daniel Adamek	11/20/2019	Kalisas	Review and index documents produced by	5.75	Ą	200.00	Ą	750.00
			·					
	10/0/0010		Defendants in response to RFPs that may be useful	4.00		222.22		
Daniel Adamek	12/3/2019	Kansas	for mediation.	1.38	\$	200.00	\$	276.67
Daniel Adamek	12/3/2019	Kansas	Review and index documents re Named Plaintiff ML.	4.38	\$	200.00	\$	876.67
	42/5/2040		Review documents produced by Defendants for	2.50		200.00		700.00
Daniel Adamek	12/6/2019	Kansas	potential use during mediation / settlement.	3.50	\$	200.00	\$	700.00
			Compare draft of motion to dismiss response to see					
Daniel Adamek	12/9/2019	Kansas	changes to draft.	0.03	\$	200.00	\$	6.67
Daniel Adamek	12/9/2019	Kansas	File extension to file opposition to motion to dismiss.	0.17	\$	200.00	\$	33.33
Daniel Adamek	12/9/2019	Kansas	Edit motion for extension for motion to dismiss.	0.27	\$	200.00	\$	53.33
			Review documents from Defendants for possible use					
Daniel Adamek	12/9/2019	Kansas	during mediation.	1.30	\$	200.00	\$	260.00
Daniel Adamek	12/9/2019	Kansas	Review and index ML's named plaintiff file.	3.02	\$	200.00	\$	603.33
Daniel Adamek	12/10/2019	Kansas	Review and index ML's named plaintiff file.	4.73	\$	200.00	\$	946.67
Daniel Adamek	12/11/2019	Kansas	Review and index ML's named plaintiff file.	5.50	\$	200.00	\$	1,100.00
Daniel Adamek	12/12/2019	Kansas	Review and index ML's named plaintiff file.	7.18	\$	200.00	\$	1,436.67

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			Review key documents from Defendants'					
Daniel Adamek	12/13/2019	Kansas	productions for potential use during mediation.	4.50	\$	200.00	\$	900.00
Daniel Adamek	12/16/2019	Kansas	Review and index ML's named plaintiff file.	2.50	\$	200.00	\$	500.00
			Draft memo re statements made by governor					
Daniel Adamek	12/17/2019	Kansas	showing her involvement in foster care system.	2.80	\$	200.00	\$	560.00
Daniel Adamek	12/17/2019	Kansas	Review and index ML's named plaintiff file.	7.43	\$	200.00	\$	1,486.67
Daniel Adamek	12/18/2019	Kansas	Review and index ML's named plaintiff file.	2.37	\$	200.00	\$	473.33
			Draft chronology for ML based on her named					
Daniel Adamek	12/19/2019	Kansas	plaintiff index.	3.28	\$	200.00	\$	656.67
Daniel Adamek	12/19/2019	Kansas	Review and index ML's named plaintiff file.	6.48	\$	200.00	\$	1,296.67
Daniel Adamek	12/20/2019	Kansas	File joint motion for stay of discovery.	0.25	\$	200.00	\$	50.00
Daniel Adamek	12/20/2019	Kansas	Edit joint motion for stay of discovery.	1.00	\$	200.00	\$	200.00
			Combine and edit CC and my indices for ML's named					
Daniel Adamek	12/20/2019	Kansas	plaintiff file.	1.17	\$	200.00	\$	233.33
			Meeting with IL, MN re debriefing on changes to					
Daniel Adamek	1/6/2020	Kansas	settlement agreement draft.	0.33	\$	200.00	\$	66.67
			Draft email to co-counsel team describing hot					
Daniel Adamek	1/6/2020	Kansas	documents found in our review.	0.58	\$	200.00	\$	116.67
			Review documents from RFPs relating to governor					
Daniel Adamek	1/6/2020	Kansas	identified by Defendants.	1.43	\$	200.00	\$	286.67
			Research discovery facts in order to draft email to					
Daniel Adamek	1/6/2020	Kansas	defendants re discovery deficiencies.	2.00	\$	200.00	\$	400.00
			Meeting with IL, JK, MN re motion to dismiss		•			
Daniel Adamek	1/7/2020	Kansas	opposition strategy.	0.43	\$	200.00	\$	86.67
			Research governor's social media and press releases		•		•	
			relating to her power over foster care system and					
Daniel Adamek	1/7/2020	Kansas	Medicaid.	1.00	\$	200.00	\$	200.00
	,,,				•		•	
			Run Relativity searches and analyze results in					
Daniel Adamek	1/7/2020	Kansas	discovery re Governor's role in foster care system.	3.00	\$	200.00	\$	600.00
	_, , , _ 020		Factual research re governor's power over foster	2.30	т			222.00
Daniel Adamek	1/8/2020	Kansas	care system.	0.77	Ś	200.00	\$	153.33
Darrier Addition	1,0,2020	Kurisus	oure system.	0.77	7	200.00	7	100.00

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			Transcribe press conference of Sec. Howard and Gov.					
			Kelly re DCF and KDADS merger for potential use in					
Daniel Adamek	1/8/2020	Kansas	motion to dismiss opposition	3.92	\$	200.00	\$	783.33
			Edit and proofread letter to defendants re 12(b)(1)					
Daniel Adamek	1/10/2020	Kansas	discovery.	2.00	\$	200.00	\$	400.00
			Meeting with MN re edits to motion to dismiss					
Daniel Adamek	1/17/2020	Kansas	opposition	0.50	\$	200.00	\$	100.00
Daniel Adamek	1/17/2020	Kansas	Edit and cite-check motion to dismiss opposition.	5.50	\$	200.00	\$	1,100.00
Daniel Adamek	1/18/2020		Draft motion to dismiss opposition appendix.	4.00	\$	200.00	•	800.00
Daniel Adamek	1/19/2020	Kansas	Cite-check motion to dismiss opposition appendix.	3.00	\$	200.00	ċ	600.00
Daniel Adamek	1/21/2020		Cite-check motion to dismiss opposition appendix.	5.97	\$	200.00		1,193.33
Daniel Adamek	1/22/2020		Cite-check motion to dismiss opposition.	2.50	\$	200.00		500.00
Daniel Adamek	1/27/2020		Meeting with IL re mediation guide.	0.33	\$	200.00	\$	66.67
Damer / tadifiek	1,27,2020	Ransas	Draft guide re responses to Defendants' settlement	0.33	Υ	200.00	Υ	00.07
Daniel Adamek	1/27/2020	Kansas	proposal.	4.33	\$	200.00	\$	866.67
Daniel Adamek	1/28/2020		Edit settlement agreement draft.	1.33	\$	200.00	\$	266.67
			Edits and cite-check motion to dismiss opposition					
Daniel Adamek	1/30/2020	Kansas	exhibits.	4.00	\$	200.00	\$	800.00
Daniel Adamek	1/30/2020	Kansas	Review and index RM's named plaintiffs file.	6.00	\$	200.00	\$	1,200.00
			Telephone call with EPG re motion to dismiss					
Daniel Adamek	2/4/2020	Kansas	opposition legal section.	0.33	\$	200.00	\$	66.67
			Cite-check and edit motion to dismiss opposition					
Daniel Adamek	2/4/2020	Kansas	legal section.	1.75	\$	200.00	\$	350.00
			Proofread motion to dismiss opposition draft before					
Daniel Adamek	2/4/2020	Kansas	circulating to co-counsel.	2.00	\$	200.00	\$	400.00
			Meeting with MN, JK, CC, NT, EPG, and CG re					
			debriefing from discovery strategy meeting with co-					
Daniel Adamek	2/5/2020	Kansas	counsel.	0.33	\$	200.00	\$	66.67
			Compile key documents and create binder for MN to					
Daniel Adamek	2/5/2020		use in mediation.	2.00	\$	200.00		400.00
Daniel Adamek	2/6/2020	Kansas	Edit motion to dismiss opposition.	4.37	\$	200.00	\$	873.33

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Daniel Adamek	2/7/2020	Kansas	Organize exhibits for motion to dismiss opposition.	2.32	\$	200.00	\$	463.33
			Edit motion to dismiss opposition transmittal					
Daniel Adamek	2/7/2020		declaration.	3.08		200.00	•	616.67
Daniel Adamek	2/10/2020	Kansas	Cite-check motion to dismiss opposition.	7.27	\$	200.00	\$	1,453.33
			Quality check and add covers to exhibits to motion					
Daniel Adamek	2/11/2020	Kansas	to dismiss exhibits.	2.13	\$	200.00	\$	426.67
			Integrate MN's edits and follow-up into motion to					
Daniel Adamek	2/11/2020	Kansas	dismiss opposition draft.	2.38	•	200.00	\$	476.67
Daniel Adamek	2/11/2020	Kansas	Cite-check motion to dismiss opposition.	4.30	•	200.00	\$	860.00
Daniel Adamek	2/12/2020	Kansas	Meeting with CC re discovery review for MTD	0.87	\$	200.00	\$	173.33
Daniel Adamek	2/12/2020	Kansas	Cite-check and edit motion to dismiss opposition.	12.27	\$	200.00	\$	2,453.33
Damer Adamen	2/12/2020	Ransas	erce check and care motion to dismiss opposition.	12.27	Υ	200.00	Υ	2, 133.33
Daniel Adamek	2/13/2020	Kansas	Proofread and edit motion to dismiss opposition.	3.28	\$	200.00	\$	656.67
			Cite-check tables of authorities and contents for					
Daniel Adamek	2/13/2020	Kansas	motion to dismiss opposition.	3.58	\$	200.00	\$	716.67
			Review and evaluate documents produced by					
Daniel Adamek	2/21/2020	Kansas	Defendants for the purpose of mediation.	1.00	\$	200.00	\$	200.00
			Create and assemble binder for MN and IL to use at					
Daniel Adamek	2/21/2020	Kansas	mediation.	4.42		200.00		883.33
Daniel Adamek	2/22/2020	Kansas	Review and index RM's named plaintiff file.	1.50	•	200.00	\$	300.00
Daniel Adamek	2/25/2020	Kansas	Review and index RM case file.	5.00	\$	200.00	\$	1,000.00
			Research factual issues raised during mediation for					
Daniel Adamek	2/26/2020		MN.	0.68		200.00		136.67
Daniel Adamek	2/26/2020	Kansas	Review and index RM named plaintiff file.	7.07	\$	200.00	\$	1,413.33
	0 /07 /0 000		Compare settlement agreement versions to ensure			222.22		
Daniel Adamek	2/27/2020	Kansas	accuracy before sending to defendants.	0.15	\$	200.00	\$	30.00
			Calculate total number of pages produced by					
Daniel Adamek	2/27/2020	Kansas	defendants for incorporation in golden rule letter.	0.57	\$	200.00	\$	113.33
Daniel Adamek	2/2//2020	Kansas	Meeting with JK, EPG, NT, CC, IL, CG and MN re	0.57	٠	200.00	٧	113.33
Daniel Adamek	2/27/2020	Kancac	mediation updates and discovery strategy.	0.50	\$	200.00	\$	100.00
Daillei Audillek	2/2//2020	Nalisas	ineulation updates and discovery strategy.	0.50	Ą	200.00	Ą	100.00

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			Compile hot documents from system document					
			review and their summaries for circulation to					
Daniel Adamek	2/27/2020	Kancac	internal team.	0.78	\$	200.00	\$	156.67
Daniel Adamek	2/2//2020	Karisas	Draft RM's chronology from her named plaintiff file	0.78	٠	200.00	٠,	130.07
Daniel Adamek	2/27/2020	Kansas	review.	2.78	\$	200.00	\$	556.67
Daniel Additiek	2/27/2020	Railsas	TCVIC W.	2.70	<u> ۲</u>	200.00	· ·	330.07
Daniel Adamek	2/27/2020	Kansas	Review batch of documents produced by KDADS.	3.30	\$	200.00	\$	660.00
Daniel Adamek	2/27/2020	Kansas	Review and index RM's case file.	5.28	\$	200.00	\$	1,056.67
Daniel Adamek	2/28/2020	Kansas	Review systemic documents from KDADS.	1.48	\$	200.00	\$	296.67
			Run searching in Relativity for redactions, technical					
Daniel Adamek	2/28/2020	Kansas	errors, and discovery deficiencies.	1.50	\$	200.00	\$	300.00
			Cite-check plaintiffs' responses to defendants'					
Daniel Adamek	2/28/2020	Kansas	responses and objections.	2.42	\$	200.00	\$	483.33
			Search for and download Crabtree class cert decision					
Daniel Adamek	3/2/2020	Kansas	in In re Epipen.	0.17	\$	200.00	\$	33.33
Daniel Adamek	3/2/2020	Kansas	Compare drafts of RFPs and rogs.	0.40	\$	200.00	\$	80.00
			Prepare certificate of service for RFPs and					
Daniel Adamek	3/2/2020	Kansas	interrogatories.	0.87	\$	200.00	\$	173.33
			Review and index batch of documents produced by					
Daniel Adamek	3/2/2020	Kansas	DCF.	3.95	\$	200.00	\$	790.00
			Meeting with MN and CC re discovery strategy and					
Daniel Adamek	3/3/2020	Kansas	tasks.	0.47	\$	200.00	\$	93.33
Daniel Adamek	3/3/2020	Kansas	Update RFP, rog, and discovery trackers.	0.60	\$	200.00	\$	120.00
			Compile ESI search term exemplars from other cases					
Daniel Adamek	3/4/2020	Kansas	to aid in drafting ours.	0.50	\$	200.00	\$	100.00
Daniel Adamek	3/11/2020	Kansas	Email to EPG re statistical experts.	0.05	\$	200.00	\$	10.00
			Research factual items for integration into third set					
Daniel Adamek	3/11/2020	Kansas	of RFPs on DCF.	0.77	\$	200.00	\$	153.33
			Generate data on Relativity for inclusion in discovery					
Daniel Adamek	3/12/2020	Kansas	deficiencies letter to defendants.	0.80	\$	200.00	\$	160.00
			Organize and analyze discovery correspondence for					
			inclusion into discovery deficiencies letter to					
Daniel Adamek	3/12/2020	Kansas	Defendants.	0.83	\$	200.00	\$	166.67

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Daniel Adamek	3/12/2020	Kansas	Review and index documents produced by DCF.	2.47	\$ 200.00	\$ 493.33
Daniel Adamek	3/13/2020	Kansas	Review and index documents produced by DCF.	1.37	\$ 200.00	\$ 273.33
Daniel Adamek	3/16/2020	Kansas	Review and index documents produced by DCF.	2.03	\$ 200.00	\$ 406.67
Daniel Adamek	3/17/2020	Kansas	Review and index documents produced by DCF.	0.28	\$ 200.00	\$ 56.67
Daniel Adamek	3/18/2020	Kansas	Review and index documents produced by DCF.	3.82	\$ 200.00	\$ 763.33
Daniel Adamek	3/19/2020	Kansas	Review and index documents produced by DCF.	2.75	\$ 200.00	\$ 550.00
Daniel Adamek	3/20/2020	Kansas	Review and index documents produced by DCF.	2.25	\$ 200.00	\$ 450.00
Daniel Adamek	3/23/2020	Kansas	Download and write descriptions of all hot documents to circulate to co-counsel.	1.52	\$ 200.00	\$ 303.33
Daniel Adamek	3/23/2020	Kansas	Review and index documents produced by DCF.	2.42	\$ 200.00	\$ 483.33
Daniel Adamek	3/24/2020	Kansas	File certificate of service for third set of RFPs on DCF.	0.25	\$ 200.00	\$ 50.00
Daniel Adamek	3/24/2020	Kansas	Prepare 3rd Set of RFPs on DCF to be served.	0.67	\$ 200.00	\$ 133.33
Daniel Adamek	3/25/2020	Kansas	Compile hot documents from document review.	0.12	\$ 200.00	\$ 23.33
Daniel Adamek	3/26/2020	Kansas	Cite-check letter re discovery deficiencies.	1.33	\$ 200.00	\$ 266.67
Daniel Adamek	3/30/2020	Kansas	Email to NT re production problems and details.	0.17	\$ 200.00	\$ 33.33
Daniel Adamek	3/30/2020	Kansas	Compile hot documents from document review.	0.23	\$ 200.00	\$ 46.67
Daniel Adamek	3/30/2020	Kansas	Edit and cite-check letter re production issues.	1.08	\$ 200.00	\$ 216.67
Daniel Adamek	4/2/2020	Kansas	Review discovery served on defendants and calculate deadlines.	0.95	\$ 200.00	\$ 190.00
Daniel Adamek	4/13/2020	Kansas	Assemble correspondence re COVID-19 RFPs for meet and confer.	0.27	\$ 200.00	\$ 53.33

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Daniel Adamek	4/13/2020	Kansas	Generate saved search and spreadsheet of hot docs.	0.28	\$	200.00	\$	56.67
Daniel Adamek	4/13/2020		Assemble e-folder for meet and confer preparation.	3.00	\$	200.00	•	600.00
Daniel Adamek	4/14/2020	Kansas	Draft discovery tracker.	3.38	\$	200.00	\$	676.67
			Prepare e-binder for attorneys to use at meet and					
Daniel Adamek	4/15/2020	Kansas	confer.	1.10	\$	200.00	\$	220.00
Daniel Adamek	4/15/2020	Kansas	Draft and update discovery tracker.	3.15	\$	200.00	\$	630.00
			Email to P. Juneja and MN re meet and confer					
Daniel Adamek	4/16/2020	Kansas	preparation.	0.12	\$	200.00	\$	23.33
Daniel Adamek	4/16/2020	Kansas	Draft and update discovery tracker.	0.42	\$	200.00	\$	83.33
Daniel Adamek	4/16/2020	Kansas	Meeting with CC re discovery tracker.	0.52	\$	200.00	\$	103.33
			Research past monitoring agreements for use in					
Daniel Adamek	4/17/2020	Kansas	settlement discussions.	0.42	\$	200.00	\$	83.33
			Perform targeted Relativity searches to gather					
Daniel Adamek	4/17/2020	Kansas	information on potential 30(b)(6) deponent.	0.42	\$	200.00	\$	83.33
Daniel Adamek	4/21/2020	Kansas	Draft recap of meet and confer.	0.15	\$	200.00	\$	30.00
Daniel Adamek	4/22/2020	Kansas	Research re potential expert.	0.17	\$	200.00	\$	33.33
Daniel Adamek	4/22/2020	Kansas	Compile list of to-do items from meet and confer.	0.37	\$	200.00	\$	73.33
Daniel Adamek	4/23/2020		Update discovery tracker.	0.63	\$	200.00		126.67
Daniel Adamek	4/23/2020		Update tracker of production issues.	0.67	\$	200.00		133.33
Damer Addition	1,23,2020	Ransas	Troubleshoot technical issues with defendants'	0.07	~	200.00	· ·	133.33
Daniel Adamek	4/27/2020	Kansas	productions.	0.30	\$	200.00	\$	60.00
Daniel Additiek	7/2//2020	Karisas	Research history of communications with defendants	0.50	<u>ب</u>	200.00	· ·	00.00
Daniel Adamek	4/27/2020	Kansas	re litigation hold.	0.37	\$	200.00	\$	73.33
Daniel Adamek	4/27/2020		Update discovery tracker.	0.38	\$	200.00	\$	76.67
Daniel Adamek	7/2//2020	Karisas	Pull documents related to kids zones in defendants'	0.30	٠,	200.00	7	70.07
Daniel Adamek	4/27/2020	Kansas	discovery.	0.50	\$	200.00	\$	100.00
Daniel Adamek	4/28/2020		Edit and update discovery tracker.	0.25	\$	200.00	\$	50.00
Daniel Addition	7, 20, 2020	Kurisus	Draft factual cites for email to Defendants re Kids	0.23	7	200.00	٧	30.00
Daniel Adamek	4/28/2020	Kancac	Zones.	0.57	\$	200.00	\$	113.33
Daniel Adamer	4/ 20/ 2020	Kalisas	Gather all documents produced by Defendants that	0.37	٧	200.00	۲	113.33
Daniel Adamak	4/20/2020	Vancas	reference "Kids Zones."	1 17	ć	200.00	\$	202 22
Daniel Adamek	4/28/2020	Kansas	reference Kias Zones.	1.47	\$	200.00	Ş	293.33

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Daniel Adamek	4/30/2020	Kansas	Update and edit discovery tracker.	0.25	\$	200.00	\$	50.00
Daniel Adamek	4/30/2020	Kansas	Compile named plaintiff file review indices.	0.32	\$	200.00	\$	63.33
			Draft list of action items to include in email to					
Daniel Adamek	5/1/2020	Kansas	Defendants re meet and confer.	0.67	\$	200.00	\$	133.33
			Research and prepare e-binder for MN to use during					
Daniel Adamek	5/1/2020	Kansas	meet and confer with defendants.	1.00	\$	200.00	\$	200.00
Daniel Adamek	5/4/2020	Kansas	Update discovery tracker.	1.00	\$	200.00	\$	200.00
Daniel Adamek	5/5/2020	Kansas	Update discovery tracker.	0.02	\$	200.00	\$	3.33
			Meeting with internal team regarding discovery					
Daniel Adamek	5/6/2020	Kansas	logistics and settlement strategy.	0.82	\$	200.00	\$	163.33
Daniel Adamek	5/7/2020	Kansas	Draft potential deponent list.	2.38	\$	200.00	\$	476.67
			Draft action items from meet and confer with					
Daniel Adamek	5/8/2020	Kansas	defendants.	1.22	\$	200.00	\$	243.33
Daniel Adamek	5/11/2020	Kansas	Update discovery trackers.	0.27	\$	200.00	\$	53.33
			Draft potential deponent list from discovery					
Daniel Adamek	5/11/2020	Kansas	reviewed.	1.75	\$	200.00	\$	350.00
Daniel Adamek	5/13/2020	Kansas	Review discovery to draft list of potential deponents.	2.87	\$	200.00	\$	573.33
Daniel Adamek	5/14/2020	Kansas	Email to MN re potential deponents research.	0.12	\$	200.00	\$	23.33
			Review discovery in order to draft list of potential					
Daniel Adamek	5/14/2020	Kansas	deponents.	1.87	\$	200.00	\$	373.33
			Draft action item list from meet and confer with					
Daniel Adamek	5/15/2020	Kansas	Defendants.	0.33	\$	200.00	\$	66.67
Daniel Adamek	5/18/2020	Kansas	Review and index named plaintiff documents.	3.62	\$	200.00	\$	723.33
			Find relevant documents in discovery to use as					
Daniel Adamek	5/21/2020	Kansas	exhibits in Kline deposition.	2.78	\$	200.00	\$	556.67
Daniel Adamek	5/27/2020	Kansas	Update discovery tracker.	0.52	\$	200.00	\$	103.33
Daniel Adamek	5/27/2020	Kansas	Meeting with internal team re discovery tasks.	0.67	\$	200.00	\$	133.33
			Compile legal research memos re dismissing					
Daniel Adamek	5/28/2020	Kansas	plaintiffs.	0.17	\$	200.00	\$	33.33
	_ /_ /_ /							
Daniel Adamek	5/28/2020	Kansas	Review documents to use in Kline deposition outline.	2.58	\$	200.00	\$	516.67
	_ , ,		Review documents to incorporate into Kline					
Daniel Adamek	5/29/2020	Kansas	deposition outline.	0.92	Ş	200.00	Ş	183.33

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Daniel Adamek	6/2/2020	Kansas	Review and index MA named plaintiff file.	1.27	\$	200.00	\$	253.33
			Perform factual research in preparation for Kline					
Daniel Adamek	6/3/2020	Kansas	deposition.	5.45	\$	200.00	\$	1,090.00
			Organize, process, and file discovery from					
Daniel Adamek	6/4/2020	Kansas	defendants.	0.62	\$	200.00	\$	123.33
Daniel Adamek	6/4/2020	Kansas	Review and index MA's named plaintiff file.	2.35	\$	200.00	\$	470.00
Daniel Adamek	6/4/2020	Kansas	Research and review documents for Kline deposition.	2.82	\$	200.00	\$	563.33
Daniel Adamek	6/5/2020	Kansas	Review and index MA file produced by defendants.	3.50	\$	200.00	\$	700.00
Daniel Adamek	6/8/2020	Kansas	Update discovery tracker.	0.12	\$	200.00	\$	23.33
Daniel Adamek	6/8/2020	Kansas	Review and index MA named plaintiff file.	2.55	\$	200.00	\$	510.00
Daniel Adamek	6/9/2020	Kansas	Review and index MA named plaintiff file.	1.32	\$	200.00	\$	263.33
Daniel Adamek	6/10/2020	Kansas	Factual research re named plaintiffs' birth dates.	0.35	\$	200.00	\$	70.00
Daniel Adamek	6/10/2020	Kansas	Meeting with MN re settlement filings strategy.	0.53	\$	200.00	\$	106.67
Daniel Adamek	6/15/2020	Kansas	Perform factual research re named plaintiffs.	2.00	\$	200.00	\$	400.00
Daniel Adamek	7/14/2020	Kansas	Review and edit preliminary approval timeline.	0.33	\$	200.00	\$	66.67
Erin G. McGuinness	12/15/2017	Kansas	Discuss investigation strategy with IL & HC	0.25	\$	240.00	\$	60.00
Erin G. McGuinness	12/21/2017	Kansas	Telephone call with NCYL to discuss next steps for investigatory research re KS foster care system	1.05	\$	240.00	\$	252.00
Erin G. McGuinness	1/10/2018	Kansas	Analyze task force report on Kansas child welfare system.	0.63	\$	240.00	\$	152.00
Erin G. McGuinness	1/11/2018	Kansas	Review HC's Kansas foster care investigatory research to share with co-counsel NCYL.	0.10	\$	240.00	\$	24.00
Lim 3. Micdumics	1, 11, 2010	Nama	Discuss status of Kansas foster care investigation	0.10	<u>ب</u>	2-0.00	Υ	27.00
Erin G. McGuinness	1/12/2018	Kansas	with IL & HC.	0.13	\$	240.00	\$	32.00
Erin G. McGuinness	1/16/2018	Kansas	Review list of potential issues and sources created by co-counsel.	0.43	\$	240.00	\$	104.00
Erin G. McGuinness	1/16/2018	Kansas	Meeting with HC, IL re factual research on potential litigation	0.75	\$	240.00	\$	180.00

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			Analyze additional factual issues to investigate in					
Erin G. McGuinness	1/17/2018	Kansas	preparation for call with NCYL re investigation	0.28	\$	240.00	\$	68.00
			Call with co-counsel, NCYL, regarding potential issue					
Erin G. McGuinness	1/19/2018	Kansas	areas to focus the investigation.	0.75	\$	240.00	\$	180.00
			Analyze various metrics from Adoption and Foster					
			Care Analysis and Reporting System (AFCARS)					
			concerning Kansas child welfare system and its					
Erin G. McGuinness	1/22/2018	Kancac	failures, including number of placement moves.	1.98	\$	240.00	¢	476.00
Lilli G. MicGuilliless	1/22/2018	Kaiisas	railules, including number of placement moves.	1.50	۲	240.00	٦	470.00
			Begin review of Kansas DCF policy & procedure					
Erin G. McGuinness	1/23/2018	Kansas	manual to isolate relevant policies	1.03	\$	240.00	\$	248.00
Lim G. Medaminess	1,23,2010	Karisas	Call with NCYL and foster care advocates to discuss	1.05	· ·	240.00	٧	240.00
Erin G. McGuinness	1/23/2018	Kansas	contact points in the state.	1.20	\$	240.00	\$	288.00
21111 31 1110 3411111633	1, 23, 2023	Ransas	contact points in the state.	1.20	Ψ	2 10.00	Ψ	200.00
			Analyze available Medicaid data for Kansas with					
Erin G. McGuinness	2/5/2018	Kansas	respect to mental health for foster youth	0.38	\$	240.00	\$	92.00
			Analyze latest information on placement moves of					
Erin G. McGuinness	2/16/2018	Kansas	foster children.	0.25	\$	240.00	\$	60.00
			Call with IL, HC, SD, co-counsel from NCYL, and foster					
			care advocates regarding strategy for upcoming trip					
Erin G. McGuinness	2/16/2018	Kansas	to Kansas and updates on investigation outreach.	0.82	\$	240.00	\$	196.00
			Meeting with IL & HC regarding status of Kansas					
Erin G. McGuinness	3/5/2018	Kansas	investigation and next steps.	0.50	\$	240.00	\$	120.00
			Review Kansas foster care placement statistics per					
Erin G. McGuinness	3/6/2018	Kansas	SD's email.	0.78	\$	240.00	\$	188.00
			Call with Plaintiff's Team, CR team (EM, SD, IL, HC)					
			and NCYL (LC, PJ) regarding status of the					
			investigation, plans for the next stakeholder trip, and					
Erin G. McGuinness	3/7/2018	Kansas	general next steps.	1.00	\$	240.00	\$	240.00

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			Prepare analysis of most relevant and shocking					
			Adoption and Foster Care Analysis and Reporting					
			System (AFCARS) data to inform Kansas foster care					
Erin G. McGuinness	3/9/2018	Kansas	investigation.	2.50	\$	240.00	\$	600.00
			Closely review latest investigation materials re child					
			welfare placements and mental health issues in					
Erin G. McGuinness	3/13/2018	Kansas	preparation for trip to meet with stakeholders.	2.00	\$	240.00	\$	480.00
Erin G. McGuinness	3/18/2018	Kansas	Flight to Kansas City, MO.	1.00	\$	240.00	\$	240.00
			Drive with SD & LW (NCYL) from Kansas City to					
Erin G. McGuinness	3/19/2018	Kansas	Wichita.	1.50	\$	240.00	\$	360.00
			Meeting with SD & LW to analyze that day's					
			interviews with local Kansas advocates and aged out					
Erin G. McGuinness	3/19/2018	Kansas	youth as well as strategy for upcoming meetings.	0.75	\$	240.00	\$	180.00
	3, 23, 2323		, can be as a conseq, to appearing meaning		т		T	
			Meet with SD, LW (NCYL), and youth who recently					
			aged out of the Kansas foster care system to discuss					
Erin G. McGuinness	3/19/2018	Kansas	issues in KS foster care system.	2.50	\$	240.00	\$	600.00
			Meeting with SD, LW (NCYL) and advocate LBB (FAC)					
			to discuss best practices in child welfare					
			spearheaded by FACs in Kansas and issues in KS child					
Erin G. McGuinness	3/19/2018	Kansas	welfare system	3.07	\$	240.00	\$	736.00
Erin G. McGuinness	3/20/2018	Kansas	Drive back to Kansas City from Wichita.	1.50	\$	240.00	\$	360.00
			Meeting with SD & LW (NCYL) with stakeholder who					
Erin G. McGuinness	3/20/2018	Kansas	worked for a private child welfare agency in Wichita.	1.00	\$	240.00	\$	240.00
			Meeting with SD & LW (NCYL co-counsel) to debrief					
			about the day's stakeholder meetings and discuss					
Erin G. McGuinness	3/20/2018	Kansas	how the new information informs the investigation.	1.00	\$	240.00	\$	240.00

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			Meetings in Wichita with SD, LW (NCYL) and foster					
			care system advocates and other involved individuals					
Erin G. McGuinness	3/20/2018	Kansas	specifically re: placement and night-to-night issues.	5.25	\$	240.00	\$	1,260.00
			Drive from stakeholder meeting to airport with SD &					<u> </u>
Erin G. McGuinness	3/21/2018	Kansas	LW (NCYL co-counsel).	0.25	\$	240.00	\$	60.00
			Meeting with SD, LW (NCYL co-counsel), LBB (co-					
			counsel) and foster care advocate to discuss case					
Erin G. McGuinness	3/21/2018	Kansas	workers' workload.	1.00	\$	240.00	\$	240.00
			Drafted contact memos summarizing highlights and					
			attorney impressions from recent stakeholder trip to					
Erin G. McGuinness	4/3/2018	Kansas	Kansas City and Wichita.	3.10	\$	240.00	\$	744.00
	., 0, 2020	11011000	Factual research re Kansas foster care system	5.20	т		т	7
Erin G. McGuinness	4/4/2018	Kansas	placements and mental health deficiencies.	1.50	\$	240.00	\$	360.00
	, ,		Edit other attorneys' contact memos from recent		<u> </u>		•	
Erin G. McGuinness	4/4/2018	Kansas	investigatory trip to send to team.	2.55	\$	240.00	\$	612.00
			Full team telephone call to discuss strategy for				· ·	
			upcoming investigation trip, next steps for factual					
Erin G. McGuinness	4/11/2018	Kansas	investigation	1.00	\$	240.00	\$	240.00
			Analyze Adoption and Foster Care Analysis and					
			Reporting System (AFCARS) data specifically re					
Erin G. McGuinness	5/8/2018	Kansas	Kansas placement array.	2.28	\$	240.00	\$	548.00
			Discuss Kansas Medicaid structure with MN to					
Erin G. McGuinness	5/14/2018	Kansas	brainstorm angles of a possible ESPDT claim.	0.25	\$	240.00	\$	60.00
			Legal and factual research re Kansas Medicaid					
			structure in consideration of an EPSDT claim for					
Erin G. McGuinness	5/14/2018	Kansas	mental health treatment.	3.77	\$	240.00	\$	904.00
			Analyze Adoption and Foster Care Analysis and					
			Reporting System (AFCARS) data for Kansas					
Erin G. McGuinness	5/23/2018	Kansas	placement stability specifically.	0.77	\$	240.00	\$	184.00
			Discussion with MN re investigation status, next					
Erin G. McGuinness	6/14/2018	Kansas	steps, and upcoming interviews	0.33	\$	240.00	\$	80.00

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			Check in with MN regarding status of KS foster care					
			investigation document review and evidentiary					
Erin G. McGuinness	6/15/2018 Ka	ansas	outline.	0.50	\$	240.00	\$	120.00
			Internal team meeting to discuss document review					
Erin G. McGuinness	6/15/2018 Ka	ansas	and evidence outlining.	1.00	\$	240.00	\$	240.00
Erin G. McGuinness	6/17/2018 Ka		Flight from La Guardia to Kansas City.	0.75	\$	240.00		180.00
Erm G. WieGumness		ansas	riight from La Gaardia to Ransas City.	0.75	Υ	2 10.00	Υ	100.00
Erin G. McGuinness	6/17/2018 Tr		Lyft to Laguardia for flight to Kansas City.	0.37	\$	240.00	\$	88.00
	Ka	ansas						
Erin G. McGuinness	6/18/2018 Tr	ravel	Drive from Kansas City to Olathe and back.	0.83	\$	240.00	\$	200.00
			Meeting with SD & Leecia Welch with a person					
			involved in the foster care system in Kansas City, MO					
Erin G. McGuinness	6/18/2018 Ka	ansas	re: foster care system issues.	1.00	\$	240.00	\$	240.00
			Meeting with potential clients re: foster care system					
Erin G. McGuinness	6/18/2018 Ka	ansas	placement array issues.	2.00	\$	240.00	\$	480.00
			Meeting with potential fact witness and recently					
			aged out youth re KS foster care system placement					
Erin G. McGuinness	6/18/2018 Ka	ansas	issues.	2.00	\$	240.00	\$	480.00
			Meeting with SD, LW, and foster care advocate re KS					
			foster care system investigation, issues facing Kansas					
Erin G. McGuinness	6/18/2018 Ka	ansas	foster care system.	2.00	\$	240.00	\$	480.00
	Ka	ansas	Drive from Kansas City to Olathe for stakeholder					
Erin G. McGuinness	6/19/2018 Tr	ravel	meetings and back.	0.83	\$	240.00	\$	200.00
			Meeting with SD & potential client re issues facing					
Erin G. McGuinness	6/19/2018 Ka	ansas	Kansas foster care system.	1.75	\$	240.00	\$	420.00
	Ka	ansas						
Erin G. McGuinness	6/20/2018 Tr	ravel	Drive from hotel to airport.	0.33	\$	240.00	\$	80.00
	Ka	ansas	Car ride home from airport after return flight from					
Erin G. McGuinness	6/20/2018 Tr	ravel	Kansas City.	0.37	\$	240.00	\$	88.00
		ansas						
Erin G. McGuinness	6/20/2018 Tr	ravel	Flight from Kansas City to NYC.	1.00	\$	240.00	\$	240.00

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			Meeting with MN, HC, DA re document review			
Erin G. McGuinness	6/21/2018	Kansas	updates to inform investigation, potential claims.	1.00	\$ 240.00	\$ 240.00
			Research the practicability of an ESSA claim in Kansas			
Erin G. McGuinness	6/25/2018	Kansas	investigation.	1.28	\$ 240.00	\$ 308.00
			Analyze KanCare network adequacy report to			
			understand the efficiency and/or gaps in pediatric			
Erin G. McGuinness	7/5/2018	Kansas	coverage.	0.75	\$ 240.00	\$ 180.00
			Call with Medicaid legal expert to discuss feasibility			
Erin G. McGuinness	7/11/2018	Kansas	of an EPSDT claim in Kansas.	0.50	\$ 240.00	\$ 120.00
			Discuss Kansas EPSDT claim and legal research with			
Erin G. McGuinness	7/13/2018	Kansas	IL.	0.42	\$ 240.00	\$ 100.00
			Review and analysis of investigation document to			
Erin G. McGuinness	7/17/2018	Kansas	incorporate into working Findings of Facts document.	0.33	\$ 240.00	\$ 80.00
			Reviewed and analyzed contracts between DCF and			
			contracting agencies to understand agency			
Erin G. McGuinness	7/19/2018	Kansas	relationship.	2.00	\$ 240.00	\$ 480.00
			Analyze what qualifies as a mental health condition			
Erin G. McGuinness	7/20/2018	Kansas	to shape EPSDT claims.	0.12	\$ 240.00	\$ 28.00
			Reviewed contracts between DCF and KVC and St.			
Erin G. McGuinness	7/20/2018	Kansas	Francis for Findings of Facts document.	3.78	\$ 240.00	\$ 908.00
			Draft and proofread Next Friend retainer for Kansas			
Erin G. McGuinness	7/30/2018	Kansas	foster care investigation.	0.23	\$ 240.00	\$ 56.00
			Review fully compiled Finding of Facts document to			
			see where, if any, holes in evidence exist in			
Erin G. McGuinness	7/30/2018	Kansas	investigation.	0.28	\$ 240.00	\$ 68.00
			Meeting with IL & MN to discuss objectives for KS			
Erin G. McGuinness	7/30/2018	Kansas	foster care investigatory trip.	0.50	\$ 240.00	\$ 120.00
			Airport delays for flight from Atlanta to Kansas City			
			due to weather. Delays continued past midnight,			
Erin G. McGuinness	7/31/2018	Kansas	remainder of delay on next day's timeslip.	0.75	\$ 240.00	\$ 180.00

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		Kansas	Taxi from offie to LaGuardia airport for trip to			
Erin G. McGuinness	7/31/2018	Travel	Kansas.	0.37	\$ 240.00	\$ 88.00
		Kansas	Airport delay for flight from LaGuardia to Atlanta. No			
Erin G. McGuinness	7/31/2018	Travel	other flights available.	0.50	\$ 240.00	\$ 120.00
		Kansas				
Erin G. McGuinness	7/31/2018	Travel	First leg of trip to Kansas from LaGuardia to Altanta.	1.25	\$ 240.00	\$ 300.00
			Upload and review case notes, contact memos, and			
Erin G. McGuinness	7/31/2018	Kansas	Findings of Facts document.	0.50	\$ 240.00	\$ 120.00
			Taxi from KCK airport to 21C Museum Hotel in			
Erin G. McGuinness	8/1/2018	Kansas	Kansas City.	0.27	\$ 240.00	\$ 64.00
		Kansas	Drive back to Lawrence from Topeka for meeting			
Erin G. McGuinness	8/1/2018	Travel	with recenty aged out youth.	0.27	\$ 240.00	\$ 64.00
			Meeting w/ recently aged out youth, and then met			
		Kansas	with stakeholder regarding further outreach			
Erin G. McGuinness	8/1/2018	Travel	avenues.	0.50	\$ 240.00	\$ 120.00
		Kansas	Drive from Kansas City to Topeka for meeting with			
Erin G. McGuinness	8/1/2018	Travel	potential co-counsel.	0.53	\$ 240.00	\$ 128.00
		Kansas	Drive back to Kansas City from dinner meeting in			
Erin G. McGuinness	8/1/2018	Travel	Topeka.	0.60	\$ 240.00	\$ 144.00
		Kansas				
Erin G. McGuinness	8/1/2018	Travel	Connecting flight from Atlanta to Kansas City.	0.75	\$ 240.00	\$ 180.00
		Kansas				
Erin G. McGuinness	8/1/2018	Travel	Dinner meeting with stakeholders in Topeka w/SD.	0.87	\$ 240.00	\$ 208.00
		Kansas	Flight delay in Atlanta for connecting flight to Kansas			
Erin G. McGuinness	8/1/2018	Travel	City, continues from 7/31/18	0.92	\$ 240.00	\$ 220.00
			Meeting with SD to plan strategy for stakeholder			
Erin G. McGuinness	8/1/2018	Kansas	meetings for the day.	0.50	\$ 240.00	\$ 120.00
		Kansas	Drive from meeting with stakeholder in Kansas City			
Erin G. McGuinness	8/2/2018	Travel	to meeting with stakeholder in Topeka.	0.50	\$ 240.00	\$ 120.00
			Drive from meeting with stakeholder in Topeka back			
		Kansas	to Kansas City for dinner meeting with stakeholder in			
Erin G. McGuinness	8/2/2018	Travel	KC w/ SD.	0.62	\$ 240.00	\$ 148.00

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		Meeting with SD to prepare and strategize for					
8/2/2018	Kansas	stakeholder meetings of the day.	0.50	\$	240.00	\$	120.00
		Meeting with foster care advocate in Kansas City					
8/2/2018	Kansas	with SD re placement array issues.	1.00	\$	240.00	\$	240.00
		Meeting with foster care advocate in Topeka with SD					
8/2/2018	Kansas	re placement array, foster care contractor problems.	1.50	\$	240.00	\$	360.00
		Meeting with foster care advocate in Kansas City,					
8/2/2018	Kansas	with SD re placement array issues.	2.00	\$	240.00	\$	480.00
	Kansas						
8/3/2018	Travel	Drive from hotel in Kansas City to airport	0.25	\$	240.00	\$	60.00
	Kansas	Taxi back to office from LaGuardia airport after					
8/3/2018	Travel	return flight from Kansas.	0.35	\$	240.00	\$	84.00
	Kansas						
8/3/2018	Travel	Flight home from Kansas City to NYC.	1.50	\$	240.00	\$	360.00
		Email exchange with Martha Hodgesmith to					
		coordinate team discussion regarding Kansas					
8/8/2018	Kansas	Medicaid and mental health systems.	0.10	\$	240.00	\$	24.00
		Management of the state of the					
0/0/2010			0.20		240.00	_	40.00
8/8/2018	Kansas	- 1	0.20	\$	240.00	\$	48.00
0/0/2010	17		0.40		240.00	_	44.00
8/9/2018	Kansas	, .	0.18	\$	240.00	\$	44.00
		, .					
0/0/2010	V		0.20	<u> </u>	240.00	۸.	72.00
8/9/2018	Kansas		0.30	\$	240.00	\$	72.00
0/0/2010	17	·	4.62		240.00	<u> </u>	202.00
8/9/2018	Kansas	from 7/31-8/2 stakeholder trip.	1.63	\$	240.00	\$	392.00
		Draft contact memos from meetings from last					
8/10/2018	Kansas	, .	1.53	\$	240.00	\$	368.00
	8/2/2018 8/2/2018 8/2/2018 8/3/2018 8/3/2018 8/3/2018 8/8/2018 8/8/2018 8/9/2018 8/9/2018	8/3/2018 Travel Kansas 8/3/2018 Travel	8/2/2018 Kansas stakeholder meetings of the day.  Meeting with foster care advocate in Kansas City with SD re placement array issues.  Meeting with foster care advocate in Topeka with SD re placement array, foster care contractor problems.  Meeting with foster care advocate in Kansas City, with SD re placement array issues.  Kansas Kansas With SD re placement array issues.  Kansas Drive from hotel in Kansas City to airport  Kansas Taxi back to office from LaGuardia airport after return flight from Kansas.  Kansas Flight home from Kansas City to NYC.  Email exchange with Martha Hodgesmith to coordinate team discussion regarding Kansas  Medicaid and mental health systems.  Kansas emails with team discussing major findings, evidence gaps in findings of facts outline.  Email exchange with Appleseed board member re mental health delivery system.  Review and analyze past NCYL consent decrees as examples for complaint drafting and litigation strategy.  Review and analyze notes to update contact memos from 7/31-8/2 stakeholder trip.  Draft contact memos from meetings from last investigatory trip for circulation to team and to	8/2/2018 Kansas stakeholder meetings of the day. 0.50  Meeting with foster care advocate in Kansas City  with SD re placement array issues. 1.00  Meeting with foster care advocate in Topeka with SD re placement array, foster care contractor problems. 1.50  Meeting with foster care advocate in Kansas City,  Meeting with SD re placement array issues. 2.00  Kansas Weeting with Kansas City to airport 0.25  Kansas Travel Drive from hotel in Kansas City to airport 10.25  Kansas Travel return flight from Kansas. 0.35  Kansas Flight home from Kansas City to NYC. 1.50  Email exchange with Martha Hodgesmith to coordinate team discussion regarding Kansas Medicaid and mental health systems. 0.10  Kansas emails with team discussing major findings, evidence gaps in findings of facts outline. 0.20  Kansas emails with team discussing major findings, evidence gaps in findings of facts outline. 0.20  Email exchange with Appleseed board member re mental health delivery system. 0.18  Review and analyze past NCYL consent decrees as examples for complaint drafting and litigation strategy. 0.30  Review and analyze notes to update contact memos from 7/31-8/2 stakeholder trip. 1.63  Draft contact memos from meetings from last investigatory trip for circulation to team and to	8/2/2018 Kansas stakeholder meetings of the day. 0.50 \$  Meeting with foster care advocate in Kansas City with SD re placement array issues. 1.00 \$  Meeting with foster care advocate in Topeka with SD re placement array, foster care contractor problems. 1.50 \$  Meeting with foster care advocate in Kansas City, with SD re placement array, foster care contractor problems. 2.00 \$  Meeting with foster care advocate in Kansas City, with SD re placement array issues. 2.00 \$  Kansas Kansas Tavel Drive from hotel in Kansas City to airport 0.25 \$  Kansas Taxi back to office from LaGuardia airport after return flight from Kansas. 0.35 \$  Kansas R/3/2018 Travel Flight home from Kansas City to NYC. 1.50 \$  Email exchange with Martha Hodgesmith to coordinate team discussion regarding Kansas Medicaid and mental health systems. 0.10 \$  Kansas emails with team discussing major findings, evidence gaps in findings of facts outline. 0.20 \$  Email exchange with Appleseed board member re mental health delivery system. 0.18 \$  Review and analyze past NCYL consent decrees as examples for complaint drafting and litigation strategy. Review and analyze notes to update contact memos from 7/31-8/2 stakeholder trip. 1.63 \$  Draft contact memos from meetings from last investigatory trip for circulation to team and to	8/2/2018 Kansas stakeholder meetings of the day. 0.50 \$ 240.00  Meeting with foster care advocate in Kansas City with SD re placement array issues. 1.00 \$ 240.00  Meeting with foster care advocate in Topeka with SD re placement array, foster care contractor problems. 1.50 \$ 240.00  Meeting with foster care advocate in Kansas City, with SD re placement array, foster care contractor problems. 1.50 \$ 240.00  Meeting with foster care advocate in Kansas City, with SD re placement array issues. 2.00 \$ 240.00  Kansas Travel Drive from hotel in Kansas City to airport 0.25 \$ 240.00  Kansas Travel Porive from LaGuardia airport after return flight from Kansas. 0.35 \$ 240.00  Kansas Travel Flight home from Kansas City to NYC. 1.50 \$ 240.00  Email exchange with Martha Hodgesmith to coordinate team discussion regarding Kansas Medicaid and mental health systems. 0.10 \$ 240.00  Kansas emails with team discussing major findings, evidence gaps in findings of facts outline. 0.20 \$ 240.00  Kansas emails with team discussing major findings, evidence gaps in findings of facts outline. 0.20 \$ 240.00  Review and analyze past NCYL consent decrees as examples for complaint drafting and litigation strategy. Review and analyze notes to update contact memos from 7/31-8/2 stakeholder trip. 1.63 \$ 240.00  Draft contact memos from meetings from last investigatory trip for circulation to team and to	8/2/2018 Kansas stakeholder meetings of the day. 0.50 \$ 240.00 \$ 8/2/2018 Kansas with SD re placement array issues. 1.00 \$ 240.00 \$ 8/2/2018 Kansas with SD re placement array issues. 1.00 \$ 240.00 \$ 8/2/2018 Kansas replacement array, foster care advocate in Topeka with SD re placement array, foster care contractor problems. 1.50 \$ 240.00 \$ 8/2/2018 Kansas replacement array, foster care advocate in Kansas City, 8/2/2018 Kansas with SD re placement array issues. 2.00 \$ 240.00 \$ 8/3/2018 Travel Drive from hotel in Kansas City to airport 0.25 \$ 240.00 \$ 8/3/2018 Travel Prive from Kansas City to airport after return flight from Kansas. 0.35 \$ 240.00 \$ 8/3/2018 Travel Flight home from Kansas City to NYC. 1.50 \$ 240.00 \$ 8/3/2018 Travel Flight home from Kansas City to NYC. 1.50 \$ 240.00 \$ 8/3/2018 Kansas Medicaid and mental health Hodgesmith to coordinate team discussion regarding Kansas Medicaid and mental health systems. 0.10 \$ 240.00 \$ 8/3/2018 Kansas evidence gaps in findings of facts outline. 0.20 \$ 240.00 \$ 8/3/2018 Kansas evidence gaps in findings of facts outline. 0.20 \$ 240.00 \$ 8/3/2018 Kansas evidence gaps in findings of facts outline. 0.20 \$ 240.00 \$ 8/3/2018 Kansas evidence gaps in findings of facts outline. 0.20 \$ 240.00 \$ 8/3/2018 Kansas evidence gaps in findings of facts outline. 0.20 \$ 240.00 \$ 8/3/2018 Kansas evidence gaps in findings of facts outline. 0.20 \$ 240.00 \$ 8/3/2018 Kansas evidence gaps in findings of facts outline. 0.30 \$ 240.00 \$ 8/3/2018 Kansas for complaint drafting and litigation strategy. 0.30 \$ 240.00 \$ 8/3/2018 Kansas from 7/31-8/2 stakeholder trip. 1.63 \$ 240.00 \$ 9/2018 Kansas from 7/31-8/2 stakeholder trip. 1.63 \$ 240.00 \$ 9/2018 Kansas from 7/31-8/2 stakeholder trip. 1.63 \$ 240.00 \$ 9/2018 Kansas from 7/31-8/2 stakeholder trip. 1.63 \$ 240.00 \$ 9/2018 Kansas from 7/31-8/2 stakeholder trip. 1.63 \$ 240.00 \$ 9/2018 Kansas from 7/31-8/2 stakeholder trip. 1.63 \$ 240.00 \$ 9/2018 Kansas from 7/31-8/2 stakeholder trip. 1.63 \$ 240.00 \$ 9/2018 Kansas from 7/31-8/2 stakeholder trip. 1.63 \$

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			Review and analyze newspaper article outlining the					
Erin G. McGuinness	8/15/2018	Kansas	Kansas psychotropic medication workgroup.	0.17	\$	240.00	\$	40.00
			Email exchange with foster care advocate in Kansas					
			to coordinate call to discuss KS mental health system					
Erin G. McGuinness	8/15/2018	Kansas	and poor outcomes for older youth in foster care.	0.18	\$	240.00	\$	44.00
I			Weekly team meeting to discuss everyon'e updates					
I			on stakeholder outreach, complaint drafting, and					
			upcoming trip with MN, DA, co-counsel (NCYL &					
Erin G. McGuinness	8/15/2018	Kansas	LBB).	0.98	\$	240.00	\$	236.00
			Research Kansas Medicaid system and interaction					
Erin G. McGuinness	8/15/2018	Kansas	between KDHE and KDADS.	1.78	\$	240.00	\$	428.00
			Prepare for call with foster care stakeholder to					
			discuss mental health system for children in foster					
Erin G. McGuinness	8/15/2018	Kansas	care.	2.00	\$	240.00	\$	480.00
			Prepare for call with advocate for mental health in					
			foster care populations in Kansas to discuss					
			outcomes for children aging out of care through					
Erin G. McGuinness	8/20/2018	Kansas	review of relevant data.	1.50	\$	240.00	\$	360.00
			Continued drafting contact memos from recent					
			stakeholder trip for inclusion in the Findings of Facts					
Erin G. McGuinness	8/20/2018	Kansas	document.	2.00	\$	240.00	\$	480.00
			Call with Kansas foster care advocate to discuss					
Erin G. McGuinness	8/21/2018	Kansas	outcomes for older youth in care.	0.83	\$	240.00	\$	200.00
			Emails with team re strategy for outreach to Kansas					
			foster care community, evidence gaps that need to					
Erin G. McGuinness	8/22/2018	Kansas	be filled in upcoming trip.	0.17	\$	240.00	\$	40.00
Erin G. McGuinness	8/23/2018	Kansas	Emails with LW and SD re strategy for upcoming trip.	0.43	\$	240.00	¢	104.00
Lini G. MicGuinness	0/23/2018	Nullaaa	Contact potential client in Topeka re potential	0.43	٧	240.00	٧	104.00
Erin G. McGuinness	8/27/2018	Kancac	interest in lawsuit.	0.20	\$	240.00	\$	48.00
Lini G. MicGuilliess	0/2//2018	Nalisas	Discuss strategy with Stephen and Leecia for	0.20	٧	240.00	٧	40.00
Erin G. McGuinness	8/27/2018	Vancac	stakeholder trip tomorrow.	0.20	\$	240.00	\$	48.00
ETHI G. MICGUITHESS	0/2//2018	Nalisas	stakenoluer trip tomorrow.	0.20	Ą	240.00	Ą	40.00

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			Review documents re Kansas foster care system in				
			preparation for meetings with foster care advocates				
Erin G. McGuinness	8/27/2018	Kansas	tomorrow.	2.00	\$ 240.00	\$	480.00
		Kansas					
Erin G. McGuinness	8/28/2018	Travel	Taxi to LaGuardia for flight ot Kansas.	0.30	\$ 240.00	\$	72.00
		Kansas	Flight from LaGuardia to Wichita, including transfer				
Erin G. McGuinness	8/28/2018	Travel	in Dallas.	3.12	\$ 240.00	\$	748.00
			Discuss strategy for upcoming meetings with foster				
Erin G. McGuinness	8/28/2018	Kansas	care advocates with SD.	0.67	\$ 240.00	\$	160.00
			Meeting with GAL in Wichita with SD re foster care				
Erin G. McGuinness	8/28/2018	Kansas	issues to potentially incorporate in litigation.	1.25	\$ 240.00	\$	300.00
		Kansas					
Erin G. McGuinness	8/29/2018	Travel	Drive from Wichita to Kansas City w/ SD.	1.50	\$ 240.00	\$	360.00
			Meeting with foster care stakeholder in Wichita re				
Erin G. McGuinness	8/29/2018	Kansas	placement array issues.	1.00	\$ 240.00	\$	240.00
			Debrief about and summarize main findings from				
			meetings with foster care advocates in Kansas with				
Erin G. McGuinness	8/29/2018	Kansas	SD.	1.00	\$ 240.00	\$	240.00
			Meeting with foster care advocate in Wichita with SD				
Erin G. McGuinness	8/29/2018	Kansas	re Medicaid provisions for foster children.	1.25	\$ 240.00	Ş	300.00
			Meeting with two foster care advocates in Wichita				
Erin G. McGuinness	8/29/2018		with SD re placement issues.	2.75	\$ 240.00	Ş	660.00
		Kansas	Drive from KCK to Topeka nad back for meeting with				
Erin G. McGuinness	8/30/2018	Travel	stakeholder in Topeka.	1.25	\$ 240.00	\$	300.00
File C. MacC. Service	0/20/2040	W		4.25	240.00		200.00
Erin G. McGuinness	8/30/2018	Kansas	Draft contact memos from investigatory meetings.	1.25	\$ 240.00	\$	300.00
5 · 0 · 4 · 0 ·	0/20/2040	.,	Call with potential next friend re major issues in	4.50	242.00		252.00
Erin G. McGuinness	8/30/2018	Kansas	Kansas foster care system.	1.50	\$ 240.00	\$	360.00
Ed. C.M.C.	0/20/2012	W	Meeting with foster care advocate in Topeka re	2.00	242.22		400.00
Erin G. McGuinness	8/30/2018		major issues facing foster care system.	2.00	\$ 240.00	\$	480.00
	0.40 - 45 - 5 -	Kansas	5				
Erin G. McGuinness	8/31/2018	Travel	Return flight from Kansas City	2.25	\$ 240.00	\$	540.00

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			Strategize for tomorrow's meeting with foster care			
Erin G. McGuinness	9/4/2018	Kansas	advocate and potential client with IL.	0.33	\$ 240.00	\$ 80.00
Erin G. McGuinness	9/4/2018	Kansas	Draft KS investigatory contact memos.	1.37	\$ 240.00	\$ 328.00
Erin G. McGuinness	9/5/2018	Kansas	Meeting with IL & JK re EPSDT research.	0.67	\$ 240.00	\$ 160.00
Erin G. McGuinness	9/5/2018	Kansas	Prepare for meeting with foster care advocate.	0.67	\$ 240.00	\$ 160.00
			Meeting with foster care advocate with IL re			
Erin G. McGuinness	9/5/2018	Kansas	placement array issues.	3.00	\$ 240.00	\$ 720.00
			Review and analyze contact memos and newly gathered information from trip to be incorporated			
Erin G. McGuinness	9/6/2018	Kansas	into Findings of Facts document.	4.22	\$ 240.00	\$ 1,012.00
Erin G. McGuinness	9/7/2018	Kansas	Drafted out timeline for help in drafting complaint for named plaintiff "J.M."	1.00	\$ 240.00	\$ 240.00
			Analzye 10th circuit class certification decision for its			
Erin G. McGuinness	9/14/2018	Kansas	application in Kansas investigation.	0.50	\$ 240.00	\$ 120.00
Erin G. McGuinness	9/18/2018	Kansas	Draft contact memo for Next Friend Ashley Thorne.	0.25	\$ 240.00	\$ 60.00
Erin G. McGuinness	9/18/2018	Kansas	Analyze and review newspaper articles regarding child welfare in Kansas relevant to claims in investigation.	0.25	\$ 240.00	\$ 60.00
Erin G. McGuinness	9/18/2018	Kansas	Internal team meeting with IL, MN, JK to discuss agenda for tomorrow's full team call, ongoing research tasks, and next steps for retaining plaintiffs.	0.58	\$ 240.00	\$ 140.00
Erin G. McGuinness	9/18/2018		Call with Ashley Thorne to discuss logistics of being a next friend and discuss J.M.'s timeline of her time in care.	2.40	\$ 240.00	\$ 576.00
Erin G. McGuinness	9/21/2018		Review past research re confidentiality to assist in drafting of a confidentiality memo for the 10th circuit.	0.75	\$ 240.00	\$ 180.00
Erin G. McGuinness	9/26/2018	Kansas	Review and analyze press re: Kansas child welfare system issues relevant to investigation and upcoming litigation.	0.52	\$ 240.00	\$ 124.00

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			Internal team meeting to discuss strategy for					
Erin G. McGuinness	9/26/2018	Kansas	ongoing investigation.	0.48	\$	240.00	\$	116.00
			Analyze and review draft complaint outline to send					
Erin G. McGuinness	9/26/2018	Kansas	feedback to team.	1.03	\$	240.00	\$	248.00
			Review class definition and support in framing KS					
Erin G. McGuinness	9/26/2018	Kansas	complaint.	1.08	\$	240.00	\$	260.00
			Research KDHE structure and regulations for					
Erin G. McGuinness	9/26/2018	Kansas	inclusion in draft complaint.	1.28	\$	240.00	\$	308.00
			Email with SD to discuss strategy for upcoming					
Erin G. McGuinness	9/27/2018	Kansas	investigatory trip to Kansas.	0.75	\$	240.00	\$	180.00
			Conduct outreach to Kansas child welfare advocates					
			to set up meetings in advance of upcoming					
Erin G. McGuinness	9/27/2018	Kansas	investigation trip.	1.00	\$	240.00	\$	240.00
			Call with Martha Hodgesmith (Appleseed) to discuss					
Erin G. McGuinness	10/1/2018	Kansas	Kansas mental health delivery system.	1.00	\$	240.00	\$	240.00
			Discuss EPSDT research regarding requirement to					
Erin G. McGuinness	10/3/2018	Kansas	provide mental health assessments with JK and IL.	0.50	\$	240.00	\$	120.00
			Draft the J.M. named plaintiff section for Kansas					
Erin G. McGuinness	10/3/2018	Kansas	complaint.	1.33	\$	240.00	\$	320.00
			Research and analyze policy reports showing that					
Erin G. McGuinness	10/3/2018	Kansas	mental health screens are medically necesary.	1.67	\$	240.00	\$	400.00
			Research into the structure of the Kansas medicaid		- T		T	
Erin G. McGuinness	10/4/2018	Kansas	system.	1.42	\$	240.00	\$	340.00
Erin G. McGuinness	10/4/2018	Kansas	Drafted J.M. named plaintiff section for complaint.	2.00	\$	240.00	\$	480.00
			Continue drafting JM named plaintiff section in KS					
Erin G. McGuinness	10/4/2018	Kansas	complaint.	2.18	\$	240.00	\$	524.00
			Review KS retainer language for DA to edit and					
Erin G. McGuinness	10/5/2018	Kansas	circulate to team.	0.33	\$	240.00	\$	80.00
Erin G. McGuinness	10/9/2018	Kansas	Taxi from Wichita airport to hotel.	0.17	\$	240.00	\$	40.00
Erin G. McGuinness	10/9/2018	Kansas	Taxi to LaGuardia for flight to Kansas.	0.50	\$	240.00	\$	120.00
Erin G. McGuinness	10/9/2018	Kansas	Flight from St. Louis to Wichita	0.72	\$	240.00	\$	172.00

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Erin G. McGuinness	10/9/2018	Kansas	Layover in St. Louis during trip from NYC to Wichita.	1.12	Ş	240.00	\$ 268.00
			Flight from NY to St. Louis (b/c no direct flights to				
Erin G. McGuinness	10/9/2018	Kansas	Wichita).	1.33	\$	240.00	\$ 320.00
Erin G. McGuinness	10/9/2018		Call with DA regarding Kansas Medicaid documents.	0.25	\$	240.00	 60.00
Erin G. McGuinness	10/10/2018	Kansas	Prepare for meeting with Next Friend.	0.33	\$	240.00	\$ 80.00
			Meeting with SD re: strategy and preparation for				
Erin G. McGuinness	10/10/2018	Kansas	meetings with Next Friends and stakeholders.	0.50	\$	240.00	\$ 120.00
			Meeting with SD & Next Friend in Wichita to discuss				
Erin G. McGuinness	10/10/2018	Kansas	case status and next steps.	1.50	\$	240.00	\$ 360.00
			Meeting with SD and two foster care stakeholders in				
Erin G. McGuinness	10/10/2018	Kansas	Wichita re KS placement array	2.50	\$	240.00	\$ 600.00
Erin G. McGuinness	10/11/2018	Kansas	Drive to meeting with Kansas foster care advocate	1.00	\$	240.00	\$ 240.00
			Meeting with SD re: preparation and strategy for				
Erin G. McGuinness	10/11/2018	Kansas	stakeholder meetings for the day.	0.75	\$	240.00	\$ 180.00
			Meeting with SD & Kansas foster care advocate re				
Erin G. McGuinness	10/11/2018	Kansas	deficiencies in Kansas foster care system.	1.50	\$	240.00	\$ 360.00
			Meeting with SD and two Kansas foster care				
			advocates re: child welfare system issues relevant to				
Erin G. McGuinness	10/11/2018	Kansas	upcoming litigation.	2.50	\$	240.00	\$ 600.00
Erin G. McGuinness	10/12/2018	Kansas	Drive to airport for return flight.	0.17	\$	240.00	\$ 40.00
			Taxi home from LaGuardia after return trip from				
Erin G. McGuinness	10/12/2018	Kansas	Wichita.	0.50	\$	240.00	\$ 120.00
Erin G. McGuinness	10/12/2018	Kansas	Flight from Wichita to St. Louis.	0.62	\$	240.00	\$ 148.00
Erin G. McGuinness	10/12/2018	Kansas	Fight from St. Louis to NYC.	1.25	\$	240.00	\$ 300.00
			Meeting with SD and foster care advocate re				
			problems in foster care system relevant to upcoming				
Erin G. McGuinness	10/12/2018	Kansas	litigation.	1.50	\$	240.00	\$ 360.00
Erin G. McGuinness	10/15/2018	Kansas	Research Kansas medicaid system	3.00	\$	240.00	\$ 720.00

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			Team meeting to debrief on EM & SD's trip last week			
			and discuss next steps for outreach to potential			
Erin G. McGuinness	10/16/2018	Kansas	clients.	0.50	\$ 240.00	\$ 120.00
			Telephone call with Kansas foster care advocate in			
			advance of upcoming trip re major problems in			
Erin G. McGuinness	10/17/2018	Kansas	Kansas foster care system.	0.33	\$ 240.00	\$ 80.00
			Internal team meeting to discuss complaint drafting			
Erin G. McGuinness	10/17/2018	Kansas	strategy.	1.00	\$ 240.00	\$ 240.00
			Call with Kansas foster care advocate re: placement			
Erin G. McGuinness	10/18/2018	Kansas	moves of foster youth.	1.43	\$ 240.00	\$ 344.00
			Call with Next Friend re: next steps, necessary			
Erin G. McGuinness	10/18/2018	Kansas	documents, and questions re: upcoming litigation.	1.50	\$ 240.00	\$ 360.00
Erin G. McGuinness	10/22/2018	Kansas	Draft memo of call with next friends for full team.	0.57	\$ 240.00	\$ 136.00
			Call with Kansas foster care advocate re: issues in KS			
Erin G. McGuinness	10/22/2018	Kansas	child welfare system relevant to upcoming litigation.	0.62	\$ 240.00	\$ 148.00
			Draft summary of Named Plaintiffs and next friends			
Erin G. McGuinness	10/22/2018	Kansas	in Wichita to circulate to team for review	0.63	\$ 240.00	\$ 152.00
Erin G. McGuinness	10/22/2018	Kansas	Drafted caseloads section of the Kansas complaint.	4.43	\$ 240.00	\$ 1,064.00
			Call with next friend regarding named plaintiff			
Erin G. McGuinness	10/23/2018		complaint section	0.17	\$ 240.00	\$ 40.00
Erin G. McGuinness	10/23/2018		Draft caseloads section of Kansas complaint	1.58	\$ 240.00	 380.00
Erin G. McGuinness	10/23/2018	Kansas	Drafted named plaintiff section of complaint.	2.00	\$ 240.00	\$ 480.00
Erin G. McGuinness	10/24/2018	Kansas	Edit caseloads section of the Kansas Complaint draft.	2.23	\$ 240.00	\$ 536.00
			Outreach to Kansas foster care advocate to inform			
Erin G. McGuinness	10/25/2018	Kansas	KS complaint drafting.	0.25	\$ 240.00	\$ 60.00
			Draft and edit caseloads section of the complaint			
Erin G. McGuinness	10/25/2018	Kansas	with sources	4.28	\$ 240.00	\$ 1,028.00

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			Discuss citations and references to complaint with			
Erin G. McGuinness	10/29/2018	Kansas	DA.	0.00	\$ 240.00	\$ -
Erin G. McGuinness	10/29/2018	Kansas	Discuss complaint draft updates with MN.	0.25	\$ 240.00	\$ 60.00
Erin G. McGuinness	10/29/2018	Kansas	Analyze and review of Medicaid claim theory with JK.	0.37	\$ 240.00	\$ 88.00
			Research KS child welfare agency, contract agency policies, and practices surrounding caseworker			
Erin G. McGuinness	10/29/2018	Kansas	duties.	2.50	\$ 240.00	\$ 600.00
Erin G. McGuinness	10/29/2018	Kansas	Edit caseloads section of complaint	4.08	\$ 240.00	\$ 980.00
			Outreach to KS foster care advocate to inform			
Erin G. McGuinness	10/30/2018	Kansas	complaint drafting re: placement moves.	0.07	\$ 240.00	\$ 16.00
			Review IL & MN redlines of complaint to work on			
Erin G. McGuinness	10/30/2018	Kansas	second round of revisions	3.68	\$ 240.00	\$ 884.00
			Outreach to KS foster care advocate to inform			
Erin G. McGuinness	10/31/2018	Kansas	complaint drafting re: placement moves.	0.13	\$ 240.00	\$ 32.00
Erin G. McGuinness	10/31/2018	Kansas	Read and analyze first fully compiled complaint draft.	1.83	\$ 240.00	\$ 440.00
Erin G. McGuinness	10/31/2018	Kansas	Read, edit, and redline full draft of Kansas complaint.	3.20	\$ 240.00	\$ 768.00
			Outreach to KS foster care advocate to inform			
Erin G. McGuinness	11/1/2018	Kansas	complaint drafting re: placement moves.	0.12	\$ 240.00	\$ 28.00
Erin G. McGuinness	11/1/2018	Kansas	Call with next friend re KS complaint draft	0.63	\$ 240.00	\$ 152.00
Erin G. McGuinness	11/1/2018	Kansas	Outlined narratives for two named plaintiffs in complaint draft	0.77	\$ 240.00	\$ 184.00
			Discuss with complaint drafting strategy, strategic			
Erin G. McGuinness	11/1/2018	Kansas	edits with DA & IL	0.75	\$ 240.00	\$ 180.00
Erin G. McGuinness	11/1/2018	Kansas	Edit and review recent complaint draft	1.00	\$ 240.00	\$ 240.00
			Call with next friend re KS complaint draft input,			
Erin G. McGuinness	11/1/2018	Kansas	questions.	1.35	\$ 240.00	\$ 324.00
			Research policy best practices for EPSDT mental			
Erin G. McGuinness	11/1/2018	Kansas	health screens	1.58	\$ 240.00	\$ 380.00
Erin G. McGuinness	11/1/2018	Kansas	Add redline edits to draft of Kansas Complaint.	1.72	\$ 240.00	\$ 412.00

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			Reviewed and analyzed co-counsel's edits to the					
Erin G. McGuinness	11/2/2018	Kansas	combined complaint.	1.30	\$	240.00	\$	312.00
Erin G. McGuinness	11/2/2010	Vancas	Drafted named plaintiff sections for complaint.	3.18	\$	240.00	Ļ	764.00
Erin G. McGuinness	11/2/2018	Kalisas	·	3.18	Ş	240.00	Ş	764.00
5	44/5/2040	14	Meeting with IL, MN, JK, DA regarding strategy for	0.50		242.00		422.00
Erin G. McGuinness	11/5/2018	Kansas	complaint drafting.	0.50	\$	240.00	\$	120.00
			Research Kansas EPSDT and applicability to					
Erin G. McGuinness	11/5/2018	Kansas	complaint.	1.00	\$	240.00	\$	240.00
			Research medical literature and best practices for					
			whether initial trauma screens are required under					
Erin G. McGuinness	11/5/2018	Kansas	EPSDT	5.60	\$	240.00	\$	1,344.00
			Review references and sources to complaint to					
Erin G. McGuinness	11/6/2018	Kansas	inform DA's citechecking of complaint footnotes.	0.47	\$	240.00	\$	112.00
			Compile facts regarding named plaintiffs in Topeka					
			and Kansas City and draft named plaintiff complaint					
Erin G. McGuinness	11/6/2018	Kansas	section for each.	4.60	\$	240.00	\$	1,104.00
			Outreach to KS foster care advocate to inform					
Erin G. McGuinness	11/7/2018	Kansas	complaint drafting re: placement moves.	0.30	\$	240.00	\$	72.00
			Analyza whathar shildren voluntarily placed into out					
Edu C Mac days	44/7/2040	17	Analyze whether children voluntarily placed into out-	0.42	<b>,</b>	240.00	_	404.00
Erin G. McGuinness	11/7/2018	Kansas	of-home care should be class members.	0.43	\$	240.00	\$	104.00
	/= /		Redline Ira's edits to the Named Plaintiff complaint				_	
Erin G. McGuinness	11/7/2018	Kansas	section draft.	0.53	\$	240.00	\$	128.00
			Re-run Adoption and Foster Care Analysis and					
			Reporting System (AFCARS) stats to validate data					
Erin G. McGuinness	11/7/2018	Kansas	used in the complaint.	1.25	\$	240.00	\$	300.00
Erin G. McGuinness	11/8/2018	Kansas	Discuss EPSDT claim for trauma screens with JK.	0.42	\$	240.00	\$	100.00
	. ,		Emails with the team coordinating upcoming trip and		<u> </u>		<u> </u>	
Erin G. McGuinness	11/8/2018	Kansas	discussing stakeholders.	0.70	\$	240.00	\$	168.00
			Internal KS meeting with IL, MN, DA regarding EPSDT					
Erin G. McGuinness	11/8/2018	Kansas	claim for trauma screens.	0.88	\$	240.00	\$	212.00

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			Read prior investigations' research memos about					
			EPSDT claim for trauma screen and discuss with JK					
Erin G. McGuinness	11/8/2018	Kansas	for context in Kansas.	1.33	\$	240.00	\$	320.00
			Confirm citations, references, and sources to various					
Erin G. McGuinness	11/9/2018	Kansas	footnotes in KS complaint draft with DA.	0.53	\$	240.00	\$	128.00
			Outreach to Next Friends re: upcoming complaint					
Erin G. McGuinness	11/9/2018	Kansas	filing.	0.60	\$	240.00	\$	144.00
			Decree for the state of EDCDT all in the state of					
Fair C. McCaire	11/0/2010	W	Prepare for presentation of EPSDT claim regarding	4.25	4	240.00	<b>~</b>	200.00
Erin G. McGuinness	11/9/2018	Kansas	initial trauma screens.	1.25	\$	240.00	\$	300.00
	11/0/0010		Review and add revisions to updated complaint					
Erin G. McGuinness	11/9/2018	Kansas	draft.	2.78	\$	240.00	\$	668.00
Erin G. McGuinness	11/10/2018	Kancac	Call with LBB to discuss current and potential clients	0.58	\$	240.00	\$	140.00
Lilli G. MicGallilless	11/10/2010	Karisas	Provide redline revisions to named plaintiff sections	0.50	٠,	240.00	٧	140.00
Erin G. McGuinness	11/10/2018	Kancac	and EPSDT sections of complaint.	3.47	\$	240.00	\$	832.00
Lilli G. MicGuilliess	11/10/2018	Kaiisas	Outline narratives for several potential named	3.47	٠,	240.00	٧	832.00
Erin G. McGuinness	11/11/2018	Kansas	plaintiffs and circulate to team for review.	0.50	\$	240.00	\$	120.00
Lim G. Wiedaminess	11/11/2010	Railsas	Reach out to foster care advocates in preparation for	0.50	<u> ۲</u>	240.00	<u> </u>	120.00
Erin G. McGuinness	11/12/2018	Kansas	this week's trip.	0.38	\$	240.00	\$	92.00
Erm G. Wieddiniess	11/12/2010	Ransas	this week's trip.	0.50	~	2 10.00	Υ	32.00
Erin G. McGuinness	11/12/2018	Kansas	Call with JK, SD, LBB to strategize for this week's trip.	0.58	\$	240.00	\$	140.00
			Call with next friend in advance of meeting later this					
Erin G. McGuinness	11/12/2018	Kansas	week.	1.05	\$	240.00	\$	252.00
			Email with JK re EPSDT provisions in mental health					
Erin G. McGuinness	11/13/2018	Kansas	section.	0.30	\$	240.00	\$	72.00
			_ ,, ,,,					
	44/40/05:5		Email with co-counsel regarding EPSDT provisions in			0.40.55		00.00
Erin G. McGuinness	11/13/2018	Kansas	the mentla health section of the complaint.	0.33	\$	240.00	\$	80.00
	44/45/55:-		Telephone call with with Freya re EPSDT section in					
Erin G. McGuinness	11/13/2018		complaint.	0.37	\$	240.00	\$	88.00
Erin G. McGuinness	11/13/2018	Kansas	Review updated complaint draft	0.50	\$	240.00	\$	120.00

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			Reach out to foster care advocates in preparation for					
Erin G. McGuinness	11/13/2018 Kar	ansas	this week's trip.	0.52	\$	240.00	\$	124.00
			Call with next friend in advance of our meeting in					
Erin G. McGuinness	11/13/2018 Kar	ansas	Kansas later this week.	0.75	\$	240.00	\$	180.00
			Call with next friend in advance of in-person meeting					
Erin G. McGuinness	11/13/2018 Kar	ansas	this week.	1.33	\$	240.00	\$	320.00
			Drafted named plaintiff sections for the complaint					
Erin G. McGuinness	11/13/2018 Kar	ansas	for new named plaintiffs.	2.27	\$	240.00	\$	544.00
Erin G. McGuinness	11/14/2018 Kar	ansas	Taxi to LaGuardia airport for flight to Kansas City.	0.38	\$	240.00	Ş	92.00
			Pick up rental car and drive to stakeholder meeting					
Erin G. McGuinness	11/14/2018 Kar		in KCK.	0.50			•	120.00
Erin G. McGuinness	11/14/2018 Kar	ansas	Flight from LaGuardia to Kansas City	1.25	\$	240.00	\$	300.00
			Masting with IV faster same advants in Venesa City					
			Meeting with JK, foster care advocate in Kansas City					
			re problems facing foster care system, addressing					
Erin G. McGuinness	11/14/2018 Kar	ansas	factual gaps in complaint for upcoming litigation	1.50	\$	240.00	\$	360.00
			Meeting with LBB and JK to debrief, summarize key					
			takeaways re the meeting with next friend and foster					
			care advocate and prep for tomorrow's meetings					
Erin G. McGuinness	11/14/2018 Kar	ansas	with other foster care advocates.	2.00	\$	240.00	\$	480.00
			Meeting with JK, next friend, foster care advocate,		т		т	
			and co-counsel in Appleseed office re remaining					
Erin G. McGuinness	11/14/2018 Kar	ansas	factual gaps in complaint.	2.50	\$	240.00	\$	600.00
Erin G. McGuinness	11/15/2018 Kar		Drvining to meetings with stakeholders.	0.67	\$	240.00	\$	160.00
Erin G. McGuinness	11/15/2018 Kar	ansas	Call with DA re complaint filing strategy.	0.25	\$	240.00	\$	60.00
5 · 0 · 4 · 0 ·	44/45/2040/4			0.25		240.00		60.00
Erin G. McGuinness	11/15/2018 Kar		Call with MN regarding updates in filing status	0.25	\$	240.00	\$	60.00
Erin G. McGuinness	11/15/2018 Kar	insas	Call with next friend re complaint status.	0.33	\$	240.00	\$	80.00
			Meeting with next friend at co-counsel's office re:					
Erin G. McGuinness	11/15/2018 Kar	ansas	complaint filing.	0.58	\$	240.00	\$	140.00

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Frin C. McCuinness	11/15/2019	Vancas	Dood and analyze final undeted complaint draft	0.67	\$	240.00	۲	160.00
Erin G. McGuinness	11/15/2018	Kansas	Read and analyze final updated complaint draft.	0.67	<b>&gt;</b>	240.00	Ş	160.00
Frin C. McCuinness	11/15/2010	Vanas	Meeting with JK & SD and next friend re complaint	2.00	۲.	240.00	\$	400.00
Erin G. McGuinness	11/15/2018	Kansas	status.	2.00	\$	240.00	Ş	480.00
			Mosting with IV & CD to compare notes for the calls					
			Meeting with JK & SD to compare notes for the calls and meetings throughout the day to nail down					
			evidence/factual gaps and strategize tomorrow's					
			investigative meetings with foster care advocates					
Frin C. McCuinness	11/15/2019	Vancas		2.00	\$	240.00	\$	490.00
Erin G. McGuinness	11/15/2018	Kansas	and current/prospective clients.	2.00	Ş	240.00	Ş	480.00
			Meeting with SD & JK to debrief on fact discovered in					
			prior meeting with foster care advocate and					
Frin C. MaCuinnasa	11/15/2010	Vanasa	strategize for next meeting with foster care	2.00	۲.	240.00	۲	400.00
Erin G. McGuinness	11/15/2018		advocate.	2.00	\$	240.00	\$	480.00
Erin G. McGuinness	11/16/2018		Taxi home from LaGuardia	0.28	\$	240.00	\$	68.00
Erin G. McGuinness	11/16/2018		Drive to airport & return rental car.	0.50	\$	240.00	\$	120.00
Erin G. McGuinness	11/16/2018	Kansas	Flight from Kansas City to LaGuardia.	1.50	\$	240.00	\$	360.00
			Call with potential client to discuss filing of					
Erin G. McGuinness	11/16/2018	Kansas	complaint.	0.42	\$	240.00	\$	100.00
Erin G. McGuinness	11/16/2018	Kansas	Call with Next Friend to discuss filing of complaint.	0.50	\$	240.00	\$	120.00
			Call with Kansas child welfare expert to discuss filing					
Erin G. McGuinness	11/16/2018	Kansas	of complaint	0.58	\$	240.00	\$	140.00
			Review and analyze press articles regarding the					
			Kansas case filing and DCF's response to the media to					
Erin G. McGuinness	11/16/2018	Kansas	inform future case development.	0.75	\$	240.00	\$	180.00
			Meeting with JK and foster care advocate re:					
Erin G. McGuinness	11/16/2018	Kansas	placement issues in Kansas.	0.75	\$	240.00	\$	180.00
			Meeting with JK to discuss main findings from recent					
Erin G. McGuinness	11/16/2018	Kansas	meetings with foster care advocates.	1.50	\$	240.00	\$	360.00
Erin G. McGuinness	11/17/2018	Kansas	Email with next friend re case filing.	1.00	\$	240.00	\$	240.00

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			Call with Christina from Appleseed regarding			
Erin G. McGuinness	11/19/2018	Kansas	contacts from potential class members, clients.	0.75	\$ 240.00	\$ 180.00
			Call with next friends to discuss case being filed and			
Erin G. McGuinness	11/19/2018	Kansas	next steps.	1.00	\$ 240.00	\$ 240.00
			Internal team meeting to discuss post-complaint			
Erin G. McGuinness	11/29/2018	Kansas	filing strategy.	0.50	\$ 240.00	\$ 120.00
			Call with next friend to discuss updates with their			
Erin G. McGuinness	12/4/2018	Kansas	named plaintiff.	1.00	\$ 240.00	\$ 240.00
			Inter-team emails discussing admissions in recent			
Erin G. McGuinness	12/5/2018	Kansas	press and updates from potential fact witnesses.	0.27	\$ 240.00	\$ 64.00
			Analyze co-counsel's summary of the press			
Erin G. McGuinness	12/6/2018	Kansas	conference with DCF secretary Gina Meyer-Hummel.	0.12	\$ 240.00	\$ 28.00
l			Email potential next friend re communiques from			
Erin G. McGuinness	12/6/2018	Kansas	DCF since complaint filing.	0.50	\$ 240.00	\$ 120.00
			Review the KS Child Welfare Task Force documents			
			circulated by co-counsel by potential inclusion in			
Erin G. McGuinness	12/6/2018	Kansas	amended complaint.	1.27	\$ 240.00	\$ 304.00
			Emails with co-counsel regarding outreach to foster			
Erin G. McGuinness	12/10/2018	Kansas	care advocates.	0.20	\$ 240.00	\$ 48.00
			Review and edit Appleseed's proposed draft intake			
			from calls from potential clients, class members in			
Erin G. McGuinness	12/10/2018	Kansas	response to the publicity surrounding the case.	0.20	\$ 240.00	\$ 48.00
			Internal team emails discussing the clerk's extension			
Erin G. McGuinness	12/13/2018	Kansas	of time to answer to the Defendants.	0.25	\$ 240.00	\$ 60.00
			Analyze and review Defendants' motion for			
Erin G. McGuinness	1/2/2019	Kansas	extension for time to answer.	0.12	\$ 240.00	\$ 28.00
			Review contracts received for case management			
Erin G. McGuinness	1/2/2019	Kansas	contractors through Kansas open records request.	0.17	\$ 240.00	\$ 40.00

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			Read and give feedback to co-counsel's first draft of					-
			opposition to defendant's motion for an extension of					
Erin G. McGuinness	1/3/2019	Kansas	time.	0.13	\$	240.00	\$	32.00
Erin G. McGuinness	1/3/2019	Kansas	Research potential KS foster care system experts	0.45	\$	240.00	\$	108.00
			Review and analyze Kansas press reports about the					
Erin G. McGuinness	1/3/2019	Kansas	newly appointed interim agency director.	0.60	\$	240.00	\$	144.00
			Review final edits to our opposition to the					
			Defendant' motion for an extension of time to					
Erin G. McGuinness	1/4/2019		answer the complaint.	0.45	\$	240.00		108.00
Erin G. McGuinness	1/7/2019	Kansas	Email with propsective consultant experts.	0.27	\$	240.00	\$	64.00
			KS internal meeting with MN, JK, DA, CC before full					
Erin G. McGuinness	1/9/2019	Kansas	team meeting to discuss agenda.	0.08	\$	240.00	\$	20.00
Frin C. McCuinness	1/10/2019	Vanaa	Telephone call with IL and consultant regarding	0.75	\$	240.00	\$	100.00
Erin G. McGuinness	1/10/2019	Kalisas	potential Medicaid and systems experts for Kansas.	0.75	Ş	240.00	Þ	180.00
			Preliminary research into the list of experts					
Erin G. McGuinness	1/16/2010	Vanaaa	suggested by Medicaid consultant, summarize, and circulate to team.	2 27	\$	240.00	\$	F.CO. 00
Erin G. McGuinness	1/16/2019	Kalisas	Draft and circulate contact memo for call with foster	2.37	Ş	240.00	Þ	568.00
Erin G. McGuinness	1/17/2019	Kancac	care expert in Kansas regarding potential mental health experts.	0.53	\$	240.00	\$	128.00
Lilli G. McGalliness	1/17/2013	Karisas	Review Defendants' proposed edits to draft	0.55	٧	240.00	٠,	120.00
Erin G. McGuinness	1/18/2019	Kansas	protective order.	0.17	\$	240.00	\$	40.00
			Emails among team and co-counsel to discuss		•		•	
			Defendants' edits to proposed protective order and					
Erin G. McGuinness	1/18/2019	Kansas	next steps.	0.25	\$	240.00	\$	60.00
			Review emails among team regarding protective					
Erin G. McGuinness	1/22/2019	Kansas	order, give opinion on edits to same.	0.33	\$	240.00	\$	80.00
			Correspond with team re protective order and					
Erin G. McGuinness	1/25/2019		strategy for next clients	0.33	\$	240.00	\$	80.00
Erin G. McGuinness	2/4/2019	Kansas	Review proposed draft protective order.	0.17	\$	240.00	\$	40.00

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Erin G. McGuinness	2/5/2019	Kansas	Correspond with prospective expert.	0.13	\$ 240.00	\$ 32.00
			Draft contact memo from call with prospective			
Erin G. McGuinness	2/6/2019	Kansas	expert and circulate to team.	0.38	\$ 240.00	\$ 92.00
			Call with IL and prospective expert re mental health			
Erin G. McGuinness	2/6/2019	Kansas	care issues for foster children.	0.75	\$ 240.00	\$ 180.00
			Analyze KS term sheet to discuss with team at			
Erin G. McGuinness	2/7/2019	Kansas	meeting tomorrow.	2.23	\$ 240.00	\$ 536.00
			Internal team meeting with IL, MN, JK, DA, CC to			
Erin G. McGuinness	2/8/2019	Kansas	discuss draft settlement term sheet.	1.50	\$ 240.00	\$ 360.00
			Internal meeting to for settlement terms sheet			
Erin G. McGuinness	2/11/2019	Kansas	review improvement plan.	1.50	\$ 240.00	\$ 360.00
			Email with prospective expert about Medicaid			
Erin G. McGuinness	2/20/2019	Kansas	claims.	0.08	\$ 240.00	\$ 20.00
			Call with next friend to discuss case updates and			
Erin G. McGuinness	2/20/2019	Kansas	named plaintiffs.	0.18	\$ 240.00	\$ 44.00
Erin G. McGuinness	2/20/2019	Kansas	Email next friend regarding protective order.	0.18	\$ 240.00	\$ 44.00
Erin G. McGuinness	2/20/2019	Kansas	Calls to next friends re case updates (continued).	0.20	\$ 240.00	\$ 48.00
			Email with next friend to discuss case updates and			
Erin G. McGuinness	2/20/2019	Kansas	next steps.	0.43	\$ 240.00	\$ 104.00
			Correspond with co-counsel regarding status of			
Erin G. McGuinness	2/20/2019	Kansas	agenda items for today's team call.	0.52	\$ 240.00	\$ 124.00
Erin G. McGuinness	2/21/2019	Kansas	Email with next friend regarding case updates.	0.13	\$ 240.00	\$ 32.00
Erin G. McGuinness	2/21/2019	Kansas	Call with next friend re case updates	0.32	\$ 240.00	\$ 76.00
			Internal team meeting with IL, MN, JK, DA, CC to			
			debrief after full team call to discuss immediate next			
Erin G. McGuinness	2/27/2019	Kansas	steps and delegations.	0.33	\$ 240.00	\$ 80.00
			Email with expert re topics, points of inquiry for			
Erin G. McGuinness	3/6/2019	Kansas	upcoming call.	0.15	\$ 240.00	\$ 36.00
			Email co-counsel and expert about exploratory call			
Erin G. McGuinness	3/7/2019	Kansas	with team.	0.33	\$ 240.00	\$ 80.00
Erin G. McGuinness	3/7/2019	Kansas	Prepare for call with prospective expert	0.50	\$ 240.00	\$ 120.00

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			Call with prospective expert to discuss possibility of			
Erin G. McGuinness	3/7/2019	Kansas	collaboration on mental health issues.	0.67	\$ 240.00	\$ 160.00
			Email with prospective mental health expert to			
			summarize meeting, pose more questions, and set			
Erin G. McGuinness	3/11/2019	Kansas	up a follow-up meeting.	0.17	\$ 240.00	\$ 40.00
			Email all next friends a copy of the protective order			
			and acknowledgment and discuss case updates with			
Erin G. McGuinness	3/11/2019	Kansas	each.	0.80	\$ 240.00	\$ 192.00
Erin G. McGuinness	3/12/2019	Kansas	Email team with updates from next friend.	0.20	\$ 240.00	\$ 48.00
Erin G. McGuinness	3/12/2019	Kansas	Call with next friend re factual updates.	0.87	\$ 240.00	\$ 208.00
Erin G. McGuinness	3/14/2019	Kansas	Email with co-counsel re potential fact witness.	0.30	\$ 240.00	\$ 72.00
Erin G. McGuinness	3/14/2019	Kansas	Prepare for call with prospective expert.	0.33	\$ 240.00	\$ 80.00
			Call with prospective expert in Medicaid systems			
Erin G. McGuinness	3/14/2019	Kansas	with IL and co-counsel from NCYL.	1.00	\$ 240.00	\$ 240.00
			Call with next friend regarding case updates and			
Erin G. McGuinness	3/15/2019	Kansas	strategy.	0.87	\$ 240.00	\$ 208.00
			Discuss talking points regarding named plainitffs and			
			next friends with JK for presentation at full team			
Erin G. McGuinness	3/19/2019	Kansas	conference tomorrow.	0.25	\$ 240.00	\$ 60.00
			Review research, facts with JK & SD for full team			
Erin G. McGuinness	3/20/2019	Kansas	conference this afternoon.	0.13	\$ 240.00	\$ 32.00
			Prepare fact patterns of potential new clients for co-			
Erin G. McGuinness	3/20/2019	Kansas	counsel meeting.	1.00	\$ 240.00	\$ 240.00
			Call with Next Friend regarding named plaintiff			
Erin G. McGuinness	3/21/2019	Kansas	concerns.	0.30	\$ 240.00	\$ 72.00
			Call with Next Friend regarding named plaintiff			
Erin G. McGuinness	3/21/2019	Kansas	concerns and update (continued).	0.37	\$ 240.00	\$ 88.00
			Emails with team and co-counsel regarding named			
Erin G. McGuinness	3/21/2019	Kansas	plaintiff concerns and update.	0.70	\$ 240.00	\$ 168.00
			Calls with co-counsel re: named plainitff status			
Erin G. McGuinness	3/21/2019	Kansas	update.	1.57	\$ 240.00	\$ 376.00

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			Email next friends re: Benet's withdrawal as counsel					
Erin G. McGuinness	3/22/2019	Kansas	and Teresa's addition.	0.90	\$	240.00	\$	216.00
			Strategize with team about the potential for interim					
Erin G. McGuinness	3/25/2019	Kansas	relief and what it would look like.	0.38	\$	240.00	\$	92.00
			Emails with the team regarding discussions with					
Erin G. McGuinness	3/27/2019	Kansas	Defendants and case strategy.	0.32	\$	240.00	\$	76.00
Erin G. McGuinness	3/28/2019	Kansas	Analyze JK's memo on 5th Circuit SDP opinions.	0.57	\$	240.00	\$	136.00
Erin G. McGuinness	4/1/2019	Kansas	Email with next friend about case updates.	0.37	\$	240.00	\$	88.00
			Read LPA follow-up audit to inform potential					
Erin G. McGuinness	4/1/2019	Kansas	settlement strategy.	0.72	\$	240.00	\$	172.00
Erin G. McGuinness	4/11/2019	Kansas	Analyze one pager re: in camera review of docs.	0.32	\$	240.00	Ś	76.00
Erm G. WieGumness	1/11/2013	Ransas	Email prospective expert re meeting topics,	0.32	<u> </u>	2 10.00	<u> </u>	70.00
Erin G. McGuinness	4/12/2019	Kansas	questions.	0.23	\$	240.00	\$	56.00
21111 01 1110 0 0111110 0 0 0 111110 0 0 0 111110 0 0 0 1 11110 0 0 0 1	1,12,2013	Ransas	Review Kansas documents sent to Ira by foster care	0.23	<u> </u>	2 10.00	<u> </u>	30.00
Erin G. McGuinness	4/12/2019	Kansas	advocate and summarize for team.	1.72	\$	240.00	\$	412.00
			Analysis offset Konses are sellitization and ansail					
Erin G. McGuinness	4/15/2019	Kansas	Analyze effect Kansas press on litigation and email conversation with co-counsel regarding KS press.	1.33	\$	240.00	\$	320.00
21111 31 1110 3411111033	1, 13, 2013	Ransas	conversation with co counsel regarding to press.	2.00	Υ	2 10.00	Υ	020.00
Erin G. McGuinness	4/29/2019	Kansas	Contact next friends to update on case.	1.08	\$	240.00	\$	260.00
			Review and analyze Defendants' answer to our					
Erin G. McGuinness	4/30/2019	Kansas	complaint.	0.67	\$	240.00	\$	160.00
Erin G. McGuinness	5/1/2019	Kansas	Emails with next friends with case updates.	0.38	\$	240.00	\$	92.00
5 : 0 14 0 :	5/20/2010	.,	Call with Medicaid expert and MN, JK, LBB, NCYL, and	4 00		240.00		240.00
Erin G. McGuinness	5/20/2019	Kansas	Appleseed, to discuss Plaintiffs' claim.	1.00	\$	240.00	\$	240.00
			Call with JK, NCYL, and Appleseed with subject					
Title C. MacC. States	F /20 /2000	17	matter expert to discuss claims in help deciding	4.00		242.22		240.00
Erin G. McGuinness	5/20/2019	Kansas	whether to amend complaint.	1.00	\$	240.00	\$	240.00
5: 0.4.6:	F /00 /00 = 5	.,	Emails to next friends with raft initial terms sheet for			2 . 2 . 2 .		400.00
Erin G. McGuinness	5/29/2019	Kansas	review and approval.	0.53	\$	240.00	\$	128.00

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			Review sample RFP's for model of how to structure			
Erin G. McGuinness	6/6/2019	Kansas	RFP for PIP related material.	0.48	\$ 240.00	\$ 116.00
Erin G. McGuinness	6/12/2019	Kansas	Discuss strategy for Medicaid claims with JK.	0.25	\$ 240.00	\$ 60.00
Erin G. McGuinness	6/14/2019	Kansas	Discuss KS RFP strategy with JK	0.33	\$ 240.00	\$ 80.00
			Prepare for KS medicaid call with co-counsel and			
Erin G. McGuinness	6/15/2019	Kansas	stakeholders.	0.50	\$ 240.00	\$ 120.00
			Call with JK, NCYL, Appleseed, LBB, and stakeholders			
Erin G. McGuinness	6/15/2019	Kansas	to discuss Kansas Medicaid practice.	1.50	\$ 240.00	\$ 360.00
Erin G. McGuinness	6/18/2019	Kansas	Discuss and review RFP's with JK.	0.57	\$ 240.00	\$ 136.00
			Debrief after KS call regarding Medicaid claim			
Erin G. McGuinness	6/19/2019	Kansas	research with CC.	0.10	\$ 240.00	\$ 24.00
			Review FP's notes from call on Saturday with foster			
Erin G. McGuinness	6/19/2019	Kansas	care advocates.	0.13	\$ 240.00	\$ 32.00
			Internal team meeting after full team call regarding			
			call Saturday with Kansas foster care advocates with			
Erin G. McGuinness	6/19/2019	Kansas	IL, JK, CC, interns.	0.18	\$ 240.00	\$ 44.00
			Discuss questions regarding edits to initial			
Erin G. McGuinness	6/25/2019	Kansas	disclosures with JK.	0.15	\$ 240.00	\$ 36.00
Erin G. McGuinness	6/25/2019	Kansas	Edit draft initial disclosures.	0.58	\$ 240.00	\$ 140.00
			Correspond with prospective expert re upcoming			
Erin G. McGuinness	7/9/2019	Kansas	meeting topics.	0.40	\$ 240.00	\$ 96.00
Erin G. McGuinness	7/22/2019	Kansas	Prepare for call with prospective expert with IL.	0.25	\$ 240.00	\$ 60.00
			Call with prospective expert & IL re evaluating			
Erin G. McGuinness	7/22/2019	Kansas	feasibility to work on this litigation.	1.00	\$ 240.00	\$ 240.00
			Emails among Kansas team re: correspondence with			
Erin G. McGuinness	7/29/2019	Kansas	Defandants counsel.	0.23	\$ 240.00	\$ 56.00
			Email with team about suggestions to include in the			
Erin G. McGuinness	8/1/2019	Kansas	3rd party subpoena.	0.32	\$ 240.00	\$ 76.00
			Discuss documents and descriptions to include in 3rd			
Erin G. McGuinness	8/1/2019	Kansas	party subpoena with JK & CG.	0.53	\$ 240.00	\$ 128.00
			Discuss edits to DLA's draft of the 3rd party			
Erin G. McGuinness	8/5/2019	Kansas	subpoena for KVC/St. Francis with IL, CG, JK.	0.47	\$ 240.00	\$ 112.00

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			Summarize memo of conversation with proposed			
Erin G. McGuinness	8/7/2019	Kansas	trauma expert for team.	0.60	\$ 240.00	\$ 144.00
			Emails with team regarding conversations with			
Erin G. McGuinness	8/8/2019	Kansas	expert.	0.27	\$ 240.00	\$ 64.00
			Call with prospective expert re potentially joining			
Erin G. McGuinness	8/8/2019	Kansas	case.	0.28	\$ 240.00	\$ 68.00
Erin G. McGuinness	8/8/2019	Kansas	Prepare for call with prospective expert	0.60	\$ 240.00	\$ 144.00
			Emails among team regarding intake call with			
Erin G. McGuinness	8/12/2019	Kansas	potential fact witness and appropriate next steps.	0.43	\$ 240.00	\$ 104.00
			Reviewed Named Plaintiff case files in advance of			
Erin G. McGuinness	8/14/2019	Kansas	doc review meeting.	0.25	\$ 240.00	\$ 60.00
			Meeting to discuss doc review of named plaintiff			
Erin G. McGuinness	8/19/2019	Kansas	files.	0.30	\$ 240.00	\$ 72.00
Erin G. McGuinness	8/20/2019	Kansas	Discuss next friend document collection with DA	0.25	\$ 240.00	\$ 60.00
			Call with Poonam and Freya re: document collection			
Erin G. McGuinness	8/20/2019	Kansas	from next friends.	0.33	\$ 240.00	\$ 80.00
			Emails with KS team to discuss status of amended			
			complaint, converstaion with next friends, updated			
Erin G. McGuinness	8/23/2019	Kansas	facts, and next steps.	0.20	\$ 240.00	\$ 48.00
			Spoke to Katharyn McIntyre to discuss case updates			
Erin G. McGuinness	8/23/2019	Kansas	and named plaintiff updates.	0.45	\$ 240.00	\$ 108.00
Erin G. McGuinness	8/23/2019	Kansas	Emails to Next Friends re: named plaintiffs' statuses.	0.47	\$ 240.00	\$ 112.00
Erin G. McGuinness	8/26/2019	Kansas	Emails to next friends regarding amended complaint.	0.35	\$ 240.00	\$ 84.00
			Review named plaintiff files to fact check amended			
Erin G. McGuinness	8/26/2019	Kansas	complaint.	2.28	\$ 240.00	\$ 548.00
			Review named plaintiff files produced by			
Erin G. McGuinness	8/26/2019	Kansas	Defendants.	5.17	\$ 240.00	\$ 1,240.00
			Correspond with co-counsel team re: amending			
Erin G. McGuinness	9/4/2019	Kansas	complaint.	0.30	\$ 240.00	\$ 72.00

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			Read and analyze Kansas article about FFPSA and					
			Medicaid complications and team emails in					
Erin G. McGuinness	9/11/2019	Kansas	response.	0.35	\$	240.00	\$	84.00
			Read and analyze GAO report regarding CMS					
Erin G. McGuinness	9/16/2019	Kansas	screening circulated by co-counsel.	1.23	\$	240.00	\$	296.00
			Discuss mediation statement and co-counsel's					
Erin G. McGuinness	9/17/2019	Kansas	response with JK.	0.42	\$	240.00	\$	100.00
			Read through co-counsel's edits to mediation					
Erin G. McGuinness	9/17/2019	Kansas	statement	0.50	\$	240.00	\$	120.00
Erin G. McGuinness	9/18/2019	Kansas	Internal KS meeting to discuss doc review	0.43	\$	240.00	\$	104.00
			Review and analyze New Mexico complaint and					
			NACC materials to prep for call with consultant re:					
Erin G. McGuinness	9/20/2019	Kansas	Medicaid claims.	1.22	\$	240.00	\$	292.00
			Prepare for call with consultant re Medicaid screen					
Erin G. McGuinness	9/23/2019	Kansas	claims	0.33	\$	240.00	\$	80.00
			Call wth IL, MN, consultants to discuss development					
Erin G. McGuinness	9/23/2019	Kansas	of TXIX claims	1.50	\$	240.00	\$	360.00
			Correspond with team re: opposing counsel					
Erin G. McGuinness	9/27/2019	Kansas	withdrawing and new counsel making appearance.	0.40	\$	240.00	\$	96.00
			Correspond with team discussing letter to					
			Defendants and next steps for settlement					
Erin G. McGuinness	10/2/2019	Kansas	discussions.	0.03	\$	240.00	\$	8.00
			Call with consultant & MN to discuss strategy re					
Erin G. McGuinness	10/7/2019	Kansas	Medicaid claims.	1.00	\$	240.00	\$	240.00
			Discuss status, major findings in document review					
Erin G. McGuinness	10/10/2019	Kansas	with IL	0.42	\$	240.00	\$	100.00
Erin G. McGuinness	10/21/2019	Kansas	Review and index Named Plaintiff files	6.08	\$	240.00	\$	1,460.00
Erin G. McGuinness	10/22/2019	Kansas	Review and index Named Plaintiff files	1.33	\$	240.00	Ś	320.00
	_5, _2, _5			1.55	т	0.00	т	220.00
Erin G. McGuinness	10/23/2019	Kansas	Review and index Named Plaintiff files	0.75	\$	240.00	\$	180.00

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Erin G. McGuinness	10/24/2019	Kansas	Review and index Named Plaintiff files	6.32	\$	240.00	\$	1,516.00
			Call with consultant to discuss mediation strategies					
Erin G. McGuinness	10/29/2019	Kansas	re Medicaid claims.	1.00	\$	240.00	\$	240.00
Erin G. McGuinness	10/30/2019	Kansas	Email prospective mental health experts.	0.33	\$	240.00	\$	80.00
			Correspond with prospective expert re questions					
Erin G. McGuinness	11/6/2019	Kansas	relating to class certification.	0.15	\$	240.00	\$	36.00
			Discuss expert outreach strategy, governor's role in					
Erin G. McGuinness	11/6/2019	Kansas	foster care with MN	0.17	\$	240.00	\$	40.00
Erin G. McGuinness	11/6/2019	Kansas	Call Kansas stakeholder re case strategy and updates.	0.70	\$	240.00	\$	168.00
			Edit language for draft outcome measures in					
Erin G. McGuinness	11/21/2019	Kansas	mediation	0.38	\$	240.00	\$	92.00
			Internal meeting with IL, MN, EPG, CG, DA, CC to					
Erin G. McGuinness	11/21/2019	Kansas	discuss draft outcome measures for settlement.	1.50	\$	240.00	\$	360.00
Erin G. McGuinness	11/22/2019		Review draft outcomes in settlement.	0.50	\$	240.00		120.00
Lim 6. Wicdamiress	11/22/2013	Ransas	Research definition of respite for draft prohibitions	0.50	Ψ	2 10.00	Υ	120.00
Erin G. McGuinness	11/22/2019	Kansas	in settlement	0.50	Ś	240.00	\$	120.00
			Correspond with team regarding draft settlement		-		-	
Erin G. McGuinness	12/9/2019	Kansas	proposal.	1.47	\$	240.00	\$	352.00
			Reviewed kinship model in Kansas to inform		т		т	
Erin G. McGuinness	12/12/2019	Kansas	settlement agreement negotiations	0.25	\$	240.00	\$	60.00
Erin G. McGuinness	12/12/2019	Kancac	Prepare for call with prospective Kansas expert.	0.58	\$	240.00	¢	140.00
Erin G. McGuinness	12/12/2019		Call with prospective Kansas expert.	1.50	\$	240.00	-	360.00
Lim 6. Wiedumiess	12/12/2013	Karisas	Correspond with team discussing proposed	1.50	· ·	240.00	· ·	300.00
Erin G. McGuinness	12/17/2019	Kansas	settlement draft.	0.38	\$	240.00	\$	92.00
	10/1=/05:5				_	0.40.55	_	00.55
Erin G. McGuinness	12/17/2019	Kansas	Read and edit updated proposed settlement draft	0.40	\$	240.00	\$	96.00
			Find source in Named Plaintiff file for use in response					
Erin G. McGuinness	1/13/2020	Kansas	to Defendant's motion to dismiss.	0.07	\$	240.00	\$	16.00
			Contemplate alternative metrics for stability for					
Erin G. McGuinness	2/11/2020	Kansas	incorporation into settlement agreement	0.33	\$	240.00	\$	80.00

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			Meeting with IL & EGH to discuss stability proxy				
Erin G. McGuinness	2/11/2020	Kansas	metrics for settlement.	1.00	\$ 240.00	\$	240.00
			Call with EGH & MN to discuss CFSR review				
Erin G. McGuinness	2/25/2020	Kansas	instrument and measurement metrics for mediation.	0.20	\$ 240.00	\$	48.00
			Discuss potential measurement metrics for Kansas				
Erin G. McGuinness	2/25/2020	Kansas	mediation	0.50	\$ 240.00	•	120.00
Erin G. McGuinness	2/27/2020	Kansas	Review updated Kansas mediation package	0.97	\$ 240.00	\$	232.00
			Discussion regarding measurement metrics with				
Erin G. McGuinness	3/16/2020	Kansas	team.	0.33	\$ 240.00	\$	80.00
			Correspond with team re settlement agreement				
Erin G. McGuinness	4/1/2020	Kansas	metrics.	0.25	\$ 240.00	\$	60.00
Erin G. McGuinness	4/2/2020	Kansas	Correspond with team re: RFP, discovery strategy.	0.43	\$ 240.00	\$	104.00
			Correspond with team re substitution of next friend				
Erin G. McGuinness	4/14/2020	Kansas	and case strategy.	0.42	\$ 240.00	\$	100.00
			Review and analyze recap of Kansas meet and				
Erin G. McGuinness	5/4/2020	Kansas	confer.	0.42	\$ 240.00	\$	100.00
			Analyze potential for using CFSR Item 18 as a draft				
Erin G. McGuinness	5/5/2020	Kansas	settlement metric.	1.60	\$ 240.00	\$	384.00
			Correspond with team re settlement and litigation				
Erin G. McGuinness	5/6/2020	Kansas	strategy.	0.37	\$ 240.00	\$	88.00
			Correspond with team re settlement updates and				
Erin G. McGuinness	5/14/2020	Kansas	strategy.	0.30	\$ 240.00	\$	72.00
			Highlight and circulate CFSR syntax to Kansas				
			mediation team for integration into settlement				
Erin G. McGuinness	5/14/2020	Kansas	agreement.	0.37	\$ 240.00	\$	88.00
Erin G. McGuinness	5/14/2020	Kansas	Meeting with IL, CG, NT, EGH re settlement metrics.	0.75	\$ 240.00	\$	180.00
			Review CFSR Item 4 measures and compare language				
Erin G. McGuinness	5/14/2020	Kansas	to draft settlement proposal.	2.03	\$ 240.00	\$	488.00
			Call with IL & EGH to discuss draft settlement				
Erin G. McGuinness	5/15/2020	Kansas	metrics.	0.50	\$ 240.00	\$	120.00

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Erin G. McGuinness	5/18/2020	Kansas	Correspond with team re settlement strategy.	0.37	\$	240.00	\$	88.00
			Review CFSR Item 4 definitions references in draft					
Erin G. McGuinness	5/28/2020	Kancac	settlement agreement to ensure efficacy.	0.40	\$	240.00	\$	96.00
Lini G. MicGannicss	3/20/2020	Karisas	Call with IL, JK, EGH to discuss outcome metrics and	0.40	Ψ	240.00	٠,	30.00
			CFSR definitions incorporated by reference in					
Erin G. McGuinness	5/28/2020	Kansas	settlement agreement.	0.50	\$	240.00	\$	120.00
Lim Grivio Guiniess	3, 23, 2323	Ransas	Review updated settlement draft and Defendants'	0.50	Υ	2 10.00	Ψ	120.00
			comments in preparation for KS meeting to discuss					
Erin G. McGuinness	5/28/2020	Kansas	settlement metrics.	0.88	\$	240.00	\$	212.00
	5/25/2525		Analyze Adoption and Foster Care Analysis and		-		т	
			Reporting System (AFCARS) data run for length of					
Erin G. McGuinness	5/28/2020	Kansas	stay to aid settlement negotiations	1.33	\$	240.00	\$	320.00
	-, -, -		Emails with IL & EGH regarding CFSR and KS		•		•	
Erin G. McGuinness	6/4/2020	Kansas	settlement metrics.	0.38	\$	240.00	\$	92.00
	. ,		Call with IL & EGH & JK to discuss pros and cons to		•		•	
			different outcome metrics in preparation for					
Erin G. McGuinness	6/5/2020	Kansas	continued settlement negotiations.	0.58	\$	240.00	\$	140.00
			Confirm language in KS Draft settlement agreement					
Erin G. McGuinness	6/10/2020	Kansas	metrics.	0.32	\$	240.00	\$	76.00
			Telephone call with NYCL (Leecia Welch) regarding					
Ira Lustbader	11/22/2017	Kansas	KS partnership interest in lit	0.75	\$	500.00	\$	375.00
Ira Lustbader	12/20/2017	Kansas	Analyze audits reports and data cont'd re pot. Claims	2.17	\$	500.00	\$	1,083.33
			Follow up analysis press reports on caseloads; state					
Ira Lustbader	1/8/2018	Kansas	reports	1.33	\$	500.00	\$	666.67
			Review new budget info and prelim leg task force					
Ira Lustbader	1/10/2018	Kansas	report	1.17	\$	500.00	\$	583.33
			Meeting with EM and HC regarding follow up on					
			Prelim legis task force report and spreadsheet re pot					
ra Lustbader	1/16/2018	Kansas	lit	0.75	\$	500.00	\$	375.00
			Review and analyze issues spreadsheet from co					
Ira Lustbader	1/16/2018	Kansas	counsel NYCL re potetnial claims	1.17	\$	500.00	\$	583.33

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			Review and analyze Task Force Prelim report,					
Ira Lustbader	1/16/2018	Kansas	including referenced data and findings	2.25	\$	500.00	\$	1,125.00
			Telephone call with co counsel regarding fact areas					
Ira Lustbader	1/19/2018	Kansas	for claims and investigation strategy	0.75	\$	500.00	\$	375.00
			Prep for telecom with co counsel on potential fact					
Ira Lustbader	1/19/2018	Kansas	areas for investigation	1.33	\$	500.00	\$	666.67
Ira Lustbader	2/1/2018	Kansas	Follow up analysis frame for factual investigation trip	0.67	\$	500.00	\$	333.33
			Prep and t/c with local KS advocates re regarding					
Ira Lustbader	2/5/2018	Kansas	systemic issues and pot claim	1.08	\$	500.00	\$	541.67
			Telephone call with local KS advocate stakeholder on					
Ira Lustbader	2/7/2018	Kansas	potential plaintiff access	0.33	\$	500.00	\$	166.67
			Follow up with team regarding steps for investigation					
Ira Lustbader	3/2/2018	Kansas	and priorities for compl filing	1.25	\$	500.00	\$	625.00
			Telephone call with SD (and HC and EM) regarding					
Ira Lustbader	3/5/2018	Kansas	ground investigation, strategy and next steps	0.58	\$	500.00	\$	291.67
			Follow up data review and analysis regarding fact					
Ira Lustbader	3/6/2018	Kansas	support for potential claims	2.17	\$	500.00	\$	1,083.33
			Team call with co counsel and CR team regarding					
Ira Lustbader	3/7/2018	Kansas	investing strategy and next steps (left call early)	0.67	\$	500.00	\$	333.33
	-,,		Prep for team call on investigation priorities and					
Ira Lustbader	3/7/2018	Kansas	strategy	1.08	\$	500.00	\$	541.67
			Follow up analysis regarding current data and					
			documents to isolate what information has yet to be					
Ira Lustbader	3/9/2018	Kansas	collected for next steps	1.75	\$	500.00	\$	875.00
Ira Lustbader	3/13/2018	Kansas	Review recent reports from legis task force	0.75	\$	500.00	\$	375.00
			Team strategy call with co counsel, including					
Ira Lustbader	3/28/2018	Kancac	discussion of investigation strategy and pot. claims	1.07	\$	500.00	\$	533.33
ii a Lustbauei	3/20/2018	Nalisas	Review and analyze updated report and frame for	1.07	٧	500.00	ڔ	J33.33
Ira Lustbader	4/3/2018	Kansas	claims (health care)	1.83	\$	500.00	\$	916.67
ii a Lastbaaci	7/ 3/ 2010	Ransas	ciainis (nearth care)	1.05	٧	300.00	٠	510.07

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

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

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			1				
		Analyzing recent investigation and claims strategy					
		regarding mental health allegations and placement					
5/18/2018	Kansas	array	2.83	\$	500.00	\$	1,416.67
		Telephone call with co-counsel (LBB and NCYL)					
5/21/2018	Kansas	regarding investigation strategy and claims	1.00	\$	500.00	\$	500.00
		Analyzing method for organizing all facts to date;					
5/22/2018	Kansas	assessing delib indiff. issues	1.58	\$	500.00	\$	791.67
		Team meeting regarding strategy for investigation					
5/23/2018	Kansas	and claims (left early)	0.58	\$	500.00	\$	291.67
		Follow up analysis on claims structure and complaint					
5/24/2018	Kansas	FOF outline	1.58	\$	500.00	\$	791.67
		Continued analysis case law and exemplars of					
5/25/2018	Kansas	settlement approaches	2.42	\$	500.00	\$	1,208.33
5/30/2018	Kansas	Team counsel call regarding strategy for claims	0.75	\$	500.00	\$	375.00
		Analyzing recent report and contact memos					
5/30/2018	Kansas	regarding investigation strategy and claims	2.08	\$	500.00	\$	1,041.67
6/5/2018	Kansas	Review analyze outline for FOF and complaint alleg	1.17	\$	500.00	\$	583.33
				<u> </u>		<u> </u>	
6/6/2018	Kansas	investigation tasks	1.00	\$	500.00	\$	500.00
		Prep for team meeting and next steps strategy on					
6/6/2018	Kansas	claims	1.83	\$	500.00	\$	916.67
6/7/2018	Kansas	FOF review re factual claim support	1.67	\$	500.00	\$	833.33
6/8/2018	Kansas	Discuss FOF strategy with MN	0.67	\$	500.00	\$	333.33
		Analyzing revisions to FOF document to align with					
6/8/2018	Kansas	potential claims	1.92	\$	500.00	\$	958.33
		Revisions to FOF structure regarding focus on					
6/12/2018	Kansas	children with identified MH needs	3.75	\$	500.00	\$	1,875.00
		Telephone call with full co-counsel team regarding					•
6/13/2018	Kansas	claims and investigation strategy	1.00	\$	500.00	\$	500.00
		Follow up analysis of alternative FOF structure for					
6/13/2018	Kansas	kids with MH needs	2.33	\$	500.00	\$	1,166.67
6/14/2018	Kansas	Telephone call with stakeholder regarding plaintiff	0.67	\$	500.00	\$	333.33
	5/21/2018 5/22/2018 5/23/2018 5/24/2018 5/25/2018 5/30/2018 5/30/2018 6/5/2018 6/6/2018 6/6/2018 6/6/2018 6/8/2018 6/8/2018 6/12/2018 6/13/2018 6/13/2018	5/18/2018 Kansas  5/21/2018 Kansas  5/22/2018 Kansas  5/23/2018 Kansas  5/24/2018 Kansas  5/25/2018 Kansas  5/30/2018 Kansas  5/30/2018 Kansas  6/5/2018 Kansas  6/6/2018 Kansas  6/6/2018 Kansas  6/6/2018 Kansas  6/8/2018 Kansas  6/8/2018 Kansas  6/8/2018 Kansas  6/8/2018 Kansas  6/8/2018 Kansas  6/13/2018 Kansas  6/13/2018 Kansas  6/13/2018 Kansas  6/13/2018 Kansas	regarding mental health allegations and placement array  Telephone call with co-counsel (LBB and NCYL) regarding investigation strategy and claims Analyzing method for organizing all facts to date; assessing delib indiff. issues  Team meeting regarding strategy for investigation and claims (left early) Follow up analysis on claims structure and complaint FOF outline Continued analysis case law and exemplars of settlement approaches  5/30/2018 Kansas Team counsel call regarding strategy for claims Analyzing recent report and contact memos regarding investigation strategy and claims  6/5/2018 Kansas Review analyze outline for FOF and complaint alleg Team meeting regarding strategy and claims, investigation tasks Prep for team meeting and next steps strategy on claims  6/6/2018 Kansas FOF review re factual claim support 6/8/2018 Kansas Discuss FOF strategy with MN Analyzing revisions to FOF document to align with potential claims Revisions to FOF structure regarding focus on children with identified MH needs  6/13/2018 Kansas FOI review re factual claims regarding focus on children with identified MH needs Follow up analysis of alternative FOF structure for kids with MH needs	regarding mental health allegations and placement array 2.83 Telephone call with co-counsel (LBB and NCYL) regarding investigation strategy and claims 1.00 Analyzing method for organizing all facts to date; 5/22/2018 Kansas assessing delib indiff. issues 1.58 Team meeting regarding strategy for investigation and claims (left early) 0.58 Follow up analysis on claims structure and complaint FOF outline 1.58 Continued analysis case law and exemplars of 5/25/2018 Kansas settlement approaches 2.42 5/30/2018 Kansas Team counsel call regarding strategy for claims 0.75 Analyzing recent report and contact memos regarding investigation strategy and claims 2.08  6/5/2018 Kansas Review analyze outline for FOF and complaint alleg 1.17 Team meeting regarding strategy and claims, investigation tasks 1.00 Prep for team meeting and next steps strategy on claims 6/6/2018 Kansas Claims FOF review re factual claim support 1.67 6/8/2018 Kansas Discuss FOF strategy with MN 0.67 Analyzing revisions to FOF document to align with 6/8/2018 Kansas children with identified MH needs 3.75 Telephone call with full co-counsel team regarding claims and investigation strategy 9 6/13/2018 Kansas kids with MH needs 2.33	regarding mental health allegations and placement array  7.83 \$  Telephone call with co-counsel (LBB and NCYL)  7.721/2018 Kansas regarding investigation strategy and claims 1.00 \$  Analyzing method for organizing all facts to date; assessing delib indiff. issues 1.58 \$  Team meeting regarding strategy for investigation and claims (left early) 0.58 \$  Follow up analysis on claims structure and complaint FOF outline 1.58 \$  5/24/2018 Kansas FOF outline 1.58 \$  Continued analysis case law and exemplars of settlement approaches 2.42 \$  5/30/2018 Kansas Team counsel call regarding strategy for claims 0.75 \$  Analyzing recent report and contact memos regarding investigation strategy and claims 2.08 \$  6/5/2018 Kansas Review analyze outline for FOF and complaint alleg 1.17 \$  Team meeting regarding strategy and claims, investigation tasks 1.00 \$  Prep for team meeting and next steps strategy on 6/6/2018 Kansas claims 1.83 \$  6/7/2018 Kansas FOF review re factual claim support 1.67 \$  6/8/2018 Kansas FOF review re factual claim support 1.67 \$  6/8/2018 Kansas Discuss FOF strategy with MN 0.67 \$  Analyzing revisions to FOF document to align with potential claims 1.92 \$  Revisions to FOF structure regarding focus on children with identified MH needs 3.75 \$  Telephone call with full co-counsel team regarding claims and investigation strategy 50 \$  6/13/2018 Kansas claims and investigation strategy 50 \$  Follow up analysis of alternative FOF structure for kids with MH needs 2.33 \$	regarding mental health allegations and placement array  Telephone call with co-counsel (LBB and NCYL)  5/21/2018 Kansas array  Telephone call with co-counsel (LBB and NCYL)  5/21/2018 Kansas regarding investigation strategy and claims  Analyzing method for organizing all facts to date; assessing delib indiff. issues  Team meeting regarding strategy for investigation and claims (left early)  Follow up analysis on claims structure and complaint  5/24/2018 Kansas  FOF outline  Continued analysis case law and exemplars of settlement approaches  5/30/2018 Kansas  Team counsel call regarding strategy for claims  Analyzing recent report and contact memos regarding investigation strategy and claims  2.08 \$ 500.00  6/5/2018 Kansas  Review analyze outline for FOF and complaint alleg  Team meeting regarding strategy and claims, investigation tasks  Prep for team meeting and next steps strategy on claims  6/6/2018 Kansas  Discuss FOF review re factual claim support  6/8/2018 Kansas  Discuss FOF strategy with MN  Analyzing revisions to FOF document to align with potential claims  Revisions to FOF structure regarding focus on children with identified MH needs  6/13/2018 Kansas  Claims and investigation strategy  1.00 \$ 500.00  Follow up analysis of alternative FOF structure for kids with MH needs  East Stock of the structure for kids with MH needs  East Stock of the structure for kids with MH needs  East Stock of the structure for kids with MH needs  East Stock of the structure for kids with MH needs  East Stock of the structure for kids with MH needs  East Stock of the structure for kids with MH needs  East Stock of the structure for kids with MH needs  East Stock of the structure for kids with MH needs  East Stock of the structure for kids with MH needs  East Stock of the structure for kids with MH needs  East Stock of the structure for kids with MH needs  East Stock of the structure for kids with MH needs  East Stock of the structure for kids with MH needs  East Stock of the structure for kids of the structure for kids o	regarding mental health allegations and placement array  Telephone call with co-counsel (LBB and NCYL)  5/21/2018 Kansas array  Telephone call with co-counsel (LBB and NCYL)  5/21/2018 Kansas assessing delib indiff. issues  Team meeting regarding strategy for investigation and claims (left early)  5/23/2018 Kansas assessing delib indiff. issues  Team meeting regarding strategy for investigation and claims (left early)  5/24/2018 Kansas FOF outline  Continued analysis case law and exemplars of settlement approaches  5/30/2018 Kansas Team counsel call regarding strategy for claims  Analyzing recent report and contact memos  5/30/2018 Kansas regarding investigation strategy and claims  6/5/2018 Kansas Review analyze outline for FOF and complaint alleg  Team meeting regarding strategy and claims, investigation tasks  Prep for team meeting and next steps strategy on claims  6/6/2018 Kansas PoF review re factual claim support  6/8/2018 Kansas Discuss FOF strategy with MN  Analyzing revisions to FOF document to align with potential claims  Poferview re factual claim support  6/8/2018 Kansas Colidren with identified MH needs  7/13/2018 Kansas Claims and investigation strategy  6/13/2018 Kansas Claims and investigation strategy  Follow up analysis of alternative FOF structure for kids with MH needs  Follow up analysis of alternative FOF structure for kids with MH needs  Follow up analysis of alternative FOF structure for kids with MH needs  Follow up analysis of alternative FOF structure for kids with MH needs  Follow up analysis of alternative FOF structure for kids with MH needs  Follow up analysis of alternative FOF structure for kids with MH needs  Follow up analysis of alternative FOF structure for kids with MH needs

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

			Telephone call with team and co-counsel regarding					
Ira Lustbader	6/25/2018	Kansas	investigation strategy and drafting FOF / cloaks	1.42	\$	500.00	\$	708.33
			Review research memos and contact memos					
Ira Lustbader	7/2/2018	Kansas	regarding next steps re plaintiffs	1.33	\$	500.00	\$	666.67
			Cont'd review research memos and contact memos					
Ira Lustbader	7/3/2018	Kansas	regarding next steps re plaintiffs	1.58	\$	500.00	\$	791.67
Ira Lustbader	7/5/2018	Kansas	Review/analyze Medicaid research and strategy	2.67	\$	500.00	\$	1,333.33
Ira Lustbader	7/9/2018	Kansas	Follow up review of Medicaid research	1.17	\$	500.00	\$	583.33
			Meeting with NYCL co-counsel regarding					
Ira Lustbader	7/11/2018	Kansas	investigation strategy	0.58	\$	500.00	\$	291.67
			Telephone call with NYCL co-counsel and stakeholder					
Ira Lustbader	7/11/2018	Kansas	on Medicaid structural issues	0.75	\$	500.00	\$	375.00
Ira Lustbader	7/11/2018	Kansas	Prep for discussion with stakeholder on Medicaid issues specific to MH delivery structures	2.17	\$	500.00	Ś	1,083.33
	, , ,		Draft summary of strategy meeting and follow up		•		•	,
Ira Lustbader	7/12/2018	Kansas	tasks for team	1.17	\$	500.00	\$	583.33
Ira Lustbader	7/12/2018	Kansas	Follow up analysis regarding Medicaid case law	1.67	\$	500.00	\$	833.33
Lead allowed a	7/40/2040	W	Strategy conference call with co counsel team on	0.00		500.00	۸.	450.22
Ira Lustbader	7/18/2018		investigations status	0.92	\$ \$	500.00	-	458.33
Ira Lustbader	7/30/2018	Kansas	Discuss investigation strategy with EM and MN	0.50	<b>&gt;</b>	500.00	>	250.00
Iva I atha a d a v	7/24/2010	Vanana	Investigation status meeting with NYCL LBB and CR	0.33	\$	F00 00	۸.	100.07
Ira Lustbader Ira Lustbader	7/31/2018		counsel team	1.83	\$ \$	500.00 500.00		166.67 916.67
Ira Lustbader	8/2/2018		Review draft FOF regarding complaint strategy		\$ \$			875.00
ira Lustbauer	8/7/2018	Karisas	Review/edit medicaid research memo  Strategy conference call with co-counsel team (LBB,	1.75	Ş	500.00	Þ	8/5.00
Ira Lustbader	8/8/2018	Vancas	NYCL, CR) and complaint drafting	1.33	\$	500.00	\$	666.67
וום בעאנטמעכו	0/0/2018	Nalisas	Cont'd review/edit Medicaid research memo and	1.33	ې —	300.00	Ą	000.07
Ira Lustbader	8/8/2018	Kancac	strategic email to MN for follow up	1.75	\$	500.00	¢	875.00
Ira Lustbader	8/9/2018		Cont'd review/comment on EPSDT research	1.73	\$ \$	500.00		791.67
Ira Lustbader	8/14/2018		Review FOF re claims struture	3.75		500.00		1,875.00
וים בעאנטמעפו	0/14/2018	I/alisas	Meview FOF TE Claims Structure	3./3	Ą	300.00	Ą	1,0/5.00

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8/15/2018	Kansas	Review FOF contd on claims structure	1.25	\$	500.00	\$	625.00
		Review/analyze FOF regarding complaint outline					
8/17/2018	Kansas	contd	1.42	\$	500.00	\$	708.33
		Review and analyze FOF cont'd regarding framing					
8/20/2018	Kansas	complaint	1.92	\$	500.00	\$	958.33
8/22/2018	Kansas		3.67	\$	500.00	\$	1,833.33
		Meeting with MN regarding strategy on outline for					
8/23/2018	Kansas	complaint	1.00	\$	500.00	\$	500.00
0/22/2010	Vancas	Analyzing FOE regarding from a for complaint outline	2 17	۲	F00 00	۲	1 502 22
8/23/2018	Kalisas	, , , , , , , , , , , , , , , , , , , ,	3.17	Ş	500.00	Ş	1,583.33
0/24/2010	Vanaga	,	1 25	۲	F00 00	۲.	625.00
8/24/2018	Kansas		1.25	\$	500.00	\$	625.00
0/24/2040		,	4.25		500.00		625.00
8/24/2018	Kansas		1.25	\$	500.00	\$	625.00
0/= /0010			4 = 0				
9/5/2018	Kansas		1.50	\$	500.00	\$	750.00
		·				_	
9/5/2018	Kansas		4.25	\$	500.00	Ş	2,125.00
		, -					
9/6/2018	Kansas	team	1.08	\$	500.00	\$	541.67
9/6/2018	Kansas	Analyzing FOF cont'd regarding complaint oultine	1.83	\$	500.00	\$	916.67
		Read and analyze updated report Legis Task Force					
9/6/2018	Kansas	and data	2.33	\$	500.00	\$	1,166.67
0/11/2019	Vancas	Analyzing FOE for complaint outline and strategy	2.00	۲	F00 00	۲	1,041.67
9/11/2018	Kalisas	Analyzing FOF for complaint outline and strategy	2.08	Ş	500.00	Þ	1,041.67
		Telephone call with team co-counsel regarding next					
9/12/2018	Kansas		0.58	\$	500.00	\$	291.67
, ,				•		•	
9/14/2018	Kansas	,	2.42	Ś	500.00	\$	1,208.33
	8/17/2018 8/20/2018 8/23/2018 8/23/2018 8/24/2018 8/24/2018 9/5/2018 9/5/2018 9/6/2018 9/6/2018 9/6/2018 9/11/2018	8/15/2018 Kansas  8/17/2018 Kansas  8/20/2018 Kansas  8/22/2018 Kansas  8/23/2018 Kansas  8/23/2018 Kansas  8/24/2018 Kansas  8/24/2018 Kansas  9/5/2018 Kansas  9/5/2018 Kansas  9/6/2018 Kansas  9/6/2018 Kansas  9/6/2018 Kansas  9/6/2018 Kansas  9/11/2018 Kansas  9/11/2018 Kansas	Review/analyze FOF regarding complaint outline contd Review and analyze FOF cont'd regarding framing complaint  Cont'd review and analysis FOF; review of status of pltff potentials; both re outlining complaint  Meeting with MN regarding strategy on outline for complaint  Review and analysis FOF; review of status of pltff potentials; both re outlining complaint  Meeting with MN regarding strategy on outline for complaint  Review and analysis FOF; review of status of pltff potentials; both re outlining complaint  Meeting with MN regarding strategy on outline for complaint  Review and analysis FOF; review of status of pltff potentials; both re outlining complaint  Meeting with MN regarding strategy on outline for complaint  Telephone call with Freya and NYCL, MN regarding strategy for complaint  Telephone conference with co-counsel team regarding investigation and compl strategy  Prep for and meet with stakeholder and possible client  Analyzing co-counsel claim strategy and email to team  9/6/2018 Kansas  Analyzing FOF cont'd regarding complaint outline  Read and analyze updated report Legis Task Force and data  9/11/2018 Kansas  Analyzing FOF for complaint outline and strategy  Telephone call with team co-counsel regarding next steps and strategy for compl and pltffs  Read/analyze contact memos re pltff sources and	Review/analyze FOF regarding complaint outline contd Review and analyze FOF cont'd regarding framing complaint  Cont'd review and analysis FOF; review of status of pltff potentials; both re outlining complaint  Meeting with MN regarding strategy on outline for complaint  Reyal/2018 Kansas Analyzing FOF regarding frame for complaint outline Regarding strategic call with Freya and NYCL, MN regarding strategy for complaint  Reyal/2018 Kansas Reyal/2018 Kansas Regarding strategy for complaint  Regarding strategy for complaint  1.25 Telephone call with Freya and NYCL, MN regarding Regarding investigation and compl strategy  Prep for and meet with stakeholder and possible client  Prep for and meet with stakeholder and possible client  Analyzing co-counsel claim strategy and email to team  Prep for cont'd regarding complaint outline  Read and analyze updated report Legis Task Force and data  2.33  P/11/2018 Kansas Analyzing FOF for complaint outline and strategy  Telephone call with team co-counsel regarding next steps and strategy for compl and pltffs  Read/analyze contact memos re pltff sources and	Review/analyze FOF regarding complaint outline contd 1.42 \$  Review and analyze FOF cont'd regarding framing complaint (Cont'd review and analyze FOF cont'd regarding framing complaint 1.92 \$  Cont'd review and analysis FOF; review of status of pltff potentials; both re outlining complaint 3.67 \$  Meeting with MN regarding strategy on outline for complaint 1.00 \$  8/23/2018 Kansas Analyzing FOF regarding frame for complaint outline 2.17 \$  Prep for strategic call with Freya and NYCL, MN regarding strategy for complaint 1.25 \$  Telephone call with Freya and NYCL, MN regarding strategy for complaint 1.25 \$  Telephone conference with co-counsel team regarding investigation and compl strategy 1.50 \$  Prep for and meet with stakeholder and possible client 4.25 \$  Analyzing co-counsel claim strategy and email to team 1.08 \$  9/6/2018 Kansas Analyzing FOF cont'd regarding complaint outline 1.83 \$  9/6/2018 Kansas Analyzing FOF cont'd regarding complaint outline 1.83 \$  9/6/2018 Kansas Analyzing FOF cont'd regarding complaint outline 1.83 \$  Prep for outline and strategy 2.08 \$  Telephone call with team co-counsel regarding next 1.25 \$  Telephone call with team co-counsel regarding next 1.25 \$  Telephone call with team co-counsel regarding next 1.25 \$  Read/analyze contact memos re pltff sources and	Review/analyze FOF regarding complaint outline 8/17/2018 Kansas contd  Review and analyze FOF cont'd regarding framing 8/20/2018 Kansas complaint  Cont'd review and analysis FOF; review of status of 8/22/2018 Kansas pltff potentials; both re outlining complaint  3.67 \$ 500.00  Meeting with MN regarding strategy on outline for complaint  3.67 \$ 500.00  8/23/2018 Kansas Analyzing FOF regarding frame for complaint outline  8/24/2018 Kansas regarding strategy for complaint  1.25 \$ 500.00  1.25 \$ 500.00  1.25 \$ 500.00  1.26 \$ 500.00  1.27 \$ 500.00  1.28 \$ 500.00  1.29 \$ 500.00  1.20 \$ 500.00  1.21 \$ 500.00  1.22 \$ 500.00  1.23 \$ 500.00  1.24 \$ 500.00  1.25 \$ 500.00  1.26 \$ 500.00  1.27 \$ 500.00  1.28 \$ 500.00  1.29 \$ 500.00  1.29 \$ 500.00  1.29 \$ 500.00  1.20 \$ 500.00  1.21 \$ 500.00  1.22 \$ 500.00  1.23 \$ 500.00  1.24 \$ 500.00  1.25 \$ 500.00  1.26 \$ 500.00  1.27 \$ 500.00  1.28 \$ 500.00  1.29 \$ 500.00  1.29 \$ 500.00  1.20 \$ 500.00  1.21 \$ 500.00  1.22 \$ 500.00  1.23 \$ 500.00  1.24 \$ 500.00  1.25 \$ 500.00  1.26 \$ 500.00  1.27 \$ 500.00  1.28 \$ 500.00  1.29 \$ 500.00  1.20 \$ 500.00  1.20 \$ 500.00  1.21 \$ 500.00  1.22 \$ 500.00  1.23 \$ 500.00  1.24 \$ 500.00  1.25 \$ 500.00  1.26 \$ 500.00  1.27 \$ 500.00  1.28 \$ 500.00  1.29 \$ 500.00  1.20 \$ 500.	Review/analyze FOF regarding complaint outline contd Review and analyze FOF cont'd regarding framing complaint  Cont'd review and analysis FOF; review of status of pltff potentials; both re outlining complaint  Review and analysis FOF; review of status of pltff potentials; both re outlining complaint  Review and analysis FOF; review of status of pltff potentials; both re outlining complaint  Review and analysis FOF; review of status of pltff potentials; both re outlining complaint  Review and analysis FOF; review of status of pltff potentials; both re outlining complaint  Review and analysis FOF; review of status of pltff potentials; both re outlining complaint  Review and analysis FOF; review of status of pltff potentials; both re outlining complaint  Review and analysis FOF; review of status of pltff potentials; both re outlining complaint  Review and analysing FOF regarding strategy on outline for complaint  Review and analysing FOF regarding strategy on outline for complaint  Review and analysing FOF regarding frame for complaint outline  Review and analysing FOF regarding frame for complaint outline  Review and analysing FOF cont'd regarding strategy on outline for complaint  Review and analysing for complaint outline  Read and analyzing for complaint outline  Read and analyzing FOF cont'd regarding complaint outline  Read and data  Review and analyzing FOF complaint outline and strategy  Read and analyzing FOF for complaint outline and strategy  Read/analyzing FOF complaint outline

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			Continued analysis 2018 performance data regarding					
Ira Lustbader	9/17/2018	Kansas	complaint outline	1.25	\$	500.00	\$	625.00
Ira Lustbader	9/18/2018	Kansas	Discuss strategy with MN, Jon and Erin re pltffs	0.58	\$	500.00	\$	291.67
			Telephone call with co-counsel Leecia Welch					
Ira Lustbader	9/18/2018	Kansas	regarding investigation and filing strategy	0.58	\$	500.00	\$	291.67
			Cont'd analyzing FOF and approach for complaint					
Ira Lustbader	9/18/2018	Kansas	outline	1.83	\$	500.00	\$	916.67
			Telephone call with Jon K regarding EPSDT research					
Ira Lustbader	9/21/2018	Kansas	and strategy	0.33	\$	500.00	\$	166.67
	0/04/0040	.,		2.22	4	500.00		4 466 67
Ira Lustbader	9/21/2018	Kansas	Analysis facts and data for complaint outline contd	2.33	\$	500.00	\$	1,166.67
	0/06/0040		Telephone call with co-counsel team regarding the	4.00				
Ira Lustbader	9/26/2018	Kansas	timing and strategy for filing	1.00	\$	500.00	Ş	500.00
	0/06/0040		Read/analyzing research memo JK on EPSDT cases					
Ira Lustbader	9/26/2018		and strategy	2.83		500.00		1,416.67
Ira Lustbader	9/27/2018	Kansas	Analyzing and editing complaint outline	6.42	\$	500.00	\$	3,208.33
			Cont'd analyzing draft outline for complaint, edit for					
Ira Lustbader	9/28/2018	Kansas	co-counsel	2.83	\$	500.00	\$	1,416.67
			Read memo and caselaw and comment EPSDT					
Ira Lustbader	10/1/2018		claims, edits for JK	1.83		500.00		916.67
Ira Lustbader	10/1/2018	Kansas	Contd analyze and edit complaint outline	3.25	\$	500.00	\$	1,625.00
			Telephone call with co-counsel LBB regarding compl					
Ira Lustbader	10/2/2018	Kansas	strategy	0.92	\$	500.00	\$	458.33
			Analyze memo and case law and comment for team					
Ira Lustbader	10/2/2018	Vancac	regarding class cert standards of in 10th Circuit	4.17	ć	500.00	Ļ	2,083.33
ira Lustbauei	10/2/2018	Nalisas	Strategy meeting for investigation trip week of Oct. 8	4.17	Ą	300.00	Ą	2,065.55
Ira Lustbader	10/3/2018	Vancas	ad possible plaintiffs	1.00	۲	500.00	۲	500.00
Ira Lustbader	• •		Follow up analysis of class cert issues	1.75	\$ \$	500.00		875.00
ira Lustbauer	10/3/2018	Kalisas	·	1./5	Ş	500.00	Ą	8/5.00
Ira Lustbader	10/4/2019	Vancas	Telephone call with potential expert in health care	0.83	ć	500.00	ć	416.67
	10/4/2018		structures  Revisions to retainer for not pltffe				\$ \$	
Ira Lustbader	10/4/2018	Kansas	Revisions to retainer for pot pltffs	1.08	\$	500.00	Þ	541.67
Ina I watha die e	10/1/2010	W	Draft strat agenda for team meeting in KC with co-	4 4 7	<u> </u>	F00 00	<b>~</b>	F02.22
Ira Lustbader	10/4/2018	kansas	counsel	1.17	\$	500.00	\$	583.33

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

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

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

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Ira Lustbader	11/15/2018	Kansas	Finalizing complaint for filing per revised strategy	11.25	\$	500.00	\$	5,625.00
			Strategic emails with co-counsel post filing regarding					
Ira Lustbader	11/16/2018		judge assignment, next steps	0.58	•	500.00		291.67
Ira Lustbader	11/16/2018	Kansas	Strategic emails regarding final filing logistics	0.75	\$	500.00	\$	375.00
			Team call regarding initial post filing outreach and					
Ira Lustbader	11/21/2018	Kansas	litigation strategies	0.83	\$	500.00	\$	416.67
			Telephone call with co-counsel LBB regarding expert					
Ira Lustbader	11/27/2018	Kansas	strategy	0.58	\$	500.00	\$	291.67
			Team conf call regarding litigation strategy					
Ira Lustbader	11/28/2018	Kansas	stakeholder/witness engagement	1.08	\$	500.00	\$	541.67
			Discuss next steps and strategy for complaint					
Ira Lustbader	12/5/2018	Kansas	drafting with MN	0.75	\$	500.00	\$	375.00
Ira Lustbader	12/5/2018	Kansas	Analyzing possible experts re placement array	1.17	\$	500.00	\$	583.33
			Co-counsel team meeting call regarding next steps					
			post filing regarding fact and plaintiff amendment,					
Ira Lustbader	12/5/2018	Kansas	inital response, witnesses	1.42	\$	500.00	\$	708.33
			Team strategy call with co-counsel re post filing					
Ira Lustbader	12/12/2018	Kansas	litigation strategy including class cert	0.50	\$	500.00	\$	250.00
			Review/analyze witness developments, extension					
Ira Lustbader	12/12/2018	Kansas	strategy and intial expert vetting for class cert	1.75	\$	500.00	\$	875.00
			Telephone call with co-counsel LW/NCYL and		•			
			LRS/Appleseed regarding initial deadlines, extension					
Ira Lustbader	12/21/2018	Kansas	request and discovery strategy	0.75	\$	500.00	\$	375.00
			Telephone call with AG for defs and co-counsel L					
Ira Lustbader	12/31/2018	Kansas	Rute and L Welch regarding same	1.00	\$	500.00	\$	500.00
			Prep regarding initial informal discovery and		•			
			protective order, time to answer/move and					
Ira Lustbader	12/31/2018	Kansas	extension with def counsel	1.08	\$	500.00	\$	541.67
			Researching and analyzing possible consulting					
Ira Lustbader	12/31/2018	Kancac	experts on child welfare/stability and Medicaid	2.17	Ċ	500.00	ċ	1,083.33
וומ בעאנטמעפו	12/31/2018	1/411242	experts on child wellare/stability and Medicald	2.1/	Ą	300.00	Ą	1,000.03

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			Team conference call regarding status of litigation					
			and strategy on next steps regarding amendments,					
Ira Lustbader	1/2/2019	Kansas	experts	0.93	\$	500.00	\$	466.67
			Cont'd researching, analyzing consulting experts					
Ira Lustbader	1/2/2019	Kansas	needed	1.83	\$	500.00	\$	916.67
			Telephone call with source regarding potential					
Ira Lustbader	1/10/2019	Kansas	expert re MH, placement	0.75	\$	500.00	\$	375.00
			Conference call with Def counsel (and co-counsel LR,					
Ira Lustbader	1/22/2019	Kansas	LW) regarding meet and confer on protective order	1.00	\$	500.00	\$	500.00
			Comments (internal for co-counsel) to protective					
Ira Lustbader	1/22/2019	Kansas	order draft and prep for meet and confer	2.58	\$	500.00	\$	1,291.67
Ira Lustbader	1/24/2019	Kansas	Analyzing potential experts contd MH and placement	1.33	\$	500.00	\$	666.67
Ira Lustbader	1/25/2019		Read edit proposed protective order alts.	1.08	\$	500.00		541.67
ii a Lustbauei	1/23/2019	Kaiisas	Follow up with Leecia Welch regarding protective	1.08	٠	300.00	٠	341.07
Ira Lustbader	1/29/2019	Kansas	order edits and strategy	0.33	\$	500.00	\$	166.67
			Analyzing potential experts cont'd (liability and class					
Ira Lustbader	1/29/2019	Kansas	cert distinguished)	1.75	\$	500.00	\$	875.00
			Telephone call with team regarding expert strategy -					
Ira Lustbader	1/29/2019	Kansas	vetting and engagement	2.17	\$	500.00	\$	1,083.33
			Research and drafting proposed Terms Sheet for					
Ira Lustbader	1/31/2019	Kansas	possible early settlement	7.17	\$	500.00	\$	3,583.33
			Analyzing and drafting possibility of immediate					
Ira Lustbader	2/1/2019	Kansas	(consent) relief	2.08	\$	500.00	\$	1,041.67
Ira Lustbader	2/1/2019	Kansas	Drafting proposed Terms sheet continued	4.25	\$	500.00	\$	2,125.00
			Telephone call with potential consulting expert in					
Ira Lustbader	2/4/2019	Kansas	child welfare structural failures	0.67	\$	500.00	\$	333.33
			Analyzing and drafting potential immediate Interim					
Ira Lustbader	2/4/2019	Kansas	relief for class	3.92	\$	500.00	\$	1,958.33
_			Telephone call with potential neuroscience expert					
Ira Lustbader	2/6/2019	Kansas	(with EM)	0.75	\$	500.00	\$	375.00

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

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

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		Analyze and draft proposed interim relief regarding					
3/25/2019	Kansas	possible settlement	3.83	\$	500.00	\$	1,916.67
		Meeting (call) with co-counsel on strategy, early					
3/27/2019	Kansas	settlement stay	0.90	\$	500.00	\$	450.00
3/27/2019	Kansas	Review and edit memo from JK on abstention	1.33	\$	500.00	\$	666.67
3/28/2019	Kansas	Cont'd analyzing research on abstention and SDP	1.58	\$	500.00	\$	791.67
		Telephone call with Def counsel and co-counsel					
3/29/2019	Kansas	regarding MTD, answer, discovery	0.50	\$	500.00	\$	250.00
3/29/2019	Kansas	Analyzing proposal on answering and discovery	1.58	\$	500.00	\$	791.67
. /2 /2 2 4		Team counsel call regarding strategy on discovery,					
4/3/2019	Kansas	•	0.98	\$	500.00	\$	491.67
4/4/2019	Kansas		1.17	Ś	500.00	\$	583.33
., ., ====				т	333.33	т	333.33
4/10/2019	Kansas	disc	1.00	\$	500.00	\$	500.00
		Telephone call with Leecia Welch NYCL regarding					
4/11/2019	Kansas	settlement strategy	0.67	\$	500.00	\$	333.33
		Telephone call with DLA co-counsel DS regarding					
4/17/2019	Kansas	strategy for settlement and discovery	0.42	\$	500.00	\$	208.33
		Prep for team strategy call regarding settlement					
4/17/2019	Kansas	strategy	0.75	\$	500.00	\$	375.00
4/17/2019	Kansas	Team strategy call regarding settlement meeting	0.82	\$	500.00	\$	408.33
		Telephone call with DS from DLA regarding strategy					
4/18/2019	Kansas	for settlement discovery	0.83	\$	500.00	\$	416.67
4/18/2019	Kansas	Analyze strategy for settlement meetings with Defs	1.00	\$	500.00	\$	500.00
4/26/2019	Kansas	Analyze issue of Gov as party and share strategy with	1 08	\$	500.00	\$	541.67
	3/27/2019 3/27/2019 3/28/2019 3/29/2019 3/29/2019 4/3/2019 4/4/2019 4/10/2019 4/17/2019 4/17/2019 4/17/2019 4/18/2019 4/18/2019	3/25/2019 Kansas 3/27/2019 Kansas 3/27/2019 Kansas 3/28/2019 Kansas 3/29/2019 Kansas 4/3/2019 Kansas 4/3/2019 Kansas 4/10/2019 Kansas 4/10/2019 Kansas 4/11/2019 Kansas 4/17/2019 Kansas 4/17/2019 Kansas 4/17/2019 Kansas 4/17/2019 Kansas 4/18/2019 Kansas 4/18/2019 Kansas 4/18/2019 Kansas	3/25/2019 Kansas possible settlement Meeting (call) with co-counsel on strategy, early settlement stay 3/27/2019 Kansas Review and edit memo from JK on abstention  3/28/2019 Kansas Cont'd analyzing research on abstention and SDP Telephone call with Def counsel and co-counsel regarding MTD, answer, discovery  3/29/2019 Kansas Analyzing proposal on answering and discovery Team counsel call regarding strategy on discovery, experts, settlement Analyzing early discovery options as condition of settlement Full pltff team litigation strategy call re settlement, disc Telephone call with Leecia Welch NYCL regarding settlement strategy  Telephone call with DLA co-counsel DS regarding strategy for settlement and discovery Prep for team strategy call regarding settlement strategy  4/17/2019 Kansas Team strategy call regarding settlement meeting Telephone call with DS from DLA regarding strategy for settlement discovery  4/18/2019 Kansas Analyze strategy for settlement meetings with Defs Analyze issue of Gov as party and share strategy with	3/25/2019 Kansas possible settlement 3.83  Meeting (call) with co-counsel on strategy, early settlement stay 0.90  3/27/2019 Kansas Review and edit memo from JK on abstention 1.33  3/28/2019 Kansas Cont'd analyzing research on abstention and SDP 1.58  Telephone call with Def counsel and co-counsel regarding MTD, answer, discovery 0.50  3/29/2019 Kansas Analyzing proposal on answering and discovery 1.58  Team counsel call regarding strategy on discovery, experts, settlement 0.98  Analyzing early discovery options as condition of settlement 1.17  Full pltff team litigation strategy call re settlement, disc 1.00  Telephone call with Leecia Welch NYCL regarding settlement strategy 0.67  Telephone call with DLA co-counsel DS regarding strategy for settlement and discovery 0.42  Prep for team strategy call regarding settlement 3.75  4/17/2019 Kansas Team strategy call regarding settlement 3.82  4/17/2019 Kansas Team strategy call regarding settlement meeting 0.82  Telephone call with DS from DLA regarding strategy 0.83  4/18/2019 Kansas Analyze strategy for settlement meetings with Defs 1.00  Analyze issue of Gov as party and share strategy with	3/25/2019 Kansas possible settlement 3.83 \$  Meeting (call) with co-counsel on strategy, early settlement stay 0.90 \$  3/27/2019 Kansas Review and edit memo from JK on abstention 1.33 \$  3/28/2019 Kansas Cont'd analyzing research on abstention and SDP 1.58 \$  Telephone call with Def counsel and co-counsel regarding MTD, answer, discovery 0.50 \$  3/29/2019 Kansas Analyzing proposal on answering and discovery 1.58 \$  Team counsel call regarding strategy on discovery, experts, settlement 0.98 \$  Analyzing early discovery options as condition of settlement 1.17 \$  Full pltff team litigation strategy call re settlement, disc 1.00 \$  Telephone call with DLA co-counsel DS regarding strategy on 0.67 \$  Telephone call with DLA co-counsel DS regarding strategy 0.67 \$  Telephone call with DLA co-counsel DS regarding strategy 0.75 \$  Telephone call with DLA co-counsel DS regarding settlement strategy 0.75 \$  Telephone call with DLA co-counsel DS regarding settlement strategy 0.75 \$  Telephone call with DLA co-counsel DS regarding strategy 0.75 \$  Telephone call with DLA co-counsel DS regarding settlement strategy 0.75 \$  Telephone call with DLA co-counsel DS regarding settlement strategy 0.75 \$  Telephone call with DLA co-counsel DS regarding settlement strategy 0.75 \$  Telephone call with DLA co-counsel DS regarding settlement strategy 0.75 \$  Telephone call with DLA co-counsel DS regarding settlement strategy 0.75 \$  A/17/2019 Kansas Team strategy call regarding settlement meeting 0.82 \$  Telephone call with DS from DLA regarding strategy 0.83 \$  A/18/2019 Kansas Analyze strategy for settlement meetings with Defs 1.00 \$  Analyze issue of Gov as party and share strategy with	3/25/2019 Kansas possible settlement 3.83 \$ 500.00  Meeting (call) with co-counsel on strategy, early 500.00  3/27/2019 Kansas settlement stay 0.90 \$ 500.00  3/27/2019 Kansas Review and edit memo from JK on abstention 1.33 \$ 500.00  3/28/2019 Kansas Cont'd analyzing research on abstention and SDP 1.58 \$ 500.00  Telephone call with Def counsel and co-counsel regarding MTD, answer, discovery 0.50 \$ 500.00  3/29/2019 Kansas Analyzing proposal on answering and discovery 1.58 \$ 500.00  Team counsel call regarding strategy on discovery, experts, settlement 0.98 \$ 500.00  Analyzing early discovery options as condition of settlement 5.17 \$ 500.00  4/4/2019 Kansas disc 1.00 \$ 500.00  Telephone call with Leecia Welch NYCL regarding 5.00.00  Telephone call with Leecia Welch NYCL regarding 5.00.00  Telephone call with DLA co-counsel DS regarding 5.00.00  Telephone call with DLA co-counsel DS regarding 5.00.00  4/17/2019 Kansas 5.00.00  Telephone call with DLA co-counsel DS regarding 5.00.00  4/17/2019 Kansas 5.00.00  Telephone call with DLA co-counsel DS regarding 5.00.00  Telephone call with DLA co-counsel DS regarding 5.00.00  4/17/2019 Kansas 5.00.00  Telephone call with DLA co-counsel DS regarding 5.00.00  Telephone call with DLA co-counsel DS regarding 5.00.00  4/17/2019 Kansas 5.00.00  Telephone 6.00 F.00.00 F.00.00  Telephone	3/25/2019 Kansas possible settlement 3.8.8 \$ 500.00 \$  Meeting (call) with co-counsel on strategy, early 5.00.00 \$  3/27/2019 Kansas settlement stay 0.90 \$ 500.00 \$  3/28/2019 Kansas Review and edit memo from JK on abstention 1.33 \$ 500.00 \$  3/28/2019 Kansas Cont'd analyzing research on abstention and SDP 1.58 \$ 500.00 \$  Telephone call with Def counsel and co-counsel regarding MTD, answer, discovery 0.50 \$ 500.00 \$  3/29/2019 Kansas Analyzing proposal on answering and discovery 1.58 \$ 500.00 \$  Team counsel call regarding strategy on discovery, experts, settlement 0.98 \$ 500.00 \$  Analyzing early discovery options as condition of settlement, discovery 4/10/2019 Kansas disc 1.17 \$ 500.00 \$  Full pltff team litigation strategy call re settlement, discovery 0.67 \$ 500.00 \$  Telephone call with Leecia Welch NYCL regarding 0.67 \$ 500.00 \$  Telephone call with DLA co-counsel DS regarding strategy 0.42 \$ 500.00 \$  Telephone call with DLA co-counsel DS regarding 0.67 \$ 500.00 \$  Telephone call with DLA co-counsel DS regarding strategy 0.75 \$ 500.00 \$  A/17/2019 Kansas strategy for settlement and discovery 0.42 \$ 500.00 \$  Prep for team strategy call regarding settlement 0.75 \$ 500.00 \$  A/17/2019 Kansas Team strategy call regarding settlement meeting 0.82 \$ 500.00 \$  Telephone call with DS from DLA regarding strategy 0.83 \$ 500.00 \$  Telephone call with DS from DLA regarding strategy 0.83 \$ 500.00 \$  A/18/2019 Kansas Analyze strategy for settlement meetings with Defs 1.00 \$ 500.00 \$

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			Telephone call with co-counsel team regarding					
			Answer, settlement strategy and amending					
Ira Lustbader	5/2/2019	Kansas	complaint	0.93	\$	500.00	\$	466.67
			Analyzing answer and identifying strategic issues for					
Ira Lustbader	5/2/2019	Kansas	team discussion	1.83	\$	500.00	\$	916.67
Ira Lustbader	5/8/2019	Kansas	Follow up regarding initial disclosures and tasks	0.67	\$	500.00	\$	333.33
Ira Lustbader	5/8/2019	Vancac	Co-counsel meeting regarding strategy on next 3 weeks litigation	0.92	\$	500.00	\$	458.33
ira Lustbauer	5/8/2019	KdHSdS		0.92	Ş	500.00	Ş	458.55
Ira Lustbader	5/9/2019	Kansas	Review and edit revised terms sheet regarding possible settlement	1.75	\$	500.00	\$	875.00
Ira Lustbader	5/11/2019	Kansas	Edits to revised term sheet for settlement	2.75	\$	500.00	\$	1,375.00
			Review and respond to strategy emails on					
Ira Lustbader	5/13/2019	Kansas	settlement and discovery and initial disclosures	0.83	\$	500.00	\$	416.67
			Telephone call with team co counsel re: amendment					
Ira Lustbader	5/15/2019	Kansas	and discovery strategy, terms sheet for settlement	0.93	\$	500.00	\$	466.67
Ira Lustbader	5/28/2019	Kansas	Analyzing strategy for discovery conf/report	1.25	\$	500.00	\$	625.00
			Review and comment on settlement approach to be					
Ira Lustbader	5/29/2019	Kansas	sent to defendants	0.50	\$	500.00	\$	250.00
			Team strategy meeting regarding initial discovery					
Ira Lustbader	5/29/2019	Kansas	and 26f documents	0.72	\$	500.00	\$	358.33
Ira Lustbader	6/4/2019	Kansas	Meeting with Jonathan King regarding RFP strategy	0.53	\$	500.00	\$	266.67
Ira Lustbader	6/4/2019	Kansas	Analyzing additional targeted discovery for class cert	2.75	\$	500.00	\$	1,375.00
			Review and edit initial RFP discovery draft,		-			•
Ira Lustbader	6/10/2019	Kansas	placements	2.67	\$	500.00	\$	1,333.33
Ira Lustbader	6/12/2019	Kansas	Team meeting regarding discovery strategy	0.67	\$	500.00	\$	333.33
			Review/edit first round RFP, placement, CFSR,		_		_	
Ira Lustbader	6/12/2019	Kansas	caseloads	1.50	\$	500.00	\$	750.00
	0//		Review draft of initial RFP continue narrow	=				<b></b>
Ira Lustbader	6/13/2019	Kansas	requests	1.58	Ş	500.00	\$	791.67

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

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

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

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

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

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Children's Rights Itemized Time Entries

Ira Lustbader	12/4/2019	Kansas	Team co counsel call regarding pltffs settlement draft	0.90	\$	500.00	\$	450.00
Ira Lustbader	12/4/2019	Kansas	Edit Pltffs settlement draft contd	2.25	\$	500.00	\$	1,125.00
			Follow up regarding potential "neutral validators" for					
Ira Lustbader	12/5/2019	Kansas	settlement	0.92	\$	500.00	\$	458.33
			Closely analyze potential hot docs from limited					
Ira Lustbader	12/5/2019	Kansas	discovery production for mediation purposes	1.33	\$	500.00	\$	666.67
Ira Lustbader	12/5/2019	Kansas	Edit draft MTD opp	3.25	\$	500.00	\$	1,625.00
to the dec	12/0/2010		Destruction of the Leading of the Le	F 47		500.00		2 502 22
Ira Lustbader	12/8/2019	Kansas	Draft line edits to Defendants' settlement prop	5.17	\$	500.00	\$	2,583.33
	12/0/2010		Prep for mediation contd, including finalizing draft	2.47		500.00	_	4 000 00
Ira Lustbader	12/9/2019	Kansas	counter to defs proposal	2.17	\$	500.00	\$	1,083.33
			Telephone call with team regarding counter redline					
Ira Lustbader	12/10/2019	Kansas	to defs mediation proposal	0.92	\$	500.00	\$	458.33
			Prep for t/c with potential expert on brain					
Ira Lustbader	12/11/2019	Kansas	development	1.67	\$	500.00	\$	833.33
			Conference call with co counsel and potential expert					
Ira Lustbader	12/11/2019	Kansas	on brain development	2.00	\$	500.00	\$	1,000.00
			Analyze Defs counter prop on outcomes,					
Ira Lustbader	12/11/2019	Kansas	prohibitions, and process	3.92	\$	500.00	\$	1,958.33
		Kansas						
Ira Lustbader	12/15/2019	Travel	Travel to Kansas City for mediation (delays)	3.58	\$	500.00	\$	1,791.67
Ira Lustbader	12/15/2019	Kansas	Mediation drafting with co-counsel	2.00	\$	500.00	\$	1,000.00
Ira Lustbader	12/15/2019	Kansas	Mediation session in KCK with parties and K. Ryan	5.00	\$	500.00	\$	2,500.00
		Kansas						
Ira Lustbader	12/16/2019	Travel	Return travel	3.62	\$	500.00	\$	1,808.33
Ira Lustbader	12/16/2019	Kansas	Mediation session in KCK with parties and mediator	6.50	\$	500.00	\$	3,250.00
	12, 10, 2013		Telephone call with stakeholder regarding possible	3.30		555.56	Υ	3,233.00
Ira Lustbader	12/17/2019	Kansas	expert role	0.58	\$	500.00	\$	291.67
ii a Lastbauei	12/11/2019	Namaa	CAPCIT TOIC	0.56	۲	500.00	٠	231.07

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M.B. v. Howard

Children's Rights Itemized Time Entries

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

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

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

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Ira Lustbader	3/6/2020	Kansas	Analyzing potential record review expert(s)	1.67	\$	500.00	\$	833.33
			Telephone call with LW at NCYL and CS at DLA					
Ira Lustbader	3/11/2020	Kansas	regarding discovery/endorcement strategy	0.58	\$	500.00	\$	291.67
			Co counsel call regarding specific discovery RFP					
Ira Lustbader	3/11/2020	Kansas	drafts, case review strategy	1.00	\$	500.00	\$	500.00
			Analyzing "hot" docs from discovery regarding depo					
Ira Lustbader	3/11/2020	Kansas	strategy	1.25	\$	500.00	\$	625.00
			Follow up analysis of HPAA objections to MCO Third					
Ira Lustbader	3/12/2020	Kansas	Party discovery	1.08	\$	500.00	\$	541.67
			Telephone call with co counsel on discovery strategy					
Ira Lustbader	3/18/2020	Kansas	and follow up	1.00	\$	500.00	\$	500.00
			Analyzing approach to rec review and					
Ira Lustbader	3/18/2020	Kansas	expert/statistician	1.25	\$	500.00	\$	625.00
			Review/analyze hot docs regarding placement issues					
Ira Lustbader	3/18/2020	Kansas	cont'd	2.17	\$	500.00	\$	1,083.33
			Review edit and finalize COVID 19 contingency letter					
Ira Lustbader	3/19/2020	Kansas	to Defs	0.75	\$	500.00	\$	375.00
to to the de-	2/40/2020	W		4 22	_	500.00		666.67
Ira Lustbader	3/19/2020		Hot doc review contd regarding placement issues	1.33	\$	500.00		666.67
Ira Lustbader	3/20/2020	Kansas	Review/edit RFP3	0.75	\$	500.00	\$	375.00
	2/22/222		Closely review Plaintiffs revised RFP set 3 for	4.00		500.00		046.67
Ira Lustbader	3/23/2020	Kansas	comments to team	1.83	\$	500.00	\$	916.67
	0/07/0000		Internal call regarding specific discovery issues in	0.50				252.00
Ira Lustbader	3/25/2020	Kansas	Defendants' productions	0.50	\$	500.00	\$	250.00
			Telephone call with full co counsel team regarding					
			discovery strategy, including RFPs and production		_		_	
Ira Lustbader	3/25/2020	Kansas	holes	0.75	\$	500.00	Ş	375.00
			Review/analyze plaintiff strategy on COVID-19		_		_	
Ira Lustbader	3/29/2020	Kansas	protocols	0.83	\$	500.00	\$	416.67
			Follow up review and strategy on RFP for COVID-19					
Ira Lustbader	3/30/2020	Kansas	materials	1.08	\$	500.00	\$	541.67
			Prep for call with potential expert regarding contract					
Ira Lustbader	3/31/2020	Kansas	oversight	0.58	\$	500.00	\$	291.67

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

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			Telephone call with NT, EG, MN regarding potential					
Ira Lustbader	4/30/2020	Kansas	experts on placement	1.00	\$	500.00	\$	500.00
Ira Lustbader	5/1/2020	Kansas	Review updated doc production/responses	2.17	\$	500.00	\$	1,083.33
			Review and analyze Defs settlement prop and					
Ira Lustbader	5/4/2020	Kansas	possible response	3.08	\$	500.00	\$	1,541.67
			Review and analyze Defs settlement proposal and					
Ira Lustbader	5/5/2020	Kansas	analyzing alternatives for team	4.25	\$	500.00	\$	2,125.00
			Discuss settlement response with Leecia W/co					
Ira Lustbader	5/6/2020	Kansas	counsel	1.00	\$	500.00	\$	500.00
			Co-counsel call regarding discovery and settlement					
Ira Lustbader	5/6/2020	Kansas	strategy	1.00	\$	500.00	\$	500.00
Ira Lustbader	5/6/2020	Kansas	Cont'd analysis of defs settlement proposal	3.17	\$	500.00	\$	1,583.33
Ira Lustbader	5/8/2020	Kansas	Cont'd analysis of settlement proposal/counter	1.33	\$	500.00	\$	666.67
Ira Lustbader	5/9/2020	Kansas	Cont'd analyzing settlement draft, counters	2.33	\$	500.00	\$	1,166.67
	= / / / / / 0 0 0 0		Co counsel discussion on strategy for defs proposed					
Ira Lustbader	5/11/2020	Kansas	settlement and specific responses to each	1.00	\$	500.00	\$	500.00
			Cont'd analysis and outlining of defs proposed					
	= / / / / / 0 0 0 0		settlement and specific responses to each new					4 60= 00
Ira Lustbader	5/11/2020	Kansas	counter	3.25	\$	500.00	\$	1,625.00
	- / - /		Analyzing settlement proposal cont'd and editing					
Ira Lustbader	5/12/2020	Kansas	counters	2.83	\$	500.00	\$	1,416.67
Ira Lustbader	5/13/2020	Kansas	Discuss strategy for redactions, privielge with JK	0.20	\$	500.00	Ś	100.00
Ira Lustbader	5/13/2020		Review JK proposal on redactions	0.67	\$	500.00		333.33
na Lastbader	3/13/2020	Ransas	neview six proposar on readerions	0.07	Υ	300.00	~	333.33
			Team co-counsel meeting regarding settlement					
Ira Lustbader	5/13/2020	Kansas	strategy; discovery follow up/strategy	1.00	\$	500.00	\$	500.00
			Cont'd analyzing settlement and prep for discussions					
Ira Lustbader	5/13/2020	Kansas	with co counsel	2.42	\$	500.00	\$	1,208.33
			Discuss alternatives to placement stability outcomes					·
Ira Lustbader	5/14/2020	Kansas	with EM and EH	0.75	\$	500.00	\$	375.00

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

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

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			Co-counsel team strategy call on SFC approval,				
Ira Lustbader	7/1/2020	Kansas	discovery	0.58	\$	500.00	\$ 291.67
			Follow up strategy discovery on settlement approval				
Ira Lustbader	7/6/2020	Kansas	and language	0.67	\$	500.00	\$ 333.33
Ira Lustbader	7/6/2020	Kansas	Analyze and edit draft prelim approval papers	2.17	\$	500.00	\$ 1,083.33
			Analyze and edit prelim. appr. papers (brief, notice,				
Ira Lustbader	7/13/2020	Kansas	decl. order)	2.50	\$	500.00	\$ 1,250.00
			Meeting with co counsel on preliminary approval				
Ira Lustbader	7/15/2020	Kansas	strategy	1.50	\$	500.00	\$ 750.00
			Meeting with co-counsel regarding preliminary				
Ira Lustbader	7/22/2020	Kansas	approval process and strategy	0.58	\$	500.00	\$ 291.67
			Research case law regarding EPSDT for cause of				
Jonathan King	9/7/2018	Kansas	action for complaint	1.38	\$	345.00	\$ 477.25
			Conduct legal resaerch re EPSDT provision of				
Jonathan King	9/11/2018	Kansas	Medicaid Act	0.82	\$	345.00	\$ 281.75
			Meet with MN, EM, and DA regarding drafting				
Jonathan King	9/12/2018	Kansas	complaint	0.25	\$	345.00	\$ 86.25
			Conference call with team regarding case status and				
Jonathan King	9/12/2018	Kansas	next steps	0.58	\$	345.00	\$ 201.25
			Legal research re EPSDT provision of Medicaid Act				
			for preparation of EPSDT cause of action in				
Jonathan King	9/12/2018	Kansas	complaint	3.98	\$	345.00	\$ 1,374.25
			Legal research re EPSDT provision of Medicaid Act				
Jonathan King	9/13/2018		for complaint drafting purposes	4.52	•	345.00	 1,558.25
Jonathan King	9/14/2018	Kansas	Meet with IL and MN regarding EPSDT research	1.00	\$	345.00	\$ 345.00
			Continue researching case law regarding potential				
Jonathan King	9/14/2018	Kansas	EPSDT claim for complaint	2.00	\$	345.00	\$ 690.00
Jonathan King	9/17/2018	Kansas	Research case law regarding potential EPSDT claim	3.20	\$	345.00	\$ 1,104.00
			Meet with internal CR team re updates from EPSDT				
Jonathan King	9/18/2018	Kansas	research	0.58	\$	345.00	\$ 201.25

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9/18/2018	Kansas	Research case law regarding potential EPSDT claim	2.38	\$	345.00	\$	822.25
		Conference call with team regarding case status and local updates; discuss research and drafting of					
9/19/2018	Kansas	complaint	0.78	\$	345.00	\$	270.25
		Regin drafting written analysis of legal research					
9/19/2018	Kansas	regarding potential EPSDT claim	7.17	\$	345.00	\$	2,472.50
		Meet with MN regarding EPSDT research	0.33		345.00	\$	115.00
9/20/2018	Kansas	Research case law regarding potential EPSDT claim	5.27	\$	345.00	\$	1,817.00
		Call with IL regarding EPSDT research					115.00
9/21/2018	Kansas	Research case law regarding potential EPSDT claim	6.20	\$	345.00	\$	2,139.00
		Draft summary of research regarding notential					
9/24/2018	Kansas	EPSDT claim	0.70	\$	345.00	\$	241.50
9/25/2018	Kansas	Research case law regarding potential EPSDT claim	2.87	\$	345.00	\$	989.00
9/26/2018	Kansas	Research case law regarding potential EPSDT claim	2.35	\$	345.00	\$	810.75
9/28/2018	Kansas	Research case law regarding potential EPSDT claim	6.43	\$	345.00	\$	2,219.50
10/1/2018	Kansas	Revise current EPSDT draft section in draft complaint	1.00	\$	345.00	\$	345.00
, , , , ,		р		•		•	
10/1/2018	Kansas	Legal research of case law regarding FPSDT claim	1.77	Ś	345.00	\$	609.50
	9/19/2018 9/19/2018 9/20/2018 9/20/2018 9/21/2018 9/21/2018 9/24/2018 9/25/2018 9/26/2018 10/1/2018	9/18/2018 Kansas  9/19/2018 Kansas  9/19/2018 Kansas  9/20/2018 Kansas  9/20/2018 Kansas  9/21/2018 Kansas  9/21/2018 Kansas  9/21/2018 Kansas  9/24/2018 Kansas  9/25/2018 Kansas  9/26/2018 Kansas  10/1/2018 Kansas  10/1/2018 Kansas	Conference call with team regarding case status and local updates; discuss research and drafting of complaint  Begin drafting written analysis of legal research regarding potential EPSDT claim  9/19/2018 Kansas Meet with MN regarding EPSDT research  9/20/2018 Kansas Research case law regarding potential EPSDT claim  9/21/2018 Kansas Research case law regarding potential EPSDT claim  9/21/2018 Kansas Research case law regarding potential EPSDT claim  Draft summary of research regarding potential EPSDT claim  9/24/2018 Kansas Research case law regarding potential EPSDT claim  9/25/2018 Kansas Research case law regarding potential EPSDT claim  9/26/2018 Kansas Research case law regarding potential EPSDT claim  9/28/2018 Kansas Research case law regarding potential EPSDT claim  9/28/2018 Kansas Research case law regarding potential EPSDT claim  10/1/2018 Kansas Research case law regarding potential EPSDT claim	Conference call with team regarding case status and local updates; discuss research and drafting of complaint 0.78  Begin drafting written analysis of legal research regarding potential EPSDT claim 7.17  9/20/2018 Kansas Meet with MN regarding EPSDT research 0.33  9/20/2018 Kansas Research case law regarding potential EPSDT claim 5.27  9/21/2018 Kansas Call with IL regarding EPSDT research 0.33  9/21/2018 Kansas Research case law regarding potential EPSDT claim 6.20  Draft summary of research regarding potential EPSDT claim 0.70  9/24/2018 Kansas Research case law regarding potential EPSDT claim 2.87  9/26/2018 Kansas Research case law regarding potential EPSDT claim 2.87  9/28/2018 Kansas Research case law regarding potential EPSDT claim 2.35  9/28/2018 Kansas Research case law regarding potential EPSDT claim 6.43  10/1/2018 Kansas Research case law regarding potential EPSDT claim 6.43	Conference call with team regarding case status and local updates; discuss research and drafting of complaint 0.78 \$  Begin drafting written analysis of legal research regarding potential EPSDT claim 7.17 \$  9/19/2018 Kansas Meet with MN regarding EPSDT research 0.33 \$  9/20/2018 Kansas Research case law regarding potential EPSDT claim 5.27 \$  9/21/2018 Kansas Call with IL regarding EPSDT research 0.33 \$  9/21/2018 Kansas Research case law regarding potential EPSDT claim 6.20 \$  9/21/2018 Kansas Research case law regarding potential EPSDT claim 6.20 \$  9/24/2018 Kansas Research case law regarding potential EPSDT claim 0.70 \$  9/25/2018 Kansas Research case law regarding potential EPSDT claim 2.87 \$  9/26/2018 Kansas Research case law regarding potential EPSDT claim 2.87 \$  9/28/2018 Kansas Research case law regarding potential EPSDT claim 6.43 \$  10/1/2018 Kansas Research case law regarding potential EPSDT claim 6.43 \$  10/1/2018 Kansas Research case law regarding potential EPSDT claim 6.43 \$	Conference call with team regarding case status and local updates; discuss research and drafting of complaint 0.78 \$ 345.00  9/19/2018 Kansas complaint 7.17 \$ 345.00  9/20/2018 Kansas Meet with MN regarding EPSDT claim 7.17 \$ 345.00  9/20/2018 Kansas Research case law regarding potential EPSDT claim 5.27 \$ 345.00  9/21/2018 Kansas Research case law regarding potential EPSDT claim 5.27 \$ 345.00  9/21/2018 Kansas Research case law regarding potential EPSDT claim 6.20 \$ 345.00  9/21/2018 Kansas Research case law regarding potential EPSDT claim 6.20 \$ 345.00  9/24/2018 Kansas Research case law regarding potential EPSDT claim 0.70 \$ 345.00  9/25/2018 Kansas Research case law regarding potential EPSDT claim 2.87 \$ 345.00  9/26/2018 Kansas Research case law regarding potential EPSDT claim 2.87 \$ 345.00  9/28/2018 Kansas Research case law regarding potential EPSDT claim 2.35 \$ 345.00  9/28/2018 Kansas Research case law regarding potential EPSDT claim 2.35 \$ 345.00  9/28/2018 Kansas Research case law regarding potential EPSDT claim 2.35 \$ 345.00  9/28/2018 Kansas Research case law regarding potential EPSDT claim 6.43 \$ 345.00	Conference call with team regarding case status and local updates; discuss research and drafting of complaint 0.78 \$ 345.00 \$  9/19/2018 Kansas complaint 7.17 \$ 345.00 \$  Begin drafting written analysis of legal research regarding potential EPSDT claim 7.17 \$ 345.00 \$  9/20/2018 Kansas Meet with MN regarding EPSDT research 0.33 \$ 345.00 \$  9/20/2018 Kansas Research case law regarding potential EPSDT claim 5.27 \$ 345.00 \$  9/21/2018 Kansas Call with IL regarding EPSDT research 0.33 \$ 345.00 \$  9/21/2018 Kansas Research case law regarding potential EPSDT claim 6.20 \$ 345.00 \$  9/24/2018 Kansas EPSDT claim 0.70 \$ 345.00 \$  9/25/2018 Kansas Research case law regarding potential EPSDT claim 0.70 \$ 345.00 \$  9/25/2018 Kansas Research case law regarding potential EPSDT claim 2.87 \$ 345.00 \$  9/26/2018 Kansas Research case law regarding potential EPSDT claim 2.87 \$ 345.00 \$  9/28/2018 Kansas Research case law regarding potential EPSDT claim 2.35 \$ 345.00 \$  9/28/2018 Kansas Research case law regarding potential EPSDT claim 6.43 \$ 345.00 \$

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			Continue drafting written analysis of legal research			
Jonathan King	10/2/2018	Kansas	regarding potential EPSDT claim	5.65	\$ 345.00	\$ 1,949.25
Jonathan King	10/3/2018	Kansas	Research case law regarding potential EPSDT claim	0.72	\$ 345.00	\$ 247.25
Jonathan King	10/4/2018	Kansas	Research case law regarding potential EPSDT claim	0.43	\$ 345.00	\$ 149.50
			Draft summary of research regarding potential			
Jonathan King	10/5/2018	Kansas	EPSDT claim	0.72	\$ 345.00	\$ 247.25
			Meet with MN and EM regarding ongoing legal			
Jonathan King	10/16/2018	Kansas	research for complaint	0.12	\$ 345.00	\$ 40.25
Jonathan King	10/16/2018	Kansas	Research case law regarding potential EPSDT claim	4.03	\$ 345.00	\$ 1,391.50
			Finalize memornadum of analysis of potential EPSDT			
Jonathan King	10/17/2018	Kansas	claim based on legal research	1.27	\$ 345.00	\$ 437.00
			Meet with IL, MN, EM and DA regarding case status			
			and strategy, including draft complaint, ongoing			
Jonathan King	10/17/2018	Kansas	research, and updates from counsel meeting	1.00	\$ 345.00	\$ 345.00
			Conduct legal research on Tenth Circuit case law			
			regarding adequacy of next friends for purposes of			
Jonathan King	10/18/2018	Kansas	complaint drafting	8.17	\$ 345.00	\$ 2,817.50
			Draft written analysis of legal research re next			
Jonathan King	10/19/2018	Kansas	friends	5.02	\$ 345.00	\$ 1,730.75
			Continue researching Tenth Circuit caselaw regarding			
Jonathan King	10/22/2018	Kansas	next friends to update memorandum	1.50	\$ 345.00	\$ 517.50

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	Draft complaint section regarding oversight of					
10/22/2018 Kans	s private contract providers	6.35	\$	345.00	\$	2,190.75
	Meet with IL, MN and EG regarding potential					
	revisions to current draft complaint sections					
10/23/2018 Kans	s prepared by self and EG	0.50	\$	345.00	\$	172.50
	Undate logal research memorandum regarding					
10/23/2018 Kans		1 78	خ	3/15 00	¢	615.25
10/23/2018 Kans	analysis of adequacy of flext friends	1.70	ڔ	343.00	٠	013.23
	Update draft complaint section regarding oversight					
10/23/2018 Kans	, , , , , , , , , , , , , , , , , , , ,	3.87	\$	345.00	\$	1,334.00
	·					<u> </u>
	Conference call with team regarding case status,					
10/24/2018 Kans	s plaintiff updates, and complaint drafting	0.85	\$	345.00	\$	293.25
10/24/2010 Kan		1 10	<b>,</b>	245.00	Ċ	270.50
10/24/2018 Kans	s oversight of private contract providers	1.10	<b>\$</b>	345.00	Ş	379.50
	Draft complaint section regarding oversight of					
10/25/2018 Kans		6.75	\$	345.00	\$	2,328.75
-, -,	P		<u>'</u>		<u> </u>	,
	Draft complaint section regarding oversight of					
10/26/2018 Kans	s private contract providers	2.53	\$	345.00	\$	874.00
	Droft complaint section recording available of					
10/20/2018 Van		2 20	خ	3/15 00	ć	793.50
10/29/2010 Kdii		2.30	٧	343.00	٦	733.30
10/29/2018 Kans		8.02	\$	345.00	\$	2,765.75
	10/23/2018 Kansa 10/23/2018 Kansa 10/24/2018 Kansa 10/24/2018 Kansa 10/25/2018 Kansa 10/26/2018 Kansa	10/22/2018 Kansas private contract providers  Meet with IL, MN and EG regarding potential revisions to current draft complaint sections prepared by self and EG  Update legal research memorandum regarding analysis of adequacy of next friends  Update draft complaint section regarding oversight of private contract providers  Conference call with team regarding case status, plaintiff updates, and complaint drafting  Continue drafting complaint section regarding oversight of private contract providers  Draft complaint section regarding oversight of private contract providers  Draft complaint section regarding oversight of private contract providers  Draft complaint section regarding oversight of private contract providers	10/22/2018 Kansas private contract providers 6.35  Meet with IL, MN and EG regarding potential revisions to current draft complaint sections prepared by self and EG 0.50  Update legal research memorandum regarding analysis of adequacy of next friends 1.78  Update draft complaint section regarding oversight of private contract providers 3.87  Conference call with team regarding case status, plaintiff updates, and complaint drafting 0.85  Continue drafting complaint section regarding oversight of private contract providers 1.10  Draft complaint section regarding oversight of private contract providers 6.75  Draft complaint section regarding oversight of private contract providers 2.53  Draft complaint section regarding oversight of private contract providers 2.30  Conduct more targetted legal research of caselaw regarding potential EPSDT claim in response to	10/22/2018 Kansas private contract providers 6.35 \$  Meet with IL, MN and EG regarding potential revisions to current draft complaint sections prepared by self and EG 10/23/2018 Kansas prepared by self and EG 0.50 \$  Update legal research memorandum regarding analysis of adequacy of next friends 1.78 \$  Update draft complaint section regarding oversight of private contract providers 3.87 \$  Conference call with team regarding case status, plaintiff updates, and complaint drafting 0.85 \$  Continue drafting complaint section regarding oversight of private contract providers 1.10 \$  Draft complaint section regarding oversight of private contract providers 6.75 \$  Draft complaint section regarding oversight of private contract providers 2.53 \$  Draft complaint section regarding oversight of private contract providers 2.53 \$  Draft complaint section regarding oversight of private contract providers 2.53 \$  Draft complaint section regarding oversight of private contract providers 2.53 \$  Conduct more targetted legal research of caselaw regarding potential EPSDT claim in response to	10/22/2018   Kansas   Private contract providers   6.35   \$ 345.00	10/22/2018 Kansas   private contract providers   Meet with IL, MN and EG regarding potential revisions to current draft complaint sections   10/23/2018 Kansas   prepared by self and EG   0.50 \$ 345.00 \$

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			Meet with IL regarding complaint drafting and legal					
Jonathan King	11/2/2018	Kansas	research	0.50	\$	345.00	\$	172.50
			Review current draft complaint for purposes of					
Jonathan King	11/2/2018	Kansas	editting and advising team	2.42	\$	345.00	\$	833.75
	11/5/0010			0.50		0.45.00	_	470.50
Jonathan King	11/5/2018	Kansas	Conference call with team regarding draft complaint	0.50	\$	345.00	\$	172.50
Jonathan King	11/5/2018	Kansas	Revise current draft of complaint	4.57	\$	345.00	\$	1,575.50
Jonathan King	11/6/2018	Kansas	Revise current draft of complaint	0.90	\$	345.00	\$	310.50
Jonathan King	11/6/2018	Kansas	Edit memo regarding potential EPSDT cause of action	2.67	\$	345.00	\$	920.00
Jonathan King	11/7/2018	Kansas	Edit current draft of complaint	0.62	\$	345.00	\$	212.75
Jonathan King	11/7/2018	Kansas	Conference call with team regarding draft complaint	1.00	\$	345.00	\$	345.00
			Research Kansas statutes and case law regarding					
Jonathan King	11/7/2018	Kansas	class definition for purposes of defining class in complaint	5.27	\$	345.00	\$	1,817.00
Jonathan King	11/8/2018	Kansas	Meet with EM and MN regarding draft complaint	0.50	Ś	345.00	\$	172.50
<u> </u>	==, 0, ===	11011000	Research Kansas statutes and case law regarding	0.00		0.0.00	т	
Jonathan King	11/8/2018	Kansas	class definition	2.75	\$	345.00	\$	948.75
Jonathan King	11/8/2018	Kansas	Revise and edit current draft of complaint	4.17	\$	345.00	Ś	1,437.50
			Meet with IL and EM regarding editting draft		· ·		т	
Jonathan King	11/9/2018	Kansas	complaint	0.50	\$	345.00	\$	172.50
Jonathan King	11/9/2018	Kansas	Research case law regarding potential EPSDT claim	2.47	\$	345.00	\$	851.00
			Research case law regarding substantive due process					
Jonathan King	11/9/2018	Kansas	claim	6.08	\$	345.00	\$	2,098.75

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			Conference call with team regarding outreach to KS			
Jonathan King	11/12/2018	Kansas	next friends regarding potential plaintiffs	1.50	\$ 345.00	\$ 517.50
Jonathan King	11/12/2018	Kansas	Revise current draft of complaint	3.95	\$ 345.00	\$ 1,362.75
			Travel within Kansas City for meetings with potential			
Jonathan King	11/14/2018	Kansas	next friends for named plaintiffs	1.00	\$ 345.00	\$ 345.00
			Travel to Kansas City for meetings with potential			
Jonathan King	11/14/2018	Kansas	next friends for named plaintiffs	3.50	\$ 345.00	\$ 1,207.50
I			Meeting with EM, LBB and LM regarding strategy for			
			Kansas on the ground investigation to locate NFs and			
Jonathan King	11/14/2018	Kansas	NPs	2.00	\$ 345.00	\$ 690.00
			Travel within Kansas City for meetings with potential			
Jonathan King	11/15/2018	Kansas	next friends for named plaintiffs	1.50	\$ 345.00	\$ 517.50
			Meeting with EM, SD and EB regarding Kansas			
Jonathan King	11/15/2018	Kansas	complaint	1.00	\$ 345.00	\$ 345.00
			Meeting with SD and KZ regarding Kansas			
Jonathan King	11/15/2018	Kansas	investigation	1.50	\$ 345.00	\$ 517.50
			Meeting with EM, SD, and KA regarding Kansas			
Jonathan King	11/15/2018	Kansas	investigation	1.65	\$ 345.00	\$ 569.25
			Travel within Kansas City for meetings with potential			
Jonathan King	11/16/2018	Kansas	next friends for named plaintiffs	1.00	\$ 345.00	\$ 345.00
I			Travel back to NYC from Kansas City after on the			
			ground investigation to locate named plaintiffs and			
Jonathan King	11/16/2018	Kansas	next friends	3.50	\$ 345.00	\$ 1,207.50
			Meeting with EM and TP regarding Kansas			
Jonathan King	11/16/2018	Kansas	investigation	1.00	\$ 345.00	\$ 345.00
Jonathan King	11/19/2018	Kansas	Review final draft Kansas complaint materials	1.12	\$ 345.00	\$ 385.25
Jonathan King	11/19/2018	Kansas	Research relevant decisions by Judge Lungstrum	2.02	\$ 345.00	\$ 695.75
l			Draft summary of research relevant decisions of		_	_
Jonathan King	11/20/2018	Kansas	Judge Lungstrum to share with co-counsel team	0.73	\$ 345.00	\$ 253.00

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			Review pro hac vice documents for revisions prior to					
Jonathan King	11/26/2018	Kansas	filing	0.98	\$	345.00	\$	339.25
	11/05/0010		Prepare contact memo of attorney impressions					2.47.22
Jonathan King	11/26/2018	Kansas	regarding investigatory meeting with EM and AR	1.00	\$	345.00	\$	345.00
			Legal research re District of Kansas requirements for					
Jonathan King	11/30/2018	Kansas	service and filing proof of service	3.58	\$	345.00	¢	1,236.25
Jonathan King	11/30/2018	Karisas	service and ming proof of service	3.30	٠,	343.00	٠,	1,230.23
			Review draft documents regarding filing proof of					
Jonathan King	12/3/2018	Kansas	service	0.35	\$	345.00	\$	120.75
<u> </u>					<u> </u>			
Jonathan King	12/6/2018	Kansas	Review and finalize proofs of service for filing	1.48	\$	345.00	\$	511.75
			Conduct litigation hold research for purposes of					
			advising clients and Defendants to preserve relevant					
Jonathan King	12/12/2018	Kansas	information	1.38	\$	345.00	\$	477.25
	10/10/0010		Analyse sample litigation hold letter from similar					4=0=0
Jonathan King	12/13/2018	Kansas	litigation	0.50	\$	345.00	\$	172.50
Jonathan King	12/14/2018	Kansas	Draft litigation hold letter to next friends	1.02	\$	345.00	\$	350.75
Jonathan King	12/18/2018	Kancac	Revise draft litigation hold to next friends	0.35	\$	345.00	¢	120.75
Jonathan King	12/10/2010	Karisas	Meet with IL and MN regarding research for	0.33	٠,	343.00	~	120.73
			opposition to motion for extension of time to answer					
Jonathan King	1/2/2019	Kansas	complaint	0.37	\$	345.00	\$	126.50
			Research case law and applicable legal rules in					
			support of Defendants' opposition to motion for					
Jonathan King	1/2/2019	Kansas	extension of time to answer complaint	5.30	\$	345.00	\$	1,828.50

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			Analyze draft brief in opposition to motion for					
Jonathan King	1/3/2019	Kansas	extension of time to answer complaint	1.00	\$	345.00	\$	345.00
			Continue researching caselaw regarding an					
	. /2 /2		opposition to Defendants' motion for extension of					
Jonathan King	1/3/2019	Kansas	time to answer complaint	4.12	\$	345.00	\$	1,420.25
			Finalize brief in opposition to motion for extension of					
Jonathan King	1/4/2019	Kansas	time to answer for filing of same	1.80	\$	345.00	\$	621.00
Jonathan King	1,4,2013	Karisas	time to answer for ming or sume	1.00	Υ	343.00	Υ	021.00
Jonathan King	1/9/2019	Kansas	Revise draft litigation hold	0.52	\$	345.00	\$	178.25
			Conference call with team regarding case status,					
			strategy for status conference with court, expert					
Jonathan King	1/9/2019	Kansas	updates, and litigation hold	0.77	\$	345.00	\$	264.50
lanathan Kina	1/10/2010	V	Davis a due fe litication latter to defendants	0.40	<b>.</b>	245.00	۸.	120.00
Jonathan King	1/10/2019	Kansas	Revise draft litigation letter to defendants	0.40	\$	345.00	Ş	138.00
Jonathan King	1/15/2019	Kansas	Revise draft litigation hold letters	2.02	\$	345.00	\$	695.75
			Conference call with team regarding expert updates,					
			draft litigation hold, joint motion regarding				_	
Jonathan King	1/16/2019	Kansas	pseudonyms, and draft protective order	0.92	\$	345.00	\$	316.25
Jonathan King	1/17/2019	Kancac	Review draft motion to use pseudonyms	0.33	\$	345.00	Ċ	115.00
Jonathan King	1/17/2019	Karisas	neview draft motion to use pseudonyms	0.33	٠	343.00	٠,	113.00
Jonathan King	1/22/2019	Kansas	Revise draft litigation hold materials	1.67	\$	345.00	\$	575.00
			Communicate with internal CR team regarding					
Jonathan King	1/25/2019	Kansas	review of draft protective order	0.40	\$	345.00	\$	138.00
Jonathan King	2/1/2019	Kansas	Communicate with team re potential experts	0.47	\$	345.00	\$	161.00

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Jonathan King	2/6/2019	Kansas	Analyze draft term sheet for potential settlement	2.08	\$	345.00	\$	718.75
			Communicate with team re review of protective					
Jonathan King	2/7/2019	Kansas	order, court communication, and local rules	0.50	\$	345.00	\$	172.50
Jonathan King	2/7/2019	Kansas	Review draft term sheet for potential settlement	5.50	\$	345.00	\$	1,897.50
Jonathan King	2/8/2019		Meeting with IL, MN, EM, DA and CC regarding draft settlement term sheet	1.50	-	345.00		517.50
Jonathan King	2/11/2019		Meeting with IL, MN, EM, DA and CC regarding draft settlement term sheet	1.50		345.00	\$	517.50
			Compare current draft settlement terms sheet with complaint and KS task force report to analyze		•		-	
Jonathan King	2/11/2019	Kansas	potential gaps for settlement purposes	2.75	\$	345.00	\$	948.75
Jonathan King	2/20/2019	Kansas	Conference call with team regarding plaintiff outreach, experts, and class certification research	0.60	\$	345.00	\$	207.00
Jonathan King	2/28/2019	Kansas	Research case law regarding automatic amendment of official capacity defendants	1.30	\$	345.00	\$	448.50
Janathan King	2/1/2010	Kansas	Research case law regarding automatic amendment	1.02	\$	245.00	\$	250.75
Jonathan King	3/1/2019	Kalisas	of official capacity defendants  Conference call with team regarding informal	1.02	Ş	345.00	Ş	350.75
Jonathan King	3/6/2019	Kansas	discovery and local stakeholder updates	0.75	\$	345.00	\$	258.75
Jonathan King	3/18/2019	Kansas	Review FOIA response regarding current foster care contracts in comparison to complaint allegations to analyze potential ammendment	1.05	\$	345.00	\$	362.25

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			Meeting with IL and MN regarding legal research for					
Jonathan King	3/21/2019	Kansas	opposition to potential motion to dismiss	0.32	\$	345.00	\$	109.25
			Research Tenth Circuit case law regarding					
Jonathan King	3/25/2019 H	Kansas	substantive due process claims	5.23	\$	345.00	\$	1,805.50
			Meeting with IL regarding research for opposition to					
Jonathan King	3/27/2019 H	Kansas	potential motion to dismiss	0.17	\$	345.00	\$	57.50
			Research Tenth Circuit case law regarding Younger					
			abstention in preparation for potential motion to					
Jonathan King	3/27/2019 H	Kansas	dismiss	3.67	\$	345.00	\$	1,265.00
	-, ,				<u>'</u>		•	,
			Research Tenth Circuit case law regarding MTDs re					
	0.40=40040		substantive due process claims in preparation for			2.5		
Jonathan King	3/27/2019	Kansas	potential motion to dismiss	4.13	\$	345.00	\$	1,426.00
			Draft summary of Tenth Circuit case law research					
Jonathan King	3/28/2019 H	Kansas	regarding substantive due process claims	0.63	\$	345.00	\$	218.50
			Draft summary of Tenth Circuit case law research					
Jonathan King	3/28/2019 H	Kansas	regarding Younger abstention	5.55	\$	345.00	\$	1,914.75
			Confessor call with transmission studies at a least to					
Jonathan King	4/17/2019 H	Kancac	Conference call with team regarding strategy for upcoming meeting with defendants' counsel	0.82	\$	345.00	\$	281.75
Jonathan King	4/17/2019	1303	Conference call with team regarding initial meeting	0.82	Ą	343.00	Ą	201./3
			with Defendants' counsel and local stakeholder					
Jonathan King	4/24/2019 H	Kansas	updates	0.50	\$	345.00	\$	172.50

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			Analyze relevant briefings and decisions from similar					
			cases regarding motions to dismiss a governor					
Jonathan King	4/26/2019	Kansas	named as a Defendant	3.43	\$	345.00	\$	1,184.50
			Read Defendants' answer to Plaintiffs' complaint for					
Jonathan King	5/1/2019	Kansas	discussion with team	0.60	\$	345.00	\$	207.00
			Conference call with team regarding Defendants'					
Jonathan King	5/2/2019	Kansas	answer to complaint and local stakeholder updates	0.93	\$	345.00	\$	322.00
			Meeting with IL regarding research for potential					
Jonathan King	5/3/2019	Kansas	forthcoming motion to dismiss the governor	0.20	\$	345.00	\$	69.00
			Conduct legal research re case law and statutes					
			regarding motions to dismiss governors in 10th					
Jonathan King	5/3/2019	Kansas	Circuit	4.00	\$	345.00	\$	1,380.00
			Continue researching case law and statutes regarding					
Jonathan King	5/6/2019	Kansas	motions to dismiss governors in 10th Circuit	5.73	\$	345.00	\$	1,978.00
			Prepare written summary of analysis of research into					
			case law and statutes regarding motions to dismiss					
Jonathan King	5/7/2019	Kansas	governors in 10th Circuit	3.80	\$	345.00	\$	1,311.00
			Continue drafting summary of research into case law					
	- 10 10 0 0		and statutes regarding motions to dismiss governors				_	
Jonathan King	5/8/2019	Kansas	in 10th Circuit	1.77	\$	345.00	\$	609.50
lanathan Kira	F /0 /2040	Vana	Edit current draft terms sheet to guide potential	2.67	<b>ب</b>	245.00	Ċ	1 205 00
Jonathan King	5/8/2019	Kansas	settlement discussion	3.67	\$	345.00	<b>&gt;</b>	1,265.00
			Revise draft terms sheet to guide potential					
lonathan King	5/9/2019	Kancac	settlement discussion	1.58	ċ	345.00	\$	546.25
Jonathan King	3/3/2019	I/alisas	פבנווכווועווג מופנמפפוטוו	1.58	ې	345.00	Ą	340.23

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			Conference call with team regarding scheduling conference and related deadlines, draft terms sheet,					
Jonathan King	5/15/2019	Kansas	and initial disclosures	0.93	\$	345.00	\$	322.00
			Advise co-counsel team regarding EPSDT medicaid					
Jonathan King	5/20/2019	Kansas	claim	0.60	\$	345.00	\$	207.00
			Review draft Rule 26(f) report and associated draft					
Jonathan King	5/23/2019	Kansas	scheduling order for discussion with team	1.07	\$	345.00	\$	368.00
			Communicate with internal CR team re ESI guidelines					
Jonathan King	5/28/2019	Kansas	in re potential ESI protocol	0.25	\$	345.00	\$	86.25
			Review all known documents re Defendants'					
			placement issues to identify gaps in knowledge for					
			drafting initial discovery requests re placement					
Jonathan King	5/30/2019	Kansas	issues	3.12	\$	345.00	\$	1,075.25
			Communicate with MN and IL re drafting initial					
Jonathan King	5/31/2019	Kansas	requests for production regarding placement issues	0.47	\$	345.00	\$	161.00
			Draft initial requests for production regarding					
Jonathan King	6/3/2019	Kansas	placement issues	5.05	\$	345.00	\$	1,742.25
Jonathan King	0,3,2013	Ransas	Meeting with IL regarding draft first request for	3.03	Υ	3 13.00	Υ	1,7 12.23
Jonathan King	6/4/2019	Kansas	production re placement issues	0.53	\$	345.00	\$	184.00
<u> </u>	, ,		·				•	
			Davisa initial samuata fau usa dustian samudina					
lanathan Kina	6/4/2010	Vancas	Revise initial requests for production regarding	1 00	۲	245.00	۲	245.00
Jonathan King	6/4/2019	Kansas	placement issues  Meeting with IL and MN regarding potential revisions	1.00	Þ	345.00	Ş	345.00
Jonathan King	6/5/2019	Kancac	to draft request for production	0.18	\$	345.00	ć	63.25
Jonathan King	0/3/2019	Kalisas	to drait request for production	0.10	ڔ	343.00	ڔ	03.23
			Revise draft request for production regarding					
Jonathan King	6/5/2019	Kansas	placement issues	2.17	\$	345.00	\$	747.50

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Jonathan King	6/6/2019	Kansas	Continue updating request for production regarding placement issues	2.53	\$	345.00	\$	874.00
			Edit further initial requests for production regarding					
Jonathan King	6/7/2019	Kansas	placement issues	2.75	\$	345.00	\$	948.75
Jonathan King	6/10/2019	Kansas	Finalize draft initial requests for production regarding placement issues	1.38	\$	345.00	\$	477.25
			Edit dueft very cote for any direction recording cocale ad					
Jonathan King	6/12/2019	Kansas	Edit draft requests for production regarding caseload and CFSR	2.63	\$	345.00	\$	908.50
			Meeting with IL regarding first request for					
Jonathan King	6/13/2019	Kansas	production regarding placement, caseloads, and CFSR	0.78	\$	345.00	\$	270.25
			Edit draft of first request for production regarding					
Jonathan King	6/13/2019	Kansas	placement, caseloads, and CFSR	2.77	\$	345.00	\$	954.50
Jonathan King	6/14/2019	Kansas	Meeting with EM regarding draft of first request for production of documents	0.33	\$	345.00	\$	115.00
Jonathan King	6/14/2019	Kansas	Revise and edit draft of first request for production regarding placement, caseloads, and CFSR	2.03	\$	345.00	Ś	701.50
	5/ = 1/ = 0 = 0		Conference call with EM, FP, TW, LR, MH, JA and BH		т	0.0.00	т	, , , ,
Jonathan King	6/15/2019	Kansas	regarding Medicaid fact questions	1.50	\$	345.00	\$	517.50
			Revise and edit draft of first request for production					
Jonathan King	6/17/2019	Kansas	regarding placement, caseloads, and CFSR	3.00	\$	345.00	\$	1,035.00
			Revise and edit draft of first request for production					
Jonathan King	6/18/2019	Kansas	regarding placement, caseloads, and CFSR	3.12	\$	345.00	\$	1,075.25

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6/19/2019 Kansas	Revise and edit draft of first request for production regarding placement, caseloads, and CFSR	1.52	\$	345.00	\$	523.25
6/20/2019 Kansas	Revise and edit draft of first request for production regarding placement, caseloads, and CFSR	3.53	\$	345.00	\$	1,219.00
	Draft 30(b)(6) deposition notice related to first request for production regarding placement,					
6/21/2019 Kansas	caseloads, and CFSR	4.93	\$	345.00	\$	1,702.00
6/24/2019 Kansas	Revise 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CESR	2.97	\$	345.00	\$	1,023.50
6/25/2019 Kansas	Call with PJ and CC regarding Defs' production of initial disclosure materials and status of draft		•		-	103.50
6/25/2019 Kansas	Revise and edit draft of first request for production regarding placement, caseloads, and CFSR	3.03	\$	345.00	\$	1,046.50
6/26/2019 Kansas	Closely review draft initial disclosures and potential document production to discuss analysis and	5 50	¢	345 00	ς.	1,897.50
OJ ZOJ ZOTO RAIISAS	potential revisions	3.30	<b>ب</b>	343.00	<b>ب</b>	1,037.30
6/27/2019 Kansas	Propose edits to draft initial disclosures and potential document production	2.88	Ś	345.00	Ś	994.75
	6/20/2019 Kansas 6/21/2019 Kansas 6/24/2019 Kansas	Revise and edit draft of first request for production regarding placement, caseloads, and CFSR  Revise and edit draft of first request for production regarding placement, caseloads, and CFSR  Draft 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR  Revise 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR  Call with PJ and CC regarding Defs' production of initial disclosure materials and status of draft discovery requests  Revise and edit draft of first request for production regarding placement, caseloads, and CFSR  Closely review draft initial disclosures and potential document production to discuss analysis and potential revisions  Propose edits to draft initial disclosures and potential	Revise and edit draft of first request for production regarding placement, caseloads, and CFSR 3.53  Revise and edit draft of first request for production regarding placement, caseloads, and CFSR 3.53  Draft 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR 4.93  Revise 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR 2.97  Call with PJ and CC regarding Defs' production of initial disclosure materials and status of draft discovery requests 0.30  Revise and edit draft of first request for production regarding placement, caseloads, and CFSR 3.03  Closely review draft initial disclosures and potential document production to discuss analysis and potential revisions 5.50  Propose edits to draft initial disclosures and potential	Revise and edit draft of first request for production regarding placement, caseloads, and CFSR  Revise and edit draft of first request for production regarding placement, caseloads, and CFSR  Draft 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR  Revise 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR  Revise 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR  Call with PJ and CC regarding Defs' production of initial disclosure materials and status of draft discovery requests  Revise and edit draft of first request for production regarding placement, caseloads, and CFSR  3.03 \$  Closely review draft initial disclosures and potential document production to discuss analysis and potential revisions  Fropose edits to draft initial disclosures and potential	Revise and edit draft of first request for production 6/20/2019 Kansas regarding placement, caseloads, and CFSR 3.53 \$ 345.00  Draft 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR 4.93 \$ 345.00  Revise 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR 4.93 \$ 345.00  Revise 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR 2.97 \$ 345.00  Call with PJ and CC regarding Defs¹ production of initial disclosure materials and status of draft discovery requests 0.30 \$ 345.00  Revise and edit draft of first request for production regarding placement, caseloads, and CFSR 3.03 \$ 345.00  Closely review draft initial disclosures and potential document production to discuss analysis and potential revisions 5.50 \$ 345.00  Propose edits to draft initial disclosures and potential	Revise and edit draft of first request for production regarding placement, caseloads, and CFSR  8. Revise and edit draft of first request for production regarding placement, caseloads, and CFSR  8. Draft 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR  8. Revise 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR  8. Revise 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR  8. Call with PJ and CFSR  8. Call with PJ and CFSR  8. 2.97 \$ 345.00 \$ \$ 345.00 \$ \$ 345.00 \$ \$ 345.00 \$ \$ \$ 345.00 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$

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		Revise 30(b)(6) deposition notice related to first					
		request for production regarding placement,					
7/1/2019	Kansas	caseloads, and CFSR	0.37	\$	345.00	\$	126.50
7/2/2010		Edit draft of first request for production regarding	2.45		245.00		0.45.05
//2/2019	Kansas	•	2.45	\$	345.00	\$	845.25
= /+= /0.0+0	.,				2 22		44= 00
7/17/2019	Kansas	caseloads, and CFSR	0.33	\$	345.00	\$	115.00
		Conference call with team regarding Defendants'					
7/17/2019	Kansas	and local stakeholder updates	0.88	\$	345.00	\$	304.75
7/26/2010	.,	·	0.45		245.00		455.25
//26/2019	Kansas		0.45	\$	345.00	\$	155.25
7/20/2010	.,		0.00		245.00		400.50
//29/2019	Kansas	contractors	0.30	\$	345.00	\$	103.50
7/31/2019	Kansas	Revise draft subpoena to contractors	1.25	\$	345.00	\$	431.25
8/1/2019	Kansas	Continue editting draft of subpoena to contractors	2.23	\$	345.00	\$	770.50
				•		•	
8/5/2019	Kansas	subpoena to contractors	0.47	\$	345.00	\$	161.00
8/5/2019	Kansas	Revise and edit draft of subpoena to contractors	1.33	\$	345.00	\$	460.00
		·					
8/8/2019	Kansas	plaintiff files	0.50	\$	345.00	\$	172.50
		Review document review database and potential					
8/9/2019	Kansas	·	0.80	Ś	345.00	\$	276.00
	7/2/2019 7/17/2019 7/17/2019 7/26/2019 7/29/2019 7/31/2019 8/1/2019 8/5/2019 8/5/2019 8/8/2019	7/1/2019 Kansas  7/2/2019 Kansas  7/17/2019 Kansas  7/17/2019 Kansas  7/26/2019 Kansas  7/29/2019 Kansas  7/31/2019 Kansas  8/1/2019 Kansas  8/5/2019 Kansas  8/5/2019 Kansas  8/5/2019 Kansas	request for production regarding placement, caseloads, and CFSR  Edit draft of first request for production regarding placement, caseloads, and CFSR  Revise and edit 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR  Conference call with team regarding Defendants' mediation counter-proposal, draft 30(b)(6) notice, and local stakeholder updates  Review correspondence with Defs re responses to Plaintiffs' First RFP to discuss with internal CR team Review draft third party subpoena regarding contractors  Revise draft subpoena to contractors  Revise draft subpoena to contractors  Meeting with IL, EM and CG regarding edits to draft subpoena to contractors  Revise and edit draft of subpoena to contractors Read team protocol for upcoming review of named plaintiff files  Review document review database and potential	request for production regarding placement, caseloads, and CFSR  2.45  Edit draft of first request for production regarding placement, caseloads, and CFSR  Revise and edit 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR  Conference call with team regarding Defendants' mediation counter-proposal, draft 30(b)(6) notice, and local stakeholder updates  Review correspondence with Defs re responses to Plaintiffs' First RFP to discuss with internal CR team Review draft third party subpoena regarding contractors  7/31/2019 Kansas  Revise draft subpoena to contractors  8/1/2019 Kansas  Continue editting draft of subpoena to contractors  8/5/2019 Kansas  Revise and edit draft of subpoena to contractors  8/5/2019 Kansas  Revise and edit draft of subpoena to contractors  8/5/2019 Kansas  Revise and edit draft of subpoena to contractors  Read team protocol for upcoming review of named plaintiff files  Review document review database and potential	request for production regarding placement, caseloads, and CFSR    Figure   Edit draft of first request for production regarding placement, caseloads, and CFSR   Sevise and edit 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR   Sevise and edit 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR   Sevise and edit 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR   Sevise draft subtraction counter-proposal, draft 30(b)(6) notice, and local stakeholder updates   Sevise draft 30(b)(6) notice, and local stakeholder updates   Sevise draft third party subpoena regarding   Sevise draft third party subpoena regarding   Sevise draft third party subpoena regarding   Sevise draft subpoena to contractors   Sevise draft subpoena to contractors	request for production regarding placement, caseloads, and CFSR  Edit draft of first request for production regarding placement, caseloads, and CFSR  Z.45 \$ 345.00  Revise and edit 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR  Z.45 \$ 345.00  Revise and edit 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR  Conference call with team regarding Defendants' mediation counter-proposal, draft 30(b)(6) notice, and local stakeholder updates  Review correspondence with Defs re responses to Plaintiffs' First RFP to discuss with internal CR team Review draft third party subpoena regarding contractors  7/29/2019 Kansas  Review draft third party subpoena regarding contractors  3.45.00  Review draft third party subpoena to contractors  1.25 \$ 345.00  Review draft subpoena to contractors  2.23 \$ 345.00  Review draft subpoena to contractors  8/5/2019 Kansas  Revise and edit draft of subpoena to contractors  Read team protocol for upcoming review of named plaintiff files  Review document review database and potential	request for production regarding placement, caseloads, and CFSR  Edit draft of first request for production regarding placement, caseloads, and CFSR  Revise and edit 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR  Revise and edit 30(b)(6) deposition notice related to first request for production regarding placement, caseloads, and CFSR  Conference call with team regarding Defendants' mediation counter-proposal, draft 30(b)(6) notice, and local stakeholder updates  Review correspondence with Defs re responses to Plaintiffs' First RFP to discuss with internal CR team Review draft third party subpoena regarding 7/29/2019 Kansas  Review draft third party subpoena regarding 7/31/2019 Kansas  Revise draft subpoena to contractors  1.25 \$ 345.00 \$  8/1/2019 Kansas  Continue editting draft of subpoena to contractors  8/5/2019 Kansas  Revise and edit draft of subpoena to contractors  Read team protocol for upcoming review of named plaintiff files  Review document review database and potential

Jonathan King	8/9/2019	Kansas	Review factual research regarding potential experts	1.02	Ś	345.00	Ś	350.75
Jonathan King	0,3,2023	Ransas	neview ractaal research regarding potential experts	2.02	Ψ	3 13.00	Υ	330.73
			Review all materials (protocol, templates, and					
Jonathan King	8/14/2019	Kansas	reference guides) to begin named plaintiff file review	1.67	\$	345.00	\$	575.00
			Analyze correspondence regarding mediation and					
Jonathan King	8/15/2019	Kansas	response to Plaintiffs' term sheet	0.55	\$	345.00	\$	189.75
			Meeting with MN, CG, EM, DA and CC regarding					
Jonathan King	8/19/2019	Kansas	strategy for review of named plaintiff files	0.30	\$	345.00	\$	103.50
			Begin review and detailed analysis of named plaintiff					
Jonathan King	8/19/2019	Kansas	file of ZZ as produced by Defendants	0.75	\$	345.00	\$	258.75
Jonathan King	8/20/2019	Kansas	Review and analyze named plaintiff file for ZZ	0.90	\$	345.00	\$	310.50
			Review draft fact sections of complaint amendment					
Jonathan King	8/21/2019	Kansas	regarding named plaintiffs	0.87	\$	345.00	\$	299.00
Jonathan King	8/21/2019	Kansas	Review and analyze named plaintiff file for ZZ	1.43	\$	345.00	\$	494.50
	- / /		Draft summary of potential updates for amended		_		_	
Jonathan King	8/22/2019	Kansas	complaint regarding named plaintiffs	1.08	\$	345.00	Ş	373.75
Jonathan King	8/22/2019	Kancac	Review and analyze named plaintiff file for ZZ	3.10	\$	345.00	Ċ	1,069.50
Jonathan King	8/22/2019	Kalisas	Neview and analyze named plantin me for 22	3.10	۲	343.00	٠	1,009.30
			Begin drafting first draft of Plaintiffs' initial mediation					
Jonathan King	8/22/2019	Kansas	statement	3.18	\$	345.00	\$	1,098.25
20	5,22,2013		Conference call with IL and MN regarding strategy	3.10	~	3 .3.00	Υ	1,000.20
Jonathan King	8/23/2019	Kansas	for mediation statement	0.42	Ś	345.00	\$	143.75
- CHACHAIT KING	5, 25, 2015	aiisus	101 Inculation statement	U.7Z	Υ	3 73.00	7	± <del>-</del> -5.75

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Jonathan King	8/23/2019	Kansas	Draft Plaintiffs' initial mediation statement	7.18	\$	345.00	\$	2,478.25
Jonathan King	8/26/2019	Kansas	Draft Plaintiffs' initial mediation statement	8.90	\$	345.00	\$	3,070.50
Jonathan King	8/27/2019	Kansas	Draft Plaintiffs' initial mediation statement	8.00	\$	345.00	\$	2,760.00
Jonathan King	8/28/2019	Kansas	Draft Plaintiffs' initial mediation statement	5.92	\$	345.00	\$	2,041.25
Jonathan King	8/29/2019	Kansas	Review and analyze named plaintiff file for ZZ	0.85	\$	345.00	\$	293.25
Jonathan King	8/29/2019	Kansas	Draft Plaintiffs' initial mediation statement	6.63	\$	345.00	\$	2,288.50
Jonathan King	9/16/2019	Kansas	Read comments by co-counsel to draft mediation statement	0.50	\$	345.00	\$	172.50
Jonathan King	9/16/2019	Kansas	Review and analyze named plaintiff file for ZZ	3.10	\$	345.00	\$	1,069.50
Jonathan King	9/17/2019	Kansas	Review NCYL's edits to plaintiffs' draft mediation statement	0.48	\$	345.00	\$	166.75
Jonathan King	9/17/2019	Kansas	Review and analyze named plaintiff file for ZZ	3.43	\$	345.00	\$	1,184.50
Jonathan King	9/18/2019	Kansas	Review plaintiffs' updated draft mediation statement	0.33	\$	345.00	\$	115.00
Jonathan King	9/18/2019	Kansas	Meeting with team regarding status of named plaintiff document review	0.43	¢	345.00	¢	149.50
JOHACHAH KINS	5, 10, 2013	Nambus	plantan document review	0.73	٧	3-73.00	7	175.50

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Jonathan King	9/18/2019	Kancac	Review and analyze named plaintiff file for ZZ	5.12	\$	345.00	¢	1,765.25
Jonathan King	9/19/2019		Review plaintiffs' draft mediation statement	0.43		345.00		149.50
	3, 23, 2323		,		т		т	
Jonathan King	9/19/2019	Kansas	Review and analyze named plaintiff file for ZZ	7.15	\$	345.00	\$	2,466.75
Jonathan King	9/20/2019	Kansas	Review and analyze named plaintiff file for ZZ	7.05	\$	345.00	\$	2,432.25
Jonathan King	9/23/2019	Kansas	Review and analyze named plaintiff file for ZZ	1.63	\$	345.00	\$	563.50
Jonathan King	9/24/2019	Kansas	Review and analyze named plaintiff file for ZZ	1.33	\$	345.00	\$	460.00
Jonathan King	9/25/2019	Kansas	Review and analyze named plaintiff file for ZZ	2.18	\$	345.00	\$	753.25
Jonathan King	9/27/2019	Kansas	Conference call with discovery sub-team regarding issues with Defendants' production of documents	0.72	\$	345.00	\$	247.25
Jonathan King	9/30/2019	Kansas	Review and analyze named plaintiff file for ZZ	0.53	\$	345.00	\$	184.00
Jonathan King	10/4/2019	Kansas	Review and analyze named plaintiff file for ZZ	1.95	\$	345.00	\$	672.75
Jonathan King	10/7/2019	Kansas	Review and analyze named plaintiff file for ZZ	8.37	\$	345.00	\$	2,886.50
Jonathan King	10/8/2019	Kansas	Review and analyze named plaintiff file for ZZ	6.92	\$	345.00	\$	2,386.25
Jonathan King	10/9/2019	Kansas	Review and analyze named plaintiff file for ZZ	5.75	\$	345.00	\$	1,983.75
Jonathan King	10/10/2019	Kansas	Review and analyze named plaintiff file for ZZ	6.58	\$	345.00	\$	2,271.25
Jonathan King	10/15/2019	Kansas	Review and analyze named plaintiff file for ZZ	1.33	\$	345.00	\$	460.00
Jonathan King	10/16/2019	Kansas	Conference call with MN and EG regarding strategy for drafting opposition to potential MTD	0.50	\$	345.00	\$	172.50

			Conference call with team regarding status of					
Jonathan King	10/23/2019	Kansas	discovery and potential experts	0.68	\$	345.00	\$	235.75
Jonathan King	10/25/2019	Kansas	Read Defendants' filed 12b1 motion to dismiss	0.37	\$	345.00	\$	126.50
			Begin reading caselaw cited in Defendants' motion to					
Jonathan King	10/28/2019	Kansas	dismiss	1.93	\$	345.00	\$	667.00
			Continue review of caselaw cited by Defendants in					
Jonathan King	10/29/2019	Kansas	their motion to dismiss	1.85	\$	345.00	\$	638.25
			Call with EG regarding strategy for opposition to					
Jonathan King	10/30/2019	Kansas	Defendants' motion to dismiss	0.33	\$	345.00	\$	115.00
			Research case law to support Plaintiffs' opposition to					
Jonathan King	10/30/2019	Kansas	Defendants' motion to dismiss	4.97	\$	345.00	\$	1,713.50
			Conference call with MN and EG regarding strategy					
Jonathan King	10/31/2019	Kansas	for opposition to Defendants' motion to dismiss	0.67	\$	345.00	\$	230.00
			·					
			Research case law regarding opposition to					
Jonathan King	10/31/2019	Kansas	Defendants' motion to dismiss	8.05	\$	345.00	\$	2,777.25
			Research case law regarding opposition to					
Jonathan King	11/1/2019	Kansas	Defendants' motion to dismiss	4.85	\$	345.00	Ś	1,673.25
Jonathan King	11/1/2013	Ransas	peremants motion to distins	1.03	Ψ	3 13.00	Ψ	1,073.23
Jonathan King	11/4/2019	Kansas	Draft opposition to Defendants' motion to dismiss	0.40	\$	345.00	\$	138.00
Jonathan King	11/4/2013	Karisas	Draft opposition to Defendants motion to dishinss	0.40	Υ	343.00	<u>,                                     </u>	130.00
la nathan Kina	11/6/2010	<b>Vanas</b>	Dueft annecities to Defendents' section to dispuis	1 42	¢	245.00	<u>د</u>	404.50
Jonathan King	11/6/2019	Kansas	Draft opposition to Defendants' motion to dismiss	1.43	Ş	345.00	<b>&gt;</b>	494.50
			Review motions for extension of time regarding					
Jonathan King	11/7/2019	Kansas	discovery and Defendants' MTD	0.77	\$	345.00	\$	264.50
			Research case law regarding opposition to					
Jonathan King	11/7/2019	Kansas	Defendants' motion to dismiss	2.75	\$	345.00	\$	948.75

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			Research case law regarding opposition to					
Jonathan King	11/11/2019	Kansas	Defendants' motion to dismiss	0.40	\$	345.00	\$	138.00
Jonathan King	11/14/2019	Kansas	Draft opposition to Defendants' motion to dismiss	1.80	\$	345.00	\$	621.00
Jonathan King	11/15/2019	Kansas	Draft opposition to Defendants' motion to dismiss	1.73	\$	345.00	\$	598.00
Jonathan King	11/19/2019	Kansas	Call with EG regarding draft opposition to MTD	0.47	\$	345.00	\$	161.00
_			Research case law regarding opposition to					
Jonathan King	11/19/2019	Kansas	Defendants' motion to dismiss	0.65	\$	345.00	\$	224.25
			Research case law regarding opposition to					
Jonathan King	11/20/2019	Kansas	Defendants' motion to dismiss	1.67	\$	345.00	\$	575.00
Somethan King	11/20/2013	Karisas	Determants motion to distribus	1.07	Ψ	3 13.00	Ψ	373.00
Jonathan King	11/21/2019	Kansas	Draft opposition to Defendants' motion to dismiss	1.25	\$	345.00	\$	431.25
Jonathan King	11/25/2019	Kansas	Draft opposition to Defendants' motion to dismiss	2.25	\$	345.00	\$	776.25
Jonathan King	11/27/2019	Kansas	Draft opposition to Defendants' motion to dismiss	2.50	\$	345.00	\$	862.50
Jonathan King	12/2/2019	Kansas	Draft opposition to Defendants' motion to dismiss	2.85	\$	345.00	\$	983.25
	10/0/0010		Call with EG regarding draft opposition to motion to			2.5		22.52
Jonathan King	12/3/2019	Kansas	dismiss	0.23	\$	345.00	\$	80.50
			Research case law regarding opposition to					
Jonathan King	12/3/2019	Kansas	Defendants' motion to dismiss	0.75	\$	345.00	\$	258.75

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			Calls with EG regarding draft opposition to motion to					
Jonathan King	12/4/2019	Kansas	dismiss	0.65	\$	345.00	\$	224.25
	, ,							
Jonathan King	12/4/2019	Kansas	Draft opposition to Defendants' motion to dismiss	6.77	\$	345.00	\$	2,334.50
Jonathan King	12/5/2019	Kansas	Draft motion regarding extension of deadline to oppose MTD	1.02	\$	345.00	\$	350.75
Jonathan King	12/3/2013	Karisas	Call with EG regarding draft opposition to motion to	1.02	٠,	343.00	٧	330.73
Jonathan King	12/6/2019	Kansas	dismiss	0.25	\$	345.00	\$	86.25
			Meeting with IL regarding draft opposition to motion					
Jonathan King	12/6/2019	Kansas	to dismiss	0.68	\$	345.00	\$	235.75
			Device and edit mating according					
Jonathan King	12/6/2019	Kansas	Revise and edit motion regarding second extension of deadline to oppose MTD	0.75	ς .	345.00	¢	258.75
Jonathan King	12/0/2013	Karisas	or deadine to oppose with	0.75	<u> ۲</u>	343.00	٧	230.73
			Research case law regarding opposition to					
Jonathan King	12/8/2019	Kansas	Defendants' motion to dismiss	4.00	\$	345.00	\$	1,380.00
Jonathan King	12/9/2019	Kansas	Draft opposition to Defendants' motion to dismiss	3.28	\$	345.00	\$	1,132.75
,			Meeting with MN regarding opposition to motion to					•
Jonathan King	12/10/2019	Kansas	dismiss	0.42	\$	345.00	\$	143.75
Jonathan King	1/6/2020	Kansas	Draft opposition to Defendants' motion to dismiss	6.87	\$	345.00	\$	2,369.00
			Call with EG regarding opposition to motion to					
Jonathan King	1/7/2020	Kansas	dismiss governor	0.17	\$	345.00	\$	57.50
			Conference call with CR team regarding targetted				_	
Jonathan King	1/7/2020	Kansas	12(b)(1) discovery	0.52	\$	345.00	\$	178.25
Jonathan King	1/7/2020	Vancas	Draft apposition to Defendants' motion to dismiss	5.15	¢	345.00	ć	1,776.75
Jonathan King	1///2020	Ndlisds	Draft opposition to Defendants' motion to dismiss	5.15	Þ	345.00	Þ	1,//0./5
Jonathan King	1/8/2020	Kansas	Call with EG regarding edits to opposition to MTD	0.25	\$	345.00	\$	86.25

			Meetings with MN regarding edits to opposition to			
Jonathan King	1/8/2020	Kansas	MTD	0.33	\$ 345.00	\$ 115.00
Jonathan King	1/8/2020	Kansas	Draft opposition to Defendants' motion to dismiss	7.32	\$ 345.00	\$ 2,524.25
Jonathan King	1/9/2020	Kansas	Draft opposition to Defendants' motion to dismiss	7.78	\$ 345.00	\$ 2,685.25
			Meeting with MN regarding draft opposition to			
Jonathan King	1/10/2020	Kansas	Defendants' motion to dismiss	0.42	\$ 345.00	\$ 143.75
Jonathan King	1/10/2020	Kansas	Draft opposition to Defendants' motion to dismiss	7.83	\$ 345.00	\$ 2,702.50
Jonathan King	1/11/2020	Kansas	Draft opposition to Defendants' motion to dismiss	6.50	\$ 345.00	\$ 2,242.50
			Research case law regarding opposition to			
Jonathan King	1/13/2020	Kansas	Defendants' motion to dismiss	7.17	\$ 345.00	\$ 2,472.50
Jonathan King	1/14/2020	Kansas	Draft opposition to Defendants' motion to dismiss	4.00	\$ 345.00	\$ 1,380.00
Jonathan King	1/15/2020	Kansas	Draft opposition to Defendants' motion to dismiss	1.00	\$ 345.00	\$ 345.00
			Review updates to current draft opposition to			
			motion to dismiss and corresponding factual			
Jonathan King	2/4/2020	Kansas	materials	3.30	\$ 345.00	\$ 1,138.50
			Review updated draft opposition to motion to			
Jonathan King	2/5/2020	Kansas	dismiss and corresponding exhibits	1.00	\$ 345.00	\$ 345.00
			Revise draft opposition to motion to dismiss and			
Jonathan King	2/5/2020	Kansas	corresponding exhibits	2.75	\$ 345.00	\$ 948.75

			Edit draft opposition to motion to dismiss and					
Jonathan King	2/10/2020	Kansas	corresponding exhibits	8.45	\$	345.00	\$	2,915.25
			Revise draft opposition to motion to dismiss and					
Jonathan King	2/11/2020	Kansas	corresponding exhibits	2.33	\$	345.00	\$	805.00
			Revise and edit draft opposition to motion to dismiss					
Jonathan King	2/12/2020	Kansas	and corresponding exhibits	5.43	\$	345.00	\$	1,874.50
			Revise and edit draft opposition to motion to dismiss	00	т	0.0.00	· ·	
Jonathan King	2/13/2020	Kansas	and corresponding exhibits	4.42	\$	345.00	\$	1,523.75
			Review documents produced in response to					·
Jonathan King	2/24/2020	Kansas	Plaintiffs' first RFP	4.00	\$	345.00	\$	1,380.00
			Draft written analysis of documents produced in					
Jonathan King	2/25/2020	Kansas	response to Plaintiffs' first RFP	1.52	\$	345.00	\$	523.25
			Conference call with team regarding status of					
			document review, new factual findings in document					
Jonathan King	2/26/2020	Kansas	review	0.35	\$	345.00	\$	120.75
			Continue analyzing documents produced in response					
Jonathan King	2/26/2020	Kancac	to Plaintiffs' first RFP	2.78	\$	345.00	\$	960.25
Jonathan King	2/20/2020	Karisas	Meeting with team regarding status of mediation	2.70	٠,	343.00	٠,	300.23
Jonathan King	2/27/2020	Kansas	and next steps	0.50	\$	345.00	Ś	172.50
ornathan imig	2,27,2020	Ransas	and next steps	0.50	Ψ	3 13.00		1, 2,00
Jonathan King	2/28/2020	Kansas	Call with MN and EG regarding draft ESI search terms	0.17	\$	345.00	\$	57.50
Jonathan King	2/28/2020	Kansas	Revise draft of ESI search terms	2.08	\$	345.00	\$	718.75
Jonathan King	2/29/2020	Kansas	Edit draft of ESI search terms	1.75	\$	345.00	\$	603.75
	, ==, ====		Meeting with MN, NT, CG, DA, and CC regarding		•	- 12.20	•	
			analysis of search terms, requests for for production,					
Jonathan King	3/4/2020	Kansas	and upcoming discovery	0.50	\$	345.00	\$	172.50

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			Telephone call with PJ regarding edits to ESI search					
Jonathan King	3/4/2020	Kansas	terms	0.60	\$	345.00	\$	207.00
Jonathan King	3/5/2020	Kansas	Revise draft ESI search terms	1.75	\$	345.00	\$	603.75
Jonathan King	3/6/2020	Kansas	Call with PJ regarding draft ESI search terms	0.15	\$	345.00	\$	51.75
Jonathan King	3/6/2020	Kansas	Revise draft of ESI search terms	3.58	\$	345.00	\$	1,236.25
Jonathan King	3/9/2020	Kansas	Edit draft ESI search terms	2.02	\$	345.00	\$	695.75
Jonathan King	3/12/2020	Kansas	Revise draft of ESI search terms	1.42	\$	345.00	\$	488.75
Jonathan King	3/13/2020	Kansas	Review draft search terms suggestions from DLA	0.58	\$	345.00	\$	201.25
			Read Defendants' reply brief in support of Governor's motion to dismiss for discussion with MN					
Jonathan King	3/13/2020	Kansas	and EG	0.95	\$	345.00	\$	327.75
Jonathan King	3/18/2020	Kansas	Conference call with CR team regarding discovery and ESI	0.50	\$	345.00	\$	172.50
la a abhan Mina	2/40/2020	<b>V</b>	Review public materials re Defs' plans for COVID-19 with respect to placements and mental health care	0.70	<i>k</i>	245.00	<b>.</b>	244 50
Jonathan King Jonathan King	3/18/2020		relevant to litigation  Conference call with team regarding status of discovery, ESI	0.70		345.00 345.00	\$	241.50 172.50
	3/19/2020		Revise draft of ESI search terms	0.33	-	345.00	<u> </u>	115.00
Jonathan King	3/19/2020	Kalisas	Draft letter to defendants regarding plans for COVID-	0.33	Þ	345.00	Ş	115.00
Jonathan King	3/19/2020	Kansas	19 with respect to placements and mental health treatment	3.30	\$	345.00	\$	1,138.50
Jonathan King	3/20/2020	Kansas	Conference call with discovery subteam team regarding discovery status	0.27	\$	345.00	\$	92.00
Jonathan King	3/20/2020		Review and analyze documents produced in response to Plaintiffs' RFP	1.65		345.00		569.25

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			Reviewand analyze documents produced in response					
Jonathan King	3/23/2020	Kansas	to Plaintiffs' RFP	2.87	\$	345.00	\$	989.00
			Reviewand analyze documents produced in response					
Jonathan King	3/25/2020	Kansas	to Plaintiffs' RFP	0.42	\$	345.00	\$	143.75
			Conference call with CG and MN regarding draft					
Jonathan King	3/27/2020	Kansas	document request	0.25	\$	345.00	\$	86.25
			Call with CG regarding draft document request for					
Jonathan King	3/27/2020	Kansas	COVID-19 plans	0.55	\$	345.00	\$	189.75
			Review guidance regarding contingency plans for					
Jonathan King	3/27/2020	Kansas	COVID-19	1.87	\$	345.00	\$	644.00
lanathan Kina	2/20/2020	Vanasa	Review guidance regarding contingency plans for COVID-19	1 52	<u> </u>	245.00	۲.	F22.2F
Jonathan King	3/30/2020	Kansas		1.52	\$	345.00	Þ	523.25
Jonathan King	3/31/2020	Vancac	Conference call with CG regarding draft RFP relating to COVID-19	0.18	\$	345.00	\$	63.25
Jonathan King	3/31/2020	Kalisas	to COVID-19	0.18	Ş	345.00	Ş	03.25
			Revise and edit discovery request regarding					
Jonathan King	3/31/2020	Kancac	contingency plans for COVID-19	3.87	\$	345.00	ċ	1,334.00
Jonathan King	3/31/2020	Kaiisas	contingency plans for COVID-13	3.67	٠	343.00	٠,	1,334.00
			Conference call with team regarding case status,					
Jonathan King	4/1/2020	Kansas	discovery projects, and potential experts	0.83	\$	345.00	\$	287.50
Jonathan King	7/ 1/2020	Railbas	discovery projects, and potential experts	0.05	· ·	343.00	<u> ۲</u>	207.50
			Revise and edit discovery request regarding					
Jonathan King	4/1/2020	Kansas	contingency plans for COVID-19	1.17	\$	345.00	Ś	402.50
	1, 1, 2020	Ransas	contingency plans for covid 15	1.17	Υ	3 13.00	~	102.30
			Revise and edit discovery request regarding					
Jonathan King	4/2/2020	Kansas	contingency plans for COVID-19	2.50	\$	345.00	\$	862.50
l	1,2,2020	Ransas	contingency plans for covid 15	2.30	<u> </u>	3 13.00		002.50
			Advise team re COVID-19 RFP and related documents					
Jonathan King	4/13/2020	Kansas	in preparation for meet and confer re same	0.42	\$	345.00	\$	143.75
	, =, ====						•	
			Analyze defendants' R&Os to Plaintiffs' RFPs relating					
Jonathan King	4/20/2020	Kansas	to COVID-19	1.52	\$	345.00	\$	523.25

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	. (2.7 (2.2 2							
Jonathan King	4/27/2020	Kansas	Closely review Defendants' privilege log	3.17	\$	345.00	\$	1,092.50
Jonathan King	4/28/2020	Kansas	Discuss with CR team re Defendants' privilege log	0.70	\$	345.00	\$	241.50
			Conference call with MN, NT, and CG regarding					
			discovery issues CR will handle at upcoming meet					
Jonathan King	4/29/2020	Kansas	and confer	0.33	\$	345.00	\$	115.00
Jonathan King	4/29/2020	Kansas	Review correspondence re Defendants' privilege log	0.40	\$	345.00	ċ	138.00
Jonathan King	4/29/2020	Nalisas	Review correspondence te Defendants privilege log	0.40	Ą	343.00	٦	136.00
Laurathau Kina	4/20/2020	Wa na a a		4.67	ć	245.00	¢	F.7F 00
Jonathan King	4/29/2020	Kansas	Begin review of Defendants' redaction log	1.67	\$	345.00	\$	575.00
			Detailed review of Defendants' redaction log with					
Jonathan King	4/30/2020	Kansas	corresponding documents	3.65	\$	345.00	\$	1,259.25
			Attend meet and confer conference call with					
Jonathan King	5/1/2020	Kansas	Defendants regarding discovery	0.80	\$	345.00	\$	276.00
			Call with MN regarding review of document					
Jonathan King	5/6/2020	Kansas	redactions and privilege designations	0.25	\$	345.00	\$	86.25
Jonathan King	5/6/2020	Kansas	Begin drafting analysis of Defendants' privilege log	0.33	\$	345.00	\$	115.00
			Draft written analysis of Defendants' redaction log					
Jonathan King	5/7/2020	Kansas	with corresponding documents	4.13	\$	345.00	\$	1,426.00
			Draft written analysis Defendants' redaction log and					
Jonathan King	5/8/2020	Kansas	corresponding documents	0.93	\$	345.00	\$	322.00
			Continue drafting written analysis of Defendants'					
Jonathan King	5/11/2020	Kancac	redaction log and corresponding materials	1.53	¢	345.00	¢	529.00
Jonathan King	3/11/2020	Kalisas	reduction log and corresponding materials	1.33	٧	345.00	۲	329.00

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			Review and analyze Defendants' redaction logs and					
Jonathan King	5/12/2020	Kansas	corresponding documents	2.87	\$	345.00	\$	989.00
			Conference call with IL regarding proposal for					
Jonathan King	5/13/2020	Kansas	Defendants' redactions	0.20	\$	345.00	\$	69.00
			Review and analyze Defendants' redaction logs and					
Jonathan King	5/13/2020	Kansas	corresponding documents	1.38	\$	345.00	\$	477.25
			Advise internal CR team re privilege and redaction					
Jonathan King	5/14/2020	Kansas	log in preparation for M&C including that topic	0.75	\$	345.00	\$	258.75
	_ / /		Conference call with CR team regarding status of		_		_	
Jonathan King	5/27/2020	Kansas	case, discovery, and settlement negotiations	0.67	\$	345.00	Ş	230.00
La calle a 12° a a	F /27 /2020	17		0.60		245.00		225.75
Jonathan King	5/27/2020	Kansas	Closely review Defendants' settlement proposal	0.68	\$	345.00	\$	235.75
lanathan Kina	F /28 /2020	Vanaaa	Conference call with team regarding draft settlement	0.50	<u> </u>	245.00	\$	172.50
Jonathan King	5/28/2020	Kansas	agreement	0.50	\$	345.00	<b>&gt;</b>	172.50
			Review materials collected by CG in preparation for					
Jonathan King	5/28/2020	Kansas	CR meeting with potential expert re brain science	0.92	\$	345.00	\$	316.25
Jonathan King	3/20/2020	Ransas	en meeting with potential expert to brain science	0.52	Υ	343.00	<u> </u>	310.23
			Communicate with CR team re Defendants'					
Jonathan King	5/28/2020	Kansas	settlement proposal	0.32	\$	345.00	\$	109.25
<u> </u>	-, -, -							
			Draft outline in preparation for meeting with					
Jonathan King	5/29/2020	Kansas	potential expert PF	1.60	\$	345.00	\$	552.00
Jonathan King	6/1/2020	Kansas	Call with IL, MN, CG, CC and potential expert	0.72	\$	345.00	\$	247.25
			Conduct legal research on case law regarding valid					
Jonathan King	6/2/2020	Kansas	reasons for redactions	1.50	\$	345.00	\$	517.50
			Call with IL and MN regarding prep for settlement					
Jonathan King	6/3/2020	Kansas	negotiation	0.48	\$	345.00	\$	166.75
Jonathan King	6/3/2020	Kansas	Research case law regarding redactions	1.08	\$	345.00	\$	373.75

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			Review and analyze updated settlement proposal by					
Jonathan King	6/3/2020	Kansas	Defendants	1.60	\$	345.00	\$	552.00
I								
			Review and analyze decision granting governor's					
Jonathan King	6/3/2020	Kansas	MTD to advise team re same	1.97	\$	345.00	\$	678.50
Jonathan King	6/4/2020	Kansas	Analyze Defendants' settlement proposal	0.48	\$	345.00	\$	166.75
			Conference call with IL, MN, EG, and EM regarding					
Jonathan King	6/5/2020	Kansas	draft settlement agreement	0.58	\$	345.00	\$	201.25
Jonathan King	6/11/2020	Kansas	Analyze updated draft settlement agreement	0.50	\$	345.00	\$	172.50
			Conference call with team regarding status of					
Jonathan King	7/1/2020	Kansas	settlement and discovery	0.58	\$	345.00	\$	201.25
			participate in team KS investigatory meeting					
Marissa Nardi	5/3/2018	Kansas	regarding strategy for foster care investigation	1.00	\$	380.00	\$	380.00
			Daniel and the state of an extinuous to call forther and					
			Prepare outline of questions to ask foster care					
Navissa Naveli	E /11 /2010	Vanaga	community advocates for upcoming investigatory	1.05	۲.	200.00	۲	C27.00
Marissa Nardi	5/11/2018	Kansas	trip	1.65	\$	380.00	\$	627.00
			Discuss factual research from child welfare report					
Marissa Nardi	5/14/2018	Kansas	and audits with paralegal H. Cherepon	0.48	\$	380.00	\$	183.67
			Edit written investigation plan to incorporate edits					
Marissa Nardi	5/14/2018	Kansas	from I. Lustbader and S. Dixon	0.50	\$	380.00	\$	190.00
_			meet with E. McGuinness to discuss investigation					
Marissa Nardi	5/14/2018	Kansas	factual source materials including Medicaid contract	0.65	\$	380.00	\$	247.00
			closely review and analyze factual investigation					
Marissa Nardi	5/14/2018	Kansas	source materials	2.90	\$	380.00	\$	1,102.00
IVIGITSSU IVOLGI	3/ 17/ 2010	Kulisus	Jource materials	2.30	٧	300.00	٠	1,102.00

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			Investigate KS foster care system with S. Dixon, L.			
		Kansas	Welch, and L.B.B. via fact-finding meetings with			
Marissa Nardi	5/15/2018	Travel	foster care advocates.	4.50	\$ 380.00	\$ 1,710.00
			Investigate KS foster care system with S. Dixon, L.			
		Kansas	Welch, and L.B.B. via fact-finding meetings with			
Marissa Nardi	5/16/2018	Travel	foster care advocates.	3.58	\$ 380.00	\$ 1,361.67
			meet with I. Lustbader to discuss Kansas			
Marissa Nardi	5/17/2018	Kansas	investigation strategy	0.10	\$ 380.00	\$ 38.00
			factual research for news articles re KS child welfare			
Marissa Nardi	5/17/2018	Kansas	system and DCF Secretary outreach	0.55	\$ 380.00	\$ 209.00
			read and analyze recent news articles re KS foster			
Marissa Nardi	5/18/2018	Kansas	care system	0.30	\$ 380.00	\$ 114.00
			edit attorney contact memo from interview with two			
Marissa Nardi	5/21/2018	Kansas	advocates at KC youth homeless shelter	0.72	\$ 380.00	\$ 272.33
			attend strategy meeting with litigation team re			
Marissa Nardi	5/21/2018	Kansas	investigation and upcoming interviews	1.00	\$ 380.00	\$ 380.00
			Advise internal team re investigation and next steps			
Marissa Nardi	5/24/2018	Kansas	for factual research	0.77	\$ 380.00	\$ 291.33
			Add attorney impressions to draft contact memos			
			from meetings with advocates at KC foster and			
Marissa Nardi	5/24/2018	Kansas	adoption group, 2 foster parents, and a former CASA	2.10	\$ 380.00	\$ 798.00
Marissa Nardi	5/24/2018	Kansas	draft legal research action items	0.57	\$ 380.00	\$ 215.33
			draft contact memos of interviews with three local			
			civil rights attorneys and youth worker from recent			
Marissa Nardi	5/25/2018	Kansas	investigatory trip to Kansas	2.03	\$ 380.00	\$ 772.67
			discuss data collection with CR, NYCL, and Foster			
Marissa Nardi	5/29/2018	Kansas	Adopt Connect teams	0.32	\$ 380.00	\$ 120.33
			discuss and meet with H. Cherepon re fact-gathering			
Marissa Nardi	5/29/2018	Kansas	for complaint drafting	0.37	\$ 380.00	\$ 139.33
			edit 7 contact memos for circulation to co-counsel			
Marissa Nardi	5/29/2018	Kansas	team	2.37	\$ 380.00	\$ 899.33

N. A. a. Caran N. La and	5 /20 /2010		Lead Western Control of the	0.75		200.00		205.00
Marissa Nardi	5/30/2018	Kansas	lead Kansas co-counsel call	0.75	\$	380.00	\$	285.00
	5 /00 /00 A	14	Analyze investigation notes to prepare for call with	0.45		200.00	_	474.00
Marissa Nardi	5/30/2018	Kansas	co-counsel	0.45	\$	380.00	\$	171.00
	5/24/2040	.,	Correspond with internal team and co-counsel re	0.40	4	200.00		46467
Marissa Nardi	5/31/2018	Kansas	document review of newly located fact documents	0.43	\$	380.00	\$	164.67
	- 1- 1 1- 1-		Begin close review of DCF Continuum of Care Grant		1			
Marissa Nardi	5/31/2018	Kansas	RFP	0.65	\$	380.00	\$	247.00
	_		draft factual document review guidelines for internal					
Marissa Nardi	5/31/2018	Kansas	team	0.68	\$	380.00	\$	259.67
			prepare detailed written analysis of Kansas DCF					
Marissa Nardi	5/31/2018	Kansas	Foster Care Grant	2.53	\$	380.00	\$	962.67
			read news article re DCF lobbying restrictions and					
Marissa Nardi	6/1/2018		lack of oversight	0.10	\$	380.00	\$	38.00
Marissa Nardi	6/1/2018		review new KS RFP re continuum of care	0.75	\$	380.00	\$	285.00
Marissa Nardi	6/5/2018		prepare for and discuss upcoming Kansas trip	0.23	\$	380.00	\$	88.67
Marissa Nardi	6/5/2018	Kansas	review current draft findings of fact (FOF)	0.27	\$	380.00	\$	101.33
			revise draft summaries by H. Cherepon of her factual					
Marissa Nardi	6/5/2018	Kansas	document review	0.33	\$	380.00	\$	126.67
Marissa Nardi	6/6/2018	Kansas	discuss legal research projects with I. Lustbader	0.08	\$	380.00	\$	31.67
iviari33a ivarar	0/0/2018	Karisas	review and correspond with P. Juneja re legal	0.00	Ų	300.00	Ų	31.07
Marissa Nardi	6/6/2018	Kansas	research projects	0.13	\$	380.00	\$	50.67
iviari33a ivarar	0/0/2018	Karisas	participate in Kansas co-counsel team mtg re	0.15	٠,	300.00	٠,	30.07
Marissa Nardi	6/6/2018	Kancac	complaint drafting and investigation	1.00	\$	380.00	\$	380.00
iviai issa ivai ui	0/0/2018	Kalisas	complaint draiting and investigation	1.00	٠,	380.00	٠	360.00
			Correspond with legal intern E. Fowler re deliberate					
			indifference research for substantive due process					
Marissa Nardi	6/7/2018	Kansas	(SDP) cause of action (COA) for draft complaint	0.13	\$	380.00	\$	50.67
Marissa Nardi	6/8/2018		meet with I. Lustbader re revising FOF	0.10	\$	380.00	\$	38.00
			meet with intern V. Weber re policy research for		-		<u> </u>	
Marissa Nardi	6/8/2018	Kansas	complaint drafting	0.27	\$	380.00	\$	101.33

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Marissa Nardi	6/8/2018	Kansas	review E. Fowler's research to date re SDP COA	0.28	\$	380.00	\$	107.67
Marissa Nardi	6/8/2018		revise FOF	0.20	\$	380.00		139.33
TVIAI 1554 TVAI AI	0,0,2010	Ransas	meet with E. Fowler re Kansas legal research on	0.57	Υ	300.00	<u> </u>	133.33
Marissa Nardi	6/8/2018	Kansas	deliberate indifference	0.47	\$	380.00	Ś	177.33
	0,0,000		30.000 man. 5. 6.100	• • • • • • • • • • • • • • • • • • • •	т	555.55	T	
			research re confidential individuals with knowledge					
Marissa Nardi	6/10/2018	Kansas	of KS foster care system for upcoming meetings	0.47	\$	380.00	\$	177.33
Marissa Nardi	6/11/2018	Kansas	correspond with co-counsel re legal research re SDP	0.08	\$	380.00	\$	31.67
Marissa Nardi	6/11/2018	Kansas	continue editing FOF	0.68	\$	380.00	\$	259.67
			discuss with H. Cherepon factual document review					
Marissa Nardi	6/12/2018	Kansas	and analysis	0.18	\$	380.00	\$	69.67
			email with I. Lustbader re key factual allegations					
Marissa Nardi	6/12/2018	Kansas	from FOF	0.20	\$	380.00	\$	76.00
			prepare for and meet with internal team re FOF and					
Marissa Nardi	6/12/2018	Kansas	case development	0.52	\$	380.00	\$	196.33
			correspond with V. Weber re policy research for					
Marissa Nardi	6/13/2018	Kansas	complaint drafting	0.25	\$	380.00	\$	95.00
			prepare for and lead Kansas co-counsel conference					
Marissa Nardi	6/13/2018		call	1.00	\$	380.00	\$	380.00
Marissa Nardi	6/15/2018	Kansas	correspond with L. Welch re FOF	0.13	\$	380.00	\$	50.67
	- 4 4		meet and discuss with E. McGuiness Kansas FOF,					
Marissa Nardi	6/15/2018	Kansas	research tasks, and strategy	0.47	\$	380.00	\$	177.33
	- / - /		Lead internal CR team meeting re Kansas		_			
Marissa Nardi	6/15/2018	Kansas	investigation and projects	1.00	\$	380.00	\$	380.00
	6/10/0010		meet with E. Fowler re deliberate indifference legal			222.22		
Marissa Nardi	6/19/2018	Kansas	research	0.50	\$	380.00	\$	190.00
NA - da - N - U	6/20/2012	1/	correspond with co-counsel re upcoming group call	0.00		202.22		445.65
Marissa Nardi	6/20/2018	Kansas	and strategy	0.38	\$	380.00	\$	145.67
NA - da - N - U	6/20/2012	1/	participate in Kansas co-counsel team call re	4 00	4	202.22		E00.00
Marissa Nardi	6/20/2018	Kansas	complaint and stakeholder strategy	1.32	\$	380.00	\$	500.33

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			meet with paralegal H. Cherepon re fact			
Marissa Nardi	6/21/2018	Kansas	development as to deliberate indifference	1.00	\$ 380.00	\$ 380.00
			Meet with external co-counsel team re complaint			
			drafting and investigatory meetings with individuals			
Marissa Nardi	6/25/2018	Kansas	on the group	1.42	\$ 380.00	\$ 538.33
Marissa Nardi	6/25/2018	Kansas	conduct legal research re EPSDT	3.92	\$ 380.00	\$ 1,488.33
Marissa Nardi	6/27/2018	Kansas	Strategy conference call with co-counsel team	0.25	\$ 380.00	\$ 95.00
Marissa Nardi	6/29/2018	Kansas	continue conducting legal research re EPSDT COA	2.15	\$ 380.00	\$ 817.00
Marissa Nardi	7/1/2018	Kansas	conduct EPSDT research	4.07	\$ 380.00	\$ 1,545.33
Marissa Nardi	7/2/2018	Kansas	add additional factual research into FOF	0.80	\$ 380.00	\$ 304.00
			Draft written summary of EPSDT research for			
Marissa Nardi	7/2/2018	Kansas	circulation to team	0.88	\$ 380.00	\$ 335.67
Marissa Nardi	7/3/2018	Kansas	Advise E. Fowler re legal research re SDP	0.25	\$ 380.00	\$ 95.00
Marissa Nardi	7/3/2018	Kansas	Discuss key updates to FOF with internal team	0.42	\$ 380.00	\$ 158.33
			Review new fact documents re ESPDT to incorporate			
Marissa Nardi	7/3/2018	Kansas	into FOF	0.92	\$ 380.00	\$ 348.33
Marissa Nardi	7/17/2018	Kansas	correspond with team re edits to FOF	0.13	\$ 380.00	\$ 50.67
			follow up from KS team meeting re local KS youth			
Marissa Nardi	7/18/2018	Kansas	advocate contacts	0.17	\$ 380.00	\$ 63.33
Marissa Nardi	7/18/2018	Kansas	prepare for team meeting	0.17	\$ 380.00	\$ 63.33
			participate in Kansas external co-counsel team			
Marissa Nardi	7/18/2018	Kansas	meeting re complaint drafting and new facts	0.92	\$ 380.00	\$ 348.33
			correspond with team re setting up call w B.			
			Magnuson at Kansas Appleseed re potential			
Marissa Nardi	7/19/2018	Kansas	collaboration	0.22	\$ 380.00	\$ 82.33
			correspond with team re call with Kansas Appleseed			
Marissa Nardi	7/23/2018	Kansas	and next steps re co-counseling	0.17	\$ 380.00	\$ 63.33
			participate in call with Kansas Appleseed re factual			
Marissa Nardi	7/24/2018	Kansas	development and potential collaboration	1.00	\$ 380.00	\$ 380.00

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Marissa Nardi	7/25/2018	Kansas	follow-up correspondence with Kansas Appleseed	0.17	\$	380.00	¢	63.33
IVIAI133a IVAI GI	7/23/2018	Kalisas	Tollow-up correspondence with Kalisas Appleseed	0.17	٠,	360.00	٠,	03.33
			review new factual documents from KS foster care					
Marissa Nardi	7/25/2018	Kansas	news monitoring for incorporation into FOF	0.75	\$	380.00	\$	285.00
	1,20,2020		correspond with co-counsel team re next steps re				т	
Marissa Nardi	7/26/2018	Kansas	Kansas Appleseed collaboration	0.17	\$	380.00	\$	63.33
			review new factual documents re deliberate		<u> </u>		•	
Marissa Nardi	7/28/2018	Kansas	indifference to incorporate into FOF	1.37	\$	380.00	\$	519.33
Marissa Nardi	7/29/2018	Kansas	Edit FOF section re mental health care	0.75	\$	380.00	\$	285.00
Marissa Nardi	7/31/2018	Kansas	prepare draft retainer agreement	0.30	\$	380.00	\$	114.00
			participate in team external co-counsel agreement re					
Marissa Nardi	7/31/2018	Kansas	FOF, complaint drafting, and collaboration	0.33	\$	380.00	\$	126.67
Marissa Nardi	8/1/2018	Kansas	participate in follow-up call with B. Magnuson	1.08	\$	380.00	\$	411.67
			discuss latest interviews with foster parents with Erin					
Marissa Nardi	8/6/2018	Kansas	McGuinness	0.22	\$	380.00	\$	82.33
			correspond with D. Adamek, I. Lustbader, and E.					
Marissa Nardi	8/6/2018	Kansas	McGuinness re FOF	0.22	\$	380.00	\$	82.33
			correspond with I. Lustbader, P. Juneja, and E.					
Marissa Nardi	8/6/2018	Kansas	McGuiness re review of FOF	0.50	\$	380.00	\$	190.00
			review contact memorandum from recent meeting					
Marissa Nardi	8/6/2018		with foster parent	0.63	•	380.00		240.67
Marissa Nardi	8/7/2018	Kansas	edit and supervise updates to finding of fact	0.87	\$	380.00	\$	329.33
	0/7/0010	.,						
Marissa Nardi	8/7/2018	Kansas	review EPSDT legal research re private right of action	0.87	\$	380.00	Ş	329.33
Marissa Nardi	8/7/2018	Kansas	Edit FOF section re missing foster youth	1.33	\$	380.00	\$	506.67
	=, , 10=0		Review recent contact memos in preparation for		•			
Marissa Nardi	8/8/2018	Kansas	Kansas team meeting	0.22	\$	380.00	\$	82.33

			review updated draft memo by E. Fowler re EPSDT					
Marissa Nardi	8/8/2018	Kansas	pleading requirements	0.55	\$	380.00	\$	209.00
			help lead Kansas co-counsel team meeting re					
			complaint drafting and fact updates from					
			investigation (and time reflects needing to leave the					
Marissa Nardi	8/8/2018	Kansas	meeting early)	0.87	\$	380.00	\$	329.33
Marissa Nardi	8/8/2018	Kansas	Edit FOF section re missing foster youth	1.03	\$	380.00	\$	392.67
Marissa Nardi	8/10/2018	Kansas	Edit new 8-10 version of FOF	1.33	\$	380.00	\$	506.67
Marissa Nardi	8/10/2018	Kansas	Edit draft EPSDT legal research memo by E. Fowler	1.57	\$	380.00	\$	595.33
Marissa Nardi	8/13/2018	Vancas	correspond with L. Welch re B. Magnuson contact	0.08	\$	380.00	ć	31.67
IVId1155d IVd1UI	6/13/2016	Natisas	Discuss call with I. Lustbader re co-counsel and	0.08	Ą	360.00	ې	31.07
Marissa Nardi	0/12/2010	Vancas		0.12	\$	380.00	\$	44.33
Marissa Narui	8/13/2018	Karisas	strategy	0.12	Ş	380.00	Ş	44.33
Maricca Nardi	0/15/2010	Vancas	meeting with D. Adamek and E. McGuinness re factual research for complaint EPSDT COA	0.30	\$	380.00	۲	114.00
Marissa Nardi	8/15/2018	Karisas	factual research for complaint EPSDT COA	0.30	Ş	380.00	Þ	114.00
Marissa Nardi	8/15/2018	Kansas	review updated EPSDT memo by E. Fowler	0.48	\$	380.00	\$	183.67
			participate in external co-counsel team meeting re					
			factual investigation updates, co-counsel					
Marissa Nardi	8/15/2018	Kansas	partnerships, and complaint drafting	0.98	\$	380.00	\$	373.67
			Discuss follow-up with internal CR team re tasks					
Marissa Nardi	8/16/2018	Kansas	from Kansas call	0.33	\$	380.00	\$	126.67
			correspond with E. McGuinness and D. Adamek re					
Marissa Nardi	8/20/2018	Kansas	FOF and contact memos	0.25	\$	380.00	\$	95.00
			correspond with S. Dixon and E. McGuinness re					
Marissa Nardi	8/20/2018	Kansas	Kansas meetings with foster parent stakeholders	0.37	\$	380.00	Ś	139.33
Marissa Nardi	8/21/2018		discuss next steps re FOF with D. Adamek	0.08	\$	380.00		31.67
	3,21,2010	Namous	disease next steps for or with birrhainer	0.00	Υ	300.00	Υ	31.07
Marissa Nardi	8/21/2018	Kansas	discuss updates to FOF with I. Lustbader	0.25	\$	380.00	\$	95.00

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		Correspond with S. Dixon, team, and new contact re				
Marissa Nardi	8/22/2018 Kansas	potential next friend relationship	0.25	\$ 380.00	\$	95.00
		Begin legal analysis of EPSDT COAs in other foster				
Marissa Nardi	8/22/2018 Kansas	care and civil rights litigations	0.30	\$ 380.00	\$	114.00
Marissa Nardi	8/22/2018 Kansas	Edit FOF re EPSDT issues	0.45	\$ 380.00	\$	171.00
		help lead co-counsel team meeting re complaint				
Marissa Nardi	8/22/2018 Kansas	drafting and investigatory updates	0.93	\$ 380.00	\$	354.67
Marissa Nardi	8/24/2018 Kansas	correspond with F. Pitts re complaint drafting	0.23	\$ 380.00	\$	88.67
		meet with Ira, Freya, and Amanda re deliberate				
Marissa Nardi	8/27/2018 Kansas	indifference	1.20	\$ 380.00	\$	456.00
		prepare for and correspond with internal CR team re				
Marissa Nardi	8/28/2018 Kansas	Kansas external co-counsel meeting	0.30	\$ 380.00	\$	114.00
Marissa Nardi	8/28/2018 Kansas	participate in Kansas group call re complaint drafting	0.52	\$ 380.00	\$	196.33
Marissa Nardi	9/11/2018 Kansas	correspond with E. McGuinness re complaint drafting	0.10	\$ 380.00	\$	38.00
		meet with JK EMG and DA re legal, policy, and fact				
Marissa Nardi	9/12/2018 Kansas	research for complaint COAs	0.25	\$ 380.00	\$	95.00
		prepare for KS joint co-counsel call re complaint				
Marissa Nardi	9/13/2018 Kansas	drafting and investigation	0.25	\$ 380.00	\$	95.00
		meet with I. Lustbader and J. King re Kansas legal				
Marissa Nardi	9/14/2018 Kansas	research	0.50	\$ 380.00	\$	190.00
		read KS news articles with new info re foster care				
Marissa Nardi	9/18/2018 Kansas	grantees	0.42	\$ 380.00	\$	158.33
		review latest relevant news articles re KS foster care				
Marissa Nardi	10/1/2018 Kansas	system circulated by D. Adamek	0.17	\$ 380.00	\$	63.33
		correspond with D. Adamek re sourcing for draft				
Marissa Nardi	10/1/2018 Kansas	complaint	0.33	\$ 380.00	\$	126.67
Marissa Nardi	10/1/2018 Kansas	meeting with I. Lustbader re complaint drafting	1.00	\$ 380.00	Ş	380.00
		prepare for upcoming trip to Kansas re investigation				
Marissa Nardi	10/2/2018 Kansas	and complaint	0.32	\$ 380.00	\$	120.33

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		analyze research memorandum re 10th Circuit post-					
10/2/2018	Kansas	Walmart class certification standards	0.47	\$	380.00	\$	177.33
10/3/2018	Kansas	correspond with S. Dixon re foster parent research	0.17	\$	380.00	\$	63.33
10/3/2018	Kansas	review updated class certification legal research	0.25	\$	380.00	\$	95.00
10/3/2018	Kansas	analyze potential Next Friends (NFs) and Named Plaintiffs (NPs)	0.25	\$	380.00	\$	95.00
10/3/2018	Kansas	Advise E. McGuinness re research project on trauma- informed care for complaint drafting	0.33	\$	380.00	\$	126.67
10/3/2018	Kansas	participate in Kansas co-counsel meeting re complaint drafting and selecting NPs & NFs	1.00	\$	380.00	\$	380.00
10/5/2018	Kansas	correspond with internal team re stakeholder contact at disability advocacy group	0.08	\$	380.00	\$	31.67
10/7/2018	Kansas	prepare with I. Lustbader for stakeholder meeting with foster parent	0.57	\$	380.00	\$	215.33
10/9/2018	Kansas	participate in meeting with foster parent re KS foster care night to nights	1.00	\$	380.00	\$	380.00
10/9/2018	Kansas Travel	travel from home in NY to NY airport to KC airport to Kansas hotel for foster care investigation fact-finding and complaint drafting trip	3.12	\$	380.00	\$	1,184.33
10/10/2018	Kansas Travel	travel from KC to KC airport to NY airport to home in NY for foster care investigation fact-finding and complaint drafting trip	2.40	\$	380.00	\$	912.00
		prepare for meeting with co-counsel re updated stakeholder outreach, complaint drafting, and new facts	0.22	\$	380.00	\$	82.33
		participate in in-depth in-person meeting with co- counsel I. Lustbader, LBB, L. Welch, F. Pitts, and L. Rute re complaint drafting, including potential NPs and NFs, COAs, key allegations, and Defendants to		·		•	1,393.33
	10/3/2018 10/3/2018 10/3/2018 10/3/2018 10/5/2018 10/7/2018 10/9/2018 10/9/2018 10/10/2018	10/9/2018 Travel	10/3/2018 Kansas correspond with S. Dixon re foster parent research 10/3/2018 Kansas review updated class certification legal research analyze potential Next Friends (NFs) and Named Plaintiffs (NPs) Advise E. McGuinness re research project on trauma- informed care for complaint drafting participate in Kansas co-counsel meeting re complaint drafting and selecting NPs & NFs correspond with internal team re stakeholder contact at disability advocacy group prepare with I. Lustbader for stakeholder meeting with foster parent participate in meeting with foster parent re KS foster care night to nights  travel from home in NY to NY airport to KC airport to Kansas 10/9/2018 Travel Kansas 10/10/2018 Travel Kansas 10/10/2018 Kansas  10/10/2018 Kansas  10/10/2018 Kansas 10/10/2018 Kansas 10/10/2018 Kansas 10/10/2018 Kansas 10/10/2018 Kansas 10/10/2018 Kansas 10/10/2018 Kansas	10/3/2018 Kansas correspond with S. Dixon re foster parent research 10/3/2018 Kansas review updated class certification legal research 10/3/2018 Kansas review updated class certification legal research 10/3/2018 Kansas Plaintiffs (NPs) Advise E. McGuinness re research project on trauma- informed care for complaint drafting 0.33 participate in Kansas co-counsel meeting re complaint drafting and selecting NPs & NFs 1.00 correspond with internal team re stakeholder contact at disability advocacy group 0.08 prepare with I. Lustbader for stakeholder meeting with foster parent 0.57 participate in meeting with foster parent re KS foster care night to nights 10/9/2018 Kansas correspond with internal team re stakeholder meeting with foster parent 0.57 participate in meeting with foster parent re KS foster care night to nights 1.00  travel from home in NY to NY airport to KC airport to Kansas Antel for foster care investigation fact-finding and complaint drafting trip 10/9/2018 Travel complaint drafting trip 2.40 prepare for meeting with co-counsel re updated stakeholder outreach, complaint drafting, and new facts 0.22 participate in in-depth in-person meeting with co-counsel I. Lustbader, LBB, L. Welch, F. Pitts, and L. Rute re complaint drafting, including potential NPs and NFs, COAs, key allegations, and Defendants to	10/3/2018 Kansas review updated class certification legal research 0.25 \$ 10/3/2018 Kansas review updated class certification legal research 0.25 \$ 10/3/2018 Kansas Plaintiffs (NPs) 0.25 \$ Advise E. McGuinness re research project on traumainformed care for complaint drafting 0.33 \$ 10/3/2018 Kansas participate in Kansas co-counsel meeting re complaint drafting and selecting NPs & NFs 1.00 \$ 10/5/2018 Kansas complaint drafting and selecting NPs & NFs 1.00 \$ 10/5/2018 Kansas complaint drafting and selecting NPs & NFs 1.00 \$ 10/5/2018 Kansas complaint drafting and selecting NPs & NFs 1.00 \$ 10/7/2018 Kansas complaint drafting and selecting NPs & NFs 1.00 \$ 10/7/2018 Kansas complaint drafting and selecting NPs & NFs 1.00 \$ 10/7/2018 Kansas with foster parent pre stakeholder meeting with foster parent re KS foster care night to nights 1.00 \$ 10/9/2018 Kansas care night to nights 1.00 \$ 10/9/2018 Travel and complaint drafting trip 3.12 \$ 10/10/2018 Travel complaint drafting trip 2.40 \$ 10/10/2018 Kansas Prevent of the Complaint drafting trip 2.40 \$ 10/10/2018 Kansas Prevent of the Complaint drafting trip 2.40 \$ 10/10/2018 Kansas Plainting trip 2.40 \$ 10/	10/3/2018 Kansas correspond with S. Dixon re foster parent research 0.17 \$ 380.00  10/3/2018 Kansas review updated class certification legal research 0.25 \$ 380.00  analyze potential Next Friends (NFs) and Named  10/3/2018 Kansas Plaintiffs (NPs) 0.25 \$ 380.00  Advise E. McGuinness re research project on traumainformed care for complaint drafting 0.33 \$ 380.00  participate in Kansas co-counsel meeting re  10/3/2018 Kansas complaint drafting and selecting NPs & NFs 1.00 \$ 380.00  correspond with internal team re stakeholder  10/5/2018 Kansas contact at disability advocacy group 0.08 \$ 380.00  prepare with I. Lustbader for stakeholder meeting with foster parent participate in meeting with foster parent re KS foster  10/9/2018 Kansas care night to nights 1.00 \$ 380.00  travel from home in NY to NY airport to KC airport to Kansas hotel for foster care investigation fact-finding and complaint drafting trip 3.12 \$ 380.00  travel from KC to KC airport to NY airport to home in NY for foster care investigation fact-finding and complaint drafting trip 2.40 \$ 380.00  prepare for meeting with co-counsel re updated stakeholder outreach, complaint drafting, and new facts participate in in-depth in-person meeting with co-counsel I. Lustbader, LBB, L. Welch, F. Pitts, and L. Rute re complaint drafting, including potential NPs and NFs, COAs, key allegations, and Defendants to	10/3/2018 Kansas correspond with S. Dixon re foster parent research 0.17 \$ 380.00 \$ 10/3/2018 Kansas review updated class certification legal research 0.25 \$ 380.00 \$ analyze potential Next Friends (NFs) and Named 10/3/2018 Kansas Plaintiffs (NPs) 0.25 \$ 380.00 \$ 4 dvise E. McGuinness re research project on trauma-10/3/2018 Kansas informed care for complaint drafting re participate in Kansas co-counsel meeting re complaint drafting and selecting NPs & NFs 1.00 \$ 380.00 \$ correspond with internal team re stakeholder contact at disability advocacy group 0.08 \$ 380.00 \$ prepare with 1. Lustbader for stakeholder meeting with foster parent with foster parent re KS foster care night to nights 10/9/2018 Kansas Care night to nights 10/9/2018 Travel Care investigation fact-finding and complaint drafting trip 3.12 \$ 380.00 \$ prepare for meeting with foster care investigation fact-finding and complaint drafting trip 2.40 \$ 380.00 \$ prepare for meeting with co-counsel re updated stakeholder outreach, complaint drafting, and new facts and NFs, COAs, key allegations, and Defendants to

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			correspond with E. McGuinness re foster care				
Marissa Nardi	10/15/2018	Kansas	policies for complaint drafting	0.17	\$	380.00	\$ 63.33
			meet with external co-counsel team members re				
Marissa Nardi	10/16/2018	Kansas	complaint drafting and named plaintiffs	0.50	\$	380.00	\$ 190.00
			lead internal Kansas team meeting re complaint				
Marissa Nardi	10/17/2018	Kansas	drafting	1.00	\$	380.00	\$ 380.00
			participate in weekly KS co-counsel call re complaint				
Marissa Nardi	10/17/2018	Kansas	drafting	0.92	\$	380.00	\$ 348.33
			meeting w I. Lustbader and E. Hyne re complaint				
Marissa Nardi	10/18/2018	Kansas	drafting	0.55	\$	380.00	\$ 209.00
			correspond with I. Lustbader re factual support for				
Marissa Nardi	10/19/2018	Kansas	complaint	0.20	\$	380.00	\$ 76.00
			correspond with team re strategy re complaint				
Marissa Nardi	10/19/2018	Kansas	drafting	0.33	\$	380.00	\$ 126.67
			correspond with I. Lustbader re FOIA and CORA				
Marissa Nardi	10/22/2018	Kansas	research	0.32	\$	380.00	\$ 120.33
Marissa Nardi	10/23/2018	Kansas	meeting with internal team re complaint outline	0.50	\$	380.00	\$ 190.00
Marissa Nardi	10/24/2018	Kansas	prepare for co-counsel meeting re litigation strategy	0.38	\$	380.00	\$ 145.67
Marissa Nardi	10/25/2018	Kansas	begin writing NP sections of draft complaint	2.92	\$	380.00	\$ 1,108.33
Marissa Nardi	10/26/2018	Kansas	begin drafting complaint factual allegations section	8.18	\$	380.00	\$ 3,109.67
			continue drafting complaint factual allegation				
Marissa Nardi	10/27/2018	Kansas	sections	12.57	\$	380.00	\$ 4,775.33
			Advise J. King and E. McGuinness re their respective				
Marissa Nardi	10/29/2018	Kansas	complaint draft sections	1.37	\$	380.00	\$ 519.33
Marissa Nardi	10/29/2018	Kansas	draft complaint factual allegation sections	8.82	\$	380.00	\$ 3,350.33
Marissa Nardi	10/30/2018	Kansas	edit complaint sections by J. King	2.78	\$	380.00	\$ 1,057.67
Marissa Nardi	10/30/2018	Kansas	draft complaint factual allegation sections	5.25	\$	380.00	\$ 1,995.00
Marissa Nardi	11/2/2018	Kansas	correspond with team regarding complaint drafting	0.27	\$	380.00	\$ 101.33
Marissa Nardi	11/2/2018	Kansas	Closely analyze new potential sources for complaint	2.13	Ś	380.00	\$ 810.67

			correspond with internal Kansas team re EPSDT			
Marissa Nardi	11/5/2018	Kansas	research	0.20	\$ 380.00	\$ 76.00
			review contact memo from S. Dixon re new next			
Marissa Nardi	11/5/2018	Kansas	friends	0.32	\$ 380.00	\$ 120.33
Marissa Nardi	11/5/2018	Kansas	review draft Kansas complaint	0.85	\$ 380.00	\$ 323.00
Marissa Nardi	11/6/2018	Kansas	discuss Named Plaintiff strategy with S. Dixon	0.13	\$ 380.00	\$ 50.67
			discuss with F. Pitts re model complaint and			
Marissa Nardi	11/6/2018	Kansas	complaint strategy	0.25	\$ 380.00	\$ 95.00
			Correspond re Kansas potential new Governor as it			
Marissa Nardi	11/6/2018	Kansas	relates to naming Defendants in the complaint	0.80	\$ 380.00	\$ 304.00
Marissa Nardi	11/7/2018	Kansas	correspond with B. Magnuson re KORA request	0.10	\$ 380.00	\$ 38.00
			review current draft named plaintiff section of			
Marissa Nardi	11/7/2018	Kansas	complaint	0.17	\$ 380.00	\$ 63.33
Marissa Nardi	11/7/2018	Kansas	Circulate draft named plaintiff section to co-counsel	0.22	\$ 380.00	\$ 82.33
Marissa Nardi	11/7/2018	Kansas	discuss complaint sources with D. Adamek	0.33	\$ 380.00	\$ 126.67
Marissa Nardi	11/7/2018	Kansas	discuss FOIA/KORA with D. Adamek and I. Lustbader	0.40	\$ 380.00	\$ 152.00
			discuss with I. Lustbader and J. King substantive due			
Marissa Nardi	11/7/2018	Kansas	process research	0.45	\$ 380.00	\$ 171.00
			Advise D. Adamek on collecting sources for draft			
Marissa Nardi	11/7/2018	Kansas	complaint	0.50	\$ 380.00	\$ 190.00
			Edit current draft named plaintiff section of			
Marissa Nardi	11/7/2018	Kansas	complaint	0.58	\$ 380.00	\$ 221.67
			Participate in co-counsel call re updated draft of			
Marissa Nardi	11/7/2018	Kansas	complaint	1.00	\$ 380.00	\$ 380.00
			Begin researching substantive due process re night-			
Marissa Nardi	11/7/2018	Kansas	to-night placements	1.25	\$ 380.00	\$ 475.00
			discuss research project re substantive due process			
Marissa Nardi	11/8/2018	Kansas	with J. King and I. Lustbader	0.30	\$ 380.00	\$ 114.00
			edit draft Kansas complaint allegations re night-to-			
Marissa Nardi	11/8/2018	Kansas	night placements	0.78	\$ 380.00	\$ 297.67

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			meeting with D. Adamek, I. Lustbader, and E.			
Marissa Nardi	11/8/2018	Kansas	McGuinness re complaint drafting	0.88	\$ 380.00	\$ 335.67
			conduct legal research re substantive due process re			
Marissa Nardi	11/8/2018	Kansas	placements	1.92	\$ 380.00	\$ 728.33
			supervise D. Adamek in factual research for new			
Marissa Nardi	11/8/2018	Kansas	draft complaint allegations	0.80	\$ 380.00	\$ 304.00
Marissa Nardi	11/9/2018	Kansas	review redline of draft Kansas complaint	0.70	\$ 380.00	\$ 266.00
			analyze potential sources for draft complaint			
Marissa Nardi	11/9/2018	Kansas	allegations	1.28	\$ 380.00	\$ 487.67
			participate in Kansas team co-counsel meeting re			
Marissa Nardi	11/9/2018	Kansas	draft complaint and locating NPs	1.00	\$ 380.00	\$ 380.00
Marissa Nardi	11/9/2018	Kansas	edit draft complaint allegations	3.80	\$ 380.00	\$ 1,444.00
			draft memorandum analyzing night-to-night legal			
Marissa Nardi	11/9/2018	Kansas	research to inform complaint	3.85	\$ 380.00	\$ 1,463.00
Marissa Nardi	11/10/2018	Kansas	Discuss with CR Kansas team draft complaint	0.63	\$ 380.00	\$ 240.67
Marissa Nardi	11/10/2018	Kansas	Call with foster parent re night-to-nights	0.67	\$ 380.00	\$ 253.33
			Discuss and fill gaps in complaint with F. Pitts and D.			
Marissa Nardi	11/10/2018	Kansas	Adamek	3.13	\$ 380.00	\$ 1,190.67
Marissa Nardi	11/10/2018	Kansas	Edit draft complaint	8.32	\$ 380.00	\$ 3,160.33
Marissa Nardi	11/11/2018	Kansas	Supervise complaint allegation sourcing	1.32	\$ 380.00	\$ 500.33
Marissa Nardi	11/11/2018	Kansas	Edit updated draft complaint	8.73	\$ 380.00	\$ 3,318.67
			Prepare for Kansas co-counsel team call by reviewing			
Marissa Nardi	11/12/2018	Kansas	latest emails re NPs	0.32	\$ 380.00	\$ 120.33
			correspond with D. Adamek and I. Lustbader re			
Marissa Nardi	11/12/2018	Kansas	follow-up tasks for complaint	0.55	\$ 380.00	\$ 209.00
			attend part of Kansas co-counsel team call meeting			
Marissa Nardi	11/12/2018	Kansas	re NPs/NFs and complaint drafting (left early)	0.75	\$ 380.00	\$ 285.00
			review Sheila A. complaint documents to prepare			
Marissa Nardi	11/12/2018	Kansas	related complaint filings here	1.83	\$ 380.00	\$ 696.67
Marissa Nardi	11/12/2018	Kansas	edit draft complaint	6.07	\$ 380.00	\$ 2,305.33
Marissa Nardi	11/13/2018	Kansas	correspond with team re Senate Bill 367	0.27	\$ 380.00	\$ 101.33

Marissa Nardi	11/13/2018	Kansas	review new draft Named Plaintiff write-ups	0.48	\$	380.00	\$	183.67
			analyze Defendant's Facebook live video for					
Marissa Nardi	11/13/2018	Kansas	incorporation into the complaint	0.53	\$	380.00	\$	202.67
Marissa Nardi	11/13/2018	Kansas	edit draft legal research memo re night-to-nights	1.80	\$	380.00	¢	684.00
Marissa Nardi	11/13/2018		edit draft complaint COAs and introduction	7.57	\$	380.00	-	2,875.33
iviai issa ivai ui	11/13/2016	Nalisas	correspond with co-counsel L. Rute and I. Lustbader	7.37	٠	360.00	Ą	2,073.33
Marissa Nardi	11/14/2018	Kansas	re complaint filing plan	0.33	\$	380.00	\$	126.67
iviarissa ivarar	11/14/2010	Karisas	Discuss call with foster parent re night-to-night	0.55	٧	300.00	٠,	120.07
Marissa Nardi	11/14/2018	Kansas	placements	0.55	\$	380.00	\$	209.00
Marissa Nardi	11/14/2018	Kansas	Research local filing requirements specific to D. Kan.	0.82	\$	380.00	\$	310.33
Marissa Nardi	11/14/2018	Kansas	Edit draft complaint	1.00	\$	380.00	\$	380.00
			Participate in call with co-counsel re edits to draft					
Marissa Nardi	11/14/2018	Kansas	complaint	0.58	\$	380.00	\$	221.67
			Edit draft Kansas complaint sections re class and fact					
Marissa Nardi	11/14/2018	Kansas	allegations and Defendants	6.93	\$	380.00	\$	2,634.67
			correspond with E. Gretter re motion to use					
Marissa Nardi	11/15/2018	Kansas	pseudonyms	0.18	\$	380.00	\$	69.67
Marissa Nardi	11/15/2018	Kansas	call with internal teams re updated complaint draft	1.65	\$	380.00	Ś	627.00
Marissa Nardi	11/16/2018		Monitor news re Kansas foster care system	0.45	\$	380.00		171.00
Trianssa Tranai	11/10/2010	Ransas	Correspond with local KS law firm re complaint filing	0.15	Ψ	300.00	Ψ	1, 1,00
Marissa Nardi	11/16/2018	Kansas	and necessary summonses	1.55	\$	380.00	\$	589.00
Marissa Nardi	11/16/2018		Edit final complaint draft	6.27	\$	380.00	•	2,381.33
Marissa Nardi	11/18/2018		correspond with D. Adamek re summonses	0.10	\$	380.00	\$	38.00
			discuss preparation of annotated complaint with D.					
Marissa Nardi	11/19/2018	Kansas	Adamek	0.30	\$	380.00	\$	114.00
Marissa Nardi	11/19/2018	Kansas	meet with D. Adamek re service of summonses	0.50	\$	380.00	\$	190.00
Marissa Nardi	11/19/2018		finalize service of process with D. Adamek	0.92	\$	380.00	\$	348.33
Marissa Nardi	11/19/2018		discuss service of complaint with co-counsel	1.58	\$	380.00		601.67
IVIGI1330 INGLO	11, 13, 2018	Nations	alseass service of complaint with to counsel	1.50	٧	300.00	٠	001.07
Marissa Nardi	11/20/2018	Kansas	review J. King's legal research re D. Kan. and MTDs	0.32	\$	380.00	\$	120.33

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			discuss motion to use pseudonyms with co-counsel				
Marissa Nardi	11/20/2018	Kansas	team	0.40	\$ 380.00	\$	152.00
Marissa Nardi	11/20/2018	Kansas	prepare potential edits for first amended complaint	0.42	\$ 380.00	\$	158.33
Marissa Nardi	11/20/2018	Kansas	correspond with co-counsel re pro hac vice forms	0.47	\$ 380.00	\$	177.33
			discuss receipt of service with J. King, D. Adamek,				
Marissa Nardi	11/20/2018	Kansas	and I. Lustbader	0.55	\$ 380.00	•	209.00
Marissa Nardi	11/20/2018	Kansas	correspond with L. Rute re service via email	0.65	\$ 380.00	\$	247.00
			Advise D. Adamek on preparation on pro hac vice				
Marissa Nardi	11/20/2018	Kansas	forms	1.38	\$ 380.00	\$	525.67
Marissa Nardi	11/20/2018	Kansas	prepare detailed written plan for service of process	0.73	\$ 380.00	\$	278.67
Marissa Nardi	11/29/2018	Kansas	meeting with I. Lustbader re complaint follow-up	0.50	\$ 380.00	\$	190.00
Marissa Nardi	11/29/2018	Kansas	discuss receipts of service with D. Adamek and J. King	0.80	\$ 380.00	\$	304.00
			discuss return receipts for filing proof of service with				
Marissa Nardi	11/30/2018	Kansas	D. Adamek and J. King	0.78	\$ 380.00	•	297.67
Marissa Nardi	11/30/2018	Kansas	edit draft proof of service	0.85	\$ 380.00	\$	323.00
Marissa Nardi	12/3/2018	Kansas	discuss service of J. Colyer's summonses with D. Adamek	0.23	\$ 380.00	\$	88.67
Marissa Nardi	12/3/2018	Kansas	supervise D. Adamek re editing certificates of service	0.70	\$ 380.00	\$	266.00
Marissa Nardi	12/4/2018	Kansas	Edit proof of service for Def. Hummel	0.30	\$ 380.00	\$	114.00
			Advise D. Adamek and J. King re editing remaining				
Marissa Nardi	12/4/2018	Kansas	proofs of service	0.40	\$ 380.00	\$	152.00
			factual research re return receipt delivery for Def.				
Marissa Nardi	12/4/2018	Kansas	Hummel	0.53	\$ 380.00	\$	202.67
			meeting with I. Lustbader in preparation for				
Marissa Nardi	12/5/2018	Kansas	upcoming co-counsel call re litigation strategy	0.75	\$ 380.00	\$	285.00
			co-counsel meeting re complaint service, preparation				
Marissa Nardi	12/5/2018	Kansas	for first conference, and complaint amendments	1.42	\$ 380.00	\$	538.33

Marissa Nardi	12/6/2018	Kansas	review edited draft proofs of service	0.22	\$ 380.00	\$ 82.33
Marissa Nardi	12/6/2018		discuss AG's request for extension with co-counsel	0.30	 380.00	 114.00
Marissa Nardi	12/6/2018	Kansas	finalize proofs of service	0.60	\$ 380.00	 228.00
Marissa Nardi	12/11/2018	Kansas	discuss pro hac vice form for B. Magnuson	0.22	\$ 380.00	\$ 82.33
			participate in Kansas call meeting with co-counsel re			
Marissa Nardi	12/12/2018	Kansas	fact development	0.50	\$ 380.00	\$ 190.00
Marissa Nardi	12/18/2018	Kansas	edit draft litigation holds	0.22	\$ 380.00	\$ 82.33
			analyze legal research re KS motions for extension			
Marissa Nardi	1/2/2019	Kansas	with J. King	0.33	\$ 380.00	\$ 126.67
			analyze current draft response to Defendants'			
Marissa Nardi	1/2/2019	Kansas	request for an extension	0.42	\$ 380.00	\$ 158.33
			discuss legal research with I. Lustbader and J. King re			
Marissa Nardi	1/2/2019	Kansas	standard for granting extension	0.37	\$ 380.00	\$ 139.33
			correspond with team re strategy for response to			
Marissa Nardi	1/2/2019	Kansas	Defendants' motion for an extension	0.92	\$ 380.00	\$ 348.33
			attend weekly co-counsel team meeting re litigation			
Marissa Nardi	1/2/2019	Kansas	strategy	0.93	\$ 380.00	\$ 354.67
			prepare written analysis of Defendants' motion for			
			extension of time to file answer as it relates to our			
Marissa Nardi	1/3/2019	Kansas	draft opposition	0.43	\$ 380.00	\$ 164.67
			edit draft opposition to motion for extension of time			
Marissa Nardi	1/3/2019	Kansas	to file response to complaint	3.02	\$ 380.00	\$ 1,146.33
			Advise internal CR team on motion in opposition for			
Marissa Nardi	1/4/2019	Kansas	extension of time	0.55	\$ 380.00	\$ 209.00
Marissa Nardi	1/4/2019	Kansas	edit motion in opposition for extension of time	1.50	\$ 380.00	\$ 570.00
Marissa Nardi	1/8/2019	Kansas	read news article re KS foster care system	0.12	\$ 380.00	\$ 44.33
Marissa Nardi	1/8/2019	Kansas	draft discovery plan	0.43	\$ 380.00	\$ 164.67
Marissa Nardi	1/8/2019	Kansas	Review legal research re class certification strategy	0.48	\$ 380.00	\$ 183.67
			review email correspondence re KS foster care			
Marissa Nardi	1/9/2019	Kansas	placement	0.08	\$ 380.00	\$ 31.67

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			meeting with internal team to discuss case strategy					
Marissa Nardi	1/9/2019	Kansas	updates	0.08	\$	380.00	\$	31.67
			correspond with C. Connaughton re notes from joint					
Marissa Nardi	1/9/2019	Kansas	call with co-counsel re strategy for court conference	0.17	\$	380.00	\$	63.33
			Telephone call with call with I. Lustbader re strategy					
Marissa Nardi	1/9/2019	Kansas	for upcoming court conference	0.30	\$	380.00	\$	114.00
			attend weekly co-counsel telephonic meeting re					
			strategy for litigation and upcoming conference (and					
Marissa Nardi	1/9/2019	Kansas	left early)	0.38	\$	380.00	•	145.67
Marissa Nardi	1/10/2019	Kansas	Review revised litigation hold	0.18	\$	380.00	\$	69.67
Marissa Nardi	1/11/2019	Kansas	attend court conference re motion hearing	0.42	\$	380.00	\$	158.33
Marissa Nardi	1/15/2019	Kansas	Review updated litigation hold	0.13	\$	380.00	\$	50.67
			Discuss litigation hold considerations with internal					
Marissa Nardi	1/15/2019	Kansas	CR KS team	0.27	\$	380.00	\$	101.33
			debrief with internal CR KS team re next steps for					
Marissa Nardi	1/16/2019	Kansas	follow-up from litigation strategy call	0.08	\$	380.00	\$	31.67
Marissa Nardi	1/16/2019	Kansas	prepare for meeting re litigation strategy	0.12	\$	380.00	\$	44.33
			participate in Kansas weekly co-counsel team					
			telephonic meeting re litigation strategy, including					
Marissa Nardi	1/16/2019	Kansas	litigation hold and initial discovery	0.92	\$	380.00	\$	348.33
Marissa Nardi	1/18/2019	Kansas	Discuss notice of appearance for co-counsel	0.20	\$	380.00	\$	76.00
Marissa Nardi	1/23/2019	Kansas	attend team meeting re protective order	0.53	\$	380.00	\$	202.67
Marissa Nardi	1/30/2019	Kansas	attend co-counsel team call re initial discovery	0.38	\$	380.00	\$	145.67
Marissa Nardi	2/3/2019	Kansas	email with co-counsel re NP fact update	0.30	\$	380.00	\$	114.00
Marissa Nardi	2/7/2019	Kansas	review correspondence with opposing counsel re PO	0.17	\$	380.00	\$	63.33
Marissa Nardi	2/7/2019		discuss case strategy re PO with co-counsel	0.33	\$	380.00		126.67
Marissa Nardi	2/8/2019		attend draft settlement terms sheet meeting	1.50	\$	380.00	\$	570.00
Marissa Nardi	2/8/2019		edit draft settlement terms	2.85	\$	380.00	\$	1,083.00
IVIAII33a IVAI AI	2,0,2013	Railsas	review operative draft terms sheet for settlement	2.03	٧	300.00	٠,	1,000.00
Marissa Nardi	2/11/2019	Kansas	purposes	0.30	\$	380.00	\$	114.00
Marissa Nardi	2/11/2019		Edit draft terms sheet	0.83	\$	380.00	\$	316.67

			meeting with internal team to strategize and edit					
Marissa Nardi	2/11/2019	Kansas	substance of draft proposed settlement terms sheet	1.50	\$	380.00	\$	570.00
			review C. Connaughton's notes from KS Task Force					
Marissa Nardi	2/12/2019		Recommendations re fact issues in litigation	0.47		380.00		177.33
Marissa Nardi	2/12/2019	Kansas	read final KS task force recommendations	0.70	•	380.00	•	266.00
Marissa Nardi	2/13/2019	Kansas	edit draft terms sheet	0.62	\$	380.00	\$	234.33
Marissa Nardi	2/13/2019	Kansas	continue editing draft terms sheet	1.50	\$	380.00	\$	570.00
			meeting with co-counsel re case updates and					
Marissa Nardi	2/13/2019	Kansas	ongoing litigation strategy	1.38	\$	380.00	\$	525.67
Marissa Nardi	2/19/2019	Kansas	discuss co-counsel update with IL	0.12	\$	380.00	\$	44.33
Marissa Nardi	2/19/2019	Kansas	discuss NP updates with co-counsel team	0.47	\$	380.00	\$	177.33
Marissa Nardi	2/19/2019	Kansas	edit draft terms sheet	2.22	\$	380.00	\$	842.33
Marissa Nardi	2/20/2019	Kansas	prepare for team meeting	0.20	\$	380.00	\$	76.00
Marissa Nardi	2/20/2019	Kansas	discuss updated draft terms sheet with IL	0.30	\$	380.00	\$	114.00
Marissa Nardi	2/20/2019	Kansas	discuss updates re next friend with internal team	0.33	\$	380.00	\$	126.67
Marissa Nardi	2/20/2019	Kansas	review potential settlement documents	0.33	\$	380.00	\$	126.67
Marissa Nardi	2/20/2019	Kansas	discuss PO with EMG	0.42	\$	380.00	\$	158.33
			attend weekly co-counsel meeting re NP/NF updates					
Marissa Nardi	2/20/2019	Kansas	and discovery strategy	0.60	\$	380.00	\$	228.00
			discuss hearing transcript project with C.					
Marissa Nardi	2/25/2019	Kansas	Connaughton	0.25	\$	380.00	\$	95.00
			attend team meeting with co-counsel re discovery					
Marissa Nardi	2/27/2019	Kansas	and mediation strategy	1.00	\$	380.00	\$	380.00
Marissa Nardi	3/13/2019	Kansas	discuss acknowledgements with team	0.32	\$	380.00	\$	120.33
			discuss electronic document management system					
Marissa Nardi	3/13/2019	Kansas	with co-counsel	0.33	\$	380.00	\$	126.67
Marissa Nardi	3/13/2019		prepare for Kansas co-counsel call	0.37	•	380.00	\$	139.33
			analyze and share relevant caselaw with co-counsel		-		-	
Marissa Nardi	3/13/2019	Kansas	team	0.93	\$	380.00	\$	354.67

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Marissa Nardi	3/13/2019	Kansas	attend Kansas co-counsel meeting re discovery	0.83	\$ 380.00	\$	316.67
			prepare plans for document management system				
Marissa Nardi	3/18/2019	Kansas	with co-counsel	0.42	\$ 380.00	\$	158.33
			email team in preparation for upcoming co-counsel				
Marissa Nardi	3/19/2019	Kansas	meeting re case strategy	0.30	\$ 380.00		114.00
Marissa Nardi	3/19/2019	Kansas	prepare for meeting with co-counsel	0.27	\$ 380.00	\$	101.33
Marissa Nardi	3/19/2019	Kansas	analyze substantive due process claims	0.83	\$ 380.00	\$	316.67
Marissa Nardi	3/20/2019	Kansas	meet with internal Kansas team re case strategy	0.50	\$ 380.00	\$	190.00
			attend in-person co-counsel strategy meeting at DLA				
Marissa Nardi	3/20/2019	Kansas	office re discovery and MTD	3.00	\$ 380.00	\$	1,140.00
Marissa Nardi	3/21/2019	Kansas	internal CR legal research meeting re MTD	0.32	\$ 380.00	\$	120.33
Marissa Nardi	3/22/2019	Kansas	discuss SDP research with C. Connaughton and J. King	0.55	\$ 380.00	\$	209.00
Marissa Nardi	4/1/2019	Kansas	discuss electronic document storage with co-counsel	0.23	\$ 380.00	\$	88.67
			discuss recent news article re KS foster care system				
Marissa Nardi	4/1/2019		with D. Adamek	0.32	\$ 380.00	\$	120.33
Marissa Nardi	4/1/2019		review legislative post audit reports	0.40	\$ 380.00		152.00
Marissa Nardi	4/3/2019		email with clerk re filings	0.17	\$ 380.00		63.33
Marissa Nardi	4/3/2019	Kansas	discuss fact-gathering with CR co-counsel	0.28	\$ 380.00		107.67
Marissa Nardi	4/3/2019	Kansas	review latest correspondence re discovery	0.32	\$ 380.00	\$	120.33
Marissa Nardi	4/4/2019	Kansas	discuss document review coding palette with I. Lustbader	0.13	\$ 380.00	\$	50.67
Marissa Nardi	4/4/2019	Kansas	draft categories and list of tags for electronic document review of files produced by Defs thus far	1.15	\$ 380.00	Ś	437.00
	, ,		prepare for weekly call by reading relevant			<u> </u>	
Marissa Nardi	4/10/2019	Kansas	documents	0.27	\$ 380.00	\$	101.33
			Review discovery documents that discuss foster care				
Marissa Nardi	4/10/2019	Kansas	agency with I. Lustbader	0.33	\$ 380.00	\$	126.67
			attend weekly KS team meeting re discovery and				
Marissa Nardi	4/10/2019	Kansas	legal research	1.00	\$ 380.00	\$	380.00

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Marissa Nardi	4/11/2019	Kansas	review materials from Health Forward Fdtn	0.33	\$ 380.00	\$ 126.67
			prepare for team meeting by reviewing relevant			
Marissa Nardi	4/15/2019	Kansas	documents	0.22	\$ 380.00	\$ 82.33
			attend team meeting with co-counsel re litigation			
			strategy, including discovery and MTD and fact			
Marissa Nardi	4/15/2019	Kansas	updates from stakeholders	1.00	\$ 380.00	\$ 380.00
			discuss legal research re initial disclosures with J.			
Marissa Nardi	4/26/2019	Kansas	King	0.25	\$ 380.00	\$ 95.00
Marissa Nardi	4/26/2019	Kansas	review recent filings	0.33	\$ 380.00	\$ 126.67
			attend 30 minutes of KS weekly co-counsel meeting			
Marissa Nardi	5/22/2019	Kansas	re investigation, terms sheet (needed to leave early)	0.50	\$ 380.00	\$ 190.00
Marissa Nardi	6/20/2019	Kansas	discuss Kansas court conference with IL	0.50	\$ 380.00	\$ 190.00
Marissa Nardi	6/21/2019	Kansas	edit discovery schedule	0.83	\$ 380.00	\$ 316.67
			Telephone call with IL to discuss upcoming KS			
Marissa Nardi	6/24/2019	Kansas	discovery projects	0.50	\$ 380.00	\$ 190.00
Marissa Nardi	6/25/2019	Kansas	review redline of initial disclosures	0.40	\$ 380.00	\$ 152.00
Marissa Nardi	6/26/2019	Kansas	edit initial disclosures	0.75	\$ 380.00	\$ 285.00
			participate in KS co-counsel group meeting re			
			discovery strategy, including initial disclosures and			
Marissa Nardi	6/26/2019	Kansas	rule 26 M&C	1.00	\$ 380.00	\$ 380.00
			meet with external co-counsel in KS in preparation			
Marissa Nardi	6/26/2019	Kansas	for 26f	1.00	\$ 380.00	\$ 380.00
			email with F. Pitts re preparation for discovery			
Marissa Nardi	6/27/2019	Kansas	conference	0.63	\$ 380.00	\$ 240.67
			participate in rule 26 meet and confer with opposing			
Marissa Nardi	6/27/2019	Kansas	counsel	2.00	\$ 380.00	\$ 760.00
Marissa Nardi	6/27/2019	Kansas	prepare for 26(f) conference	1.67	\$ 380.00	\$ 633.33
			strategy session with co-counsel LBB & TW in			
Marissa Nardi	6/27/2019	Kansas	preparation for 26f	2.00	\$ 380.00	\$ 760.00
Marissa Nardi	6/28/2019	Kansas	meeting to discuss and analyze 26f conference	1.50	\$ 380.00	\$ 570.00
Marissa Nardi	7/2/2019	Kansas	discuss litigation schedule with JK and CG	0.13	\$ 380.00	\$ 50.67
Marissa Nardi	7/3/2019	Kansas	discuss litigation schedule with CG	0.17	\$ 380.00	\$ 63.33

Marissa Nardi	7/3/2019		follow-up with external co-counsel re rule 26 M&C	0.40	\$ 380.00	\$	152.00
		Kansas	travel from NY to Kansas City for purposes of				
Marissa Nardi	7/7/2019		appearing at 26(f) conference	3.25	\$ 380.00	\$	1,235.00
		Kansas					
Marissa Nardi	7/8/2019		travel from KS to NYC from 26f conference in KS	3.50	\$ 380.00	•	1,330.00
Marissa Nardi	7/9/2019	Kansas	discuss appearances with team	0.22	\$ 380.00		82.33
Marissa Nardi	7/10/2019	Kansas	prepare for KS group mtg	0.33	\$ 380.00	\$	126.67
Marissa Nardi	7/12/2019	Kansas	discuss potential mediators w/ IL & CC	0.23	\$ 380.00	\$	88.67
Marissa Nardi	7/12/2019	Kansas	prepare internal CR plan for NP document review	0.33	\$ 380.00	\$	126.67
			email with internal CR team re electronic review of				
Marissa Nardi	7/12/2019	Kansas	documents produced by Defs in discovery	0.33	\$ 380.00	\$	126.67
			participate in KS team mtg re mediation and				
			litigation strategy, including depositions and				
Marissa Nardi	7/12/2019		discovery conference	1.00	\$ 380.00	_ '	380.00
Marissa Nardi	7/16/2019		discuss 30b6 strategy with internal CR KS team	0.23	\$ 380.00		88.67
Marissa Nardi	7/16/2019	Kansas	review draft 30b6 deposition notice	0.40	\$ 380.00		152.00
Marissa Nardi	7/17/2019	Kansas	edit draft 30b6 notice	0.62	\$ 380.00	\$	234.33
			attend KS co-counsel meeting with external team re				
Marissa Nardi	7/17/2019	Kansas	discovery and mediation strategy	0.88	\$ 380.00	\$	335.67
Marissa Nardi	7/23/2019	Kansas	email re upcoming court deadlines with CC and DA	0.17	\$ 380.00	\$	63.33
Marissa Nardi	7/23/2019	Kansas	email w/ external co-counsel re discovery schedule	0.22	\$ 380.00	\$	82.33
Marissa Nardi	7/23/2019	Kansas	discuss w/ IL draft email to opposing counsel	0.23	\$ 380.00	\$	88.67
			email external co-counsel team re editing draft				
Marissa Nardi	7/24/2019	Kansas	subpoena	0.17	\$ 380.00	\$	63.33
			prepare for KS external co-counsel call by reviewing				
Marissa Nardi	7/24/2019		recent team correspondence re discovery	0.23	 380.00	•	88.67
Marissa Nardi	7/24/2019	Kansas	review draft subpoena	0.67	\$ 380.00	\$	253.33

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			attend KS external co-counsel team meeting re			
			discovery strategy, including document review and			
Marissa Nardi	7/24/2019	Kansas	MTD	0.72	\$ 380.00	\$ 272.33
			Telephone call w/ NCYL re electronic document			
			review of files produced by Defendants as part of			
Marissa Nardi	7/26/2019	Kansas	discovery	0.75	\$ 380.00	\$ 285.00
Marissa Nardi	7/29/2019	Kansas	discuss with IL review of NP files produced by Defs	0.20	\$ 380.00	\$ 76.00
			email internal CR team re forthcoming review by			
Marissa Nardi	7/29/2019	Kansas	internal team of select NP files	0.42	\$ 380.00	\$ 158.33
Marissa Nardi	7/29/2019	Kansas	discuss doc review of NP files with JK, DA & CC	0.43	\$ 380.00	\$ 164.67
			review DLA chart with comparison between			
Marissa Nardi	7/29/2019	Kansas	proposals	0.80	\$ 380.00	\$ 304.00
			draft updated litigation plan for all co-counsel KS			
Marissa Nardi	7/29/2019	Kansas	case teams	1.68	\$ 380.00	\$ 639.67
Marissa Nardi	7/30/2019	Kansas	email w/ IL re draft litigation plan	0.10	\$ 380.00	\$ 38.00
Marissa Nardi	7/30/2019	Kansas	email with internal team re edits to draft subpoena	0.17	\$ 380.00	\$ 63.33
			email with CC DA JK and CC re document review of			
Marissa Nardi	7/30/2019	Kansas	NP files	0.25	\$ 380.00	\$ 95.00
			email with CR co-counsel re edits to DLA draft			
Marissa Nardi	7/30/2019	Kansas	subpoena	0.30	\$ 380.00	\$ 114.00
Marissa Nardi	7/30/2019	Kansas	discuss potential discovery addition with IL	0.33	\$ 380.00	\$ 126.67
Marissa Nardi	7/30/2019	Kansas	discuss relativity NP review with internal team	0.42	\$ 380.00	\$ 158.33
Marissa Nardi	7/30/2019	Kansas	edit written draft litigation plan	0.77	\$ 380.00	\$ 291.33
Marissa Nardi	7/30/2019	Kansas	edit DLA's draft subpoena	1.17	\$ 380.00	\$ 443.33
Marissa Nardi	7/31/2019	Kansas	discuss follow-up from mtg with internal CR KS team	0.10	\$ 380.00	\$ 38.00
Marissa Nardi	7/31/2019	Kansas	edit litigation plan document	0.28	\$ 380.00	\$ 107.67
			attend co-counsel weekly call with external co-			
			counsel re litigation strategy, including updated			
			litigation plan and document review of files			
Marissa Nardi	7/31/2019	Kansas	produced by Defs	0.67	\$ 380.00	\$ 253.33

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Marissa Nardi	8/12/2019	Kansas	review recent correspondence re NP file review	0.13	 380.00		50.67
Marissa Nardi	8/12/2019	Kansas	email with NCYL re doc review protocol	0.12	\$ 380.00	\$	44.33
Marissa Nardi	8/12/2019	Kansas	draft email to co-counsel re discovery letters	0.27	\$ 380.00	\$	101.33
			discuss news monitoring re KS foster care system				
Marissa Nardi	8/12/2019	Kansas	with DA, CC, and IL	0.30	\$ 380.00	•	114.00
Marissa Nardi	8/12/2019	Kansas	discuss discovery letters with IL and CG	0.35	\$ 380.00	•	133.00
Marissa Nardi	8/12/2019	Kansas	meet with IL re case strategy	0.75	\$ 380.00	\$	285.00
Marissa Nardi	8/12/2019	Kansas	edit KS doc review protocol	0.75	\$ 380.00	\$	285.00
			Analyze CG's summary of subset of discovery				
Marissa Nardi	8/12/2019	Kansas	produced by Defs	0.85	\$ 380.00	\$	323.00
Marissa Nardi	8/13/2019	Kansas	Email with IL re litigation strategy	0.42	\$ 380.00	\$	158.33
			Analyze mediation strategy with IL in light of court				
Marissa Nardi	8/13/2019	Kansas	order	0.50	\$ 380.00	\$	190.00
			edit draft addition to complaint for amended				
Marissa Nardi	8/13/2019	Kansas	complaint	0.83	\$ 380.00	\$	316.67
			meet with NCYL and DLA discovery subcommittee re				
Marissa Nardi	8/14/2019	Kansas	NP document review	1.00	\$ 380.00	\$	380.00
			participate in team meeting re litigation and				
			mediation strategy, including review of files				
Marissa Nardi	8/14/2019	Kansas	produced by Defs	0.75	\$ 380.00	\$	285.00
			discussion with JK, DA, CC, and CG re CR NP file				
Marissa Nardi	8/19/2019	Kansas	review	0.30	\$ 380.00	\$	114.00
Marissa Nardi	8/21/2019	Kansas	discuss mediation strategy with IL	0.50	\$ 380.00	\$	190.00
Marissa Nardi	8/21/2019	Kansas	edit discovery document maintenance protocol	0.50	\$ 380.00	\$	190.00
			participate in KS co-counsel team meeting re				
Marissa Nardi	8/21/2019	Kansas	litigation and mediation strategies	0.75	\$ 380.00	\$	285.00
Marissa Nardi	8/23/2019	Kansas	meeting with IL and JK re mediation statement	0.50	\$ 380.00	\$	190.00
Marissa Nardi	8/30/2019	Kansas	analyze draft sections of mediation statement by JK	1.30	\$ 380.00	\$	494.00
Marissa Nardi	9/3/2019	Kansas	edit draft mediation statement sections	6.38	\$ 380.00	\$	2,425.67

			meeting with external co-counsel team re discovery					
Marissa Nardi	9/4/2019	Kansas	strategy and updates	0.92	\$	380.00	\$	348.33
Marissa Nardi	9/4/2019	Kansas	draft new sections of mediation statement	9.63	\$	380.00	\$	3,660.67
Marissa Nardi	9/5/2019	Kansas	Discuss fact discovery deadlines with internal team	0.17	\$	380.00	\$	63.33
Marissa Nardi	9/5/2019		Edit draft mediation statement	2.93	\$	380.00	-	1,114.67
Marissa Nardi	9/7/2019		Discuss edits to mediation statement with IL	0.18	\$	380.00		69.67
Marissa Nardi	9/8/2019	Kansas	Edit draft mediation statement	4.67	\$	380.00	\$	1,773.33
			Telephone call with DA re Defendants' general					
Marissa Nardi	9/9/2019	Kansas	discovery rolling production	0.17	\$	380.00	\$	63.33
Marissa Nardi	9/9/2019	Kansas	Meeting with JK and IL re draft mediation statement	0.25	\$	380.00	\$	95.00
			Electronic mail to internal CR team re drafting					
Marissa Nardi	9/9/2019	Kansas	mediation statement	0.47	\$	380.00	\$	177.33
			Edit draft mediation statement for circulation to co-					
Marissa Nardi	9/9/2019	Kansas	counsel	7.87	\$	380.00	\$	2,989.33
			Edit draft mediation statement based on suggestions					
Marissa Nardi	9/10/2019	Kansas	by co-counsel	0.63	\$	380.00	\$	240.67
			Continue editing draft mediation statement based on					
Marissa Nardi	9/10/2019	Kansas	suggestions by co-counsel	2.80	\$	380.00	\$	1,064.00
			Discuss Kid Zones fact issue noted in Defendants'					
Marissa Nardi	9/11/2019		discovery with DA	0.10	\$	380.00	\$	38.00
Marissa Nardi	9/11/2019	Kansas	Discuss document review of NPs with DA	0.17	\$	380.00	\$	63.33
			Electronic mail with internal team re finalizing					
Marissa Nardi	9/11/2019	Kansas	mediation statement draft	0.17	\$	380.00	\$	63.33
			discussion with external co-counsel and internal					
			team re litigation strategy and mediation strategy,					
Marissa Nardi	9/11/2019	Kansas	including draft mediation statement	0.80	\$	380.00	\$	304.00
			Read documents in Named Plaintiff files produced by					
Marissa Nardi	9/11/2019	Kansas	Defendants that reference Kid Zones	1.00	\$	380.00	\$	380.00
	, , ,		Electronic mail with external co-counsel re mediation		•		•	
Marissa Nardi	9/12/2019	Kansas	statement draft editing	0.22	\$	380.00	\$	82.33

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			discussion with CG re document review of			
Marissa Nardi	9/12/2019	Kansas	Defendants' general discovery	0.33	\$ 380.00	\$ 126.67
Marissa Nardi	9/12/2019	Kansas	meeting with IL re case strategy re mediation	0.67	\$ 380.00	\$ 253.33
			Electronic mail with CC re follow-up research re			
Marissa Nardi	9/16/2019	Kansas	psychologist stakeholder	0.27	\$ 380.00	\$ 101.33
			Discuss Named Plaintiff document review fact			
Marissa Nardi	9/16/2019	Kansas	updates with internal team	0.30	\$ 380.00	\$ 114.00
			Electronic mail with internal team re draft mediation			
Marissa Nardi	9/16/2019	Kansas	statement	0.33	\$ 380.00	\$ 126.67
Marissa Nardi	9/16/2019	Kansas	Edit draft mediation statement	2.48	\$ 380.00	\$ 943.67
			Review tracked changes by co-counsel on draft			
Marissa Nardi	9/17/2019	Kansas	mediation statement	0.38	\$ 380.00	\$ 145.67
Marissa Nardi	9/17/2019	Kansas	Edit draft mediation statement	1.52	\$ 380.00	\$ 576.33
Marissa Nardi	9/17/2019	Kansas	Continue editing draft mediation statement	5.82	\$ 380.00	\$ 2,210.33
Marissa Nardi	9/18/2019	Kansas	Review litigation hold letters	0.25	\$ 380.00	95.00
Marissa Nardi	9/18/2019	Kansas	Prepare for meeting with external co-counsel	0.33	\$ 380.00	\$ 126.67
Marissa Nardi	9/18/2019	Kansas	Discuss potential expert with internal team	0.33	\$ 380.00	\$ 126.67
			Discuss finalizing mediation statement with internal			
Marissa Nardi	9/18/2019	Kansas	team	0.33	\$ 380.00	\$ 126.67
Marissa Nardi	9/18/2019	Kansas	Discuss next steps re discovery efforts with IL	0.47	\$ 380.00	\$ 177.33
			Discussion with internal team re ongoing NP			
Marissa Nardi	9/18/2019	Kansas	document review	0.43	\$ 380.00	\$ 164.67
Marissa Nardi	9/18/2019	Kansas	Analyze correspondence with Defs re discovery	0.57	\$ 380.00	\$ 215.33
			Analyze draft spreadsheet of key litigation			
Marissa Nardi	9/18/2019	Kansas	stakeholder contacts	0.97	\$ 380.00	\$ 367.33
			Attend strategy meeting with external co-counsel re			
Marissa Nardi	9/18/2019		litigation and mediation strategies	1.00	\$ 380.00	 380.00
Marissa Nardi	9/18/2019	Kansas	Edit draft mediation statement	2.93	\$ 380.00	\$ 1,114.67
			prepare talking points for Medicaid call with			
Marissa Nardi	9/23/2019		Medicaid expert	0.67	\$ 380.00	\$ 253.33
Marissa Nardi	9/23/2019	Kansas	call w/ Medicaid expert re ESPDT COA	1.50	\$ 380.00	\$ 570.00
Marissa Nardi	10/1/2019	Kansas	Discuss discovery letter with NCYL	0.22	\$ 380.00	\$ 82.33
Marissa Nardi	10/1/2019	Kansas	Discuss protective order with internal team	0.23	\$ 380.00	\$ 88.67

			Prepare for Kansas co-counsel team meeting by					
Marissa Nardi	10/1/2019	Kansas	reviewing updated discovery protocol	0.32	\$	380.00	\$	120.33
Marissa Nardi	10/1/2019	Kansas	Draft email to mediator	0.32	\$	380.00	\$	120.33
Marissa Nardi	10/1/2019	Kansas	Advise internal team re NP document review	0.47	\$	380.00	\$	177.33
			Meeting with external co-counsel team in					
Marissa Nardi	10/1/2019	Kansas	preparation for M&C re discovery	0.25	\$	380.00	\$	95.00
Marissa Nardi	10/1/2019	Kansas	Edit discovery letter	0.65	\$	380.00	\$	247.00
Marissa Nardi	10/2/2019	Kansas	Review first draft summaries of NP file review	0.90	\$	380.00	\$	342.00
			Meeting with external co-counsel team re litigation					
			and mediation strategies, including document review					
Marissa Nardi	10/2/2019	Kansas	and mediation statements	0.97	\$	380.00	\$	367.33
Marissa Nardi	10/3/2019	Kansas	Discuss mediation with IL	0.17	\$	380.00	\$	63.33
			Calculate discovery deadlines under FRCP to advise					
Marissa Nardi	10/3/2019	Kansas	team accordingly	0.33	\$	380.00	\$	126.67
			Discuss review of Named Plaintiff files with CR and					
Marissa Nardi	10/4/2019	Kansas	NCYL team	0.30	\$	380.00	\$	114.00
			Prepare for discovery strategy meeting with DLA					
Marissa Nardi	10/4/2019	Kansas	Piper	0.47	\$	380.00	\$	177.33
			Discuss with internal CR team updated discovery				_	
Marissa Nardi	10/4/2019	Kansas	strategy that developed from mtg with DLA	0.80	\$	380.00	Ş	304.00
			Analyze notes from strategy call re similar litigations					
Marissa Nardi	10/7/2019	Kansas	to discuss with IL	0.28	\$	380.00	\$	107.67
			Prepare for meetings with expert re brain science					
Marissa Nardi	10/7/2019		and child development	0.33	\$			126.67
Marissa Nardi	10/7/2019	Kansas	Prepare for mediation call with Kevin Ryan	0.77	\$	380.00	\$	291.33
_			Discuss meetings with experts with external co-					
Marissa Nardi	10/7/2019	Kansas	counsel	0.80	\$	380.00	\$	304.00
Marissa Nardi	10/7/2019	Kansas	Review hot documents from ongoing NP file review	0.88	\$	380.00	\$	335.67
	-,-,====		Prepare for strategy call re mediation and discovery	3.30	•			
Marissa Nardi	10/7/2019	Kansas	in similar litigation	1.00	\$	380.00	\$	380.00
	, , -			_	<u> </u>		•	
Marissa Nardi	10/7/2019	Kansas	Discuss Kansas litigation strategy with IL	1.00	\$	380.00	\$	380.00

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Marissa Nardi	10/7/2019	Kansas	Prepare for mediation ex parte call with mediator	1.62	\$ 380.00	\$	614.33
			Prepare for ex parte call with mediator by reviewing				
Marissa Nardi	10/8/2019	Kansas	mediation materials	0.83	\$ 380.00	\$	316.67
			Prepare for Kansas co-counsel team meeting by				
			reviewing correspondence and notes from call with				
Marissa Nardi	10/9/2019		mediator	0.30	\$ 380.00	\$	114.00
Marissa Nardi	10/9/2019	Kansas	Prepare for meeting with potential experts	0.37	\$ 380.00	\$	139.33
			Strategy mtg with external Kansas co-counsel team				
Marissa Nardi	10/9/2019	Kansas	re discovery efforts	0.70	\$ 380.00	\$	266.00
			Review model settlement agreements for circulation				
Marissa Nardi	10/9/2019	Kansas	to team	1.28	\$ 380.00	\$	487.67
			Discuss with NCYL electronic document review of				
Marissa Nardi	10/11/2019		discovery produced by Defendants	0.23	\$ 380.00	•	88.67
Marissa Nardi	10/11/2019	Kansas	Prepare for meeting with DLA re discovery	0.28	\$ 380.00	\$	107.67
			meeting with external co-counsel re alternative				
Marissa Nardi	10/11/2019	Kansas	approaches to settlement decrees	1.48	\$ 380.00	\$	563.67
			read brief re class certification in federal epsdt				
Marissa Nardi	10/12/2019	Kansas	litigation relevant to our litigation	0.75	\$ 380.00	\$	285.00
			Discuss annotated complaint preparation with				
Marissa Nardi	10/15/2019	Kansas	external co-counsel and internal team	0.47	\$ 380.00	\$	177.33
			prepare for meetings with potential expert by				
Marissa Nardi	10/15/2019	Kansas	reviewing articles they've written and their CV	0.73	\$ 380.00	\$	278.67
			telephone call with external co-counsel team re				
Marissa Nardi	10/15/2019	Kansas	preparation of opposition to Defs' MTD	1.00	\$ 380.00	\$	380.00
			Prepare summary of recent MTD caselaw for co-				
Marissa Nardi	10/15/2019	Kansas	counsel team	1.03	\$ 380.00	\$	392.67
			Review documents identified as hot from recent				
Marissa Nardi	10/15/2019	Kansas	review of NP file	1.32	\$ 380.00	\$	500.33
Marissa Nardi	10/16/2019		Discuss discovery strategy with IL	0.23	\$ 380.00	\$	88.67
Marissa Nardi	10/16/2019	Kansas	Prepare for ESI call with NCYL	0.35	\$ 380.00	\$	133.00
			Prepare for weekly Kansas call by reviewing relevant				
Marissa Nardi	10/16/2019	Kansas	correspondence	0.17	\$ 380.00	\$	63.33

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			Telephone call with EPG and JK re preparing					
Marissa Nardi	10/16/2019	Kansas	opposition to MTD filed by Defs	0.50	\$	380.00	\$	190.00
Marissa Nardi	10/16/2019	Kansas	Analyze Defendants' discovery letter	0.73	\$	380.00	\$	278.67
Marissa Nardi	10/16/2019	Kansas	Meeting with external co-counsel re ESI strategy	1.00	\$	380.00	\$	380.00
			Meeting with external co-counsel re discovery					
Marissa Nardi	10/16/2019	Kansas	strategy	1.00	\$	380.00	•	380.00
Marissa Nardi	10/16/2019	Kansas	Review NP indices	1.40	\$	380.00	•	532.00
Marissa Nardi	10/17/2019	Kansas	discuss with IL analysis of potential experts	0.50	\$	380.00	\$	190.00
Marissa Nardi	10/18/2019	Kansas	discuss with CC background materials for expert meeting	0.40	\$	380.00	\$	152.00
Marissa Nardi	10/18/2019	Kansas	Prepare for meeting with expert	0.50	\$	380.00	\$	190.00
Marissa Nardi	10/21/2019		Electronic mail with external co-counsel re upcoming expert materials	0.30	\$	380.00	\$	114.00
Marissa Nardi	10/21/2019	Vancas	Prepare for upcoming mediation trip by reviewing most recent mediation materials	0.32	\$	380.00	ć	120.33
Marissa Nardi	10/21/2019		Analyze with SD ongoing discovery efforts	0.32	\$ \$	380.00		126.67
IVIAI ISSA INATUI	10/21/2019	Karisas		0.33	Ş	380.00	Þ	120.07
Marissa Nardi	10/21/2019	Kansas	Discuss with internal team strategy and preparation for expert meetings	0.40	\$	380.00	\$	152.00
Marissa Nardi	10/21/2019	Kansas	Discuss annotated amended complaint with external co-counsel team	0.45	\$	380.00	\$	171.00
Marissa Nardi	10/21/2019	Kansas	Continue reading background materials for upcoming expert meetings	0.52	\$	380.00	\$	196.33
Marissa Nardi	10/21/2019	Kansas	draft outline for potential expert meetings	3.20	\$	380.00	\$	1,216.00
Marissa Nardi	10/22/2019	Kansas	travel from NYC to Kansas for meetings with potential experts in Kansas	3.42	\$	380.00	ς .	1,298.33
IVIAI133a IVAI AI	10/22/2013	TTAVCI	potential experts in Kansas	3.72	٧	300.00	٧	1,230.33
Marissa Nardi	10/22/2019	Kansas	email with CC re potential expert prep materials	0.27	\$	380.00	\$	101.33
Marissa Nardi	10/23/2019	Kansas Travel	travel from KC for expert meetings back to NYC home	2.83	\$	380.00	\$	1,076.67
Marissa Nardi	10/23/2019	Kansas	meet with co-counsel TW and LBB to prepare for meetings with experts	1.00	\$	380.00	\$	380.00

			meetings with external co-counsel LBB, TW, and LW					
Marissa Nardi	10/23/2019	Kansas	and potential expert witnesses re EPSDT COA	5.67	\$	380.00	\$	2,153.33
Marissa Nardi	10/24/2019		Discuss review of NP files with EMG	0.27	\$	380.00	\$	101.33
Marissa Nardi	10/24/2019	Kansas	Review draft discovery letter	0.30	\$	380.00	\$	114.00
Marissa Nardi	10/24/2019	Kansas	Review potential expert's CV	0.32	\$	380.00	\$	120.33
			Draft written analysis and recommendation of					
Marissa Nardi	10/24/2019	Kansas	meetings with potential experts	0.47	\$	380.00	\$	177.33
Marissa Nardi	10/24/2019	Kansas	meeting with IL re potential experts	0.70	\$	380.00	\$	266.00
			Discuss next steps for discovery with co-counsel					
Marissa Nardi	10/25/2019	Kansas	NCYL	0.25	\$	380.00	\$	95.00
Marissa Nardi	10/25/2019	Kansas	Review draft correspondence with opposing counsel	0.30	\$	380.00	Ś	114.00
	20, 20, 2020		Discuss Defs' motion to dismiss with external co-	0.00	т	000.00	т	
Marissa Nardi	10/25/2019	Kansas	counsel team	0.38	\$	380.00	\$	145.67
Marissa Nardi	10/25/2019		Meeting w/ IL re case factual developments	0.42	\$	380.00	\$	158.33
			Discuss discovery updates with external co-counsel		-		-	
Marissa Nardi	10/25/2019	Kansas	team	0.55	\$	380.00	\$	209.00
Marissa Nardi	10/25/2019	Kansas	Read Defendants' motion to dismiss motion and brief	0.67	\$	380.00	Ś	253.33
Marissa Nardi	10/25/2019		Prepare for upcoming mediation call	0.82	\$	380.00		310.33
Marissa Nardi	10/26/2019		Email with IL SS SB HF CRW & AF re MTD	0.17	\$	380.00		63.33
			Begin reading legal opinions cited in Defs' brief ISO		<u> </u>		•	
Marissa Nardi	10/27/2019	Kansas	its MTD	2.32	\$	380.00	\$	880.33
Marissa Nardi	10/28/2019	Kansas	Prepare for MTD opp meeting	0.20	\$	380.00	\$	76.00
Marissa Nardi	10/28/2019	Kansas	Discuss MTD opp drafting with EG and JK	0.65	\$	380.00	\$	247.00
Marissa Nardi	10/28/2019	Kansas	Prepare for discovery meeting with DLA	0.90	\$	380.00	\$	342.00
Marissa Nardi	10/28/2019	Kansas	Begin drafting outline for opposition to Defs' MTD	1.33	\$	380.00	\$	506.67
			Meeting with external co-counsel team re litigation					
			strategy, including discovery and opposition to Defs'					
Marissa Nardi	10/28/2019	Kansas	MTD	1.67	\$	380.00	\$	633.33

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			Prepare for call with IL re similar ongoing foster care			
Marissa Nardi	10/29/2019		litigation by reviewing filing from similar litigation	0.40	 380.00	 152.00
Marissa Nardi	10/29/2019	Kansas	Telephone call with EG and JK re MTD opp	0.50	\$ 380.00	\$ 190.00
			Meeting with IL re opp to Defs' MTD and motion for			
Marissa Nardi	10/29/2019	Kansas	extension	0.75	\$ 380.00	\$ 285.00
			Telephone call with attorney stakeholders re EPSDT			
Marissa Nardi	10/29/2019	Kansas	COA	1.00	\$ 380.00	\$ 380.00
			Conduct legal research re correct legal standard for			
Marissa Nardi	10/29/2019	Kansas	12b1 motions	4.75	\$ 380.00	\$ 1,805.00
			Prepare for meeting with external co-counsel by			
Marissa Nardi	10/30/2019	Kansas	reviewing weekly correspondence	0.23	\$ 380.00	\$ 88.67
Marissa Nardi	10/30/2019	Kansas	Discuss drafting motions with external co-counsel	0.70	\$ 380.00	\$ 266.00
			Prepare written analysis of 12b1 legal research for			
Marissa Nardi	10/30/2019	Kansas	external co-counsel	0.87	\$ 380.00	\$ 329.33
			meeting with external co-counsel team re discovery			
Marissa Nardi	10/30/2019	Kansas	strategy, including opposition to Defs' 12b1 MTD	1.00	\$ 380.00	\$ 380.00
			Conduct legal research re potential motion for			
Marissa Nardi	10/30/2019	Kansas	extension	3.75	\$ 380.00	\$ 1,425.00
Marissa Nardi	10/31/2019	Kansas	Telephone call with EG and JK re MTD opp	0.67	\$ 380.00	\$ 253.33
Marissa Nardi	10/31/2019	Kansas	Begin drafting motion for extension	3.50	\$ 380.00	\$ 1,330.00
Marissa Nardi	10/31/2019	Kansas	Legal research re evidence considered for 12b1	5.03	\$ 380.00	\$ 1,912.67
			Electronic mail with external co-counsel re mediation			
Marissa Nardi	11/4/2019	Kansas	updates	0.35	\$ 380.00	\$ 133.00
Marissa Nardi	11/4/2019	Kansas	Advise team re deposition notice	0.47	\$ 380.00	\$ 177.33
			Finalize draft motion for extension before sharing			
Marissa Nardi	11/4/2019	Kansas	with Defendants	2.30	\$ 380.00	\$ 874.00
Marissa Nardi	11/4/2019	Kansas	Edit draft motion for extension	3.22	\$ 380.00	\$ 1,222.33
		Kansas	Prepare for upcoming mediation by reviewing			
Marissa Nardi	11/4/2019	Travel	proposals and notes	0.80	\$ 380.00	\$ 304.00

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			Discuss with IL follow-up with Defs re motion for			
Marissa Nardi	11/6/2019	Kansas	extension	0.10	\$ 380.00	\$ 38.00
Marissa Nardi	11/6/2019	Kansas	Discuss Governor's role in re foster care with EMG	0.17	\$ 380.00	\$ 63.33
Marissa Nardi	11/6/2019	Kansas	Review draft deposition notice	0.20	\$ 380.00	\$ 76.00
Marissa Nardi	11/6/2019	Kansas	Analyze potential expert with internal team	0.30	\$ 380.00	\$ 114.00
			Draft email to Defs re MTD Opp extension and share			
Marissa Nardi	11/6/2019	Kansas	with external co-counsel	0.33	\$ 380.00	\$ 126.67
Marissa Nardi	11/6/2019	Kansas	Prepare for call with KR re mediation	0.33	\$ 380.00	\$ 126.67
Marissa Nardi	11/6/2019	Kansas	Prepare for mtg re alternatives to consent decrees	0.35	\$ 380.00	\$ 133.00
			Electronic mail with co-counsel re draft settlement			
Marissa Nardi	11/6/2019	Kansas	agreement strategy	0.47	\$ 380.00	\$ 177.33
Marissa Nardi	11/6/2019	Kansas	Prepare for mediation by creating talking points	0.87	\$ 380.00	\$ 329.33
Marissa Nardi	11/6/2019		Edit draft motion for extension	1.13	\$ 380.00	\$ 430.67
Marissa Nardi	11/15/2019	Kansas	Read media article re KS foster care system issues	0.32	\$ 380.00	\$ 120.33
Marissa Nardi	11/15/2019	Kansas	Discuss overnight placement issue with team	0.33	\$ 380.00	\$ 126.67
			Prepare for call with potential expert re brain science			
			and child development by reading their most recent			
Marissa Nardi	11/15/2019	Kansas	relevant article	0.50	\$ 380.00	\$ 190.00
Marissa Nardi	11/15/2019	Kansas	follow up from the email re MH re 12b1 facts	0.67	\$ 380.00	\$ 253.33
Marissa Nardi	11/15/2019	Kansas	Analyze strategy re discovery	0.67	\$ 380.00	\$ 253.33
			Continue preparing for telephone call with potential			
			expert re brain science and child development by			
Marissa Nardi	11/15/2019	Kansas	reading most recent article	0.75	\$ 380.00	\$ 285.00
			Telephone call with potential expert re brain science			
Marissa Nardi	11/15/2019	Kansas	and child development	1.00	\$ 380.00	\$ 380.00
			Meeting with external co-counsel re litigation			
			strategy, including discussion of experts and MTD			
Marissa Nardi	11/15/2019	Kansas	opp and discovery	1.00	\$ 380.00	\$ 380.00
Marissa Nardi	11/15/2019	Kansas	Meeting w/ IL re mediation draft agreement	1.00	\$ 380.00	\$ 380.00

			Discuss production of documents by Defendants with			
Marissa Nardi	11/18/2019	Kansas	internal CR team	0.42	\$ 380.00	\$ 158.33
Marissa Nardi	11/18/2019	Kansas	Prepare for upcoming call with potential expert	0.67	\$ 380.00	\$ 253.33
Marissa Nardi	11/18/2019	Kansas	Review documents produced by Defs	0.75	\$ 380.00	\$ 285.00
			Answer questions by internal CR review team re			
Marissa Nardi	11/18/2019	Kansas	document review of documents produced by Defs	0.58	\$ 380.00	\$ 221.67
Marissa Nardi	11/18/2019	Kansas	Prepare talking points for upcoming mediation	0.83	\$ 380.00	\$ 316.67
			Analyze relevant settlement agreements in			
Marissa Nardi	11/18/2019	Kansas	preparation for mediation	1.50	\$ 380.00	\$ 570.00
			Draft settlement outcomes section for draft			
Marissa Nardi	11/18/2019	Kansas	settlement agreement	8.97	\$ 380.00	\$ 3,407.33
			Coordinate with external co-counsel team re next			
Marissa Nardi	11/19/2019	Kansas	steps for potential experts	0.33	\$ 380.00	\$ 126.67
Marissa Nardi	11/19/2019	Kansas	Prepare for meeting with potential expert	0.67	\$ 380.00	\$ 253.33
			Discuss meeting with potential expert with internal			
Marissa Nardi	11/19/2019	Kansas	CR team	0.75	\$ 380.00	\$ 285.00
			Analyze rolling results of document review of			
Marissa Nardi	11/19/2019	Kansas	discovery produced by Defendants	1.50	\$ 380.00	\$ 570.00
			Continue drafting settlement outcomes for			
Marissa Nardi	11/19/2019	Kansas	mediation	3.75	\$ 380.00	\$ 1,425.00
Marissa Nardi	11/19/2019	Kansas	Edit draft settlement outcomes	5.92	\$ 380.00	\$ 2,248.33
			Telephone call with external co-counsel re case			
Marissa Nardi	11/20/2019	Kansas	developments and litigation strategy	1.00	\$ 380.00	\$ 380.00
Marissa Nardi	11/20/2019	Kansas	Edit draft outcomes of settlement agreement further	1.17	\$ 380.00	\$ 443.33
			Edit draft prohibitions sections of draft settlement			
Marissa Nardi	11/20/2019	Kansas	agreement	4.75	\$ 380.00	\$ 1,805.00
			Edit draft outcomes section of draft settlement			
Marissa Nardi	11/20/2019	Kansas	agreement	6.50	\$ 380.00	\$ 2,470.00

			Electronic mail with external co-counsel re doc					
Marissa Nardi	11/21/2019	Kansas	review and preparation for meeting with expert	0.50	\$	380.00	\$	190.00
			Edit draft outcomes section of draft settlement					
Marissa Nardi	11/21/2019	Kansas	agreement	3.17	\$	380.00	\$	1,203.33
			Continue editing draft outcomes in draft settlement					
Marissa Nardi	11/21/2019	Kansas	agreement	3.75	\$	380.00	\$	1,425.00
			Discuss recent document production by Defendants					
Marissa Nardi	11/22/2019	Kansas	with external co-counsel team	0.32	\$	380.00	\$	120.33
			Incorporate co-counsel team's edits into draft					
Marissa Nardi	11/22/2019		prohibitions in draft settlement agreement	0.58	\$	380.00		221.67
Marissa Nardi	11/22/2019	Kansas	Edit draft settlement agreement throughout	3.00	\$	380.00	\$	1,140.00
			Edit draft prohibitions section of draft settlement					
Marissa Nardi	11/22/2019	Kansas	agreement	3.25	\$	380.00	\$	1,235.00
			Discuss draft standards section of brief in opposition					
Marissa Nardi	11/27/2019	Kansas	to Defs' 12b1 MTD with EPG	0.65	\$	380.00	\$	247.00
			Discuss draft motion for extension re Oppn to Defs'					
Marissa Nardi	12/9/2019	Kansas	12b1 MTD with IL and JK	0.50	\$	380.00	\$	190.00
			Discuss draft opposition to Defs' 12b1 MTD with JK					
Marissa Nardi	12/9/2019	Kansas	and EPG	0.83	\$	380.00	\$	316.67
	12/0/2010			4.50	_	222.22		570.00
Marissa Nardi	12/9/2019	Kansas	Prepare for mediation by outlining talking points	1.50	\$	380.00	\$	570.00
N.A. dana Namel	12/0/2010		Review and edit draft opposition brief to Defs' 12b1	2.02		200.00		4 400 22
Marissa Nardi	12/9/2019	Kansas	MTD	3.92	\$	380.00	\$	1,488.33
Marissa Nardi	12/9/2019	Vancas	Edit current draft opposition to Defs' 12b1 MTD	8.65	\$	380.00	ċ	3,287.00
IVIALISSA IVALUI	12/9/2019	Kalisas	Edit Current draft opposition to Deis 1201 WID	8.03	Ą	360.00	Ą	3,267.00
Marissa Nardi	12/10/2019	Kansas	Prepare written analysis of oppn to Defs' 12b1 MTD	0.50	\$	380.00	\$	190.00
			Discuss with internal team strategy re mediation and		т		т	
Marissa Nardi	12/10/2019	Kansas	brief in oppn to Defs' 12b1 MTD	0.75	\$	380.00	\$	285.00
	, ,, ,, ,,		Telephone call with external co-counsel re mediation		•		•	
Marissa Nardi	12/10/2019	Kansas	strategy	0.92	\$	380.00	\$	348.33
Marissa Nardi	12/10/2019	Kansas	Telephone call with re JK drafting opp to 12b1 MTD	0.42	\$	380.00	\$	158.33

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Marissa Nardi	12/10/2019	Kansas	Draft discovery letter to share with Defs	1.50	\$ 380.00	\$ 570.00
Marissa Nardi	12/10/2019	Kansas	Edit draft brief in oppn to Defs' 12b1 MTD	2.50	\$ 380.00	\$ 950.00
			Advise internal CR team re analysis of documents			
Marissa Nardi	12/11/2019	Kansas	produced by Defs	0.33	\$ 380.00	\$ 126.67
Marissa Nardi	12/11/2019	Kansas	Review updated settlement draft agreement	0.75	\$ 380.00	\$ 285.00
Marissa Nardi	12/11/2019	Kansas	Prepare for meeting with potential expert	1.40	\$ 380.00	\$ 532.00
			Draft updates to settlement agreement by cross-			
Marissa Nardi	12/11/2019	Kansas	referencing to notes from settlement meetings	2.40	\$ 380.00	\$ 912.00
Marissa Nardi	12/11/2019	Kansas	Draft letter to Defendants re targeted discovery	2.57	\$ 380.00	\$ 975.33
			Read hot documents from document review to			
Marissa Nardi	12/11/2019	Kansas	analyze new key facts in preparation for mediation	2.75	\$ 380.00	\$ 1,045.00
Marissa Nardi	12/12/2019		Electronic mail with potential expert re case update	0.25	 380.00	 95.00
Marissa Nardi	12/12/2019	Kansas	Advise team re my analysis of hot documents	0.33	\$ 380.00	\$ 126.67
			Meet with potential expert re involvement in			
Marissa Nardi	12/12/2019		litigation	1.50	\$ 380.00	 570.00
Marissa Nardi	12/13/2019	Kansas	Discuss settlement drafts with IL	0.25	\$ 380.00	\$ 95.00
			Discuss with CC and DA collection of relevant			
Marissa Nardi	12/13/2019	Kansas	discovery for discovery letter to Defendants	0.50	\$ 380.00	\$ 190.00
			Review and edit updated draft discovery letter to			
Marissa Nardi	12/13/2019	Kansas	Defendants	0.67	\$ 380.00	\$ 253.33
			Edit draft letter to Defendants re needing targeted			
Marissa Nardi	12/13/2019	Kansas	discovery	1.08	\$ 380.00	\$ 411.67
			Closely review Defendants' settlement proposal in			
Marissa Nardi	12/13/2019	Kansas	response to Pls' draft settlement proposal	1.37	\$ 380.00	\$ 519.33
			Discuss plan for mediation with external co-counsel			
Marissa Nardi	12/13/2019	Kansas	team	1.50	\$ 380.00	\$ 570.00
			Prepare for mediation by analyzing relevant			
Marissa Nardi	12/13/2019	Kansas	documents	2.75	\$ 380.00	\$ 1,045.00

			Electronic mail with co-counsel from DLA re					
Marissa Nardi	12/14/2019	Kansas	mediation plan	0.17	\$	380.00	\$	63.33
		Kansas	Travel from home in NYC to NYC airport to KC airport					
Marissa Nardi	12/15/2019	Travel	to Kansas City office of Lathrop Gage for mediation	3.50	\$	380.00	\$	1,330.00
Marissa Nardi	12/15/2019	Kansas	Prepare and participate in all-day mediation	7.50	\$	380.00	\$	2,850.00
			Travel from KC office of Lathrop Gage to airport in					
		Kansas	Kansas to airport in NY to home in NYC from					
Marissa Nardi	12/16/2019	Travel	mediation trip to KS	3.25	\$	380.00	\$	1,235.00
Marissa Nardi	12/16/2019	Kansas	Prepare and participate in all-day mediation	8.00	\$	380.00	\$	3,040.00
Marissa Nardi	12/17/2019	Kansas	Prepare for mtg with potential expert	1.75	\$	380.00	\$	665.00
			Prepare for KS co-counsel team mtg by reviewing					
Marissa Nardi	12/18/2019	Kansas	latest correspondence	0.33	\$	380.00	\$	126.67
			Discuss meeting with potential expert with internal					
Marissa Nardi	12/18/2019	Kansas	CR team	0.33	\$	380.00	\$	126.67
Marissa Nardi	12/18/2019	Kansas	Edit draft engagement letter for potential expert	0.83	\$	380.00	Ś	316.67
			zan anan en gagerrien verten nor perennan en per	0.00	т	000.00	_ <del></del>	0_0.07
			Meeting with external co-counsel team re litigation					
Marissa Nardi	12/18/2019	Kansas	team strategy re discovery and settlement	0.92	\$	380.00	\$	348.33
Marissa Nardi	12/18/2019	Kansas	Edit draft motion for stay of litigation	1.50	\$	380.00	\$	570.00
Marissa Nardi	12/18/2019	Kansas	Meeting with potential expert	2.00	\$	380.00	\$	760.00
Marissa Nardi	12/18/2019	Kansas	Edit draft settlement agreement	3.00	\$	380.00	\$	1,140.00
Marissa Nardi	12/18/2019	Kansas	Edit draft motion for stay	3.93	\$	380.00	\$	1,494.67
N 4 - days NI - sald	42/40/2040	17	Discuss document review of documents newly	0.50	<u> </u>	200.00		400.00
Marissa Nardi	12/19/2019	Kansas	produced by Defs in discovery with internal team	0.50	\$	380.00	\$	190.00
Marissa Nardi	12/19/2019	Kansas	Edit draft engagement letter for potential expert	2.38	\$	380.00	\$	905.67
			Discuss strategy with team re settlement update and					
Marissa Nardi	12/20/2019	Kansas	motion to expedite	0.75	\$	380.00	\$	285.00
Marissa Nardi	12/20/2019	Kansas	Edit joint motion for stay	4.35	\$	380.00	\$	1,653.00
			Discuss deadline modification and court conference					
Marissa Nardi	12/23/2019	Kansas	with IL	0.17	\$	380.00	\$	63.33

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			Read JK legal research memo and caselaw re oppn to			
Marissa Nardi	12/24/2019	Kansas	Defs' 12b1 motion	2.33	\$ 380.00	\$ 886.67
Marissa Nardi	12/27/2019	Kansas	Discuss mediation plan with IL	0.42	\$ 380.00	\$ 158.33
Marissa Nardi	12/31/2019	Kansas	Edit current draft opposition to Defs' 12b1 MTD	4.75	\$ 380.00	\$ 1,805.00
Marissa Nardi	1/2/2020	Kansas	Discuss upcoming litigation events with internal CR team	0.50	\$ 380.00	\$ 190.00
Marissa Nardi	1/2/2020	Kansas	Draft introductory sections to draft opposition to Defs' 12b1 motion to dismiss	8.75	\$ 380.00	\$ 3,325.00
Marissa Nardi	1/3/2020	Kansas	Continue drafting sections in draft opposition to Defs' 12b1 motion to dismiss	12.92	\$ 380.00	\$ 4,908.33
Marissa Nardi	1/4/2020	Kansas	Edit draft oppn to Defs' 12b1 MTD	5.80	\$ 380.00	\$ 2,204.00
Marissa Nardi	1/4/2020	Kansas	Edit draft settlement agreement	6.63	\$ 380.00	\$ 2,520.67
Marissa Nardi	1/5/2020	Kansas	Edit draft opposition to Defs' 12b1 MTD	10.88	\$ 380.00	\$ 4,135.67
Marissa Nardi	1/6/2020	Kansas	Discuss document reviews w/ NCYL and internal team	1.20	\$ 380.00	\$ 456.00
Marissa Nardi	1/6/2020	Kansas	Telephone call with external co-counsel team re settlement draft	1.50	\$ 380.00	 570.00
Marissa Nardi	1/6/2020	Kansas	Analyze revised settlement draft	1.33	\$ 380.00	\$ 506.67
Marissa Nardi	1/6/2020	Kansas	Draft letter to Defs in response to Defs' Dec. 23 2019 letter to Pls	4.58	\$ 380.00	\$ 1,741.67
Marissa Nardi	1/7/2020	Kansas	Prepare for telephone call with potential neutral	0.67	\$ 380.00	\$ 253.33
Marissa Nardi	1/7/2020	Kansas	Telephone call with internal co-counsel team re discovery on Defendant Governor	1.00	\$ 380.00	\$ 380.00
Marissa Nardi	1/7/2020	Kansas	Edit draft letter to Defs	3.00	\$ 380.00	\$ 1,140.00
Marissa Nardi	1/7/2020	Kansas	Edit draft opposition to Defs' 12b1 MTD	3.42	\$ 380.00	\$ 1,298.33
Marissa Nardi	1/8/2020	Kansas	Edit draft settlement markup	1.25	\$ 380.00	\$ 475.00
Marissa Nardi	1/8/2020	Kansas	Edit draft opp to MTD	2.83	\$ 380.00	\$ 1,076.67
Marissa Nardi	1/9/2020	Kansas	Edit draft opp to MTD	9.50	\$ 380.00	\$ 3,610.00
Marissa Nardi	1/10/2020	Kansas	Edit draft letter to Defs re 12b1 motion for targeted discovery	0.58	\$ 380.00	\$ 221.67

Marissa Nardi	1/10/2020	Kansas	telephone call with J. King re 12b1 opposition draft	0.42	\$ 380.00	\$	158.33
Marissa Nardi	1/10/2020	Kansas	Finalize draft letter to Defs	0.75	\$ 380.00	\$	285.00
			Telephone call with P Juneja re edits to draft motion				
Marissa Nardi	1/10/2020	Kansas	re targeted discovery for 12b1 motion	0.80	\$ 380.00	\$	304.00
Marissa Nardi	1/10/2020	Kansas	Edit draft 12b1 discovery letter	1.23	\$ 380.00	\$	468.67
Marissa Nardi	1/10/2020	Kansas	Edit draft letter to Defs	1.35	\$ 380.00	\$	513.00
Marissa Nardi	1/10/2020	Kansas	Edit draft opp to Defs' 12b1 MTD	1.45	\$ 380.00	\$	551.00
Marissa Nardi	1/10/2020	Kansas	Discuss edits to letter with external co-counsel	1.63	\$ 380.00	\$	620.67
Marissa Nardi	1/10/2020		Edit draft opp to Defs 12b1 MTD	4.50	\$ 380.00	•	1,710.00
Marissa Nardi	1/11/2020		Discuss edits to mtd opp with internal team	0.25	\$ 380.00		95.00
	, ,		Analyze settlement draft documents circulated by				
Marissa Nardi	1/12/2020	Kansas	Defendants	1.75	\$ 380.00	\$	665.00
Marissa Nardi	1/12/2020	Kansas	Edit draft mtd opp	4.50	\$ 380.00	\$	1,710.00
			Analyze Defs' lack of production of Governor's files				<u> </u>
Marissa Nardi	1/13/2020	Kansas	for potential response	0.80	\$ 380.00	\$	304.00
			Discuss Defs' lack of response with external co-				
Marissa Nardi	1/14/2020	Kansas	counsel	0.50	\$ 380.00	\$	190.00
Marissa Nardi	1/14/2020	Kansas	Edit draft opp to MTD	3.60	\$ 380.00	\$	1,368.00
			Prepare for team meeting by reviewing most recent				
Marissa Nardi	1/15/2020	Kansas	emails	0.30	\$ 380.00	\$	114.00
			meeting with external co-counsel team re litigation				
			strategy and discovery, including mediation and				
Marissa Nardi	1/15/2020	Kansas	opposition draft	1.00	\$ 380.00	\$	380.00
Marissa Nardi	1/15/2020	Kansas	Edit draft opposition to Defs' 12b1 MTD	5.22	\$ 380.00	\$	1,982.33
Marissa Nardi	1/16/2020	Kansas	Edit opposition to Defs' 12b1 MTD	9.30	\$ 380.00	\$	3,534.00
			Discussion with internal CR team JK and EPG re draft				
Marissa Nardi	1/17/2020	Kansas	opp to MTD	0.50	\$ 380.00	\$	190.00
Marissa Nardi	1/17/2020	Kansas	Edit draft opp to MTD	6.75	\$ 380.00	\$	2,565.00
Marissa Nardi	1/18/2020	Kansas	Edit draft opp to MTD	5.17	\$ 380.00	\$	1,963.33
Marissa Nardi	1/19/2020	Kansas	Edit opposition brief to Kansas Defs' MTD	4.50	\$ 380.00	\$	1,710.00
			Telephone call with EPG re edits to draft opp to				
Marissa Nardi	1/20/2020	Kansas	Defs' MTD	1.00	\$ 380.00	\$	380.00

Marissa Nardi	1/20/2020	Kansas	Edit draft MTD opp	6.75	\$ 380.00	\$ 2,565.00
Marissa Nardi	1/21/2020	Kansas	Meeting with IL and EPG re draft opp	1.00	\$ 380.00	\$ 380.00
Marissa Nardi	1/21/2020	Kansas	Edit opposition to Defs' MTD	7.67	\$ 380.00	\$ 2,913.33
Marissa Nardi	1/22/2020	Kansas	Edit draft brief	3.33	\$ 380.00	\$ 1,266.67
			Meeting with external co-counsel team re mediation			
Marissa Nardi	1/23/2020	Kansas	strategy	1.00	\$ 380.00	\$ 380.00
Marissa Nardi	1/23/2020	Kansas	Edit draft brief	9.25	\$ 380.00	\$ 3,515.00
Marissa Nardi	1/24/2020	Kansas	Edit draft MTD opp brief	4.75	\$ 380.00	\$ 1,805.00
			Edit comments visible to Defs to draft mediation			
Marissa Nardi	1/28/2020	Kansas	proposal	0.92	\$ 380.00	\$ 348.33
			Telephone call with external co-counsel and			
Marissa Nardi	1/29/2020	Kansas	mediator re upcoming mediation	0.42	\$ 380.00	\$ 158.33
Marissa Nardi	1/29/2020	Kansas	Prepare for telephone call with mediator	1.00	\$ 380.00	\$ 380.00
			Telephone call with external co-counsel re			
Marissa Nardi	1/29/2020	Kansas	mediation and litigation strategy	1.00	\$ 380.00	\$ 380.00
			Advise internal CR team re mediation and litigation			
Marissa Nardi	1/30/2020	Kansas	updates	0.50	\$ 380.00	\$ 190.00
Marissa Nardi	1/30/2020	Kansas	Analyze hot doc from Defs' production	0.67	\$ 380.00	\$ 253.33
			Analyze draft opposition brief with external co-			
Marissa Nardi	1/30/2020	Kansas	counsel	0.75	\$ 380.00	\$ 285.00
			Analyze litigation strategy and upcoming projects			
Marissa Nardi	1/30/2020	Kansas	with internal team	0.75	\$ 380.00	\$ 285.00
Marissa Nardi	1/30/2020	Kansas	Edit draft opposition brief	1.25	\$ 380.00	\$ 475.00
			Analyze suggested edits to draft opp to MTD from			
Marissa Nardi	2/3/2020	Kansas	external co-counsel team	0.92	\$ 380.00	\$ 348.33
Marissa Nardi	2/3/2020	Kansas	Advise IL on discovery updates	0.92	\$ 380.00	\$ 348.33
Marissa Nardi	2/4/2020	Kansas	Meeting with IL re ongoing discovery efforts	0.58	\$ 380.00	\$ 221.67
Marissa Nardi	2/4/2020	Kansas	Telephone call with NCYL re discovery strategy	1.08	\$ 380.00	\$ 411.67
			Discuss next steps for discovery with internal CR			
Marissa Nardi	2/5/2020	Kansas	team	0.33	\$ 380.00	\$ 126.67
			Telephone call with NCYL re document review of			
Marissa Nardi	2/5/2020	Kansas	documents recently produced by Defs	0.50	\$ 380.00	\$ 190.00
Marissa Nardi	2/5/2020	Kansas	Meeting with IL re upcoming mediation	0.67	\$ 380.00	\$ 253.33

			Meeting with external co-counsel team re litigation				
			strategy, including discovery and opposition to Defs'				
Marissa Nardi	2/5/2020	Kansas	MTD and mediation	1.00	\$	380.00	\$ 380.00
Marissa Nardi	2/5/2020	Kansas	Edit new draft opp to MTD	5.25	\$	380.00	\$ 1,995.00
		Kansas	Travel from home in NYC to NYC airport to KC airport				
Marissa Nardi	2/6/2020	Travel	to KS hotel for mediation	3.50	\$	380.00	\$ 1,330.00
			Edit draft opposition to MTD to circulate to co-				
Marissa Nardi	2/6/2020	Kansas	counsel	3.33	\$	380.00	\$ 1,266.67
		Kansas	Travel from KS office of Lathrop to KC airport to NYC				
Marissa Nardi	2/7/2020	Travel	airport to home in NYC from mediation	3.62	\$	380.00	\$ 1,374.33
			Meeting with external co-counsel in preparation for				
Marissa Nardi	2/7/2020	Kansas	mediation in KS	1.00	\$	380.00	\$ 380.00
Marissa Nardi	2/7/2020	Kansas	Mediation with opposing counsel in KS at Lathrop	6.00	\$	380.00	 2,280.00
Marissa Nardi	2/10/2020	Kansas	Discuss strategy for mediation with IL	0.33	\$	380.00	\$ 126.67
			Discuss next steps for draft settlement agreement				
Marissa Nardi	2/10/2020	Kansas	with IL	0.37	\$	380.00	\$ 139.33
Marissa Nardi	2/10/2020	Kansas	Edit draft settlement agreement	8.63	\$	380.00	\$ 3,280.67
			Telephone call with IL re updated settlement				
Marissa Nardi	2/11/2020	Kansas	agreement	0.58	\$	380.00	\$ 221.67
			Telephone call with DA re checking of fact cites in				
Marissa Nardi	2/11/2020	Kansas	legal brief	0.67	\$	380.00	\$ 253.33
			Meeting with IL re stability outcomes for draft				
Marissa Nardi	2/11/2020	Kansas	settlement agreement	1.00	\$	380.00	\$ 380.00
Marissa Nardi	2/11/2020	Kansas	Edit draft opposition to Defs 12b1 MTD	10.50	\$	380.00	\$ 3,990.00
			Telephone call with external co-counsel group re				
Marissa Nardi	2/12/2020	Kansas	opp and mediation strategy	0.92	\$	380.00	\$ 348.33
Marissa Nardi	2/12/2020	Kansas	Edit draft opposition to MTD	11.82	\$	380.00	\$ 4,490.33
Marissa Nardi	2/13/2020	Kansas	Edit draft transmittal decl for opp to mtd	1.17	\$	380.00	\$ 443.33
			Telephone call with NCYL re draft settlement				
Marissa Nardi	2/14/2020	Kansas	agreement	0.50	\$	380.00	\$ 190.00
Marissa Nardi	2/14/2020	Kansas	Meeting with IL re draft settlement agreement edits	1.50	Ś	380.00	\$ 570.00

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			Finalize updated draft settlement agreement to					
Marissa Nardi	2/14/2020	Kansas	share with mediator and Defs	2.67	\$	380.00	\$	1,013.33
Marissa Nardi	2/17/2020		Electronic mail with team re Defs' mot for extension	0.42	\$	380.00	\$	158.33
		Kansas	Travel from home in NYC to LGA to Kansas City					
Marissa Nardi	2/24/2020	Travel	airport to hotel in Kansas City for mediation	2.75	\$	380.00	\$	1,045.00
Marissa Nardi	2/24/2020	Kansas	Prepare for mediation by creating talking points	2.42	\$	380.00	\$	918.33
Marissa Nardi	2/25/2020		Edit draft settlement agreement	0.85	\$	380.00		323.00
			Meeting to prepare for settlement with external co-		т		- T	
Marissa Nardi	2/25/2020	Kansas	counsel team	1.00	\$	380.00	\$	380.00
Marissa Nardi	2/25/2020		Edit settlement agreement	2.70	\$	380.00	•	1,026.00
			Mediation session at Lathrop Gage with opposing					
Marissa Nardi	2/25/2020	Kansas	counsel and mediator	6.50	\$	380.00	\$	2,470.00
		Kansas	Travel from KC mediation to KC airport to NY airport					
Marissa Nardi	2/26/2020	Travel	to NY home from mediation	3.08	\$	380.00	\$	1,171.67
			Meeting with external co-counsel to debrief on					
Marissa Nardi	2/26/2020	Kansas	mediation	1.50	\$	380.00	\$	570.00
			Meeting with external co-counsel team to prepare					
Marissa Nardi	2/26/2020	Kansas	for mediation	1.75	\$	380.00	\$	665.00
			Mediation session with mediator and opposing					
Marissa Nardi	2/26/2020	Kansas	counsel	3.00	\$	380.00	\$	1,140.00
			Meeting with CR internal team re updates and follow-					
Marissa Nardi	2/27/2020	Kansas	up from mediation sessions	0.50	\$	380.00	\$	190.00
Marissa Nardi	2/27/2020	Kansas	Review draft interrogatories	0.92	\$	380.00	\$	348.33
	2/27/2020			2.05		200.00		4 424 00
Marissa Nardi	2/27/2020		Edit draft responses to Defs' responses to Pls' RFPs	2.95	\$	380.00		1,121.00
Marissa Nardi	2/27/2020	Kansas	Edit draft RFPs	3.30	\$	380.00	\$	1,254.00
			Discuss with internal CR team new hot documents					
	- 1 1		from review of Defendants' documents recently					
Marissa Nardi	2/28/2020		produced in discovery	0.43	\$	380.00	•	164.67
Marissa Nardi	2/28/2020	Kansas	Edit RFPs to circulate to co-counsel	0.83	\$	380.00	\$	316.67
			Finalize draft interrogatories to circulate to co-					
Marissa Nardi	2/28/2020	Kansas	counsel	1.63	\$	380.00	\$	620.67

Marissa Nardi	2/28/2020		Finalize draft RFPs for circulation to co-counsel	2.25	\$ 380.00		855.00
Marissa Nardi	3/1/2020		Meeting with IL re written discovery drafts	0.67	\$ 380.00		253.33
Marissa Nardi	3/1/2020	Kansas	Comment on draft letter re 30b6 deps	0.82	\$ 380.00	•	310.33
Marissa Nardi	3/1/2020	Kansas	Edit draft letter re RFPs	0.93	\$ 380.00	\$	354.67
			Telephone call with CR policy team re policy-related				
Marissa Nardi	3/1/2020	Kansas	proposals for settlement agreement	1.00	\$ 380.00	\$	380.00
			Finalize current draft of second set of RFPs to Def.				
Marissa Nardi	3/1/2020	Kansas	DCF	1.28	\$ 380.00	\$	487.67
			Edit draft search terms for Defs to use for ESI				
Marissa Nardi	3/1/2020	Kansas	searches of their files	3.30	\$ 380.00	\$	1,254.00
			Draft certificate of services for discovery documents				
Marissa Nardi	3/2/2020	Kansas	to be propounded shortly	0.37	\$ 380.00	\$	139.33
			Revise further Plaintiffs' responses to Defs'				
Marissa Nardi	3/2/2020	Kansas	responses to Pls' first set of rfps	0.67	\$ 380.00	\$	253.33
			Advise team on finalizing written discovery for				
Marissa Nardi	3/2/2020	Kansas	today's service onto Defs	0.73	\$ 380.00	\$	278.67
			Discuss with CG and EPG suggested edits by NCYL to				
Marissa Nardi	3/2/2020	Kansas	second set of draft rfps	0.75	\$ 380.00	\$	285.00
			Edit draft discovery letter for Defs to incorporate				
Marissa Nardi	3/2/2020	Kansas	comments by NCYL	0.90	\$ 380.00	\$	342.00
			Revise further package of second set of rfps and first				
Marissa Nardi	3/2/2020	Kansas	set of rogs for dcf	1.83	\$ 380.00	\$	696.67
			Edit package of rogs and draft second set of RFPs to				
Marissa Nardi	3/2/2020	Kansas	incorporate co-counsel comments	2.48	\$ 380.00	\$	943.67
			Telephone call with IL to prepare immediate				
Marissa Nardi	3/3/2020	Kansas	discovery strategy	0.25	\$ 380.00	\$	95.00
			Meeting with discovery team re updates from				
Marissa Nardi	3/3/2020	Kansas	document review, written discovery, and ESI	0.47	\$ 380.00	\$	177.33
			Telephone call with external co-counsel at NCYL and				
Marissa Nardi	3/3/2020	Kansas	IL re discovery strategy	0.83	\$ 380.00	\$	316.67
Marissa Nardi	3/3/2020	Kansas	Finalize draft RFPs	2.32	\$ 380.00	\$	880.33

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			Meeting with external co-counsel team to discuss			
			litigation strategy, including written discovery, ESI,			
Marissa Nardi	3/4/2020	Kansas	and mediation	0.50	\$ 380.00	\$ 190.00
Marissa Nardi	3/4/2020	Kansas	Discuss draft subpoenas with NT and IL	0.20	\$ 380.00	\$ 76.00
Marissa Nardi	3/4/2020	Kansas	Telephone call with PJ re ESI	0.23	\$ 380.00	\$ 88.67
Marissa Nardi	3/4/2020	Kansas	Review document review batch completion	0.33	\$ 380.00	\$ 126.67
Marissa Nardi	3/4/2020	Kansas	Discuss ESI agreement with PJ	0.40	\$ 380.00	\$ 152.00
Marissa Nardi	3/4/2020	Kansas	Telephone call with P. Juneja re discovery plan	0.75	\$ 380.00	\$ 285.00
Marissa Nardi	3/4/2020	Kansas	Edit draft search terms for ESI	0.92	\$ 380.00	\$ 348.33
			Telephone calls with P. Juneja re status and strategy			
Marissa Nardi	3/4/2020	Kansas	for propounding upcoming discovery	1.75	\$ 380.00	\$ 665.00
Marissa Nardi	3/9/2020	Kansas	Electronic email with PJ re discovery call	0.17	\$ 380.00	\$ 63.33
Marissa Nardi	3/9/2020	Kansas	Electronic email re ESI with PJ and JK	0.33	\$ 380.00	\$ 126.67
			Discuss potential use of statistical expert with EPG			
Marissa Nardi	3/9/2020	Kansas	and IL	0.47	\$ 380.00	\$ 177.33
Marissa Nardi	3/9/2020	Kansas	Analyze draft list of search terms	0.75	\$ 380.00	\$ 285.00
Marissa Nardi	3/9/2020	Kansas	Edit draft RFPs	0.75	\$ 380.00	\$ 285.00
Marissa Nardi	3/9/2020	Kansas	Revise draft list of search terms	1.23	\$ 380.00	\$ 468.67
Marissa Nardi	3/10/2020	Kansas	Telephone call with EPG re statistician	0.12	\$ 380.00	\$ 44.33
Marissa Nardi	3/10/2020	Kansas	Electronic email with IL re types of experts to engage	0.17	\$ 380.00	\$ 63.33
			Electronic email with PJ re selection of potential			
Marissa Nardi	3/10/2020	Kansas	experts	0.22	\$ 380.00	\$ 82.33
			Electronic email with KP and PJ re weekly discovery			
Marissa Nardi	3/10/2020	Kansas	calls	0.25	\$ 380.00	\$ 95.00
			Electronic email with internal CR team re new			
Marissa Nardi	3/10/2020	Kansas	discovery to be propounded	0.25	\$ 380.00	\$ 95.00
			Discuss upcoming document review with internal CR			
Marissa Nardi	3/10/2020	Kansas	team	0.38	\$ 380.00	\$ 145.67
Marissa Nardi	3/10/2020	Kansas	Analyze use of potential statistician with EPG and IL	0.40	\$ 380.00	\$ 152.00
			Electronic email with NK and IL re new draft			
Marissa Nardi	3/10/2020	Kansas	discovery letter to Defs	0.47	\$ 380.00	\$ 177.33

Marissa Nardi	3/10/2020	Kansas	Edit list of potential experts	0.60	\$	380.00	\$	228.00
Marissa Nardi	3/10/2020	Kansas	Telephone call with IL re discovery	0.75	\$	380.00	\$	285.00
Marissa Nardi	3/10/2020	Kansas	Telephone call with PJ re discovery projects	0.90	\$	380.00	\$	342.00
			Prepare for team meeting by reviewing latest expert					
Marissa Nardi	3/11/2020	Kansas	proposal	0.13	\$	380.00	\$	50.67
			Electronic email to internal CR team re discovery					
Marissa Nardi	3/11/2020	Kansas	document review to be completed	0.27	\$	380.00	\$	101.33
			Meeting with KS co-counsel team re litigation					
			strategy, including written discovery, review of					
Marissa Nardi	3/11/2020	Vancac	documents produced by Defs, experts, and ESI	1.00	\$	380.00	ć	380.00
Marissa Nardi	3/11/2020		Edit draft third set of RFPs	3.42		380.00		1,298.33
IVIdi 155a ival ul	3/11/2020	Nalisas	Electronic email with internal CR team re edits to	3.42	Ą	360.00	Ą	1,290.33
Marissa Nardi	3/12/2020	Vancas	written discovery	0.32	\$	380.00	ċ	120.33
IVId1155d IVd1UI	3/12/2020	Nalisas	Telephone call with NT and PJ re production	0.52	Ą	360.00	Ą	120.55
Marissa Nardi	3/12/2020	Vancas	deficiencies letter to draft	0.53	\$	380.00	\$	202.67
IVIATISSA INATUI	3/12/2020	Karisas	deficiencies letter to draft	0.53	Ş	380.00	Þ	202.07
			Meeting with co-counsel discovery subcommittee re					
			discovery projects, including document review,					
Marissa Nardi	3/13/2020	Kancac	production deficiencies, ESI, and written discovery	0.50	\$	380.00	ċ	190.00
IVIALISSA IVALUI	3/13/2020	Natisas	Review three hot documents from recent discovery	0.30	Ą	360.00	٦	190.00
Marissa Nardi	3/16/2020	Vancac	produced by Defs	0.58	\$	380.00	\$	221.67
IVIALISSA IVALUI	3/10/2020	Nalisas	produced by Ders	0.36	Ą	360.00	٠	221.07
Marissa Nardi	3/17/2020	Kansas	Electronic email with NT re drafting subpoenas	0.20	\$	380.00	\$	76.00
Marissa Nardi	3/18/2020		Discuss discovery schedule with T. Woody	0.17	•	380.00	\$	63.33
Marissa Nardi	3/18/2020	Kansas	Electronic email with JK re search terms	0.23	\$	380.00	\$	88.67
Marissa Nardi	3/18/2020	Kansas	Discuss third set of rfps with CG and EPG	0.28	\$	380.00	\$	107.67
			Prepare for co-counsel call by reviewing latest drafts		-			
Marissa Nardi	3/18/2020	Kansas	of written discovery	0.32	\$	380.00	\$	120.33
			Electronic email with EPG and CG re third set of draft					
Marissa Nardi	3/18/2020	Kansas	RFPs	0.32	\$	380.00	\$	120.33
			Electronic email with NCYL re email search term		•		•	
Marissa Nardi	3/18/2020	Kansas	strategy	0.32	\$	380.00	\$	120.33
Marissa Nardi	3/18/2020		Analyze email search term strategy	0.40		380.00		152.00

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Marissa Nardi	3/18/2020	Kansas	Edit draft letter to Defs re ESI search terms	0.40	\$ 380.00	\$ 152.00
			Meeting with internal CR team re ESI and document			
Marissa Nardi	3/18/2020	Kansas	review and written discovery	0.50	\$ 380.00	\$ 190.00
Marissa Nardi	3/18/2020	Kansas	Discuss discovery plan with P. Juneja	0.75	\$ 380.00	\$ 285.00
			Prepare written plan for targeted searches for			
Marissa Nardi	3/18/2020	Kansas	document review	0.75	\$ 380.00	\$ 285.00
			Meeting with external co-counsel team re litigation			
			strategy, including written discovery, review of			
Marissa Nardi	3/18/2020	Kansas	documents, and experts	1.00	\$ 380.00	\$ 380.00
Marissa Nardi	3/18/2020	Kansas	Edit third set of draft RFPs to DCF	1.93	\$ 380.00	\$ 734.67
Marissa Nardi	3/19/2020	Kansas	Electronic email with CG re draft RFPs	0.28	\$ 380.00	\$ 107.67
			Electronic email with G. Trimarco at DLA Piper re ESI-			
Marissa Nardi	3/19/2020	Kansas	related draft RFP	0.30	\$ 380.00	\$ 114.00
			Electronic email re 3 hot docs produced by Defs with			
Marissa Nardi	3/19/2020	Kansas	IL and DA	0.33	\$ 380.00	\$ 126.67
Marissa Nardi	3/19/2020	Kansas	Edit draft letter re COVID-19	0.50	\$ 380.00	\$ 190.00
Marissa Nardi	3/19/2020	Kansas	Edit draft third set of rfps	0.97	\$ 380.00	\$ 367.33
Marissa Nardi	3/20/2020	Kansas	Edit discovery deficiencies letter for Defs	0.23	\$ 380.00	\$ 88.67
Marissa Nardi	3/20/2020	Kansas	Discuss edits to draft third set of rfps with CG	0.48	\$ 380.00	\$ 183.67
			Electronic email with MF and PJ re open issues re			
Marissa Nardi	3/20/2020	Kansas	discovery	0.75	\$ 380.00	\$ 285.00
Marissa Nardi	3/23/2020	Kansas	Discuss subpoenas with NCYL	0.17	\$ 380.00	\$ 63.33
Marissa Nardi	3/23/2020	Kansas	Edit draft third set of RFPs	0.88	\$ 380.00	\$ 335.67
Marissa Nardi	3/23/2020	Kansas	Closely review draft third set of RFPs	0.97	\$ 380.00	\$ 367.33
			Discuss draft discovery deficiencies letter with N.			
Marissa Nardi	3/24/2020	Kansas	Taykhman	0.28	\$ 380.00	\$ 107.67
			Prepare summary to KS team re legal research			
Marissa Nardi	3/24/2020	Kansas	update re similar case's class certification ruling	0.33	\$ 380.00	\$ 126.67
Marissa Nardi	3/24/2020	Kansas	Edit third draft set of rfps	0.45	\$ 380.00	\$ 171.00
Marissa Nardi	3/24/2020	Kansas	Advise external co-counsel re third set of rfps	0.55	\$ 380.00	\$ 209.00
			Telephone call with M. Fowler at DLA & P. Juneja to			
Marissa Nardi	3/24/2020	Kansas	discuss discovery projects	0.75	\$ 380.00	\$ 285.00
Marissa Nardi	3/24/2020	Kansas	Edit third set of RFPs	1.13	\$ 380.00	\$ 430.67

Marissa Nardi	3/25/2020	Kansas	Analyze letter from Defs	0.33	\$	380.00	\$	126.67
Marissa Nardi	3/25/2020	Kansas	Meeting with IL re written discovery and Defs' letter	0.50	\$	380.00	\$	190.00
			Meeting with external KS co-counsel team re					
			litigation strategy, including Defendants' production					
Marissa Nardi	3/25/2020	Kansas	deficiencies, written discovery, and 30b6 depositions	0.75	\$	380.00	\$	285.00
Marissa Nardi	3/26/2020	Kansas	Prepare timeline of discovery deadlines Defs missed	0.37	\$	380.00	\$	139.33
Marissa Nardi	3/26/2020	Kansas	Edit NT's draft letter re production deficiencies	1.60	\$	380.00	\$	608.00
Marissa Nardi	3/26/2020	Kansas	Draft letter re discovery deadlines Defs missed	1.65	\$	380.00	\$	627.00
Marissa Nardi	3/27/2020		Read letter from Defs	0.23	\$	380.00	\$	88.67
			Read notes from prior m&c in re forthcoming letter		•		•	
Marissa Nardi	3/27/2020	Kansas	re discovery issues	0.32	\$	380.00	\$	120.33
Marissa Nardi	3/27/2020		Meeting with CG & JK re RFPs	0.25	\$	380.00	\$	95.00
Marissa Nardi	3/27/2020	Kansas	Edit NT's draft discovery deficiencies letter	3.45	\$	380.00	\$	1,311.00
			Edit written analysis of key facts in documents					
Marissa Nardi	3/30/2020	Kansas	produced by Defendants	0.23	\$	380.00	\$	88.67
			Electronic email with internal CR team re important					
Marissa Nardi	3/30/2020	Kansas	discovery documents	0.28	\$	380.00	\$	107.67
Marissa Nardi	3/30/2020	Kansas	Edit timeline of discovery deadlines Defs missed	0.48	\$	380.00	\$	183.67
			Read latest key documents from CR's review of Defs'					
Marissa Nardi	3/30/2020	Kansas	general discovery	0.67	\$	380.00	\$	253.33
			Edit draft rfps re new covid-19 issues re placements					
Marissa Nardi	3/30/2020	Kansas	and MH	1.37	\$	380.00	\$	519.33
Marissa Nardi	3/31/2020	Kansas	edit draft RFPs	0.83	\$	380.00	\$	316.67
			Advise internal team on letter for Defs re discovery					
Marissa Nardi	4/2/2020	Kansas	issues	0.40	\$	380.00	\$	152.00
Marissa Nardi	4/2/2020	Kansas	Edit draft RFPs	0.60	\$	380.00	\$	228.00
Marissa Nardi	4/2/2020	Kansas	Advise team on edits to rfps	0.73	\$	380.00	\$	278.67
Marissa Nardi	4/2/2020	Kansas	Finalize draft rfps	0.80	\$	380.00	\$	304.00

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			Telephone call with PJ re issue specific analysis of					
Marissa Nardi	4/7/2020	Kansas	discovery docs	0.47	\$	380.00	\$	177.33
Marissa Nardi	4/8/2020		Electronic email with external co-counsel re M&C	0.27	\$	380.00	•	101.33
Marissa Nardi	4/8/2020	Kansas	Discuss potential MH expert with LW and IL	0.33	\$	380.00	\$	126.67
			Review and analyze proposed updated discovery					
Marissa Nardi	4/8/2020	Kansas	schedule	0.38	\$	380.00	\$	145.67
			Electronic email with internal CR team re document					
Marissa Nardi	4/8/2020	Kansas	review and written discovery	0.48	\$	380.00	\$	183.67
			Meeting with external co-counsel re litigation					
			strategy, including M&C with Defs, COVID-19 issues,					
Marissa Nardi	4/8/2020	Kansas	third party subpoenas, NFs, and experts	1.00	\$	380.00	\$	380.00
			Telephone call with IL re Defs' production					
Marissa Nardi	4/9/2020	Kansas	deficiencies	0.17	\$	380.00	\$	63.33
Marissa Nardi	4/13/2020	Kansas	Discuss Defs' letter with NT	0.20	\$	380.00	\$	76.00
Marissa Nardi	4/13/2020	Kansas	Review excel of potential updated litigation timelines	0.20	\$	380.00	\$	76.00
			Electronic email with LW and DA re near-final draft					
Marissa Nardi	4/13/2020	Kansas	settlement	0.30	\$	380.00	\$	114.00
Marissa Nardi	4/13/2020	Kansas	Electronic email with DA and CC re RFP responses	0.35	\$	380.00	\$	133.00
Marissa Nardi	4/13/2020	Kansas	Analyze M&C strategy with external co-counsel	0.42	\$	380.00	\$	158.33
Marissa Nardi	4/13/2020	Vancac	Review new COVID-19 placement and MH discovery	0.47	\$	380.00	ć	177.33
Marissa Nardi	4/13/2020		Meeting with IL to prepare for M&C	0.47	\$	380.00		190.00
Marissa Nardi	4/13/2020		Prepare talking points for M&C	0.30	<del>ب</del> \$	380.00		278.67
Marissa Nardi	4/13/2020		M&C with Defs re discovery disputes	1.50	<del>ب</del> \$	380.00	\$ \$	570.00
ivialissa ivalul	4/ 13/ 2020	Kansas	Read letter from Defendants in re Pls' 4/3 production	1.50	٧	300.00	۲	370.00
Marissa Nardi	4/14/2020	Kansas	issues letter	0.48	\$	380.00	\$	183.67
Marissa Nardi	4/14/2020		Draft agenda for next M&C	0.48	\$	380.00		240.67
Marissa Nardi	4/14/2020		Telephone call with PJ to prepare for M&C	1.00	\$	380.00	\$	380.00
ivialissa ivalul	7/ 14/ 2020	Namaa	receptione can with 13 to prepare for Mixe	1.00	7	300.00	۲	300.00

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			Review most recent letters and discovery responses					
Marissa Nardi	4/14/2020	Kansas	to prepare for M&C	1.12	\$	380.00	\$	424.33
			Electronic email with external co-counsel re draft					
Marissa Nardi	4/15/2020	Kansas	expert engagement letter	0.37	\$	380.00	\$	139.33
Marissa Nardi	4/15/2020	Kansas	Finalize engagement letter for expert	0.43	\$	380.00	\$	164.67
Marissa Nardi	4/15/2020	Kansas	Electronic email with IL re expert strategy and plan	0.45	\$	380.00	\$	171.00
Marissa Nardi	4/15/2020	Kansas	Meeting with PJ in preparation for M&C	1.00	\$	380.00	\$	380.00
Marissa Nardi	4/15/2020	Kansas	Meeting with external co-counsel re weekly litigation strategy issues, including depositions, case schedule, M&C, NPs, NFs, and experts	0.92	\$	380.00	\$	348.33
Marissa Nardi	4/16/2020	Kansas	Meeting with external co-counsel in preparation for M&C	1.70	\$	380.00	\$	646.00
Marissa Nardi	4/16/2020		Draft outline of talking points for M&C	1.82	\$	380.00		690.33
Marissa Nardi	4/17/2020		M&C with Defs re discovery disputes	1.50	\$	380.00		570.00
Marissa Nardi	4/17/2020		Prepare for M&C with Defs re discovery issues	2.32	\$	380.00		880.33
Marissa Nardi	4/20/2020		Email with CC re discovery deadlines	0.15	\$	380.00	\$	57.00
	.,,		Discuss targeted factual investigatory re COVID-19		· ·		т	
Marissa Nardi	4/20/2020	Kansas	placement issues with CC	0.30	\$	380.00	\$	114.00
Marissa Nardi	4/20/2020	Kansas	Review recent R&Os from Defs	0.47	\$	380.00	\$	177.33
Marissa Nardi	4/20/2020	Kansas	Analyze case updates re COVID-19 issues re placements and MH	0.48	\$	380.00	\$	183.67
Marissa Nardi	4/21/2020	Kansas	Review CC's investigatory analysis re COVID-19 placement issues	0.20	\$	380.00	\$	76.00
Marissa Nardi	4/21/2020	Kansas	Electronic email to external co-counsel team re engagement letter	0.23	\$	380.00	\$	88.67
Marissa Nardi	4/21/2020	Kansas	Electronic email to KS external co-counsel to advise re results of CC investigatory project	0.25	\$	380.00	\$	95.00
Marissa Nardi	4/21/2020	Kansas	Analyze draft updated litigation schedule with IL	0.37	\$	380.00	\$	139.33
Marissa Nardi	4/21/2020	Kansas	Meeting with NCYL re discovery items and disputes with Defs	0.50	\$	380.00	\$	190.00

			Meeting with external co-counsel PJ FP TW and JK to					
Marissa Nardi	4/21/2020	Kansas	discuss potential arguments and strategy for M&C	1.00	\$	380.00	\$	380.00
Marissa Nardi	4/21/2020	Kansas	Prepare talking points for M&C	1.35	\$	380.00	\$	513.00
Marissa Nardi	4/21/2020	Kansas	M&C with opposing counsel re discovery disputes	0.70	\$	380.00	\$	266.00
			Prepare for KS co-counsel team mtg by reviewing					
Marissa Nardi	4/22/2020	Kansas	M&C notes and expert correspondence	0.32	\$	380.00	\$	120.33
			Electronic email with CG about new issues in Def's					
Marissa Nardi	4/22/2020		electronic production of discovery	0.38	\$	380.00	•	145.67
Marissa Nardi	4/22/2020	Kansas	Discuss experts with internal CR team	0.55	\$	380.00		209.00
Marissa Nardi	4/22/2020	Kansas	Prepare follow-up from yesterday's M&C	0.83	\$	380.00	\$	316.67
			Meeting with external co-counsel re litigation strategy, including COVID-related discovery issues,					
Marissa Nardi	4/22/2020	Kansas	experts, M&C, and updates from NFs	1.00	\$	380.00	\$	380.00
			Electronic email with external co-counsel re					
Marissa Nardi	4/23/2020	Kansas	discovery tasks	0.25	\$	380.00	\$	95.00
Marissa Nardi	4/23/2020	Kansas	Review Defs' 3rd Set of R&Os	0.73	\$	380.00	\$	278.67
			Speak with KS co-counsel PJ TW and JK to prepare for					
Marissa Nardi	4/27/2020	Kansas	next M&C	0.50	\$	380.00	\$	190.00
			Review discovery produced by Defendants to locate					
Marissa Nardi	4/27/2020	Kansas	and analyze references to kidzones	0.50	\$	380.00	\$	190.00
Marissa Nardi	4/27/2020	Kansas	M&C with Defs and external co-counsel re ESI issues specifically	1.00	\$	380.00	\$	380.00
			Electronic email with internal team re COVID-19					
Marissa Nardi	4/20/2020	Vancas		0.13	۲	380.00	\$	50.67
IVIATISSA INATUI	4/28/2020	Kalisas	placement and MH doc production and doc review  Electronic email with PJ and FP re Relativity review of	0.13	\$	380.00	Ş	50.67
Marissa Nardi	4/28/2020	Kansas	NP files	0.17	\$	380.00	\$	63.33
Marissa Nardi	4/28/2020		Electronic email with PJ re topics for ESI M&C	0.18	\$	380.00	\$	69.67
	, -, -				•		•	
Marissa Nardi	4/28/2020	Kansas	Discuss NP file review of MA file with DA, CC, and IL	0.23	\$	380.00	\$	88.67
Marissa Nardi	4/28/2020	Kansas	Telephone call with PJ re upcoming discovery	0.33	\$	380.00	\$	126.67

			Monting with CC rolidontification of autotanding					
			Meeting with CG re identification of outstanding					
	. / /		production issues for upcoming discovery M&C with	=		00000		
Marissa Nardi	4/28/2020		Defs	0.50	\$	380.00		190.00
Marissa Nardi	4/28/2020	Kansas	Edit NT draft letter re litigation holds	0.80	\$	380.00	\$	304.00
			Read closely newly identified KidZone records from					
Marissa Nardi	4/28/2020		discovery produced by Defs	1.27		380.00	\$	481.33
Marissa Nardi	4/29/2020	Kansas	Electronic email with PJ re ESI M&C prep	0.13	\$	380.00	\$	50.67
			Review draft email from CG re open issues in Defs					
Marissa Nardi	4/29/2020	Kansas	production to alert Defs to	0.25	\$	380.00	\$	95.00
			Meeting with internal KS team re ongoing discovery					
Marissa Nardi	4/29/2020	Kansas	issues to address in meet and confer	0.33	\$	380.00	\$	126.67
Marissa Nardi	4/29/2020	Kansas	Review NT's chart of potential CW experts	0.37	\$	380.00	\$	139.33
Marissa Nardi	4/29/2020	Kansas	Prepare for ESI M&C by creating talking points	0.40	\$	380.00	\$	152.00
Marissa Nardi	4/29/2020	Kansas	M&C with Defs re ESI	1.00	\$	380.00	\$	380.00
Marissa Nardi	4/29/2020	Kansas	Meeting with external co-counsel team for litigation strategy mtg, including discussion of subpoenas, M&Cs, privilege and redaction logs, case schedule, experts, and new COVID-19 issues	1.00	\$	380.00	\$	380.00
Marissa Nardi	4/30/2020		Review most relevant COVID-19 documents re placements & MH produced by Defs as isolated by CG	0.32	•	380.00	•	120.33
Marissa Nardi	4/30/2020	Kansas	Edit draft motion for extension to file motions to compel	0.40	\$	380.00	\$	152.00
Marissa Nardi	4/30/2020	Kansas	Discuss with JK privilege and redaction log analysis	0.45	\$	380.00	\$	171.00
Marissa Nardi	4/30/2020	Kansas	Telephone call with PJ to follow-up re discovery open issues	0.50	\$	380.00	\$	190.00
Marissa Nardi	4/30/2020		Read rogs and rfps just served by Defs	0.53	\$	380.00	\$	202.67
IVIGI133G IVGI GI	+/ 30/ 2020	Kulisus	Analyze draft talking points re litigation holds in	0.55	٧	300.00	7	202.07
Marissa Nardi	4/30/2020	Kansas	advance of meet and confer	0.58	\$	380.00	\$	221.67
Marissa Nardi	4/30/2020		Meeting with NT, IL, and EPG re CW experts	1.00	\$	380.00		380.00
ivialissa ivalul	4/30/2020	Nalisas	ivideding with ivi, it, and the two experts	1.00	٧	300.00	٧	300.00
Marissa Nardi	4/30/2020	Kansas	Draft outline of talking points for M&C re discovery	2.63	\$	380.00	\$	1,000.67

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Marissa Nardi	5/1/2020	Vancas	Discuss Defs' produced COVID-19 discovery with CG	0.37	Ļ	380.00	ć	139.33
IVId1155d IVd1UI	3/1/2020	Nalisas	Draft summary of all agreements and	0.57	Ą	360.00	Ş	139.33
			representations from M&C for external co-counsel's					
Marissa Nardi	5/1/2020	Kansas	review and circulation to Defs	0.53	¢	380.00	¢	202.67
iviari33a ivarar	3/1/2020	Karisas	Meeting with external co-counsel re discovery during	0.55	٧	300.00	7	202.07
Marissa Nardi	5/1/2020	Kansas	M&C	0.75	\$	380.00	\$	285.00
Marissa Nardi	5/1/2020		Review COVID-19 production by Defendants	0.77	\$	380.00	\$	291.33
	5,2,2525		Meeting with internal CR co-counsel and external co-		· ·		т	
			counsel PJ TW and JK (DLA) to prepare for M&C later					
Marissa Nardi	5/1/2020	Kansas	today	1.00	\$	380.00	\$	380.00
Marissa Nardi	5/1/2020		Edit M&C outline in preparation for M&C	1.28	\$	380.00	\$	487.67
Marissa Nardi	5/4/2020		Electronic email with JK at DLA re search terms	0.18	\$	380.00	\$	69.67
Marissa Nardi	5/4/2020	Kansas	Review Defs' letter re draft settlement agreement	0.20	\$	380.00	\$	76.00
Marissa Nardi	5/4/2020	Kansas	Electronic email with internal team re privilege log	0.22	\$	380.00	\$	82.33
			Electronic email with external co-counsel co-counsel					
Marissa Nardi	5/4/2020	Kansas	re summary of M&C to share with Defs	0.23	\$	380.00	\$	88.67
Marissa Nardi	5/4/2020		Electronic email with IL re mediation	0.27	\$	380.00		101.33
			Electronic email IL re analysis of Defs' draft					
Marissa Nardi	5/4/2020	Kansas	settlement agreement dated 5-4-20	0.27	\$	380.00	\$	101.33
			Electronic email with internal CR team re NP file					
Marissa Nardi	5/4/2020	Kansas	review	0.32	\$	380.00	\$	120.33
Marissa Nardi	5/4/2020	Kansas	Read and discuss updated NP doc review protocol	0.43	\$	380.00	\$	164.67
			Analyze and correspond with NT, IL, and EPG re					
Marissa Nardi	5/4/2020	Kansas	update re potential CW experts	0.68	\$	380.00	\$	259.67
			Analyze last draft of settlement agreement to					
Marissa Nardi	5/4/2020	Kansas	analyze potential items for further negotiations	0.72	\$	380.00	Ś	272.33
	3, ., 2020		Analyze Defendants' new 5-4-20 marked up draft	3.72	Υ	555.66	~	2,2.33
Marissa Nardi	5/4/2020	Kansas	settlement agreement	0.90	Ś	380.00	Ś	342.00

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Marissa Nardi	5/5/2020	Kansas	Discuss follow-up re brain science expert with CG	0.27	\$ 380.00	\$	101.33
Marissa Nardi	5/5/2020	Kansas	Review CG's draft summary re production issues	0.37	\$ 380.00	\$	139.33
Marissa Nardi	5/5/2020		Analyze COVID-19 production holes	1.32	\$ 380.00		500.33
Marissa Nardi	5/6/2020	Kansas	Electronic email with NK re CW expert progress	0.13	\$ 380.00	\$	50.67
Marissa Nardi	5/6/2020	Kansas	Electronic email with CC DA and CG re location of COVID-19 files	0.18	\$ 380.00	\$	69.67
Marissa Nardi	5/6/2020		Electronic email with PJ re ESI search terms	0.20	\$ 380.00	\$	76.00
Marissa Nardi	5/6/2020	Kansas	Prepare for co-counsel meeting by reviewing latest correspondence	0.27	\$ 380.00	\$	101.33
Marissa Nardi	5/6/2020	Kansas	Discuss with PJ review of documents produced by Defs and M&Cs	0.32	\$ 380.00	\$	120.33
Marissa Nardi	5/6/2020		Electronic email with JK and IL re analysis of privilege and redaction logs	0.32	 380.00	\$	120.33
Marissa Nardi	5/6/2020	Kansas	Meeting with JK re privilege and redaction log	0.25	\$ 380.00	\$	95.00
Marissa Nardi	5/6/2020	Kansas	Meeting with internal CR KS team re experts and productions	0.58	\$ 380.00	\$	221.67
Marissa Nardi	5/6/2020	Kansas	Prepare and email internal team re plan for identifying deponents	0.63	\$ 380.00	\$	240.67
Marissa Nardi	5/6/2020	Kansas	Meeting with CG re rfps (4th set of rfps to dcf and 2nd set to kdhe and kdads)	0.67	\$ 380.00	\$	253.33
Marissa Nardi	5/6/2020	Kansas	Meeting with external co-counsel team re litigation strategy, including discovery disputes, litigation schedule, experts, and settlement	1.00	\$ 380.00	\$	380.00
Marissa Nardi	5/6/2020		Edit COVID-19 production holes summary and analysis in preparation for M&C	1.45	\$ 380.00	•	551.00
Marissa Nardi	5/7/2020	Kansas	Electronic email with JK re video depositions and vendors	0.18	\$ 380.00	\$	69.67
Marissa Nardi	5/7/2020	Kansas	Electronic email with DA and CC re NP MA files and supplemental production	0.33	\$ 380.00	\$	126.67

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			Analyze and discuss with IL updated draft case					
Marissa Nardi	5/7/2020	Kansas	calendar to propose to Defs	0.40	\$	380.00	\$	152.00
			Electronic email with DA and CC re COVID-19					
Marissa Nardi	5/7/2020	Kansas	production and updates	0.47	\$	380.00	\$	177.33
			Review and edit privilege log and redaction analysis					
Marissa Nardi	5/7/2020	Kansas	in conjunction with logs provided by Defs	0.87	\$	380.00	\$	329.33
			Draft talking points and outline for upcoming					
Marissa Nardi	5/7/2020	Kansas	discovery disputes M&C	1.73	\$	380.00	\$	658.67
Marissa Nardi	5/8/2020	Kansas	Electronic email with NT re legal research re NP rogs	0.13	\$	380.00	\$	50.67
			<u> </u>					
			electronic mail with CG re production deficiencies					
Marissa Nardi	5/8/2020	Kansas	from Defendants' covid-19 production	0.22	\$	380.00	\$	82.33
			discuss with PJ discovery issues to address during					
Marissa Nardi	5/8/2020	Kansas	next M&C	0.23	\$	380.00	\$	88.67
			alastronia mail with internal CD team to first 20hC					
Namina Nami	F /0 /2020	V	electronic mail with internal CR team re first 30b6	0.27	<b>~</b>	200.00	<b>,</b>	101 22
Marissa Nardi	5/8/2020	Kansas	depositions and communications with Defs	0.27	\$	380.00	\$	101.33
Marissa Nardi	5/8/2020	Kansas	electronic mail with CC and DA re outline for M&C	0.30	\$	380.00	\$	114.00
			electronic mail with JK and PJ re search terms and ESI					
Marissa Nardi	5/8/2020	Kansas	issues	0.32	\$	380.00	\$	120.33
			electronic mail with IL, LW, PJ, and DLA re upcoming					
Marissa Nardi	5/8/2020	Kansas	30b6 topic	0.37	\$	380.00	\$	139.33
Marissa Nardi	5/8/2020	Kansas	prepare for M&C by editing outline	0.83	\$	380.00	\$	316.67
			read legal research re responding to rogs posed to					
Marissa Nardi	5/8/2020	Kansas	NPs	0.97	\$	380.00	\$	367.33
			draft latter to Defe with key assertions from NASC to					
Marissa Nardi	E /0/2020	Vancac	draft letter to Defs with key assertions from M&C to share with external co-counsel and then Defs	0.07	ć	200.00	ć	267 22
ivialissa ivalul	5/8/2020	ransas	Share with external co-counsel and then Dels	0.97	\$	380.00	\$	367.33
Marissa Nardi	5/8/2020	Kansas	M&C with opposing co-counsel re discovery matters	1.50	\$	380.00	\$	570.00

			electronic mail with NT and SD re discovery requests			
Marissa Nardi	5/14/2020	Kansas	by Defs directed at NPs	0.25	\$ 380.00	\$ 95.00
Marissa Nardi	5/14/2020	Kansas	electronic mail with NT re potential CW experts	0.28	\$ 380.00	\$ 107.67
Marissa Nardi	5/14/2020	Kansas	discuss M&C prep with PJ	0.32	\$ 380.00	\$ 120.33
Marissa Nardi	5/14/2020	Kansas	analyze discovery directed toward NPs	0.32	\$ 380.00	\$ 120.33
Marissa Nardi	5/14/2020	Kansas	prepare agenda for M&C	0.33	\$ 380.00	\$ 126.67
Marissa Nardi	5/14/2020	Kansas	discuss M&C strategy with internal team	0.37	\$ 380.00	\$ 139.33
Marissa Nardi	5/14/2020	Kansas	prepare list and analysis of CR M&C topics for PJ	0.47	\$ 380.00	\$ 177.33
			analyze proposed case schedule and email team re			
Marissa Nardi	5/14/2020	Kansas	same	0.47	\$ 380.00	\$ 177.33
			edit CG draft letter to Pls' re COVID-19 production			
Marissa Nardi	5/14/2020	Kansas	issues	0.68	\$ 380.00	\$ 259.67
Marissa Nardi	5/15/2020	Kansas	review notes and recap from M&C	0.27	\$ 380.00	\$ 101.33
			electronic mail with LF, NT, and CC re discovery to			
Marissa Nardi	5/15/2020	Kansas	NPs	0.30	\$ 380.00	\$ 114.00
Marissa Nardi	5/15/2020	Kansas	electronic mail re deposition prep	0.30	\$ 380.00	\$ 114.00
Marissa Nardi	5/15/2020	Kansas	read letters from Defs re custodians	0.43	\$ 380.00	\$ 164.67
			electronic mail with internal and co-counsel team re			
Marissa Nardi	5/15/2020	Kansas	30(b)(6) designees and scheduling	0.48	\$ 380.00	\$ 183.67
			electronic mail with internal team and PJ re			
Marissa Nardi	5/15/2020	Kansas	proposed updated case schedule	0.80	\$ 380.00	\$ 304.00
			electronic mail with CC re upcoming litigation			
Marissa Nardi	5/18/2020	Kansas	deadlines	0.13	\$ 380.00	\$ 50.67
			electronic mail with co-counsel re email letter to			
Marissa Nardi	5/18/2020	Kansas	Defs summarizing Defs' admissions from M&C	0.28	\$ 380.00	\$ 107.67
Marissa Nardi	5/18/2020		edit M&C summary to share with Defs	0.33	\$ 380.00	\$ 126.67
			discuss preparation for Koehn deposition with PJ and			
Marissa Nardi	5/18/2020	Kansas	JK	0.57	\$ 380.00	\$ 215.33
Marissa Nardi	5/18/2020		prepare for Koehn deposition	0.93	\$ 380.00	 354.67

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			electronic mail with JK re rough drafts, video, feeds,					
			and deposition details for upcoming Koehn 30b6					
Marissa Nardi	5/19/2020 Ka	ansas	deposition	0.38	\$	380.00	\$	145.67
			electronic mail with PJ, JK (CR), and JK (DLA) re					
Marissa Nardi	5/19/2020 Ka	ansas	remote deposition prep	0.47	\$	380.00	\$	177.33
			analyze 30(b)(6) deposition notice in preparation for					
Marissa Nardi	5/19/2020 Ka	ansas	depositions	0.53	\$	380.00	\$	202.67
Marissa Nardi	5/19/2020 Ka	ansas	discuss with IL deposition strategy	0.70	\$	380.00	\$	266.00
Marissa Nardi	5/20/2020 Ka		read KS local rules re depositions	0.12	\$	380.00	\$	44.33
	, ,		electronic mail to internal team re supplementation		•		•	
Marissa Nardi	5/20/2020 Ka	ansas	of initial disclosures	0.17	\$	380.00	\$	63.33
			electronic mail with JK re prepare for upcoming					
Marissa Nardi	5/20/2020 Ka	ansas	settlement session	0.18	\$	380.00	\$	69.67
Marissa Nardi	5/20/2020 Ka	ansas	advise DA & CC re MA file review	0.22	\$	380.00	\$	82.33
Marissa Nardi	5/20/2020 Ka	ansas	review sample outlines	0.22	\$	380.00	\$	82.33
Marissa Nardi	5/20/2020 Ka	ansas	electronic mail with internal team re custodian lists	0.28	\$	380.00	\$	107.67
			discuss 30b6 topic 1(1&3) deposition strategy with IL					
Marissa Nardi	5/20/2020 Ka	ansas	and NT	0.08	\$	380.00	\$	31.67
			electronic mail with NT, CC, and DA re 30b6 topic					
Marissa Nardi	5/20/2020 Ka	ansas	1(1&3) deposition preparation tasks	0.30	\$	380.00	\$	114.00
			discuss with SD and IL re news re contractors and					
Marissa Nardi	5/20/2020 Ka	ansas	updated 30b6 strategy	0.33	\$	380.00	\$	126.67
			prepare for co-counsel meeting with external team					
			re litigation strategy by reviewing recent					
Marissa Nardi	5/20/2020 Ka	ansas	correspondence	0.20	\$	380.00	\$	76.00
			Closely review newly produced docs by Defendants					
Marissa Nardi	5/20/2020 Ka	ansas	re retention policy and litigation hold	0.40	\$	380.00	\$	152.00
Marissa Nardi	5/20/2020 Ka	ansas	advise JK (DLA) for upcoming 30b6 deposition	0.45	\$	380.00	\$	171.00
			meeting with internal team re upcoming CR 30(b)(6)					
Marissa Nardi	5/20/2020 Ka	ansas	deposition	0.50	\$	380.00	\$	190.00

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			meeting with external co-counsel re litigation			
			strategy, including 30(b)(6) depositions, subpoenas,			
Marissa Nardi	5/20/2020 Ka	ansas	NPs, mediation, and experts	1.00	\$ 380.00	\$ 380.00
			email with IL and NT re custodian attachment shared			
Marissa Nardi	5/21/2020 Ka	ansas	today	0.20	\$ 380.00	\$ 76.00
			electronic mail with LBB and TW re deposition on			
Marissa Nardi	5/21/2020 Ka	ansas	Tues of Koehn	0.22	\$ 380.00	\$ 82.33
			electronic mail co-counsel daft 30b6 update letter			
Marissa Nardi	5/21/2020 Ka	ansas	and email with external co-counsel re same	0.32	\$ 380.00	\$ 120.33
			meeting with IL re litigation case strategy for Kansas, including 30(b)(6) deposition of Kline and responding			
Marissa Nardi	5/21/2020 Ka	ansas	to Defs' discovery requests re NPs	0.50	\$ 380.00	\$ 190.00
			meeting with NT and IL re 30b6 deposition topic			
Marissa Nardi	5/21/2020 Ka	ansas	I(1&3) prep	0.50	\$ 380.00	 190.00
Marissa Nardi	5/21/2020 Ka	ansas	edit draft third party subpoenas	0.53	\$ 380.00	\$ 202.67
			advise JK (DLA) re preparation of 30b6 deposition of			
Marissa Nardi	5/21/2020 Ka	ansas	topic 3(3)	0.55	\$ 380.00	\$ 209.00
Marissa Nardi	5/21/2020 Ka	ansas	Factual research re Melinda Kline 30b6 designee	0.72	\$ 380.00	\$ 272.33
Marissa Nardi	5/21/2020 Ka	ansas	prepare list of admissions from M&C	0.85	\$ 380.00	\$ 323.00
Marissa Nardi	5/21/2020 Ka	ansas	edit CG draft letter to Defs re 30b6 issues and new priority deposition	1.23	\$ 380.00	\$ 468.67
Marissa Nardi	5/22/2020 Ka	ansas	telephone call with PJ re deposition preparation	0.13	\$ 380.00	\$ 50.67
Marissa Nardi	5/22/2020 Ka	ansas	M&C with opposing counsel re ESI	1.00	\$ 380.00	\$ 380.00
			meeting with PJ and JK (DLA) in preparation for			
Marissa Nardi	5/22/2020 Ka	ansas	Tues's deposition of Koehn 30b6 topic III(3)	1.00	\$ 380.00	\$ 380.00
			review J. Koehn deposition preparation outline in			
Marissa Nardi	5/25/2020 Ka	ansas	preparation for deposition	0.67	\$ 380.00	\$ 253.33
			edit draft settlement markup document and share			
Marissa Nardi	5/26/2020 Ka	ansas	with IL	0.32	\$ 380.00	\$ 120.33

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	= /a s /a a a a					202.22		
Marissa Nardi	5/26/2020 Ka	ansas	prepare for 30b6 deposition by reviewing outline	0.88	\$	380.00	\$	335.67
	5 /27 /2020 W		electronic mail with NT EPG and IL re experts for	0.45		200.00		
Marissa Nardi	5/27/2020 Ka		child welfare	0.15	•	380.00	•	57.00
Marissa Nardi	5/27/2020 Ka	ansas	electronic mail with JK re settlement prep	0.18	\$	380.00	\$	69.67
			discuss J. Koehn deposition with IL and NT in					
Marissa Nardi	E /27/2020 Ka		·	0.23	\$	200.00	\$	88.67
Marissa Narui	5/27/2020 Ka	ansas	preparation for upcoming M. Kline deposition	0.23	<b>&gt;</b>	380.00	\$	88.67
Marissa Nardi	5/27/2020 Ka	ansas	discuss with DA and CC plan for discovery deadline	0.25	\$	380.00	\$	95.00
					-			
			prepare to discuss J. Koehn deposition highlights at					
Marissa Nardi	5/27/2020 Ka	ansas	external co-counsel team mtg by reviewing notes	0.23	\$	380.00	\$	88.67
			electronic mail with JK and PJ re Koehn deposition					
Marissa Nardi	5/27/2020 Ka	ansas	exhibits	0.30	\$	380.00	\$	114.00
			meeting with internal CR team re potential exhibits					
			for deposition of Melinda Kline, other discovery,					
Marissa Nardi	5/27/2020 Ka	ansas	settlement strategy.	0.67	\$	380.00	\$	253.33
			review select portions of J. Koehn deposition. rough					
Marissa Nardi	5/27/2020 Ka	ansas	transcript	0.80	\$	380.00	\$	304.00
			meeting with external co-counsel team re litigation					
			strategy, including responding to discovery posed by					
			Defs, third parties, depositions, aging out NPs, and					
Marissa Nardi	5/27/2020 Ka	ansas	experts	1.00	\$	380.00	\$	380.00
			electronic mail with M. Hawley re his legal research					
Marissa Nardi	5/28/2020 Ka	ansas	re discovery directed to children	0.33	\$	380.00	\$	126.67
			electronic mail with IL, NT, and KS co-counsel re M.					
			Hawley's legal research re propounding discovery to					
Marissa Nardi	5/28/2020 Ka	ansas	children	0.40	\$	380.00	\$	152.00
			meeting with CR neuroscience team to prepare for					
Marissa Nardi	5/28/2020 Ka	ansas	session w/ expert	0.50	\$	380.00	\$	190.00
Naniaa Need	F /20 /2020 1/		manation with H marks discussed as the con-	0.70	<b>,</b>	200.00	<u>د</u>	270.67
Marissa Nardi	5/28/2020 Ka	ansas	meeting with IL re KS discovery and settlement	0.73	\$	380.00	<b>\</b>	278.67

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			discuss with NT and MH NP aging out legal research					
Marissa Nardi	5/29/2020	Kansas	issue	0.32	\$	380.00	\$	120.33
			meeting with external co-counsel re draft					
			settlement agreement and proposed responses for					
Marissa Nardi	5/29/2020	Kansas	Defs	1.50	\$	380.00	\$	570.00
Marissa Nardi	6/1/2020	Kansas	electronic mail with PJ and JK re ESI M&C	0.15	\$	380.00	\$	57.00
Marissa Nardi	6/1/2020	Kansas	prepare for mtg with expert re brain science	0.33	\$	380.00	\$	126.67
Marissa Nardi	6/1/2020	Kansas	edit draft settlement agreement	0.35	\$	380.00	\$	133.00
Marissa Nardi	6/1/2020	Kansas	electronic mail with NT re Kline deposition topic	0.37	\$	380.00	\$	139.33
Marissa Nardi	6/1/2020		review KS expert research materials	0.40	\$	380.00	\$	152.00
Marissa Nardi	6/1/2020		review newly updated draft settlement	0.65	\$	380.00		247.00
			review part 1 of first draft deposition outline for M.		<u> </u>		•	
Marissa Nardi	6/1/2020	Kansas	Kline	0.83	\$	380.00	\$	316.67
Marissa Nardi	6/1/2020	Kansas	meeting with potential expert re brain science	0.72	\$	380.00	\$	272.33
Marissa Nardi	6/2/2020	Kansas	prepare for ESI M&C	0.22	\$	380.00	\$	82.33
Marissa Nardi	6/2/2020	Kansas	draft letter to Defendants re depositions	0.75	\$	380.00	\$	285.00
Marissa Nardi	6/2/2020	Kansas	M&C with Defs re ESI	1.00	\$	380.00	\$	380.00
Marissa Nardi	6/2/2020	Kansas	edit full 30(b)(6) deposition outline for Kline	2.67	\$	380.00	\$	1,013.33
			discuss with NCYL colloquial terms for night-to-night					
Marissa Nardi	6/3/2020	Kansas	placements for Kline deposition outline	0.30	\$	380.00	\$	114.00
Marissa Nardi	6/3/2020	Kansas	analyze new EPSDT data from Defs	0.32	\$	380.00	\$	120.33
Naviosa Navdi	C /2 /2020	Vanaga	prepare for co-counsel team mtg by reading latest	0.17	<u>د</u>	200.00	<u> </u>	62.22
Marissa Nardi	6/3/2020	Kalisas	correspondence	0.17	Þ	380.00	Ą	63.33
Marissa Nardi	6/3/2020	Kansas	advise JK re settlement drafts in preparation for settlement session	0.33	\$	380.00	\$	126.67
_			electronic mail to internal CR re analysis of MA NP		-			
Marissa Nardi	6/3/2020	Kansas	file	0.37	\$	380.00	\$	139.33
			read public info Defs directed Pls to on agency					
Marissa Nardi	6/3/2020	Kansas	website for purposes of settlement discussion	0.38	\$	380.00	\$	145.67
Marissa Nardi	6/3/2020	Kansas	revise deposition exhibits for Kline deposition outline	0.42	\$	380.00	\$	158.33

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			meeting with external co-counsel team to discuss					
Marissa Nardi	6/3/2020 k	Kansas	mediation strategy	0.50	\$	380.00	\$	190.00
			meeting with internal KS team re mediation					
			updates, Kline deposition, review of materials					
Marissa Nardi	6/3/2020 k	Kansas	produced by Defs, ESI and discovery responses	0.50	\$	380.00	\$	190.00
Marissa Nardi	6/3/2020 k	Kansas	advise NT re Kline deposition outline edits	0.67	\$	380.00	\$	253.33
			prepare for negotiation session with Defs re					
			settlement by reviewing latest drafts and creating					
Marissa Nardi	6/3/2020 k	Kansas	talking points	0.82	\$	380.00	\$	310.33
Marissa Nardi	6/3/2020 k	Kansas	discuss NP file review with IL, PJ, DA, and CC	0.83	\$	380.00	\$	316.67
			meeting with external co-counsel team re litigation					
			strategy, including settlement, third party					
Marissa Nardi	6/3/2020 k	Kansas	subpoenas, and depositions	1.00	\$	380.00	\$	380.00
NA set see Na self	6/4/2020		and the desired section of the Bost desired by the section of the Bost desired by the section of	0.25		200.00		05.00
Marissa Nardi	6/4/2020 k	Kansas	review updated ESI sources for DCF doc collection	0.25	\$	380.00	\$	95.00
Namina Nami	6/4/2020	<b>/</b>	electronic mail with internal CR team re settlement	0.25	<u> </u>	200.00	۸.	05.00
Marissa Nardi	6/4/2020 k	Kansas	session update	0.25	\$	380.00	\$	95.00
Marissa Nardi	6/4/2020 k	Kansas	draft updated settlement package to share with Defs	0.63	\$	380.00	\$	240.67
Marissa Nardi	6/4/2020 k	Kansas	meeting with IL re upcoming settlement session	0.67	\$	380.00	\$	253.33
			prepare for negotiation session re settlement by					
Marissa Nardi	6/4/2020 k	(ansas	drafting talking points and reviewing latest materials	1.00	\$	380.00	\$	380.00
Marissa Nardi	6/4/2020 k		meeting with Defs re settlement	5.00	\$	380.00		1,900.00
	3, 1, 2020	101110010		0.00	т	000.00	т	_,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
			prepare list of relevant listserv email addresses to					
			share with opposing counsel CJ and RD for potential					
Marissa Nardi	6/5/2020 k	Kansas	ESI searches of their inboxes and outboxes	0.33	\$	380.00	\$	126.67
			electronic mail with internal CR team re deposition					
Marissa Nardi	6/5/2020 k	Kansas	strategy for Kline in light of M&C	0.35	\$	380.00	\$	133.00
			telephone call with IL and NT re deposition					
Marissa Nardi	6/5/2020 k	Kansas	adjustment plan	0.48	\$	380.00	\$	183.67

Marissa Nardi	6/5/2020		edit draft settlement package proposal language	0.50	 380.00	 190.00
Marissa Nardi	6/5/2020		draft outline for KS general discovery M&C	0.85	\$ 380.00	\$ 323.00
Marissa Nardi	6/5/2020	Kansas	M&C with Defs re ESI	1.00	\$ 380.00	\$ 380.00
			M&C with Defs re discovery issues including			
Marissa Nardi	6/5/2020	Kansas	depositions and document productions	1.00	\$ 380.00	\$ 380.00
			review sunflower's supplemental response to			
Marissa Nardi	6/8/2020	Kansas	subpoena	0.17	\$ 380.00	\$ 63.33
Marissa Nardi	6/8/2020	Kansas	discuss legal research memo re aging out with NT	0.22	\$ 380.00	\$ 82.33
Marissa Nardi	6/8/2020	Kansas	edit legal research memo on KS NPs aging out	0.48	\$ 380.00	\$ 183.67
			discuss with SD and team conversations with clients			
Marissa Nardi	6/9/2020	Kansas	re aging out	0.38	\$ 380.00	\$ 145.67
Marissa Nardi	6/9/2020	Kansas	discuss discovery follow-up re aging out NPs with PJ	0.52	\$ 380.00	\$ 196.33
Marissa Nardi	6/9/2020	Kansas	prepare updated filing plan	0.65	\$ 380.00	\$ 247.00
			prepare for upcoming schedule 30(b)(6) deposition			
Marissa Nardi	6/9/2020	Kansas	re placement	0.82	\$ 380.00	\$ 310.33
			analyze draft Kansas settlement in preparation for			
Marissa Nardi	6/9/2020	Kansas	settlement mtg with Defs	0.93	\$ 380.00	\$ 354.67
			electronic mail with external co-counsel re edits to			
Marissa Nardi	6/10/2020	Kansas	draft settlement	0.37	\$ 380.00	\$ 139.33
			discuss settlement updates with internal and			
Marissa Nardi	6/10/2020	Kansas	external co-counsel team	0.45	\$ 380.00	\$ 171.00
			prepare for settlement session with Defs today by			
Marissa Nardi	6/10/2020	Kansas	reviewing latest drafts by each party	0.55	\$ 380.00	\$ 209.00
			electronic mail with SB and IL re suggested edits to			
Marissa Nardi	6/10/2020	Kansas	KS draft settlement	0.65	\$ 380.00	\$ 247.00
			electronic mail with external KS co-counsel re			
Marissa Nardi	6/10/2020	Kansas	potential edits to updated settlement draft	1.28	\$ 380.00	\$ 487.67
Marissa Nardi	6/10/2020	Kansas	edit draft settlement agreement	1.72	\$ 380.00	\$ 652.33
			Settlement negotiation meetings with Defendants			
Marissa Nardi	6/10/2020	Kansas	and co-counsel	3.00	\$ 380.00	\$ 1,140.00

			electronic mail with team re motions re 18 year old			
Marissa Nardi	6/11/2020	Kansas	NPs	0.35	\$ 380.00	\$ 133.00
Marissa Nardi	6/11/2020	Kansas	prepare for settlement session	0.70	\$ 380.00	\$ 266.00
			Settlement negotiation meetings and breakout			
Marissa Nardi	6/11/2020	Kansas	sessions with Defs and Pls for settlement purposes	3.00	\$ 380.00	\$ 1,140.00
			prepare draft email to NFs advising them of			
Marissa Nardi	6/12/2020	Kansas	settlement terms	0.48	\$ 380.00	\$ 183.67
			meeting with IL and CJ re settlement			
Marissa Nardi	6/12/2020	Kansas	communications	0.50	\$ 380.00	\$ 190.00
			electronic mail with external co-counsel team re all			
Marissa Nardi	6/12/2020	Kansas	follow-up needed for settlement finalization	0.72	\$ 380.00	\$ 272.33
			electronic mail with LW and SD re communications			
Marissa Nardi	6/15/2020	Kansas	with NFs re settlement	0.23	\$ 380.00	\$ 88.67
Marissa Nardi	6/15/2020	Kansas	discuss research re NP facts re settlement with CC	0.30	\$ 380.00	\$ 114.00
Marissa Nardi	6/15/2020		electronic mail with IL and SD re NF approvals	0.37	\$ 380.00	\$ 139.33
Marissa Nardi	6/15/2020	Kansas	edit draft communication re settlement agreement	0.48	\$ 380.00	\$ 183.67
			draft email letter to NFs re approval of settlement			
Marissa Nardi	6/15/2020		agreement	0.73	\$ 380.00	\$ 278.67
Marissa Nardi	6/15/2020	Kansas	prepare fee app filing plan and timeline	0.83	\$ 380.00	\$ 316.67
			electronic mail with CC and PJ re preliminary			
Marissa Nardi	6/16/2020	Kansas	approval pre-class cert in re settlement	0.32	 380.00	 120.33
Marissa Nardi	6/16/2020	Kansas	review draft stipulation	0.38	\$ 380.00	\$ 145.67
Marissa Nardi	6/16/2020	Kansas	edit draft stipulation	0.47	\$ 380.00	\$ 177.33
Marissa Nardi	6/16/2020	Kansas	edit draft communications re proposed settlement	0.65	\$ 380.00	\$ 247.00
			prepare for KS co-counsel team mtg by reviewing			
Marissa Nardi	6/17/2020	Kansas	emails	0.22	\$ 380.00	\$ 82.33
			electronic mail with NCYL and Martha re screening			
Marissa Nardi	6/17/2020	Kansas	instruments in re settlement	0.33	\$ 380.00	\$ 126.67

			electronic mail with expert re brain science re next			
Marissa Nardi	6/17/2020	Kansas	steps	0.38	\$ 380.00	\$ 145.67
			finalize draft attachments to settlement agreements			
Marissa Nardi	6/17/2020	Kansas	subject to Defs' potential additions	0.48	\$ 380.00	\$ 183.67
			telephone call with IL CJ and BR re settlement			
Marissa Nardi	6/17/2020	Kansas	agreement	0.50	\$ 380.00	\$ 190.00
			review closely the set of attachments pulled by CC as			
Marissa Nardi	6/17/2020	Kansas	potential settlement exhibits	0.57	\$ 380.00	\$ 215.33
			electronic mail with CC, IL, and co-counsel re			
Marissa Nardi	6/17/2020	Kansas	settlement exhibits	0.80	\$ 380.00	\$ 304.00
			meeting with external co-counsel team re			
			settlement and litigation strategy, including			
			settlement revisions, settlement communications			
			with clients, preliminary approval motion, and third			
Marissa Nardi	6/17/2020	Kansas	party discovery	1.00	\$ 380.00	\$ 380.00
			electronic mail with Corliss and internal CR team re			
Marissa Nardi	6/18/2020	Kansas	final exhibits	0.15	\$ 380.00	\$ 57.00
Marissa Nardi	6/18/2020	Kansas	edit draft email to Defs	0.18	\$ 380.00	\$ 69.67
			electronic mail with FP and MH re screening			
Marissa Nardi	6/18/2020	Kansas	instruments in settlement agreement	0.30	\$ 380.00	\$ 114.00
			review filing from Hapka case in re preliminary			
Marissa Nardi	6/18/2020	Kansas	approval proposed timeline	0.37	\$ 380.00	\$ 139.33
			electronic mail with PJ and NT re FRCP research re			
Marissa Nardi	6/18/2020	Kansas	preliminary approval	0.38	\$ 380.00	\$ 145.67
			meeting with IL re settlement agreement and			
Marissa Nardi	6/18/2020	Kansas	preliminary approval p	0.50	\$ 380.00	\$ 190.00
			edit final set of settlement exhibits to include new			
			materials from Defendants approved by Plaintiffs			
Marissa Nardi	6/18/2020	Kansas	and tabs	0.50	\$ 380.00	\$ 190.00
			analyze closely sample PECFS and CAFAS from			
Marissa Nardi	6/18/2020	Kansas	Defendants in re settlement	0.63	\$ 380.00	\$ 240.67

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			prepare for meeting with Defendants re settlement					
Marissa Nardi	6/18/2020	Kansas	by reviewing latest drafts and correspondence	0.80	\$	380.00	\$	304.00
Marissa Nardi	6/18/2020	Kansas	meeting with Defs and co-counsel re settlement	1.00	\$	380.00	\$	380.00
			electronic mail with SD and IL re draft updated settlement agreement in re communications with					
Marissa Nardi	6/19/2020	Kansas	NFs	0.32	\$	380.00	\$	120.33
			telephone call with potential mediator for					
Marissa Nardi	6/22/2020	Kansas	settlement in re settlement	0.25	\$	380.00	\$	95.00
Marissa Nardi	6/22/2020	Kancac	Conference call with proposed monitor re settlement agreement draft	0.33	\$	380.00	\$	126.67
ivialissa ivalui	0/22/2020	Kalisas	prepare for external team meeting by reviewing	0.33	٧	360.00	٧	120.07
			correspondence re settlement and preliminary					
Marissa Nardi	6/24/2020	Kansas	approval	0.23	\$	380.00	\$	88.67
			meeting with external co-counsel team re litigation					
			and settlement strategy, including AG's proposed					
	- / /		settlement changes, client approvals, and					
Marissa Nardi	6/24/2020	Kansas	preliminary approval motion	1.17	\$	380.00	\$	443.33
Marissa Nardi	6/20/2020	Vancas	discuss potential upcoming 30(b)(6) deposition with internal CR team	0.23	\$	380.00	\$	88.67
IVIAI ISSA IVAI UI	6/29/2020	Nalisas	meeting with external co-counsel re settlement	0.23	Ş	360.00	Ą	00.07
Marissa Nardi	6/30/2020	Kancac	strategy and next steps	0.58	\$	380.00	\$	221.67
Marissa Nardi	7/1/2020		review proposed email to opposing counsel	0.38	\$	380.00	\$	63.33
TVIGITISSA TVATAT	77172020	Ransas	prepare for KS team meeting by reviewing status of	0.17	Υ	300.00	<u> </u>	03.33
Marissa Nardi	7/1/2020	Kansas	third party discovery	0.22	\$	380.00	\$	82.33
			meeting with IL re upcoming KS litigation and					
Marissa Nardi	7/2/2020	Kansas	settlement tasks	0.50	\$	380.00	\$	190.00
			Research re KS State Finance Council in re KS					
Marissa Nardi	7/2/2020	Kansas	settlement approval process	1.57	\$	380.00	\$	595.33
Marissa Nardi	7/6/2020	Kansas	review email to Defs re next steps	0.17	\$	380.00	\$	63.33
			electronic mail with IL re edits to preliminary					
Marissa Nardi	7/6/2020	Kansas	approval motion	0.18	\$	380.00	\$	69.67

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			electronic mail with IL re proposed sequencing of					
Marissa Nardi	7/6/2020 Ka	ansas	papers to be filed with Court re settlement	0.32	\$	380.00	\$	120.33
			electronic mail with IL re draft declaration by IL for					
Marissa Nardi	7/6/2020 Ka	ansas	CR ISO class certification with preliminary approval	0.33	\$	380.00	\$	126.67
			read draft preliminary approval papers for					
Marissa Nardi	7/6/2020 Ka	ansas	settlement	0.45	\$	380.00	\$	171.00
			read notice of settlement in similar litigation to					
Marissa Nardi	7/6/2020 Ka	ansas	compare with draft notice of settlement here	0.47	\$	380.00	\$	177.33
Marissa Nardi	7/6/2020 Ka	ansas	edit draft preliminary approval motion	1.30	\$	380.00	\$	494.00
			electronic mail with SD re aged out NPs' stipulation					
Marissa Nardi	7/7/2020 Ka	ansas	of dismissal	0.17	\$	380.00	\$	63.33
Marissa Nardi	7/7/2020 Ka	ansas	electronic mail with JS re preliminary approval affidavit	0.17	\$	380.00	\$	63.33
Marissa Nardi	7/7/2020 Ka	ansas	electronic mail with IL re preliminary approval papers	0.30	\$	380.00	\$	114.00
Marissa Nardi	7/7/2020 Ka	ansas	analyze KS finance committee statute with SD	0.33	\$	380.00	\$	126.67
			review KS settlement agreement updated by JP					
Marissa Nardi	7/7/2020 Ka	ansas	tonight	0.53	\$	380.00	\$	202.67
Marissa Nardi	7/7/2020 Ka	ansas	discuss NP and NF approvals needed with SD and IL	0.67	\$	380.00	\$	253.33
Marissa Nardi	7/7/2020 Ka	ancac	edit preliminary approval motion to share with NCYL	0.70	\$	380.00	¢	266.00
Marissa Nardi	7/8/2020 Ka		finalize settlement filings	0.32	\$	380.00	\$	120.33
TVIGITISSA TVATAT	77072020 Rd	a113G3	midize section in image	0.32	Υ	300.00	Υ	120.33
Marissa Nardi	7/8/2020 Ka	ansas	review updated filings with respect to settlement	0.37	\$	380.00	\$	139.33
			analyze and share updates from state finance					
Marissa Nardi	7/8/2020 Ka	ansas	committee with Plaintiffs' team	0.63	\$	380.00	\$	240.67
			discuss final settlement with internal co-counsel					
Marissa Nardi	7/8/2020 Ka	ansas	team at CR	0.67	\$	380.00	\$	253.33
			finalize stip of dismissal for aged out NPs in					
Marissa Nardi	7/8/2020 Ka	ansas	collaboration with SD	0.82	\$	380.00	\$	310.33

			meeting with external co-counsel team re					
			settlement and next steps, including State Finance					
Marissa Nardi	7/8/2020	Kansas	Council and dismissals for aged out NPs	0.83	\$	380.00	\$	316.67
			observe and take notes at Kansas State Finance					
			Committee hearing public sessions discussing this					
Marissa Nardi	7/8/2020		settlement agreement	2.50	•	380.00	•	950.00
Marissa Nardi	7/9/2020	Kansas	discuss settlement with LBB, TW, and MH	0.48	\$	380.00	\$	183.67
Marissa Nardi	7/9/2020	Kansas	edit IL draft declaration for preliminary approval	0.80	\$	380.00	\$	304.00
			review updated draft motion for preliminary					
Marissa Nardi	7/13/2020	Kansas	approval	0.20	\$	380.00	\$	76.00
			electronic mail with IL re edits to KS preliminary					
Marissa Nardi	7/13/2020	Kansas	approval papers	0.22	\$	380.00	\$	82.33
			electronic mail with IL and NT re operative drafts of					
			preliminary approval motion papers including IL					
Marissa Nardi	7/13/2020	Kansas	affidavit	0.27	\$	380.00	\$	101.33
			review proposed edits to IL declaration re CR ISO					
Marissa Nardi	7/13/2020	Kansas	preliminary approval motion	0.32	\$	380.00	\$	120.33
Marissa Nardi	7/13/2020	Kansas	discuss with NT and IL re updates to IL draft decl	0.35	\$	380.00	\$	133.00
Marissa Nardi	7/13/2020	Kansas	edit CR declaration for preliminary approval motion	0.40	\$	380.00	\$	152.00
Marissa Nardi	7/13/2020	Kansas	edit preliminary approval motion brief	0.45	\$	380.00	\$	171.00
			electronic mail with external KS co-counsel team re					
Marissa Nardi	7/14/2020	Kansas	response to Amerigroup letter re subpoena	0.10	\$	380.00	\$	38.00
			electronic mail with NCYL re strategy re class counsel					
Marissa Nardi	7/15/2020	Kansas	in preliminary approval papers	0.33	\$	380.00	\$	126.67
Marissa Nardi	7/15/2020	Vancas	adit draft CD declaration ISO proliminary constraint	0.70	ć	200.00	ė.	266.00
Marissa Nardi	7/15/2020	V411292	edit draft CR declaration ISO preliminary approval	0.70	Ş	380.00	Ş	266.00

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			attend portion of meeting with external co-counsel					
Marissa Nardi	7/15/2020	Kansas	team re settlement and preliminary	0.75	\$	380.00	\$	285.00
			finalize drafts of preliminary approval papers to be					
			shared with Defendants for their approval prior to					
Marissa Nardi	7/16/2020	Kansas	filing	0.28	\$	380.00	\$	107.67
	7/15/2020		electronic mail with NCYL and IL re class counsel			222.22		
Marissa Nardi	7/16/2020	Kansas	designations in re preliminary approval motion	0.32	\$	380.00	\$	120.33
Marissa Nardi	7/16/2020	Kansas	edit IL declaration for preliminary approval motion	0.33	\$	380.00	\$	126.67
Marissa Nardi	7/16/2020	Kansas	edit preliminary approval proposed order	0.33	\$	380.00	\$	126.67
			electronic mail with IL LW and PJ re class counsel					
			designations for preliminary approval motion and					
Marissa Nardi	7/16/2020	Kansas	related appearances needed	0.47	\$	380.00	\$	177.33
Marissa Nardi	7/16/2020	Kansas	meeting with IL re settlement preliminary approval	0.50	\$	380.00	\$	190.00
			electronic mail with external co-counsel team re					
Marissa Nardi	7/21/2020	Kansas	proposed edits to preliminary approval papers	0.17	\$	380.00	\$	63.33
	4 /20 /2020			0.50	4	200.00		45467
Nicole Taykhman	1/28/2020	Kansas	Review current draft opposition to motion to dismiss	0.53	\$	290.00	\$	154.67
Nicole Taykhman	1/29/2020	Kansas	Review current draft settlement	0.28	\$	290.00	\$	82.17
Nicole Taykhman	1/29/2020	Kancac	Call with SD re strategy for experts	0.45	\$	290.00	ć	130.50
Nicole Taykiiiilaii	1/29/2020	Kaiisas	Reviewed key document from defense production	0.45	٠	230.00	۲	130.30
Nicole Taykhman	1/30/2020	Kansas	concerning overnight office stays.	0.15	\$	290.00	\$	43.50
Nicole Taykhman	1/30/2020		Discuss NP file review with DA and CC.	0.35	\$	290.00	\$	101.50
, -	,				•		•	
Nicole Taykhman	2/5/2020	Kansas	Discuss motion to seal sample documents with CC.	0.02	\$	290.00	\$	4.83
			Email with MN, DA, and CC re defendant's responses					
Nicole Taykhman	2/5/2020	Kansas	and objections to first set of RFPs.	0.15	\$	290.00	\$	43.50

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			Draft motion to seal exhibits in support of opposition			
Nicole Taykhman	2/5/2020	Kansas	to motion to dismiss.	1.32	\$ 290.00	\$ 381.83
			Discuss status of exhibits for purpose of motion to			
Nicole Taykhman	2/6/2020	Kansas	seal and opposition to motion to dismiss with DA.	0.03	\$ 290.00	\$ 9.67
l <u>-</u>	0/6/0000	.,	Draft transmittal declaration for opposition to	2.42	222.22	
Nicole Taykhman	2/6/2020	Kansas	motion to dismiss.	0.43	\$ 290.00	\$ 125.67
			Email with DA and MN re draft transmittal			
	- 1- 1		declaration and motion to seal filings for opposition			
Nicole Taykhman	2/7/2020	Kansas	to motion to dismiss.	0.03	\$ 290.00	\$ 9.67
			Discuss transmittal declaration and sealing			
			documents for opposition to motion to dismiss with			
Nicole Taykhman	2/7/2020	Kansas	DA.	0.15	\$ 290.00	\$ 43.50
			Work on declaration for exhibits to opposition to			
Nicole Taykhman	2/7/2020	Kansas	motion to dismiss and motion to seal exhibits	0.93	\$ 290.00	\$ 270.67
			Draft response to defendants' responses and			
Nicole Taykhman	2/7/2020	Kansas	objections to first set of requests for production.	2.98	\$ 290.00	\$ 865.17
			Review general discovery documents recently			
			produced by defendants to identify their relevance			
Nicole Taykhman	2/10/2020	Kansas	to claims asserted here.	1.95	\$ 290.00	\$ 565.50
			Revise motion to seal in light of cite-checked brief			
Nicole Taykhman	2/11/2020	Kansas	and updated exhibits.	0.22	\$ 290.00	\$ 62.83
			Email with co-counsel, IL, and MN re updated filing			
Nicole Taykhman	2/12/2020	Kansas	for opposition to motion to dismiss.	0.08	\$ 290.00	\$ 24.17
			Review local rules re declarations re declaration to			
			be submitted with opposition to Defs' motion to			
Nicole Taykhman	2/12/2020	Kansas	dismiss	0.08	\$ 290.00	\$ 24.17
			Discuss with MN status of opposition to motion to			
			dismiss, motion to seal, declaration, and golden rule			
Nicole Taykhman	2/12/2020	Kansas	letter.	0.17	\$ 290.00	\$ 48.33

			Further revise motion to seal exhibits in support of					
Nicole Taykhman	2/12/2020 Ka	ansas	opposition to motion to dismiss.	0.23	\$	290.00	\$	67.67
			Meet with MN, CG, JK, and CC to discuss updates to					
Nicole Taykhman	2/12/2020 Ka	ansas	opposition to motion to dismiss and discovery.	0.23	\$	290.00	\$	67.67
			Email with DA and MN re draft declaration and					
			motion to seal corresponding to opposition to					
Nicole Taykhman	2/12/2020 Ka	ansas	motion to dismiss.	0.33	\$	290.00	\$	96.67
			Continue reviewing while taking notes on					
			defendants' responses and objections to first set of					
			requests for production for purpose of golden rule					
Nicole Taykhman	2/12/2020 Ka	ansas	letter.	4.88	\$	290.00	\$	1,416.17
			Discuss plan for finalizing brief and exhibits with MN,					
Nicole Taykhman	2/13/2020 Ka	ansas	JK, DA, and CC.	0.05	\$	290.00	\$	14.50
			Review correspondence with co-counsel re timelines					
Nicole Taykhman	2/13/2020 Ka	ansas	for discovery.	0.08	\$	290.00	\$	24.17
			Email with MN re updates to opposition to motion to					
Nicole Taykhman	2/13/2020 Ka	ansas	dismiss.	0.08	\$	290.00	\$	24.17
			Edit transmittal declaration with list of exhibits for					
Nicole Taykhman	2/13/2020 Ka	ansas	opposition to motion to dismiss.	0.73	\$	290.00	\$	212.67
			Proofread and propose final edits to opposition to					
Nicole Taykhman	2/13/2020 Ka	ansas	motion to dismiss for finalizing.	2.00	\$	290.00	\$	580.00
Nicole Taykhman	2/14/2020 Ka	ansas	Discuss strategy for golden rule letter with MN.	0.05	\$	290.00	\$	14.50
			Continue to analyze and take notes on Defendants'					
			responses and objections to first set of requests for					
Nicole Taykhman	2/14/2020 Ka	ansas	production for purpose of Golden Rule letter.	0.92	\$	290.00	\$	265.83
Nicole Taykhman	2/18/2020 Ka	ansas	Email with MN re opposition to motion to dismiss.	0.03	\$	290.00	\$	9.67
,			Email with MN re issue tags for documents produced		•		· ·	
Nicole Taykhman	2/18/2020 Ka	ansas	by Defendants.	0.25	\$	290.00	\$	72.50

Nicole Taykhman	2/19/2020	Kansas	Email with DA re co-counsel discovery meeting.	0.03	\$	290.00	\$	9.67
NC. d. T. H	2/40/2020	W		0.00		200.00	_	24.47
Nicole Taykhman	2/19/2020	Kansas	Review notes from co-counsel strategy meeting.	0.08	\$	290.00	\$	24.17
			Continue to analyze and draft responses to					
	_ , _ , _ ,		defendants' responses and objections to first set of					
Nicole Taykhman	2/19/2020	Kansas	requests for production.	0.75	\$	290.00	\$	217.50
			Review documents produced by defendants for					
Nicole Taykhman	2/19/2020	Kansas	relevance and issue tags.	2.50	\$	290.00	\$	725.00
			Continue to analyze and draft responses to					
			defendants' responses and objections to first set of					
Nicole Taykhman	2/20/2020	Kansas	requests for production.	1.00	\$	290.00	\$	290.00
			Continue to analyze and draft responses to					
			Defendants' responses to first set of requests for					
Nicole Taykhman	2/21/2020	Kansas	production.	4.67	\$	290.00	\$	1,353.33
			Continue to research and draft responses to					
			Defendants' responses and objections to first set of					
Nicole Taykhman	2/22/2020	Kansas	requests for production.	1.67	\$	290.00	\$	483.33
			Email with MN and IL re draft responses to					
			defendants' responses and objections to first set of					
Nicole Taykhman	2/24/2020	Kansas	requests for production.	0.12	\$	290.00	\$	33.83
			Continue to research and draft responses to					
			defendants' responses and objections to plaintiffs'					
Nicole Taykhman	2/24/2020	Kansas	first set of requests for production.	8.12	\$	290.00	\$	2,353.83
,	, , ,		Continue to review documents produced by		<u> </u>			,
Nicole Taykhman	2/25/2020	Kansas	Defendants for relevance to particular issues.	0.67	\$	290.00	\$	193.33
	_,,		Continue to revise draft responses to defendants'				т	
			responses and objections to plaintffs' first set of					
			requests for production for purpose of golden rule					
Nicole Taykhman	2/25/2020	Kansas	letter.	3.22	\$	290.00	\$	932.83
THEORE TO WITH INTERPRETATION	2, 23, 2020	Ransas	Email with MN and IL re draft responses to responses	3.22	Υ	250.00	7	332.03
Nicole Taykhman	2/26/2020	Kancac	and objections to RFPs.	0.03	\$	290.00	\$	9.67
INICOIC TAYKIIIIIAII	2/20/2020	Nalisas	מווע טאוכטנוטווא נט ועו דא.	0.03	٧	230.00	٧	5.07

			Continue to review documents produced by			
			defendants for relevance to particular issues and			
Nicole Taykhman	2/26/2020	Kansas	summarize key documents located.	3.20	\$ 290.00	\$ 928.00
Nicole Taykhman	2/27/2020	Kansas	Discuss status of document review with DA and CC.	0.08	\$ 290.00	\$ 24.17
			Meet with case team to discuss status of mediation			
Nicole Taykhman	2/27/2020	Kansas	and discovery and next steps.	0.50	\$ 290.00	\$ 145.00
			Continue to review documents produced by			
Nicole Taykhman	2/27/2020	Kansas	Defendants for issue relevance.	0.73	\$ 290.00	\$ 212.67
			Revise letter response to responses and objections			
Nicole Taykhman	2/27/2020	Kansas	to first set of requests for production.	1.55	\$ 290.00	\$ 449.50
			Email with MN re proof of responses to defendants'			
Nicole Taykhman	2/28/2020	Kansas	responses and objections.	0.03	\$ 290.00	\$ 9.67
Nicole Taykhman	2/28/2020	Kansas	Review settlement correspondence.	0.05	\$ 290.00	\$ 14.50
			Email with CC and DA re cite-checking response			
Nicole Taykhman	2/28/2020	Kansas	letter.	0.05	\$ 290.00	\$ 14.50
Nicole Taykhman	2/28/2020	Kansas	Discuss cite-checking of letter with DA and CC.	0.10	\$ 290.00	\$ 29.00
			Discuss plan for finalizing response to defendants'			
Nicole Taykhman	2/28/2020	Kansas	responses and objections with M. Nardi.	0.17	\$ 290.00	\$ 48.33
			Email internal CR team written summary of hot docs			
Nicole Taykhman	2/28/2020	Kansas	reviewed by self.	0.22	\$ 290.00	\$ 62.83
			Email with MN re draft responses to defendants'			
Nicole Taykhman	2/28/2020	Kansas	responses and objections to requests for production.	0.25	\$ 290.00	\$ 72.50
			Proof and revise responses to defendants' responses			
Nicole Taykhman	2/28/2020	Kansas	and objections.	1.73	\$ 290.00	\$ 502.67
			Continue reviewing documents produced by			
Nicole Taykhman	2/28/2020	Kansas	defendants for issue relevance.	2.32	\$ 290.00	\$ 671.83
Nicole Taykhman	3/2/2020	Kansas	Review pro hac vice application.	0.08	\$ 290.00	\$ 24.17
			Email with MN re edits to letter re defendants'			
Nicole Taykhman	3/2/2020	Kansas	responses and objections.	0.10	\$ 290.00	\$ 29.00

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			Review co-counsel edits to letter re responses and					
Nicole Taykhman	3/2/2020	Kansas	objections and correspondence re same.	0.13	\$	290.00	\$	38.67
			Discuss status of discovery letters, RFPs, and					
Nicole Taykhman	3/2/2020	Kansas	interrogatories with MN.	0.17	\$	290.00	\$	48.33
			Discuss policy documents relevant to third party					
Nicole Taykhman	3/4/2020	Kansas	document requests with DA.	0.07	\$	290.00	\$	19.33
			Annotate letter response re Defendants' responses					
			and objections to first set of RFPs for planning for					
Nicole Taykhman	3/4/2020	Kansas	meet and confer.	0.12	\$	290.00	\$	33.83
			Review and provide edits to co-counsel on draft third					
Nicole Taykhman	3/4/2020	Kansas	party document requests.	1.50	\$	290.00	\$	435.00
			Communicate with CG, DA, and CC re protective					
Nicole Taykhman	3/5/2020	Kansas	order acknowledgement.	0.12	\$	290.00	\$	33.83
			Communicate with CC and DA re edits to third-party					
Nicole Taykhman	3/5/2020	Kansas	document requests.	0.13	\$	290.00	\$	38.67
			Email with IL re comments on draft third party					
Nicole Taykhman	3/5/2020	Kansas	document requests.	0.28	\$	290.00	\$	82.17
			Continue to review and provide edits on third party					
Nicole Taykhman	3/5/2020	Kansas	subpoena circulated by co-counsel.	1.73	\$	290.00	\$	502.67
			Email with co-counsel re comments on draft third-					
Nicole Taykhman	3/6/2020	Kansas	party requests to MCOs.	0.03	\$	290.00	\$	9.67
			Email with CC re edits to third-party document					
Nicole Taykhman	3/6/2020	Kansas	requests.	0.05	\$	290.00	\$	14.50
			Communicate with CG re definitions in draft requests					
Nicole Taykhman	3/6/2020	Kansas	for production.	0.12	\$	290.00	\$	33.83
Nicole Taykhman	3/6/2020	Kansas	Revise comments on third-party document requests.	0.20	\$	290.00	\$	58.00
			English MAN and a Cibindan and a barrior					
	2/40/2020	.,	Email with MN re status of third-party subpoenas	0.47		200.00		40.00
Nicole Taykhman	3/10/2020	Kansas	and letter re production deficiencies.	0.17	\$	290.00	\$	48.33
			Prepare written analysis of issue re medical releases					
Nicole Taykhman	3/11/2020	Kansas	for purpose of third-party subpoenas for MN and IL.	1.10	\$	290.00	\$	319.00
Nicole Taykhman	3/11/2020		Review ADR report drafted by defendants.	0.02	\$	290.00	•	4.83
INICOLE LAYKIIIIAII	3/ 12/ 2020	Namaa	neview ADN report drafted by defendants.	0.02	٧	230.00	٧	4.03

		Review reply filed by defendants in further support					
Nicole Taykhman	3/12/2020 Kansa	of motion to dismiss.	0.18	\$	290.00	\$	53.17
		Communicate with CC and DA re discovery					
Nicole Taykhman	3/12/2020 Kansa	correspondence and deficiencies.	0.22	\$	290.00	\$	62.83
		Continue to analyze medical release issue under					
Nicole Taykhman	3/12/2020 Kansa	protective order and email with MN and IL re same.	0.52	\$	290.00	\$	149.83
		Work on letter re defendants' document production					
Nicole Taykhman	3/12/2020 Kansa	deficiencies.	0.67	\$	290.00	\$	193.33
		Communicate with DA and CC re coding of					
		documents marked technical issues in defense					
Nicole Taykhman	3/13/2020 Kansa	production.	0.02	\$	290.00	\$	4.83
Nicole Taykhman	3/13/2020 Kansa	Review email correspondence re KVC.	0.13	\$	290.00	\$	38.67
		Email with discovery team re issues to raise in					
Nicole Taykhman	3/13/2020 Kansa	deficiency letter.	0.13	\$	290.00	\$	38.67
		Communicate with DA re factual materials for					
Nicole Taykhman	3/13/2020 Kansa	purposes of drafting discovery deficiency letter.	0.23	\$	290.00	\$	67.67
		Review discovery requests and responses circulated					
Nicole Taykhman	3/13/2020 Kansa	by co-counsel for purpose of deficiency letter.	0.27	\$	290.00	\$	77.33
=	- / - /	Review and analyze evidentiary arguments made in		_		_	
Nicole Taykhman	3/13/2020 Kansa	, ,	0.93	\$	290.00	\$	270.67
	2/12/222	Continue to draft letter re defendants' document	2 - 2		222.22		4 04 = 00
Nicole Taykhman	3/13/2020 Kansa	•	3.50	\$	290.00	\$	1,015.00
=	- / - /	Review discovery correspondence to incorporate		_		_	
Nicole Taykhman	3/16/2020 Kansa	into deficiency letter.	1.18	\$	290.00	\$	343.17
		Made and definition of letters by made with a send					
		Work on deficiency letter by reviewing and					
Nicolo Touldones	2/17/2020 //	incorporating discovery correspondence and	2.40	۲	200.00	۲.	000.00
Nicole Taykhman	3/17/2020 Kansa	documents re technical problems and redactions.	3.40	\$	290.00	\$	986.00

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		Review internal documents and correspondence					
		regarding potential expert witnesses in advance of					
Nicole Taykhman	3/18/2020 Kansa	team call.	0.32	\$	290.00	\$	91.83
		Participate in internal team call re ESI, document					
Nicole Taykhman	3/18/2020 Kansa	review.	0.50	\$	290.00	\$	145.00
		Continue to work on letter re discovery deficiencies					
		by reviewing defendants' ESI issues in other cases,					
		correspondence on discovery issues, and documents					
Nicole Taykhman	3/18/2020 Kansa		4.40	\$	290.00	\$	1,276.00
	2/42/2222		2.40		202.00		500.00
Nicole Taykhman	3/19/2020 Kansa	•	2.10	\$	290.00	\$	609.00
Minute To the con-	2/20/2020 //	Email with DA and CC re key discovery	0.05		200.00		44.50
Nicole Taykhman	3/20/2020 Kansa	·	0.05	\$	290.00	\$	14.50
Nicela Tauldanaan	2/20/2020 //	Continue to draft letter re deficiencies in document	4.70	¢	200.00	<b>,</b>	4 207 47
Nicole Taykhman	3/20/2020 Kansa	•	4.78	\$ \$	290.00		1,387.17
Nicole Taykhman	3/24/2020 Kansa	Email with MN re draft deficiency letter.	0.07	Ş	290.00	Ş	19.33
		Review team correspondence re discovery strategy					
		with respect to mental health and placements in					
Nicole Taykhman	3/24/2020 Kansa	·	0.33	\$	290.00	\$	96.67
	5,2 1,2525	Email with MN and IL re edits and strategy on		т		т	
Nicole Taykhman	3/25/2020 Kansa		0.02	\$	290.00	\$	4.83
, 		·		-		-	
Nicole Taykhman	3/25/2020 Kansa	Review MN comments to draft deficiency letter.	0.07	\$	290.00	\$	19.33
		Review team correspondence re letter on COVID					
Nicole Taykhman	3/25/2020 Kansa	response.	0.08	\$	290.00	\$	24.17
		Review circulated hot documents for potential					
Nicole Taykhman	3/25/2020 Kansa	inclusion in deficiency letter.	0.18	\$	290.00	\$	53.17
		Email with MN and IL re updated draft of deficiency					
Nicole Taykhman	3/26/2020 Kansa	letter.	0.03	\$	290.00	\$	9.67
		Email with co-counsel re document production issues					
Nicole Taykhman	3/26/2020 Kansa	·	0.05	\$	290.00	\$	14.50

			Email with DA re examples of documents for					
Nicole Taykhman	3/26/2020	Kansas	deficiency letter.	0.17	\$	290.00	\$	48.33
			Review and analyze defendants' response letter to					
Nicole Taykhman	3/26/2020	Kansas	golden rule letter.	0.18	\$	290.00	\$	53.17
			Work on deficiency letter re defendants' document					
Nicole Taykhman	3/26/2020	Kansas	productions.	3.72	\$	290.00	\$	1,077.83
			Review correspondence with defendants and co-					
Nicole Taykhman	3/27/2020	Kansas	counsel re discovery and COVID protocols.	0.18	\$	290.00	\$	53.17
			Review MN comments to draft deficiency letter for					
Nicole Taykhman	3/27/2020	Kansas	discussion with MN.	0.67	\$	290.00	\$	193.33
			Revise letter re deficiencies in Defendants' document					
Nicole Taykhman	3/29/2020	Kansas	production.	1.15	\$	290.00	\$	333.50
Nicole Taykhman	3/30/2020	Kansas	Email with MN and IL re deficiency letter.	0.02	\$	290.00	\$	4.83
			Email with DA re factual questions for deficiency					
Nicole Taykhman	3/30/2020	Kansas	letter.	0.17	\$	290.00	\$	48.33
			Continue to revise letter re deficiencies in					
Nicole Taykhman	3/30/2020	Kansas	defendants' productions.	1.75	\$	290.00	\$	507.50
Nicole Taykhman	4/1/2020	Kansas	Email with MN re status of deficiency letter.	0.02	\$	290.00	\$	4.83
			Review team correspondence re outstanding					
Nicole Taykhman	4/1/2020	Kansas	discovery projects.	0.13	\$	290.00	\$	38.67
			Circulate draft deficiency letter to co-counsel for					
Nicole Taykhman	4/1/2020		comments.	0.22	\$	290.00	\$	62.83
Nicole Taykhman	4/2/2020	Kansas	Email with MN re edits to deficiency letter.	0.03	\$	290.00	\$	9.67
			Email with DA re co-counsel correspondence re					
Nicole Taykhman	4/2/2020	Kansas	deficiency letter.	0.08	\$	290.00	\$	24.17
			Review correspondence with co-counsel re status of					
Nicole Taykhman	4/2/2020	Kansas	foster care contacts.	0.08	\$	290.00	\$	24.17
Nicole Taykhman	4/2/2020	Kansas	Communicate with PJ re edits to deficiency letter.	0.18	\$	290.00	\$	53.17
Nicole Taykhman	4/6/2020		Email with MN and CG re deficiency letter.	0.02	\$	290.00		4.83
	., :, = 0 = 0		Review relevant press on response to COVID-19 by		т		т	
Nicole Taykhman	4/6/2020	Kansas	defendants.	0.10	\$	290.00	\$	29.00
<b>,</b>	, -, -=-		Review co-counsel correspondence re discovery		•		•	
Nicole Taykhman	4/6/2020	Kansas	strategy amid COVID-19.	0.63	\$	290.00	\$	183.67

Nicole Taykhman	4/8/2020	Kansas	Email with MN re discovery letter strategy.	0.07	\$	290.00	\$	19.33
			Review draft schedule circulated by co-counsel in					
Nicole Taykhman	4/8/2020	Kansas	advance of team meeting.	0.07	\$	290.00	\$	19.33
Nicole Taykhman	4/8/2020	Kansas	Email with co-counsel re status of discovery letter.	0.15	\$	290.00	\$	43.50
,			Review correspondence with opposing counsel re					
Nicole Taykhman	4/9/2020	Kansas	meet and confer.	0.02	\$	290.00	\$	4.83
Nicole Taykhman	4/13/2020	Kansas	Email with MN re outline for meet and confer.	0.08	\$	290.00	\$	24.17
			Review team correspondence re named plaintiffs					
Nicole Taykhman	4/13/2020	Kansas	and upcoming meet and confers.	0.18	\$	290.00	\$	53.17
			Work on response to defendants' 3/25 letter re					
Nicole Taykhman	4/13/2020	Kansas	discovery deficiencies.	3.35	\$	290.00	\$	971.50
			Email with MN re outline of responses for meet and					
Nicole Taykhman	4/14/2020	Kansas	confer.	0.22	\$	290.00	\$	62.83
			Continue to draft outline response to March 25					
			letter on responses and objections for meet and					
Nicole Taykhman	4/14/2020	Kansas	confer.	2.72	\$	290.00	\$	787.83
			Email with MN and IL re process to identify child					
Nicole Taykhman	4/15/2020	Kansas	welfare expert.	0.03	\$	290.00	\$	9.67
			Continue to work on outline response to defendants'					
			letters re responses and objections and document					
Nicole Taykhman	4/15/2020	Kansas	productions.	1.30		290.00	\$	377.00
Nicole Taykhman	4/16/2020	Kansas	Email with MN re outline for meet and confer.	0.03	\$	290.00	\$	9.67
			Review correspondence with opposing counsel and					
Nicole Taykhman	4/16/2020	Kansas	Judge Crabtree order re discovery timeline.	0.25	Ś	290.00	Ś	72.50
THEORE TAYATTIAN	1, 10, 2020	Ransas	Continue to draft outline of response to defendants'	0.23	<u> </u>	250.00	<u> </u>	, 2.50
Nicole Taykhman	4/16/2020	Kansas	letters re discovery.	0.58	\$	290.00	\$	169.17
THOOLE TUYATHAN	1, 10, 2020	Ransas	Communicate with MN re prep for meet and confer	0.50	Υ	250.00	Υ	103.17
Nicole Taykhman	4/17/2020	Kansas	on discovery issues.	0.12	\$	290.00	Ś	33.83
	.,,		Discuss law on timeline for responding to 30(b)(6)	5	т		т	20.33
Nicole Taykhman	4/17/2020	Kansas	deposition notices with CG.	0.33	\$	290.00	\$	96.67
,	, ,		Draft talking points on specific discovery issues in		'		•	
Nicole Taykhman	4/17/2020	Kansas	preparation for meet and confer.	1.08	\$	290.00	\$	314.17

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			Review correspondence with team and opposing					
			counsel re discovery and defendants' responses to					
Nicole Taykhman	4/20/2020	Kansas	fourth set of requests for production.	0.17	\$	290.00	\$	48.33
			Review correspondence among team re discovery					
Nicole Taykhman	4/21/2020	Kansas	and meet and confers.	0.20	\$	290.00	\$	58.00
			Review expert materials in preparation for meeting					
Nicole Taykhman	4/21/2020	Kansas	with potential child welfare expert.	0.33	\$	290.00	\$	96.67
			Review correspondence re experts in advance of call					
Nicole Taykhman	4/22/2020	Kansas	with MN and IL re experts.	0.05	\$	290.00	\$	14.50
Nicole Taykhman	4/22/2020	Kansas	Email with MN re meeting re experts.	0.07	\$	290.00	\$	19.33
			Review and analyze litigation holds correspondence					
Nicole Taykhman	4/22/2020	Kansas	from defendants for follow-up.	0.17	\$	290.00	\$	48.33
			Email with CG, MN, CC, and DA re native redaction					
Nicole Taykhman	4/22/2020	Kansas	issue.	0.17	\$	290.00	\$	48.33
			Review correspondence from defendants re issue					
Nicole Taykhman	4/23/2020		logs.	0.05	\$	290.00	\$	14.50
Nicole Taykhman	4/23/2020	Kansas	Work on response to litigation hold issue.	1.05	\$	290.00	\$	304.50
			Email with DA and CC re document preservation					
Nicole Taykhman	4/24/2020	Kansas	policies.	0.05	\$	290.00	\$	14.50
Nicole Taykhman	4/24/2020	Kansas	Email with EPG re potential child welfare experts.	0.10	\$	290.00	\$	29.00
,			Research and review materials from child welfare					
Nicole Taykhman	4/24/2020	Kansas	and placement array experts.	1.08	\$	290.00	\$	314.17
•			Continue working on response re defendants'					
Nicole Taykhman	4/24/2020	Kansas	litigation holds and document preservation.	1.35	\$	290.00	\$	391.50
Nicole Taykhman	4/27/2020	Kansas	Email with DA and CC re litigation hold.	0.07	\$	290.00	\$	19.33
Nicole Taykhman	4/27/2020	Vancas	Email with MN re response on litigation holds issues.	0.13	\$	290.00	\$	38.67
ivicole raykiiiiali	4/2//2020	Nalisas	Linaii with win re response on ingation holds issues.	0.15	<b>ٻ</b>	250.00	<b>ٻ</b>	36.07
Nicole Taykhman	4/27/2020	Kansas	Continue working on litigation hold issue response.	0.28	\$	290.00	\$	82.17
			Email with EPG re discussing possible placement					
Nicole Taykhman	4/28/2020	Kansas	experts.	0.03	\$	290.00	\$	9.67

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			Review team correspondence re discovery and					
Nicole Taykhman	4/28/2020	Kansas	document productions.	0.12	\$	290.00	\$	33.83
Nicole Taykhman	4/29/2020	Kansas	Revise table on potential child welfare experts.	0.02	\$	290.00	\$	4.83
			Email with MN and IL re strategy on litigation hold					
Nicole Taykhman	4/29/2020	Kansas	issues.	0.08	\$	290.00	\$	24.17
			Email with CG re discovery requests on preservation					
Nicole Taykhman	4/29/2020	Kansas	policies.	0.08	\$	290.00	\$	24.17
			Email with IL and MN re litigation hold issue talking					
Nicole Taykhman	4/29/2020	Kansas	points.	0.13	\$	290.00	\$	38.67
			Review correspondence re redaction issues and					
Nicole Taykhman	4/29/2020	Kansas	privilege log.	0.20	\$	290.00	\$	58.00
			Draft talking points on litigation hold and edit draft					
Nicole Taykhman	4/29/2020	Kansas	response re same.	1.25	\$	290.00	\$	362.50
			Email with IL, MN, and EPG re identification of					
Nicole Taykhman	4/30/2020	Kansas	potential child welfare expert	0.10	\$	290.00	\$	29.00
			Email with MN re meet and confer prep session and					
Nicole Taykhman	4/30/2020	Kansas	litigation hold issue.	0.17	\$	290.00	\$	48.33
			Meet with MN, EPG, and IL to discuss process for					
Nicole Taykhman	4/30/2020	Kansas	vetting and choosing child welfare expert.	1.00	\$	290.00	\$	290.00
			Email with DA, CC, JK, and CG re deadline to respond					
Nicole Taykhman	5/1/2020	Kansas	to discovery requests.	0.08	\$	290.00	\$	24.17
-			Review and calculate deadlines for defendants'					
			requests for production and interrogatories based on					
Nicole Taykhman	5/1/2020	Kansas	federal rules.	0.17	\$	290.00	\$	48.33
			Review discovery correspondence and summary of					
			COVID-19 related document production in					
Nicole Taykhman	5/1/2020	Kansas	preparation for meet and confer.	0.22	\$	290.00	\$	62.83
Nicole Taykhman	5/1/2020	Kancac	Continue research on potential child welfare experts.	0.33	\$	290.00	\$	96.67
INICOIC TAYKIIIIAII	3/1/2020	Nalisas	Communicate with EPG re prep for call with	0.33	ڔ	250.00	۲	30.07
Nicolo Taykhman	E /4/2020	Vancac		0.15	ć	290.00	Ļ	42 FO
Nicole Taykhman	5/4/2020		potential expert.	0.15	\$		\$	43.50
Nicole Taykhman	5/4/2020	Kansas	Discuss status of discovery with CG.	0.17	<b>&gt;</b>	290.00	\$	48.33

Nicole Taykhman	5/4/2020	Kansas	Debrief call with potential expert with EPG.	0.22	\$ 290.00	\$ 62.83
			Email with MN, IL, and EPG re summary of call with			
Nicole Taykhman	5/4/2020	Kansas	potential child welfare expert.	0.43	\$ 290.00	\$ 125.67
			Review correspondence with defendants and within			
Nicole Taykhman	5/4/2020	Kansas	team re discovery and settlement offer.	0.58	\$ 290.00	\$ 169.17
			Participate in call with potential expert on child			
Nicole Taykhman	5/4/2020	Kansas	welfare and EPG.	0.67	\$ 290.00	\$ 193.33
			Prepare for call with potential expert on child			
Nicole Taykhman	5/4/2020	Kansas	welfare by drafting talking points.	1.07	\$ 290.00	\$ 309.33
			Review team correspondence re discovery and			
Nicole Taykhman	5/5/2020	Kansas	settlement.	0.02	\$ 290.00	\$ 4.83
			Email with CG re research on next friend responses			
Nicole Taykhman	5/6/2020	Kansas	to discovery.	0.03	\$ 290.00	\$ 9.67
			Communicate with SB re experts used in similar child			
			welfare litigation for purposes of selecting potential			
Nicole Taykhman	5/6/2020	Kansas	child welfare expert in this litigation.	0.05	\$ 290.00	\$ 14.50
			Email with IL, MN, and EG re search for child welfare			
Nicole Taykhman	5/6/2020	Kansas	expert.	0.05	\$ 290.00	\$ 14.50
			Communicate with potential child welfare expert re			
Nicole Taykhman	5/6/2020	Kansas	interest in expert role.	0.17	\$ 290.00	\$ 48.33
Nicole Taykhman	5/6/2020	Kansas	Review files for ideas re potential deponents.	0.18	\$ 290.00	\$ 53.17
			Email with DA and CC re communications with			
Nicole Taykhman	5/6/2020	Kansas	potential experts.	0.20	\$ 290.00	\$ 58.00
			Communicate with EPG re follow-up call with			
Nicole Taykhman	5/6/2020	Kansas	potential child welfare expert	0.20	\$ 290.00	\$ 58.00
-			Prepare for call with potential child welfare expert			
			by reviewing communications protocol and outlining			
Nicole Taykhman	5/6/2020	Kansas	talking points.	0.58	\$ 290.00	\$ 169.17
-			Communicate with EPG re status of child welfare			
Nicole Taykhman	5/7/2020	Kansas	expert search in KS.	0.02	\$ 290.00	\$ 4.83
·			Research applicability of Rule 17 on discovery served			
Nicole Taykhman	5/7/2020	Kansas	on named plaintiffs.	1.15	\$ 290.00	\$ 333.50

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			Review correspondence with opposing counsel and					
Nicole Taykhman	5/8/2020	Kansas	internal team re discovery.	0.02	\$	290.00	\$	4.83
			Email with MN re analysis of discovery directed at					
Nicole Taykhman	5/8/2020	Kansas	minors.	0.05	\$	290.00	\$	14.50
			Discuss status of discovery and next friend updates					
Nicole Taykhman	5/8/2020	Kansas	with SD.	0.08	\$	290.00	\$	24.17
			Communicate with EPG re status of child welfare					
Nicole Taykhman	5/8/2020	Kansas	expert search.	0.22	\$	290.00	\$	62.83
			Revise draft letter on litigation hold issues to account					
			for updates from meet and confers with opposing					
Nicole Taykhman	5/8/2020	Kansas	counsel.	0.22	\$	290.00	\$	62.83
			Email with IL, EPG, and MN re plan for searching for					
Nicole Taykhman	5/8/2020	Kansas	child welfare experts.	0.28	\$	290.00	\$	82.17
			Continue legal research on discovery directed at					
Nicole Taykhman	5/8/2020	Kansas	minor named plaintiffs.	1.25	\$	290.00	\$	362.50
			Email with IL, MN, and EG re names of potential child					
Nicole Taykhman	5/11/2020	Kansas	welfare experts.	0.02	\$	290.00	\$	4.83
			Review team correspondence re settlement					
			proposals, experts, and impact of coronavirus in					
Nicole Taykhman	5/11/2020	Kansas	Kansas.	0.18	\$	290.00	\$	53.17
			Email with ET and EG re potential child welfare					
Nicole Taykhman	5/11/2020	Kansas	expert and recommendations.	0.32	\$	290.00	\$	91.83
Nicole Taykhman	5/11/2020	Kansas	Attend team strategy call re settlement proposal.	1.00	\$	290.00	\$	290.00
,			Continue researching and summarizing law on		•		•	
			impact of Rule 17 on minor named plaintiff					
			responses to interrogatories and requests for					
Nicole Taykhman	5/11/2020	Kansas	production.	2.17	\$	290.00	\$	628.33
Nicole Taykhman	5/12/2020	Kansas	Email with IL re outreach to potential experts.	0.02	\$	290.00	\$	4.83
,			Review team correspondence re settlement					
Nicole Taykhman	5/12/2020	Kansas	proposals and discovery.	0.17	\$	290.00	\$	48.33
-	-		Continue researching potential child welfare experts					
Nicole Taykhman	5/12/2020	Kansas	and updating chart re same.	1.10	\$	290.00	\$	319.00

			Email with IL, MN, and EG on child welfare expert					
Nicole Taykhman	5/13/2020	Kansas	outreach.	0.12	\$	290.00	\$	33.83
			8					
=	- / - /		Review correspondence among team and with		_			
Nicole Taykhman	5/13/2020	Kansas	opposing counsel re settlement and discovery issues.	0.25	\$	290.00	\$	72.50
			Email with MN re discovery status and prep for meet					
Nicole Taykhman	5/14/2020		and confer.	0.02		290.00		4.83
Nicole Taykhman	5/14/2020	Kansas	Email with EPG re expert outreach.	0.05	\$	290.00	\$	14.50
			Communicate with JK re case schedule and prep for					
Nicole Taykhman	5/14/2020	Kansas	meet and confer.	0.08	\$	290.00	\$	24.17
			Email with MN, IL, and SD re research on discovery					
Nicole Taykhman	5/14/2020	Kansas	responses by minors.	0.08	\$	290.00	\$	24.17
			Circulate research on discovery directed at minors to					
Nicole Taykhman	5/14/2020	Kansas	co-counsel team.	0.08	\$	290.00	\$	24.17
			Review team correspondence re settlement					
Nicole Taykhman	5/14/2020	Kansas	proposals and discovery.	0.15	\$	290.00	\$	43.50
			Compile notes on litigation holds to prepare for meet					
Nicole Taykhman	5/14/2020	Kansas	and confer and email with MN, JK, and CG re same.	0.50	\$	290.00	\$	145.00
			Participate in meeting with IL, EM, EGH, and CG to					
Nicole Taykhman	5/14/2020	Vancac	brainstorm provisions for settlement proposal.	0.75	\$	290.00	ċ	217.50
Micole Taykiiiiaii	3/14/2020	Kalisas	Review correspondence from defendants on	0.73	Ą	290.00	Ą	217.30
Nicolo Touldonoon	E /1E /2020	Vanaga	custodians.	0.02	۲.	200.00	۲.	0.67
Nicole Taykhman	5/15/2020		Email with IL re child welfare expert outreach.	0.03	\$	290.00		9.67
Nicole Taykhman	5/15/2020	Kansas	·	0.05	<b>&gt;</b>	290.00	<b>&gt;</b>	14.50
A.: 1 - 11	5/45/2020		Communicate with potential expert re initial	0.47		200.00		40.00
Nicole Taykhman	5/15/2020	Kansas	discussion and update expert chart re same.	0.17	\$	290.00	\$	48.33
Nicole Taykhman	5/15/2020	Kansas	Email with CC re contact info for potential expert.	0.25	\$	290.00	\$	72.50
			Email with IL, MN, JK, CG, CC, and DA re summary of					
Nicole Taykhman	5/15/2020	Kansas	meet and confer.	0.25	\$	290.00	\$	72.50
			Prepare for meet and confer by reviewing					
Nicole Taykhman	5/15/2020	Kansas	outstanding discovery issues.	0.27	\$	290.00	\$	77.33

			Attend meet and confer with defendants re					
Nicole Taykhman	5/15/2020	Kansas	discovery and schedule updates.	0.43	\$	290.00	\$	125.67
			Draft summary email to recap meet and confer with					
Nicole Taykhman	5/15/2020	Kansas	defendants.	0.73	\$	290.00	\$	212.67
			Email with co-counsel re recap email from meet and					
Nicole Taykhman	5/18/2020	Kansas	confer.	0.08	\$	290.00	\$	24.17
Nicole Taykhman	5/20/2020	Kansas	Email with CC re expert research.	0.02	\$	290.00	\$	4.83
Nicolo Taylahman	E /20/2020	Vancas	Empil with notontial avants re initial discussion	0.03	\$	290.00	۲	9.67
Nicole Taykhman	5/20/2020	Kalisas	Email with potential experts re initial discussion.  Email with MN and co-counsel re documents on	0.03	Ş	290.00	Ş	9.07
Nicole Taykhman	5/20/2020	Kancac	retention policies.	0.07	\$	290.00	\$	19.33
NICOLE TAYKIIIIAII	3/20/2020	Kalisas	Email with MN and IL re deposition prep for 30(b)(6)	0.07	۲	230.00	٠	15.55
Nicole Taykhman	5/20/2020	Kancac	witness.	0.08	\$	290.00	\$	24.17
Nicole Taykhman	5/20/2020		Email with EG re expert outreach.	0.08	<del>ب</del> \$	290.00	•	38.67
NICOLE LAYKIIIIAII	3/20/2020	Kalisas	Review team correspondence re discovery updates	0.13	Ą	290.00	Ą	36.07
Nicole Taykhman	5/20/2020	Kancac	and next steps.	0.20	\$	290.00	\$	58.00
NICOLE TAYKIIIIAII	3/20/2020	Kalisas	Work on deposition prep for scheduled 30(b)(6)	0.20	۲	230.00	٠	36.00
Nicole Taykhman	5/20/2020	Kancac	deposition deponent M. Kline.	0.35	\$	290.00	¢	101.50
Wicole Taykiiiiaii	3/20/2020	Karisas	Review documents with defendants' retention	0.55	<u>,                                     </u>	230.00		101.50
Nicole Taykhman	5/20/2020	Kansas	policies.	0.53	\$	290.00	\$	154.67
TVICOIC TAYKIIIIAII	3, 20, 2020	Ransas	Update recommendation on child welfare expert	0.55	· ·	230.00	<u> ۲</u>	154.07
Nicole Taykhman	5/21/2020	Kansas	outreach.	0.03	\$	290.00	Ś	9.67
THOOLE TUYKIIII	3, 21, 2020	Ransas	Communicate with EPG re next steps on expert	0.00	Ψ	230.00	Υ	3.07
Nicole Taykhman	5/21/2020	Kansas	outreach.	0.03	\$	290.00	\$	9.67
Nicole Taykhman	5/21/2020	Kansas	Review team correspondence re discovery strategy.	0.05	\$	290.00	\$	14.50
			Discuss preparing factual materials for M. Kline					
Nicole Taykhman	5/21/2020	Kansas	deposition with DA.	0.13	\$	290.00	\$	38.67
Nicole Taykhman	5/21/2020	Kansas	Continue to research child welfare system expert.	0.17	\$	290.00	ċ	48.33
,			Meet with IL and MN re deposition prep.	0.17	\$ \$	290.00		145.00
Nicole Taykhman	5/21/2020	Nd115d5		0.50	Ą	290.00	Ą	145.00
Nicolo Taylchman	E /21 /2020	Vancas	Work on outline for 30b6 deposition on placement	1.60	ċ	290.00	\$	464.00
Nicole Taykhman	5/21/2020	V411242	issues.	1.60	\$	290.00	Ş	464.00

			Review rough transcript of 30b6 deposition on IT			
Nicole Taykhman	5/26/2020	Kansas	issues.	0.02	\$ 290.00	\$ 4.83
Nicole Taykhman	5/26/2020	Kansas	Email with CC re materials on potential experts.	0.05	\$ 290.00	\$ 14.50
Nicole Taykhman	5/26/2020	Kansas	Communicate with EPG re status of expert outreach.	0.12	\$ 290.00	\$ 33.83
Nicole Taykhman	5/26/2020	Kansas	Review draft settlement agreement and team correspondence re same.	0.18	\$ 290.00	\$ 53.17
Nicole Taykhman	5/26/2020	Kansas	Work on 30(b)(6) deposition outline for M. Kline on placement issues by reviewing and incorporating public sources on witness.	1.58	\$ 290.00	\$ 459.17
Nicole Taykhman	5/26/2020	Kansas	Continue working on 30b6 deposition outline for M. Kline by reviewing hot documents re placement issues.	4.10	\$ 290.00	\$ 1,189.00
Nicole Taykhman	5/27/2020	Kansas	Email with CC re research on child welfare experts.	0.05	\$ 290.00	\$ 14.50
Nicole Taykhman	5/27/2020	Kansas	Email with co-counsel group re potential child welfare experts.	0.08	\$ 290.00	\$ 24.17
Nicole Taykhman	5/27/2020	Kansas	Email with legal intern MH re legal research question on class membership and discovery.	0.17	\$ 290.00	\$ 48.33
Nicole Taykhman	5/27/2020	Kansas	Communicate with DA and CC re review of policy manual for deposition outline.	0.22	\$ 290.00	\$ 62.83
Nicole Taykhman	5/27/2020	Kansas	Communicate with EPG re status of expert outreach.	0.33	\$ 290.00	\$ 96.67
Nicole Taykhman	5/27/2020	Kansas	Review and follow-up re materials on potential experts on child welfare systems collected by CC.  Communicate with IL, MN, and EPG re status of	0.55	\$ 290.00	\$ 159.50
Nicole Taykhman	5/27/2020	Kansas	expert outreach.  Continue reviewing key documents related to	0.60	\$ 290.00	\$ 174.00
Nicole Taykhman	5/27/2020	Kansas	placement issues and drafting deposition outline for M. Kline re same.	4.15	\$ 290.00	\$ 1,203.50
Nicole Taykhman	5/28/2020	Kansas	Email with DA and CC re data on placements.	0.02	\$ 290.00	\$ 4.83

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			Communicate with MN and IL re research on class					
			membership, discovery, and status of 30b6					
Nicole Taykhman	5/28/2020	Kansas	deposition outline.	0.08	\$	290.00	\$	24.17
			Communicate with JK re dep prep for M. Kline					
Nicole Taykhman	5/28/2020	Kansas	deposition.	0.13	\$	290.00	\$	38.67
			Email with MN re research on class membership and					
Nicole Taykhman	5/28/2020	Kansas	discovery.	0.17	\$	290.00	\$	48.33
			Review existing caselaw on class membership,					
Nicole Taykhman	5/28/2020	Kansas	mootness, and discovery.	0.22	\$	290.00	\$	62.83
			Review team correspondence re settlement					
Nicole Taykhman	5/28/2020	Kansas	positions.	0.25	\$	290.00	\$	72.50
			Communicate with legal intern MH re research on					
Nicole Taykhman	5/28/2020	Kansas	class membership and discovery.	0.60	\$	290.00	\$	174.00
			Continue working on deposition outline for 30b6					
Nicole Taykhman	5/28/2020	Kansas	witness M. Kline.	7.17	\$	290.00	\$	2,078.33
			Email with DA re deposition outline and policy					
Nicole Taykhman	5/29/2020	Kansas	manual excerpts for use in deposition.	0.02	\$	290.00	\$	4.83
			Email with MN and intern MH re research on class					
Nicole Taykhman	5/29/2020	Kansas	membership and discovery.	0.32	\$	290.00	\$	91.83
			Email with IL and MN re draft deposition outline and					
Nicole Taykhman	5/29/2020	Kansas	documents.	0.08	\$	290.00	\$	24.17
Nicole Taykhman	5/29/2020	Kansas	Continue to draft deposition outline for M. Kline.	2.98	\$	290.00	Ś	865.17
	0, 20, 2020		Continue to review key documents and draft		т		т	000.127
Nicole Taykhman	5/31/2020	Kansas	deposition outline for M. Kline.	4.55	\$	290.00	\$	1,319.50
Nicole Taykhman	6/1/2020		Email with MN re 30b6 outline.	0.12	\$	290.00		33.83
,					•		•	
Nicole Taykhman	6/1/2020	Kansas	Email with IL and MN re status of deposition outline.	0.13	\$	290.00	\$	38.67
			Email with DA and CC re tasks for 30b6 deposition					
Nicole Taykhman	6/1/2020	Kansas	prep.	0.25	\$	290.00	\$	72.50
			Continue outreach to contacts re potential experts					
Nicole Taykhman	6/1/2020	Kansas	and update chart to reflect same.	0.32	\$	290.00	\$	91.83
			Continue drafting and revising deposition outline for					
Nicole Taykhman	6/1/2020	Kansas	M. Kline.	2.17	\$	290.00	\$	628.33

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			Email with IL and MN re status of draft deposition					
Nicole Taykhman	6/2/2020	Kansas	outline.	0.03	\$	290.00	\$	9.67
Nicole Taykhman	6/2/2020	Kansas	Email with MN re draft deposition outline.	0.07	\$	290.00	\$	19.33
			Email with CC re factual research on potential child					
Nicole Taykhman	6/2/2020	Kansas	welfare experts.	0.08	\$	290.00	\$	24.17
			Email with DA and CC re factual research projects for					
Nicole Taykhman	6/2/2020	Kansas	deposition outline.	0.18	\$	290.00	\$	53.17
			Read team correspondence re settlement positions					
Nicole Taykhman	6/2/2020	Kansas	and new information on foster care issues in Kansas.	0.27	\$	290.00	\$	77.33
Nicole Taykhman	6/2/2020		Email with EPG re update on expert outreach.	0.33	\$	290.00		96.67
,	-, , -		Continue to research potential child welfare		<u>'</u>		•	
Nicole Taykhman	6/2/2020	Kansas	management experts.	0.38	\$	290.00	\$	111.17
			Discussion and the second second discussion					
NC - I - T - I I	6/2/2020	17	Discuss research on class membership and discovery	0.50	<u> </u>	200.00		45467
Nicole Taykhman	6/2/2020	Kansas	directed at named plaintiff with legal intern MH.	0.53	\$	290.00	\$	154.67
Nicole Taykhman	6/2/2020	Kansas	Participate in call with potential child welfare expert.	0.47	\$	290.00	\$	135.33
·			Revise outline based on review of comments and					
Nicole Taykhman	6/2/2020	Kansas	edits to deposition outline for M. Kline.	2.47	\$	290.00	\$	715.33
Nicole Taykhman	6/3/2020	Kansas	Email with EPG re expert outreach.	0.03	\$	290.00	\$	9.67
			Email with MN re revisions to draft deposition					
Nicole Taykhman	6/3/2020	Kansas	outline.	0.08	\$	290.00	\$	24.17
Nicole Taykhman	6/3/2020	Kansas	Communicate with DA re deposition outline tasks.	0.17	\$	290.00	\$	48.33
Nicole Taykhman	6/3/2020	Kansas	Continue revising deposition outline for M. Kline.	5.88	\$	290.00	\$	1,706.17
Nicole Taykhman	6/4/2020	Kansas	Email with EPG and potential experts re scheduling initial call.	0.12	\$	290.00	\$	33.83
-			Communicate with DA re review of policy manuals					
			and ongoing factual research for deposition prep for			25.5.5		
Nicole Taykhman	6/4/2020	Kansas	M. Kline depositions.	0.17	\$	290.00	\$	48.33
Nicole Taykhman	6/5/2020	Kansas	Communicate with JK re status of mediation.	0.03	\$	290.00	\$	9.67

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			Email with MN and MH re research on named			
Nicole Taykhman	6/5/2020	Kansas	plaintiff discovery.	0.03	\$ 290.00	\$ 9.67
			Continue to review defendant policies for inclusion in			
Nicole Taykhman	6/5/2020	Kansas	deposition outline.	0.33	\$ 290.00	\$ 96.67
			Meet with IL and MN to discuss strategy for 30b6			
Nicole Taykhman	6/5/2020	Kansas	deposition.	0.48	\$ 290.00	\$ 140.17
Nicole Taykhman	6/5/2020	Kansas	Read order on motion to dismiss.	0.53	\$ 290.00	\$ 154.67
			Review and take notes on DCF policies for inclusion			
Nicole Taykhman	6/5/2020	Kansas	in deposition outline.	0.75	\$ 290.00	\$ 217.50
			Email with intern MH re discussing comments on			
Nicole Taykhman	6/8/2020	Kansas	legal research memo.	0.10	\$ 290.00	\$ 29.00
=	- /- /		Review emails with opposing counsel re 30b6			
Nicole Taykhman	6/8/2020	Kansas	deposition.	0.12	\$ 290.00	\$ 33.83
=	- /- /		Email with MN re legal research on discovery of			
Nicole Taykhman	6/8/2020	Kansas	former named plaintiffs.	0.12	\$ 290.00	\$ 33.83
	_ ,_ ,_ ,		Review and provide comments on research memo			
Nicole Taykhman	6/8/2020	Kansas	on named plaintiffs aging out.	2.90	\$ 290.00	\$ 841.00
Nicole Taykhman	6/9/2020	Kansas	Email with DA and CC re tasks for deposition prep.	0.05	\$ 290.00	\$ 14.50
Nicole Taykhman	6/9/2020	Kansas	Email with potential expert re initial call.	0.07	\$ 290.00	\$ 19.33
,			Email with IL and MN re deposition prep tasks and			
Nicole Taykhman	6/9/2020	Kansas	outline.	0.08	\$ 290.00	\$ 24.17
			Review team correspondence re document			
			productions, foster care issues in Kansas, and			
Nicole Taykhman	6/9/2020	Kansas	settlement discussions.	0.10	\$ 290.00	\$ 29.00
,			Prep for meeting with intern MH re feedback on			
			legal research memo on discovery of former			
Nicole Taykhman	6/9/2020	Kansas	plaintiffs and meet with MH re same.	0.75	\$ 290.00	\$ 217.50
			Continue to review and take notes on DCF manual			
Nicole Taykhman	6/9/2020	Kansas	for deposition outline.	1.28	\$ 290.00	\$ 372.17
-			Communicate with potential child welfare experts re			
Nicole Taykhman	6/10/2020	Kansas	initial calls.	0.12	\$ 290.00	\$ 33.83

		Communicate with team re settlement negotiations					
Nicole Taykhman	6/10/2020 Kansa	and case status.	0.42	\$	290.00	\$	120.83
		Review draft settlement agreement and email with					
Nicole Taykhman	6/10/2020 Kansa	MN, IL, and JK re defined term.	1.02	\$	290.00	\$	294.83
		Review team correspondence and drafts re					
Nicole Taykhman	6/16/2020 Kansa	monitoring and dismissal of named plaintiffs.	1.10	\$	290.00	\$	319.00
		Email with MN and MH re legal research on notice to					
Nicole Taykhman	6/18/2020 Kansa		0.02	\$	290.00	\$	4.83
		Email with IL re deposition schedule and settlement					
Nicole Taykhman	6/18/2020 Kansa	update.	0.08	\$	290.00	\$	24.17
		Communicate with MN re research on Rule 23(h)					
Nicole Taykhman	6/18/2020 Kansa	notice to class members.	0.20	\$	290.00	\$	58.00
		Communicate with legal intern MH re research on					
Nicole Taykhman	6/18/2020 Kansa		0.28	\$	290.00	\$	82.17
		Email with MH re additional case law on notice to					
Nicole Taykhman	6/23/2020 Kansa		0.02	\$	290.00	\$	4.83
		Email with co-counsel re applicability of Kansas Tort					
Nicole Taykhman	6/23/2020 Kansa	Claims Act to settlement.	0.07	\$	290.00	\$	19.33
		Review correspondence with co-counsel re case					
Nicole Taykhman	6/23/2020 Kansa	• • • • • • • • • • • • • • • • • • • •	0.33	\$	290.00	\$	96.67
		Research applicability of Kansas Tort Claims Act to					
Nicole Taykhman	6/23/2020 Kansa		0.85	\$	290.00	\$	246.50
		Email with SD re applicability of Kansas Tort Claims					
Nicole Taykhman	6/24/2020 Kansa	Act to settlement.	0.08	\$	290.00	\$	24.17
=	2/2 - /2 - 2	Review correspondence among team re settlement				_	
Nicole Taykhman	6/24/2020 Kansa	proposals and legislative committee meeting.	0.37	\$	290.00	Ş	106.33
Nicolo Touldonous	C/25/2020 Kanaa		0.02	۲.	200.00	۲.	0.67
Nicole Taykhman	6/25/2020 Kansa	Review team correspondence re settlement process.	0.03	\$	290.00	<b>&gt;</b>	9.67
Nicole Taykhman	6/25/2020 Kansa	Research impact of state law on settlement process.	0.13	\$	290.00	\$	38.67
		Review co-counsel correspondence re third-party					
Nicole Taykhman	6/29/2020 Kansa	subpoenas and status of settlement.	0.18	\$	290.00	\$	53.17

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Nicole Taykhman	6/30/2020	Kansas	Read co-counsel emails re settlement strategy.	0.13	\$	290.00	\$	38.67
			Email with MN re preparing attorney declaration for					
Nicole Taykhman	7/1/2020	Kansas	class certification.	0.07	\$	290.00	\$	19.33
			Draft attorney declaration in support of motion for					
Nicole Taykhman	7/1/2020	Kansas	class certification.	1.37	\$	290.00	\$	396.33
			Email with IL and MN re draft declaration for					
Nicole Taykhman	7/2/2020	Kansas	preliminary approval of settlement.	0.05	\$	290.00	\$	14.50
Nicolo To House	7/2/2020		2	0.00	_	200.00	_	24.47
Nicole Taykhman	7/2/2020	Kansas	Review team correspondence re settlement process.	0.08	\$	290.00	\$	24.17
l <u>-</u>	- /- /		Email with MN and DA re draft attorney declaration		_		_	
Nicole Taykhman	7/2/2020	Kansas	for class certification.	0.22	\$	290.00	\$	62.83
=	- 1- 1		Revise attorney declaration in support of motion for		_			
Nicole Taykhman	7/2/2020	Kansas	class certification.	1.00	\$	290.00	\$	290.00
			Communicate with MN and EPG re updating					
Nicole Taykhman	7/10/2020	Kansas	potential experts re status of settlement.	0.07	\$	290.00	\$	19.33
			Communicate with potential experts re status of					
Nicole Taykhman	7/10/2020	Kansas	settlement.	0.12	\$	290.00	\$	33.83
			Review draft preliminary approval motion and team					
Nicole Taykhman	7/10/2020	Kansas	correspondence re edits to same.	0.30	\$	290.00	\$	87.00
			Email with IL and MN re review of preliminary					
Nicole Taykhman	7/13/2020	Kansas	approval motion and draft declaration.	0.17	\$	290.00	\$	48.33
			Revise declaration in support of motion for					
Nicole Taykhman	7/13/2020	Kansas	preliminary approval of settlement.	0.75	\$	290.00	\$	217.50
			Email with MN and IL re updates to declaration for					
Nicole Taykhman	7/15/2020	Kansas	motion for preliminary approval.	0.17	\$	290.00	\$	48.33
			Read co-counsel correspondence re stakeholder					
Nicole Taykhman	7/22/2020	Kansas	information and motion for preliminary approval.	0.05	\$	290.00	\$	14.50
			Email with MN re updates to declaration in support					
			of motion for preliminary approval and rules for fee					
Nicole Taykhman	7/23/2020	Kansas	application.	0.13	\$	290.00	\$	38.67
			Revise and finalize IL declaration in support of					
Nicole Taykhman	7/23/2020	Kansas	motion for preliminary approval.	0.50	\$	290.00	\$	145.00

			Electronic mail with co-counsel team re investigation			
Stephen Dixon	12/10/2017	Kansas	strategy	0.08	\$ 410.00	\$ 34.17
			Electronic mail to co-counsel team re points of			
Stephen Dixon	1/12/2018	Kansas	factual inquiry for investigation	0.10	\$ 410.00	\$ 41.00
Stephen Dixon	1/17/2018	Kansas	Electronic mail to P. Juneja re investigation outreach	0.03	\$ 410.00	\$ 13.67
			Call with NCYL and potential co-counsel re potential			
Stephen Dixon	1/23/2018	Kansas	advocates to talk to in investigation	1.20	\$ 410.00	\$ 492.00
			Telephone call with confidential Kansas children's			
			advocate re current child welfare environment in			
Stephen Dixon	2/5/2018	Kansas	Kansas	0.40	\$ 410.00	\$ 164.00
Stephen Dixon	2/9/2018	Kansas	Electronic mail with IL re investigation strategy	0.08	\$ 410.00	\$ 34.17
			Electronic mails with co-counsel re main point of			
Stephen Dixon	2/16/2018	Kansas	factual inquiry for investigation	0.13	\$ 410.00	\$ 54.67
			Electronic mail re key child welfare contacts in			
Stephen Dixon	2/20/2018	Kansas	Kansas	0.05	\$ 410.00	\$ 20.50
			Electronic mail to co-counsel re investigation			
Stephen Dixon	2/22/2018	Kansas	strategy	0.03	\$ 410.00	\$ 13.67
			Telephone call with local Kansas contact re			
Stephen Dixon	2/23/2018	Kansas	placement array challenges	0.18	\$ 410.00	\$ 75.17
			Electronic mail with confidential local Kansas contact			
			re foster care contractors, placement array			
Stephen Dixon	2/23/2018	Kansas	challenges	0.33	\$ 410.00	\$ 136.67
			Electronic mail with confidential local Kansas contact			
			re foster care contractors, placement array			
Stephen Dixon	2/26/2018	Kansas	challenges	0.33	\$ 410.00	\$ 136.67
			Electronic mail with confidential local Kansas contact			
			re mental health care problems for Kansas foster			
Stephen Dixon	2/27/2018	Kansas	children	0.03	\$ 410.00	\$ 13.67
			Telephone call with confidential local Kansas contact			
			re mental health care problems for Kansas foster			
Stephen Dixon	2/27/2018	Kansas	children	0.37	\$ 410.00	\$ 150.33

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			Meeting with confidential local Kansas contact re					
Stephen Dixon	2/28/2018	Kansas	problems facing Kansas child welfare system	1.00	\$	410.00	\$	410.00
			Electronic mail to confidental Kansas contact re					
Stephen Dixon	3/1/2018	Kansas	clarification on facts discussed in meeting	0.08	\$	410.00	\$	34.17
			Mastings with spatial level Konses spats at an					
Chamban Divan	2/1/2019	Vanaaa	Meetings with confidential local Kansas contacts re	4.50	۲	410.00	۲.	1 045 00
Stephen Dixon	3/1/2018	Kansas	problems facing Kansas child welfare system	4.50	\$	410.00	Ş	1,845.00
			Meeting with confidential local Kansas contact re					
Stephen Dixon	3/2/2018	Kansas	problems facing Kansas child welfare system	1.25	\$	410.00	\$	512.50
Chamban Divon	2/5/2018	Vanaaa	Electronic mail to co-counsel team re major factual	0.12	۲	410.00	۲.	F4.C7
Stephen Dixon	3/5/2018	Kansas	discoveries during investigation trip and interviews  Draft memos re recent interviews with Kansas child	0.13	\$	410.00	Ş	54.67
Stanban Divan	3/5/2018	Vancas		0.50	\$	410.00	\$	205.00
Stephen Dixon	3/3/2018	Kdlisds	advocates during last trip to Kansas  Telephone call with Kansas GAL re problems facing	0.50	Ş	410.00	Þ	205.00
Stephen Dixon	3/5/2018	Kansas	child welfare system	0.80	\$	410.00	\$	328.00
этернен ыхон	3/3/2010	Karisas	Telephone call with potential client re problems	0.00	· ·	410.00	· ·	320.00
			facing Kansas child welfare system's mental health					
Stephen Dixon	3/7/2018	Kansas	delivery system	0.88	\$	410.00	\$	362.17
	0 /0 /00 0		Electronic mail with potential client re placement				_	
Stephen Dixon	3/9/2018	Kansas	array problems for Kansas foster children	0.43	\$	410.00	\$	177.67
Stephen Dixon	3/10/2018	Kansas	Electronic mails with client re investigation updates	0.07	\$	410.00	\$	27.33
			Electronic mail with potential client re placement					
Stephen Dixon	3/10/2018	Kansas	array problems for Kansas foster children	0.25	\$	410.00	\$	102.50
			Draft memos re recent interviews with Kansas child					
Stephen Dixon	3/10/2018	Kansas	advocates with key facts important to investigation	0.50	\$	410.00	\$	205.00
	5, 10, 2010	1.0000	and the second s	3.30	т	. 10.00	T	
Stephen Dixon	3/11/2018	Kansas	Electronic mail to co-counsel team re legal strategy	0.03	\$	410.00	\$	13.67

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			Draft memo re recent interviews with Kansas child					
Stephen Dixon	3/11/2018	Kansas	advocates with key facts important to investigation	0.58	\$	410.00	\$	239.17
			Draft memo re recent interviews with Kansas child					
			advocates with key facts important to investigation					
Stephen Dixon	3/11/2018	Kansas	(cont'd)	0.67	\$	410.00	\$	273.33
Stephen Dixon	3/12/2018	Kansas	Electronic mail with IL re vetting potential client	0.03	\$	410.00	\$	13.67
Stephen Dixon	3/12/2018	Kansas	Electronic mail with paralegal re retainer for client	0.08	\$	410.00	\$	34.17
			Draft memo re recent meeting with potential client					
Stephen Dixon	3/12/2018	Kansas	with key facts important to investigation	0.67	\$	410.00	\$	273.33
			Draft memo re recent meeting with potential client					
Stephen Dixon	3/12/2018	Kansas	with key facts important to investigation (cont'd)	1.12	\$	410.00	Ś	457.83
	3,,		Telephone call with GAL re placement moves for		т		т	
Stephen Dixon	3/13/2018	Kansas	children in DCF custody	0.80	\$	410.00	\$	328.00
•			Electronic mails with potential clients re Kansas					
Stephen Dixon	3/14/2018	Kansas	foster care system deficiencies	0.25	\$	410.00	\$	102.50
			Electronic mail to potential client re Kansas foster					
Stephen Dixon	3/15/2018	Kansas	care system deficiencies	0.03	\$	410.00	\$	13.67
			Telephone call with potential client re child they may					
Stephen Dixon	3/15/2018	Kansas	potentially be next friend for	1.07	\$	410.00	\$	437.33
			Telephone call with potential client re child they may					
Stephen Dixon	3/16/2018	Kansas	potentially be next friend for	0.10	\$	410.00	\$	41.00
			Telephone call with potential client re next friend					
Stephen Dixon	3/16/2018	Kansas	legal theory	0.18	\$	410.00	\$	75.17
			Electronic mail to KS confidential contact/child					
			advocate re problems facing Kansas child welfare					
Stephen Dixon	3/17/2018	Kansas	system	0.17	\$	410.00	\$	68.33
			Electronic mail with co-counsel re recent factual					
Stephen Dixon	3/18/2018	Kansas	findings in investigation	0.75	\$	410.00	\$	307.50

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			Meeting with co-counsel re investigation strategy for			
Stephen Dixon	3/18/2018	Kansas	trip.	1.00	\$ 410.00	\$ 410.00
			Meeting with confidential contact re ongoing			
			investigation, their impressions of problems with			
Stephen Dixon	3/18/2018	Kansas	foster care contractor oversight	1.25	\$ 410.00	\$ 512.50
		Kansas	Travel to Kansas City for meetings with potential			
Stephen Dixon	3/18/2018	Travel	clients, foster care advocates.	2.00	\$ 410.00	\$ 820.00
			Electronic mail with confident contact re more			
Stephen Dixon	3/19/2018	Kansas	information on foster care contractor oversight	0.10	\$ 410.00	\$ 41.00
			Meeting with Kansas foster care organization re			
			major problems in placement instability, mental			
Stephen Dixon	3/19/2018	Kansas	health screening in foster care system	2.00	\$ 410.00	\$ 820.00
			Meeting with recently aged out former foster youth			
Stephen Dixon	3/19/2018	Kansas	re placement changes in Kansas	2.50	\$ 410.00	\$ 1,025.00
Stephen Dixon	3/19/2018	Kansas	Travel to meeting in Kansas.	0.38	\$ 410.00	\$ 157.17
Stephen Dixon	3/19/2018	Kansas	Travel to meeting in Kansas.	1.50	\$ 410.00	\$ 615.00
			Electronic mail with potential client re further			
Stephen Dixon	3/20/2018	Kansas	questions re DCF operations problems.	0.03	\$ 410.00	\$ 13.67
			Meeting with confidential contact/child advocate re			
			problems facing Kansas child welfare system,			
Stephen Dixon	3/20/2018	Kansas	specifically for those in the Wichita area	3.50	\$ 410.00	\$ 1,435.00
Stephen Dixon	3/20/2018		Travel to meeting in Kansas.	1.50	\$ 410.00	\$ 615.00
•			Electronic mail with potential client re problems in			
Stephen Dixon	3/21/2018	Kansas	Kansas foster care system	0.07	\$ 410.00	\$ 27.33
-			Electronic mail to co-counsel re new facts useful for			
Stephen Dixon	3/21/2018	Kansas	investigation	0.13	\$ 410.00	\$ 54.67
			Meeting with Kansas foster care advocate and co-			
			counsel re major problems in placement instability,			
Stephen Dixon	3/21/2018	Kansas	mental health screening in foster care system	1.00	\$ 410.00	\$ 410.00
Stephen Dixon	3/21/2018		Travel to meeting in Kansas.	2.00	\$ 410.00	\$ 820.00

			Electronic mail to co-counsel re new facts useful for			
Stephen Dixon	3/22/2018	Kansas	investigation	0.03	\$ 410.00	\$ 13.67
			Electronic mail to co-counsel re new facts useful for			
Stephen Dixon	3/26/2018	Kansas	investigation	0.20	\$ 410.00	\$ 82.00
			Electronic mail to co-counsel re new facts useful for			
Stephen Dixon	3/27/2018	Kansas	investigation	0.03	\$ 410.00	\$ 13.67
			Electronic mail to co-counsel re new facts useful for			
Stephen Dixon	3/27/2018	Kansas	investigation	0.08	\$ 410.00	\$ 34.17
			Electronic mail to paralegal re new important factual			
Stephen Dixon	3/28/2018	Kansas	document	0.03	\$ 410.00	\$ 13.67
			Telephone call with co-counsel re investigation			
Stephen Dixon	3/28/2018	Kansas	strategy, factual findings	1.07	\$ 410.00	\$ 437.33
			Electronic mail to co-counsel re new facts useful for			
Stephen Dixon	3/29/2018	Kansas	investigation	0.10	\$ 410.00	\$ 41.00
			Draft memo re recent meeting with potential client			
Stephen Dixon	4/4/2018	Kansas	with key facts important to investigation	0.37	\$ 410.00	\$ 150.33
			Draft memo re recent meeting with Kansas foster			
			system advocate with key facts important to			
Stephen Dixon	4/4/2018	Kansas	investigation	0.47	\$ 410.00	\$ 191.33
			Draft memo re recent meeting with potential client			
Stephen Dixon	4/5/2018	Kansas	with key facts important to investigation	1.42	\$ 410.00	\$ 580.83
			Telephone call with Kansas social worker re			
Stephen Dixon	4/11/2018	Kansas	problems in foster care system	0.50	\$ 410.00	\$ 205.00
Stephen Dixon	4/13/2018	Kansas	Electronic mail to co-counsel team re fact analysis	0.25	\$ 410.00	\$ 102.50
			Electronic mails with confidential contact/child			
			advocate re problems facing Kansas child welfare			
Stephen Dixon	4/17/2018	Kansas	system	0.30	\$ 410.00	\$ 123.00
			Telephone call with potential client re problems in			
Stephen Dixon	4/17/2018	Kansas	Kansas foster care system	0.35	\$ 410.00	\$ 143.50
Stephen Dixon	4/17/2018	Kansas	Electronic mail to co-counsel re potential client	0.43	\$ 410.00	\$ 177.67

		Electronic mail with potential fact witness re					
4/17/2018	Kansas	problems in Kansas foster care system	0.50	\$	410.00	\$	205.00
		Electronic mail with confidential contact/child					
		advocate re problems facing Kansas child welfare					
4/19/2018	Kansas	system	0.33	\$	410.00	\$	136.67
		Electronic mail with potential fact witness re					
4/19/2018	Kansas	problems in Kansas foster care system	0.50	\$	410.00	\$	205.00
		Electronic mail to co-counsel re call with potential					
4/22/2018	Kansas	fact witness	0.03	\$	410.00	\$	13.67
5/1/2018	Kansas	Electronic mail to IL re call with potential fact witness	0.02	\$	410.00	\$	6.83
		Electronic mail to co-counsel team re new factual					
5/2/2018	Kansas	developments	0.05	\$	410.00	\$	20.50
		Electronic mail with MN re status of investigation in					
5/2/2018	Kansas	Kansas	0.50	\$	410.00	\$	205.00
		Electronic mail with potential fact witness re					
5/3/2018	Kansas	problems in Kansas foster care system	0.08	\$	410.00	\$	34.17
		Electronic mail with potential client re upcoming					
5/9/2018	Kansas	meeting	0.13	\$	410.00	\$	54.67
		Telephone call with team re strategy for next					
5/9/2018	Kansas	investigation trip (left early)	0.57	\$	410.00	\$	232.33
		Electronic mail with confidential Kansas contact re					
5/10/2018	Kansas	factual developments with client	0.25	\$	410.00	\$	102.50
		Telephone call with potential fact witness re mental					
5/10/2018	Kansas	health screens for Kansas foster children	0.83	\$	410.00	\$	341.67
, ,	Kansas	Travel to Kansas City for meetings with potential		<u> </u>		•	
5/14/2018	Travel	,	2.00	\$	410.00	\$	820.00
		·				•	
5/15/2018	Kansas		4.50	\$	410.00	\$	1,845.00
, ,	Kansas	·					, , , , , , , , , , , , , , , , , , ,
5/15/2018		potential clients, foster care advocates.	1.72	\$	410.00	\$	703.83
		Emails to potential fact witness re follow-up on		•		•	
5/16/2018	Kansas	foster care facts from meeting	0.08	\$	410.00	\$	34.17
	4/19/2018 4/19/2018 4/19/2018 5/1/2018 5/2/2018 5/2/2018 5/3/2018 5/9/2018 5/9/2018 5/10/2018 5/10/2018 5/14/2018 5/15/2018	5/14/2018 Travel 5/15/2018 Kansas	4/17/2018 Kansas problems in Kansas foster care system Electronic mail with confidential contact/child advocate re problems facing Kansas child welfare system Electronic mail with potential fact witness re problems in Kansas foster care system Electronic mail with potential fact with potential fact witness re problems in Kansas foster care system Electronic mail to co-counsel re call with potential fact witness  5/1/2018 Kansas Electronic mail to IL re call with potential fact witness Electronic mail to co-counsel team re new factual developments Electronic mail with MN re status of investigation in Kansas Electronic mail with potential fact witness re problems in Kansas foster care system Electronic mail with potential client re upcoming meeting Telephone call with team re strategy for next investigation trip (left early) Electronic mail with confidential Kansas contact re factual developments with client  Telephone call with potential fact witness re mental health screens for Kansas foster children Travel to Kansas City for meetings with potential clients, foster care advocates.  Meetings with several potential fact witnesses re foster care system deficiencies Kansas Travel within Kansas for several meetings with potential clients, foster care advocates. Emails to potential fact witness re follow-up on	4/17/2018 Kansas problems in Kansas foster care system  Electronic mail with confidential contact/child advocate re problems facing Kansas child welfare  4/19/2018 Kansas system  3.33  Electronic mail with potential fact witness re  4/19/2018 Kansas problems in Kansas foster care system  6.50  Electronic mail to co-counsel re call with potential fact witness  6.02  Electronic mail to IL re call with potential fact witness  6.03  5/1/2018 Kansas Electronic mail to IL re call with potential fact witness  Electronic mail to co-counsel team re new factual developments  Electronic mail with MN re status of investigation in  5/2/2018 Kansas Electronic mail with potential fact witness re  Electronic mail with potential fact witness re  problems in Kansas foster care system  6.08  Electronic mail with potential client re upcoming  5/9/2018 Kansas meeting  7.13  Telephone call with team re strategy for next investigation trip (left early)  Electronic mail with confidential Kansas contact re  5/10/2018 Kansas factual developments with client  7.25  Telephone call with potential fact witness re mental health screens for Kansas foster children  8.40  Kansas Travel to Kansas City for meetings with potential clients, foster care advocates.  8.515/2018 Kansas foster care advocates.  8.615/15/2018 Kansas Fravel within Kansas for several meetings with  potential clients, foster care advocates.  1.72  Emails to potential fact witness re follow-up on	4/17/2018 Kansas problems in Kansas foster care system  Electronic mail with confidential contact/child advocate re problems facing Kansas child welfare system  4/19/2018 Kansas system  Electronic mail with potential fact witness re problems in Kansas foster care system  4/19/2018 Kansas problems in Kansas foster care system  Electronic mail to co-counsel re call with potential fact witness  5/1/2018 Kansas Electronic mail to IL re call with potential fact witness  Electronic mail to co-counsel team re new factual developments  Electronic mail with MN re status of investigation in Kansas  Electronic mail with potential fact witness re problems in Kansas foster care system  5/2/2018 Kansas Electronic mail with potential fact witness re problems in Kansas foster care system  5/3/2018 Kansas Electronic mail with potential client re upcoming meeting  5/9/2018 Kansas investigation trip (left early)  5/9/2018 Kansas Electronic mail with confidential Kansas contact re factual developments with client  5/10/2018 Kansas Factual developments with client  5/10/2018 Kansas Travel clients, foster care advocates.  Kansas Travel within Kansas for several meetings with potential several meetings with potential clients, foster care advocates.  Emails to potential fact witness re follow-up on	4/17/2018 Kansas problems in Kansas foster care system 0.50 \$ 410.00  Electronic mail with confidential contact/child advocate re problems facing Kansas child welfare system 0.33 \$ 410.00  Electronic mail with potential fact witness re problems in Kansas foster care system 0.50 \$ 410.00  Electronic mail to co-counsel re call with potential fact witness 0.03 \$ 410.00  5/1/2018 Kansas Electronic mail to IL re call with potential fact witness 0.02 \$ 410.00  5/1/2018 Kansas Electronic mail to co-counsel team re new factual developments 0.05 \$ 410.00  Electronic mail with MN re status of investigation in Kansas problems in Kansas foster care system 0.00 \$ 410.00  5/2/2018 Kansas Electronic mail with potential fact witness re problems in Kansas foster care system 0.08 \$ 410.00  Electronic mail with potential client re upcoming meeting 0.13 \$ 410.00  Electronic mail with potential client re upcoming meeting 0.13 \$ 410.00  Electronic mail with team re strategy for next investigation trip (left early) 0.57 \$ 410.00  Electronic mail with confidential Kansas contact re factual developments with client 0.25 \$ 410.00  Telephone call with team re strategy for next investigation trip (left early) 0.57 \$ 410.00  Electronic mail with potential fact witness re mental health screens for Kansas foster children 0.25 \$ 410.00  Telephone call with potential fact witness re mental health screens for Kansas foster children 0.83 \$ 410.00  Meetings with several potential fact witnesses re foster care advocates. 2.00 \$ 410.00  Meetings with several potential fact witnesses re foster care system deficiencies 4.50 \$ 410.00  Emails to potential clients, foster care advocates. 1.72 \$ 410.00  Emails to potential fact witness re follow-up on	4/17/2018 Kansas problems in Kansas foster care system 0.50 \$ 410.00 \$  Electronic mail with confidential contact/child advocate re problems facing Kansas child welfare system 0.33 \$ 410.00 \$  Electronic mail with potential fact witness re problems in Kansas foster care system 0.50 \$ 410.00 \$  Electronic mail to co-counsel re call with potential fact witness re problems in Kansas foster care system 0.50 \$ 410.00 \$  5/1/2018 Kansas Electronic mail to IL re call with potential fact witness 0.02 \$ 410.00 \$  5/2/2018 Kansas Electronic mail to co-counsel team re new factual developments developments 0.05 \$ 410.00 \$  Electronic mail with MN re status of investigation in Kansas Felectronic mail with potential fact witness re problems in Kansas foster care system 0.08 \$ 410.00 \$  Electronic mail with potential fact witness re problems in Kansas foster care system 0.08 \$ 410.00 \$  Electronic mail with potential client re upcoming meeting 0.13 \$ 410.00 \$  Telephone call with team re strategy for next investigation trip (left early) 0.57 \$ 410.00 \$  Electronic mail with confidential Kansas contact re factual developments with client 0.25 \$ 410.00 \$  Telephone call with team re strategy for next investigation trip (left early) 0.57 \$ 410.00 \$  Electronic mail with potential fact witness re mental health screens for Kansas foster children 0.25 \$ 410.00 \$  Telephone call with potential fact witness re mental health screens for Kansas foster children 0.83 \$ 410.00 \$  Tavel to Kansas City for meetings with potential fact witnesses re foster care advocates. 2.00 \$ 410.00 \$  Meetings with several potential fact witnesses re foster care advocates. 4.50 \$ 410.00 \$  Emails to potential fact witness re follow-up on

			Electronic mail to co-counsel team re new factual			
Stephen Dixon	5/16/2018	Kansas	developments	0.33	\$ 410.00	\$ 136.67
			Meetings with several potential fact witnesses re			
Stephen Dixon	5/16/2018	Kansas	foster care system deficiencies	3.58	\$ 410.00	\$ 1,469.17
		Kansas	Travel within Kansas for several meetings with			
Stephen Dixon	5/16/2018	Travel	potential clients, foster care advocates.	2.45	\$ 410.00	\$ 1,004.50
			Electronic mail to co-counsel re new factual			
Stephen Dixon	5/21/2018	Kansas	developments	0.03	\$ 410.00	\$ 13.67
			Electronic mail with MN re fact pattern of potential			
Stephen Dixon	5/21/2018	Kansas	client	0.03	\$ 410.00	\$ 13.67
			Electronic mail to team re fact pattern of potential			
Stephen Dixon	5/21/2018	Kansas	client	0.03	\$ 410.00	\$ 13.67
			Draft memo re recent meeting with potential client			
Stephen Dixon	5/21/2018	Kansas	with key facts important to investigation	0.58	\$ 410.00	\$ 239.17
			Draft memo re recent meeting with potential client			
Stephen Dixon	5/21/2018	Kansas	with key facts important to investigation (cont'd)	0.67	\$ 410.00	\$ 273.33
			Draft memos re recent meetings with potential			
Stephen Dixon	5/21/2018	Kansas	clients with key facts important to investigation	2.50	\$ 410.00	\$ 1,025.00
			Electronic mail to co-counsel re recent contact			
Stephen Dixon	5/22/2018	Kansas	memos	0.03	\$ 410.00	\$ 13.67
			Electronic mail with potential client re new factual			
Stephen Dixon	5/22/2018	Kansas	developments	0.08	\$ 410.00	\$ 34.17
			Electronic mail with potential fact witness re new			
Stephen Dixon	5/22/2018	Kansas	factual developments	0.08	\$ 410.00	\$ 34.17
			Draft memo re recent meeting with potential client			
Stephen Dixon	5/22/2018	Kansas	with key facts important to investigation	0.53	\$ 410.00	\$ 218.67
			Draft memo re recent meeting with potential client			
Stephen Dixon	5/22/2018	Kansas	with key facts important to investigation (cont'd)	1.00	\$ 410.00	\$ 410.00

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			Electronic mail with potential fact witness re					
Stephen Dixon	5/23/2018	Kansas	question re mental health screenings	0.13	\$	410.00	\$	54.67
			Telephone call with team to discuss investigation					
Stephen Dixon	5/23/2018	Kansas	strategy, potential clients.	0.88	\$	410.00	\$	362.17
			Electronic mail to co-counsel re mental health					
Stephen Dixon	5/30/2018	Kansas	screens for youth in care	0.03	\$	410.00	\$	13.67
Stephen Dixon	5/31/2018	Kansas	Electronic mail with client re investigation update	0.07	\$	410.00	\$	27.33
Stephen Dixon	6/4/2018	Kansas	Electronic mail to team re factual developments	0.03	\$	410.00	\$	13.67
Stephen Dixon	6/4/2018	Kansas	Electronic mail with potential client re investigation update	0.08	\$	410.00	\$	34.17
Stephen Dixon	6/5/2018	Kansas	Electronic mail to co-counsel team re factual developments	0.28	\$	410.00	\$	116.17
Stephen Dixon	6/6/2018		Electronic mail to co-counsel team re factual developments	0.17	\$	410.00	<u> </u>	68.33
Stephen Dixon	0/0/2018	Nalisas	Electronic mail with potential client re investigation	0.17	Ą	410.00	Ş	06.55
Stephen Dixon	6/6/2018	Kansas	update	0.20	\$	410.00	\$	82.00
			Electronic mail with potential fact witnesses re					
Stephen Dixon	6/8/2018	Kansas	placement array challenges in Kansas	0.33	\$	410.00	\$	136.67
			Electronic mail with potential fact witnesses re					
Stephen Dixon	6/13/2018	Kansas	placement array challenges in Kansas	0.17	\$	410.00	\$	68.33
			Electronic mail with potential fact witnesses re					
Stephen Dixon	6/13/2018	Kansas	placement array challenges in Kansas (cont'd)	0.20	\$	410.00		82.00
Stephen Dixon	6/13/2018	Kansas	Review and analyze findings of fact	0.83	\$	410.00	\$	341.67
			Electronic mail with IL and MN re status of potential					
Stephen Dixon	6/14/2018	Kansas	named plaintiffs	0.03	\$	410.00	\$	13.67
			Electronic mail with potential fact witnesses re					
Stephen Dixon	6/14/2018	Kansas	problems in Kansas foster care system	0.83	\$	410.00	\$	341.67
			Electronic mail with potential fact witnesses re					
Stephen Dixon	6/15/2018	Kansas	problems in Kansas foster care system	0.65	\$	410.00	\$	266.50
			Electronic mail with potential fact witnesses re					
Stephen Dixon	6/16/2018	Kansas	problems in Kansas foster care system	0.12	\$	410.00	\$	47.83

			Electronic mail with co-counsel team re gaps in			
Stephen Dixon	6/16/2018	Kansas	findings of fact	0.47	\$ 410.00	\$ 191.33
		Kansas	Travel to Kansas City for meetings with potential			
Stephen Dixon	6/17/2018	Travel	clients, foster care advocates.	1.25	\$ 410.00	\$ 512.50
			Meetings with potential fact witnesses and clients in			
			Kansas re placement array issues in Kansas foster			
Stephen Dixon	6/18/2018	Kansas	care system	3.50	\$ 410.00	\$ 1,435.00
		Kansas	Travel within Kansas for several meetings with			
Stephen Dixon	6/18/2018	Travel	potential clients, foster care advocates.	0.62	\$ 410.00	\$ 252.83
			Electronic mail to co-counsel group re factual			
Stephen Dixon	6/19/2018	Kansas	developments	0.13	\$ 410.00	\$ 54.67
			Meetings with potential fact witnesses and clients in			
			Kansas re placement array issues in Kansas foster			
Stephen Dixon	6/19/2018	Kansas	care system	3.92	\$ 410.00	\$ 1,605.83
		Kansas	Travel within Kansas for several meetings with			
Stephen Dixon	6/19/2018	Travel	potential clients, foster care advocates.	0.67	\$ 410.00	\$ 273.33
			Electronic mail to co-counsel group re factual			
Stephen Dixon	6/20/2018	Kansas	developments	0.73	\$ 410.00	\$ 300.67
		Kansas				
Stephen Dixon	6/20/2018	Travel	Travel home from Kansas.	1.25	\$ 410.00	\$ 512.50
			Electronic mail to IL and MN re potential clients' fact			
Stephen Dixon	6/21/2018	Kansas	patterns	0.13	\$ 410.00	\$ 54.67
			Electronic mail to co-counsel re legal analysis of			
Stephen Dixon	6/24/2018	Kansas	placement array problems	0.07	\$ 410.00	\$ 27.33
			Electronic mail to co-counsel re factual			
Stephen Dixon	6/28/2018	Kansas	developments	0.05	\$ 410.00	\$ 20.50
			Electronic mail with potential fact witness re			
Stephen Dixon	6/28/2018	Kansas	problems in Kansas foster care system	0.08	\$ 410.00	\$ 34.17
			Telephone call with confidential foster care system			
Stephen Dixon	6/28/2018	Kansas	advocate re placement moves for foster children	0.22	\$ 410.00	\$ 88.83
			Electronic mail to co-counsel re conversation with			
Stephen Dixon	7/5/2018	Kansas	advocate	0.05	\$ 410.00	\$ 20.50

			Electronic mail with potential fact witness re				
Stephen Dixon	7/5/2018	Kansas	placement array challenges in Kansas	0.13	\$ 410.00	\$	54.67
			Electronic mail with potential fact witness re				
Stephen Dixon	7/5/2018	Kansas	placement array challenges in Kansas (cont'd)	0.33	\$ 410.00	\$	136.67
			Draft memo re recent converstion with confidential				
			Kansas foster care advocate with key facts important				
Stephen Dixon	7/5/2018	Kansas	to investigation	0.42	\$ 410.00	\$	170.83
			Draft memo re recent converstion with confidential				
			Kansas foster care advocate with key facts important				
Stephen Dixon	7/5/2018	Kansas	to investigation (cont'd)	0.75	\$ 410.00	\$	307.50
			Draft memo re recent converstion with confidential				
			Kansas foster care advocate with key facts important				
Stephen Dixon	7/5/2018	Kansas	to investigation (cont'd)	0.92	\$ 410.00	\$	375.83
			Electronic mail to co-counsel re investigation				
Stephen Dixon	7/6/2018	Kansas	strategy	0.03	\$ 410.00	\$	13.67
			Electronic mail to potential client re Kansas foster				
Stephen Dixon	7/6/2018	Kansas	care system deficiencies	0.05	\$ 410.00	\$	20.50
			Electronic mail to potential client re Kansas foster				
Stephen Dixon	7/6/2018	Kansas	care system deficiencies (cont'd)	0.25	\$ 410.00	\$	102.50
			Draft memo re recent converstion with potential				
			client with key facts important to investigation				
Stephen Dixon	7/6/2018	Kansas	(cont'd)	1.53	 410.00	•	628.67
Stephen Dixon	7/9/2018	Kansas	Electronic mail to MN re investigation strategy	0.03	\$ 410.00	\$	13.67
			Electronic mail to co-counsel re factual gaps in				
Stephen Dixon	7/11/2018	Kansas	findings of fact	0.03	\$ 410.00	\$	13.67
			Electronic mails to potential client re foster care				
Stephen Dixon	7/11/2018	Kansas	rates	0.17	\$ 410.00	\$	68.33
			Telephone call with co-counsel team re EPSDT				
			claims; Medicaid legal expert joined the call about 35				
Stephen Dixon	7/11/2018	Kansas	minutes into the call	1.23	\$ 410.00	\$	505.67
			Electronic mail to confidental Kansas contact re				
Stephen Dixon	7/18/2018	Kansas	respite care rates	0.05	\$ 410.00	\$	20.50
			Electronic mail to confidental Kansas contact re				
Stephen Dixon	7/18/2018	Kansas	respite care rates (different contact)	0.08	\$ 410.00	\$	34.17

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Stephen Dixon	7/18/2018	Kansas	Electronic mail to co-counsel team respite care rates	0.15	\$ 410.00	\$	61.50
- · · · · · · · · · · · · · · · · · · ·			Electronic mail to co-counsel team respite care rates			_	
Stephen Dixon	7/18/2018	Kansas	(cont'd)	0.17	\$ 410.00	\$	68.33
_			Electronic mail to confidental Kansas guardian ad				
Stephen Dixon	7/19/2018	Kansas	litem re Kids Zone	0.08	\$ 410.00	\$	34.17
			Electronic mails to confidential Kansas guardian ad				
Stephen Dixon	7/24/2018	Kansas	litem re Kids Zone	0.08	\$ 410.00	\$	34.17
			Prepare to present facts re Kids Zone for co-counsel				
Stephen Dixon	7/24/2018	Kansas	call	0.13	\$ 410.00	\$	54.67
			Electronic mail with confidential foster parents re				
Stephen Dixon	7/26/2018	Kansas	short-term placements	0.13	\$ 410.00	\$	54.67
Stephen Dixon	7/27/2018	Kansas	Electronic mail with IL re investigation strategy	0.20	\$ 410.00	\$	82.00
			Electronic mail to group of foster care advocates re				
Stephen Dixon	7/27/2018	Kansas	factual gaps in our findings of fact	0.37	\$ 410.00	\$	150.33
Stephen Dixon	7/30/2018	Kansas	Electronic mail with IL re investigation strategy	0.10	\$ 410.00	\$	41.00
			Telephone call with potential next friend re night-to-				
Stephen Dixon	7/30/2018	Kansas	night placements, screening problems	0.37	\$ 410.00	\$	150.33
			Electronic mails with potential next friends re follow-				
			up on conversation re night-to-night placements,				
Stephen Dixon	7/30/2018	Kansas	screening problems	0.67	\$ 410.00	\$	273.33
			Electronic mail with potential next friend re night-to-				
Stephen Dixon	7/31/2018	Kansas	night placements	0.05	\$ 410.00	\$	20.50
			Electronic mail with co-counsel team re conversation				
Stephen Dixon	7/31/2018	Kansas	with potential next friend	0.08	\$ 410.00	\$	34.17
		Kansas	Travel to Kansas City for meetings with potential				
Stephen Dixon	7/31/2018	Travel	clients, foster care advocates.	2.00	\$ 410.00	\$	820.00
			Electronic mail with Kansas foster parent re mental				
Stephen Dixon	8/1/2018	Kansas	health screenings	0.22	\$ 410.00	\$	88.83

			Meetings in Kansas with foster care advocates re					
Stephen Dixon	8/1/2018	Kansas	deficiencies in foster care system	4.75	\$	410.00	\$	1,947.50
		Kansas	Travel within Kansas for several meetings with					
Stephen Dixon	8/1/2018	Travel	potential clients, foster care advocates.	1.53	\$	410.00	\$	628.67
			Meetings in Kansas with foster care advocates re					
Stephen Dixon	8/2/2018	Kansas	deficiencies in foster care system	4.33	\$	410.00	\$	1,776.67
		Kansas	Travel within Kansas for several meetings with					
Stephen Dixon	8/2/2018	Travel	potential clients, foster care advocates.	1.25	\$	410.00	\$	512.50
1			Electronic mail to confidential foster care advocate					
Stephen Dixon	8/3/2018	Kansas	re factual follow-up from meeting yesterday	0.08	\$	410.00	\$	34.17
·			Electronic mail to co-counsel team re potential					
Stephen Dixon	8/3/2018	Kansas	clients	0.25	\$	410.00	\$	102.50
-			Draft memo re recent meeting with foster care					
Stephen Dixon	8/3/2018	Kansas	advocate in Kansas and circulate to team	0.33	\$	410.00	\$	136.67
		Kansas						
Stephen Dixon	8/3/2018	Travel	Travel home from Kansas.	2.00	\$	410.00	\$	820.00
			Draft memo re recent meeting with foster care					
Stephen Dixon	8/4/2018	Kansas	advocate in Kansas and circulate to team	0.37	\$	410.00	\$	150.33
			Draft memo re recent meeting with foster care					
Stephen Dixon	8/4/2018	Kansas	advocate in Kansas and circulate to team (cont'd)	0.58	\$	410.00	\$	239.17
	-, ,		Electronic mail to foster care advocate re factual		•		•	
Stephen Dixon	8/6/2018	Kansas	clarification for memo	0.03	\$	410.00	\$	13.67
			Draft memo re recent meeting with foster care		•		•	
Stephen Dixon	8/6/2018	Kansas	advocate in Kansas and circulate to team	0.33	\$	410.00	\$	136.67
			Draft memo re recent meeting with foster care					
Stephen Dixon	8/6/2018	Kancac	advocate in Kansas and circulate to team (cont'd)	0.63	\$	410.00	Ċ	259.67
Stephen Dixon	8/7/2018		Electronic mail with EM re potential client	0.03	\$	410.00		13.67
Stehileli Dixoli	6///2018	Kalisas	Electronic mail to foster care advocate re foster care	0.03	٧	410.00	٦	13.07
Stephen Dixon	8/7/2018	Kancac	contractors	0.17	\$	410.00	\$	68.33
Stehileli Dixoli	6/ //2018	Nalisas	Draft memo re recent meeting with foster care	0.17	٧	410.00	٦	00.33
Stephen Dixon	8/7/2018	Kansas	advocate in Kansas and circulate to team	0.50	¢	410.00	¢	205.00
Stehileli Dixoli	0///2018	Nalisas	auvocate iii Naiisas aiiu tiittiidte to tediii	0.50	ې	410.00	Ą	205.00

			Electronic mail to foster care advocate re foster care			
Stephen Dixon	8/8/2018	Kansas	contractors	0.03	\$ 410.00	\$ 13.67
			Electronic mail with team re new facts re foster care			
Stephen Dixon	8/8/2018	Kansas	contractors	0.07	\$ 410.00	\$ 27.33
			Draft memo re recent meeting with foster care			
Stephen Dixon	8/8/2018	Kansas	advocate in Kansas and circulate to team	0.92	\$ 410.00	\$ 375.83
			Electronic mail to potential client re caseworker			
Stephen Dixon	8/10/2018	Kansas	problems	0.25	\$ 410.00	\$ 102.50
			Electronic mail to co-counsel team re new factual			
Stephen Dixon	8/11/2018	Kansas	developments for findings of fact	0.08	\$ 410.00	\$ 34.17
Stephen Dixon	8/13/2018	Kansas	Electronic mail to MN re investigation strategy	0.05	\$ 410.00	\$ 20.50
			Electronic mail with L. Welch re investigation			
Stephen Dixon	8/13/2018	Kansas	strategy	0.05	\$ 410.00	\$ 20.50
			Electronic mail with paralegal re findings of fact			
Stephen Dixon	8/14/2018	Kansas	evidence gaps	0.03	\$ 410.00	\$ 13.67
			Electronic mail to foster care advocate re drop-off			
Stephen Dixon	8/16/2018	Kansas	process for foster children	0.13	\$ 410.00	\$ 54.67
			Electronic mail to co-counsel team re process for			
Stephen Dixon	8/20/2018	Kansas	new placements	0.05	\$ 410.00	\$ 20.50
			Electronic mails with foster care advocates in Kansas			
			re night-to-night placements and emergency			
Stephen Dixon	8/20/2018	Kansas	placements	0.75	\$ 410.00	\$ 307.50
			Telephone calls with foster care advocate re PRTFs			
Stephen Dixon	8/20/2018	Kansas	and foster youth	0.78	\$ 410.00	\$ 321.17
			Telephone calls with foster care advocate re PRTFs			
Stephen Dixon	8/21/2018	Kansas	and foster youth	0.08	\$ 410.00	\$ 34.17
			Electronic mail with foster care advocates re night-to-			
Stephen Dixon	8/21/2018	Kansas	night placements	0.97	\$ 410.00	\$ 396.33
			Electronic mail with foster care advocate re night-to-			
Stephen Dixon	8/22/2018	Kansas	night placements	0.08	\$ 410.00	\$ 34.17
			Telephone call with team re complaint drafting,			
Stephen Dixon	8/22/2018	Kansas	investigation strategy (came late to meeting)	0.35	\$ 410.00	\$ 143.50

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			Telephone call with Kansas GAL re potentially					
Stephen Dixon	8/22/2018	Kansas	wanting to join lawsuit	0.50	\$	410.00	\$	205.00
			Electronic mail to team re factual developments in					
Stephen Dixon	8/22/2018	Kansas	investigation	0.55	\$	410.00	\$	225.50
Stanban Divan	0/22/2010	Vanaaa	Tolombono cell with client we investigation status	0.05	<b>د</b>	410.00	۲.	20.50
Stephen Dixon	8/23/2018	Kalisas	Telephone call with client re investigation status	0.05	\$	410.00	\$	20.50
Stanban Divan	0/22/2010	Vancas	Electronic mail to foster parent re experience	0.27	\$	410.00	\$	109.33
Stephen Dixon	8/23/2018	Kalisas	fostering	0.27	Ş	410.00	Ş	109.33
Stephen Dixon	8/24/2018	Kansas	Telephone call to GAL re night-to-night placements	0.03	\$	410.00	\$	13.67
Stephen Dixon	8/25/2018	Kansas	Telephone call to GAL re night-to-night placements	0.03	\$	410.00	\$	13.67
-			Electronic mail with foster care advocate re Child					
Stephen Dixon	8/26/2018	Kansas	Welfare System Task Force	0.03	\$	410.00	\$	13.67
			Electronic mail with foster care advocate re Child					
Stephen Dixon	8/27/2018	Kansas	Welfare System Task Force	0.03	\$	410.00	\$	13.67
			Electronic mail to paralegal re Child Welfare Systems					
Stephen Dixon	8/27/2018	Kansas	task force report	0.05	\$	410.00	\$	20.50
			Electronic mail with foster care advocate re Child					
Stephen Dixon	8/28/2018	Kansas	Welfare System Task Force	0.08	\$	410.00	\$	34.17
			Electronic mail with paralegal re Child Welfare					
Stephen Dixon	8/28/2018	Kansas	System task force report	0.10	\$	410.00	\$	41.00
			Telephone call with client re status of investigation,					
Stephen Dixon	8/28/2018	Kansas	questions re factual allegations	0.22	\$	410.00	\$	88.83
			Meeting with GAL re problems in Kansas foster care					
Stephen Dixon	8/28/2018	Kansas	system	1.25	\$	410.00	\$	512.50
		Kansas	Travel to Wichita for meetings with potential clients,					
Stephen Dixon	8/28/2018	Travel	foster care advocates.	2.00	\$	410.00	\$	820.00
Stephen Dixon	8/29/2018	Kansas	Electronic mail to co-counsel re meeting with GAL	0.03	\$	410.00	\$	13.67
			Electronic mail to paralegal re additional facts to add					
Stephen Dixon	8/29/2018	Kansas	to finding of facts	0.05	\$	410.00	\$	20.50
			Electronic mails to child advocates in Kansas re foster					
Stephen Dixon	8/29/2018	Kansas	care placement instability	0.37	\$	410.00	\$	150.33

			Telephone call with Kansas child advocate re			
Stephen Dixon	8/29/2018	Kansas	placement instability	0.53	\$ 410.00	\$ 218.67
			Meetings with foster care advocates re deficiencies			
Stephen Dixon	8/29/2018	Kansas	in foster care system	5.00	\$ 410.00	\$ 2,050.00
		Kansas	Travel within Kansas for several meetings with			
Stephen Dixon	8/29/2018	Travel	potential clients, foster care advocates.	0.17	\$ 410.00	\$ 68.33
			Travel from Wichita to Kansas City for several			
		Kansas	meetings with potential clients, foster care			
Stephen Dixon	8/29/2018	Travel	advocates.	1.50	\$ 410.00	\$ 615.00
			Meetings with foster care advocates re deficiencies			
Stephen Dixon	8/30/2018	Kansas	in foster care system	5.00	\$ 410.00	\$ 2,050.00
			Meetings with foster care advocates re deficiencies			
Stephen Dixon	8/31/2018	Kansas	in foster care system	5.08	\$ 410.00	\$ 2,084.17
		Kansas	Travel from Kansas City to Topeka for meetings with			
Stephen Dixon	8/31/2018	Travel	potential client.	0.50	\$ 410.00	\$ 205.00
		Kansas	Travel from Topeka to Kansas City for meetings with			
Stephen Dixon	8/31/2018	Travel	potential clients.	0.50	\$ 410.00	\$ 205.00
			Electronic mail to co-counsel team re new facts			
Stephen Dixon	9/1/2018	Kansas	learned from stakeholder meetings	0.30	\$ 410.00	\$ 123.00
			Electronic mail to child advocates following up on			
Stephen Dixon	9/1/2018	Kansas	facts from recent meetings	0.80	\$ 410.00	\$ 328.00
		Kansas				
Stephen Dixon	9/1/2018	Travel	Travel home from Kansas.	2.00	\$ 410.00	\$ 820.00
			Electronic mail to co-counsel re new factual			
Stephen Dixon	9/4/2018	Kansas	developments	0.12	\$ 410.00	\$ 47.83
			Electronic mail to child advocates following up on			
Stephen Dixon	9/4/2018	Kansas	facts from recent meetings	1.17	\$ 410.00	\$ 478.33
Stephen Dixon	9/5/2018	Kansas	Electronic mail to client re investigation update	0.03	\$ 410.00	\$ 13.67
			Electronic mail with potential client re potential			
Stephen Dixon	9/5/2018	Kansas	EPSDT claim	0.03	\$ 410.00	\$ 13.67
			Electronic mail to co-counsel facts supporting EPSDT			
Stephen Dixon	9/5/2018	Kansas	claim	0.05	\$ 410.00	\$ 20.50

			Telephone call with co-counsel team re complaint,			
Stephen Dixon	9/5/2018	Kansas	investigation strategy	1.50	\$ 410.00	\$ 615.00
			Electronic mail to co-counsel re potential EPSDT			
Stephen Dixon	9/6/2018	Kansas	claim facts	0.03	\$ 410.00	\$ 13.67
Stephen Dixon	9/6/2018	Kansas	Electronic mail to team re framing EPSDT claim	0.13	\$ 410.00	\$ 54.67
			Electronic mail with IL re investigation update,			
Stephen Dixon	9/6/2018	Kansas	strategy	0.17	\$ 410.00	\$ 68.33
			Electronic mail to EM re fact pattern of potential			
Stephen Dixon	9/7/2018	Kansas	next friend	0.03	\$ 410.00	\$ 13.67
			Electronic mail to EM re fact pattern of potential			
Stephen Dixon	9/7/2018	Kansas	next friend	0.17	\$ 410.00	\$ 68.33
			Telephone call with IL re update on potential next			
Stephen Dixon	9/7/2018	Kansas	friend	0.17	\$ 410.00	\$ 68.33
			Draft memo re potential next friend and circulate to			
Stephen Dixon	9/14/2018	Kansas	team	0.42	\$ 410.00	\$ 170.83
			Draft memo re potential next friend and circulate to			
Stephen Dixon	9/14/2018	Kansas	team (cont'd)	0.50	\$ 410.00	\$ 205.00
			Draft memo re potential next friend and circulate to			
Stephen Dixon	9/15/2018	Kansas	team	1.42	\$ 410.00	\$ 580.83
			Electronic mail to foster parent re lack of trauma			
Stephen Dixon	9/18/2018	Kansas	screens, assessments	0.08	\$ 410.00	\$ 34.17
			Electronic mail to team re conversation with foster			
Stephen Dixon	9/18/2018	Kansas	parent re screens	0.08	\$ 410.00	\$ 34.17
			Telephone call re status of complaint drafting,			
Stephen Dixon	9/19/2018	Kansas	investigation strategy	0.78	\$ 410.00	\$ 321.17
Stephen Dixon	9/20/2018	Kansas	Electronic mails to co-counsel team re factual update	0.13	\$ 410.00	\$ 54.67
			Telephone call with GAL re Kansas foster care system			
Stephen Dixon	9/20/2018	Kansas	placement array issues	0.93	\$ 410.00	\$ 382.67
			Electronic mail with co-counsel re conversation with			
Stephen Dixon	9/24/2018		GAL	0.13	 410.00	\$ 54.67
Stephen Dixon	9/26/2018	Kansas	Telephone call re investigation strategy	1.00	\$ 410.00	\$ 410.00
			Electronic mail to team re analysis of potential legal			
Stephen Dixon	9/28/2018	Kansas	argument	0.25	\$ 410.00	\$ 102.50

			Electronic mails to Kansas mental health advocate re					
Stephen Dixon	10/1/2018	Kansas	trauma screens for foster children	0.10	\$	410.00	\$	41.00
			Telephone call with Kansas mental health advocate					
Stephen Dixon	10/1/2018	Kansas	re trauma screens for foster children	0.25	\$	410.00	\$	102.50
			Electronic mail to team re analysis of potential legal					
Stephen Dixon	10/1/2018	Kansas	argument	0.58	\$	410.00	\$	239.17
			Electronic mail to co-counsel re conversation with					
Stephen Dixon	10/2/2018	Kansas	mental health advocate re trauma screens	0.33	\$	410.00	\$	136.67
			Telephone call with Kansas mental health advocate		т		т	
Stephen Dixon	10/2/2018	Kansas	re trauma screens for foster children	0.42	\$	410.00	\$	170.83
•	, ,		Electronic mail to team re potential clients' fact					
Stephen Dixon	10/3/2018	Kansas	patterns	0.20	\$	410.00	\$	82.00
			Electronic mails to child advocates in Kansas re foster					
Stephen Dixon	10/3/2018	Kansas	care placement instability factual questions	0.25	\$	410.00	\$	102.50
			Electronic mail to co-counsel re fact patterns of					
Stephen Dixon	10/4/2018	Kansas	potential next friends	0.27	\$	410.00	\$	109.33
			Telephone call with potential next friend re night-to-					
Stephen Dixon	10/4/2018	Kansas	night placements, screening problems	0.40	\$	410.00	\$	164.00
Stephen Dixon	10/4/2018	Kansas	Electronic mail with client re investigation update	1.53	\$	410.00	\$	628.67
Stephen bixon	10/ 4/ 2010	Ransas	Electronic mail with electric investigation apaate	1.55	<b>У</b>	410.00	<b>У</b>	020.07
Stephen Dixon	10/5/2018	Kansas	Telephone call with client re investigation update	0.03	\$	410.00	\$	13.67
			Electronic mails to child advocates in Kansas re filling					
			in factual gaps about the child welfare system in					
Stephen Dixon	10/5/2018	Kansas	Kansas	0.83	\$	410.00	\$	341.67
			Electronic mail to child advocate re night-to-night					
Stephen Dixon	10/6/2018	Kansas	placements	0.07	\$	410.00	\$	27.33
			Review evidence gaps in findings of fact to prepare					
			targeted questions for meetings with Kansas child					
Stephen Dixon	10/6/2018	Kansas	advocates, GALs	0.83	\$	410.00	\$	341.67

			Electronic mail to Kansas GAL re mental health			
Stephen Dixon	10/7/2018	Kansas	screenings	0.08	\$ 410.00	\$ 34.17
Stephen Dixon	10/7/2018	Kansas	Electronic mail to co-counsel re upcoming meetings	0.25	\$ 410.00	\$ 102.50
			Review evidence gaps in findings of fact to prepare			
			targeted questions for meetings with Kansas child			
Stephen Dixon	10/7/2018	Kansas	advocates, GALs	0.83	\$ 410.00	\$ 341.67
		Kansas	Travel to Kansas for meetings with potential clients,			
Stephen Dixon	10/7/2018	Travel	foster care advocates.	2.00	\$ 410.00	\$ 820.00
			Telephone calls to foster care advocate re follow-up			
			questions from meeting early re Kansas foster care			
Stephen Dixon	10/8/2018	Kansas	system	0.13	\$ 410.00	\$ 54.67
			Meetings with foster care advocates re deficiencies			
Stephen Dixon	10/8/2018	Kansas	in foster care system	4.50	\$ 410.00	\$ 1,845.00
		Kansas	Travel within Kansas for several meetings with			
Stephen Dixon	10/8/2018	Travel	potential clients, foster care advocates.	1.00	\$ 410.00	\$ 410.00
			Electronic mail to co-counsel re factual updates from			
Stephen Dixon	10/9/2018	Kansas	meetings with local contacts	0.33	\$ 410.00	\$ 136.67
			Electronic mail to foster care advocate re follow-up			
			questions from meeting early re Kansas foster care			
Stephen Dixon	10/9/2018	Kansas	system	0.42	\$ 410.00	\$ 170.83
			Meetings with foster care advocates re deficiencies			
Stephen Dixon	10/9/2018	Kansas	in foster care system	2.25	\$ 410.00	\$ 922.50
		Kansas	Travel within Kansas for several meetings with			
Stephen Dixon	10/9/2018	Travel	potential clients, foster care advocates.	1.00	\$ 410.00	\$ 410.00
			Telephone call with foster care advocate re follow-up			
			questions from meeting early re Kansas foster care			
Stephen Dixon	10/10/2018	Kansas	system	0.05	\$ 410.00	\$ 20.50
			Electronic mail to foster care advocate re follow-up			
			questions from meeting early re Kansas foster care			
Stephen Dixon	10/10/2018	Kansas	system	0.20	\$ 410.00	\$ 82.00
			Electronic mails to co-counsel re key facts from			
Stephen Dixon	10/10/2018	Kansas	meetings with child advocates in Kansas	0.25	\$ 410.00	\$ 102.50

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			Meetings with foster care advocates re deficiencies					
Stephen Dixon	10/10/2018	Kansas	in foster care system	4.00	\$	410.00	\$	1,640.00
		Kansas	Travel within Kansas for several meetings with					
Stephen Dixon	10/10/2018	Travel	potential clients, foster care advocates.	1.62	\$	410.00	\$	662.83
			Electronic mail to confidential child advocate re					
Stephen Dixon	10/11/2018	Kansas	connecting with potential client	0.15	\$	410.00	\$	61.50
Stephen Dixon	10/11/2018	Kansas	Electronic mail to potential client re fact pattern	0.17	\$	410.00	\$	68.33
	10/11/2010		Telephone call with potential client re their					101.50
Stephen Dixon	10/11/2018	Kansas	perspective on foster care deficiencies in Kansas	0.45	\$	410.00	Ş	184.50
C. 1 D:	40/44/2040	.,	Meetings with foster care advocates re deficiencies	4.00		440.00		4 6 4 0 0 0
Stephen Dixon	10/11/2018		in foster care system	4.00	\$	410.00	\$	1,640.00
C. 1 D:	10/11/2010	Kansas	Travel within Kansas for several meetings with	0.50		440.00		205.00
Stephen Dixon	10/11/2018		potential clients, foster care advocates.	0.50		410.00		205.00
Stephen Dixon	10/12/2018	Kansas	Electronic mail with IL re investigation update	0.03	\$	410.00	\$	13.67
Stephen Dixon	10/12/2018	Kansas	Electronic mail with potential client re new factual developments	0.12	\$	410.00	\$	47.83
	29/ 22/ 2323		Meetings with foster care advocate re deficiencies in	0.1_	т		т	.,,,,,
Stephen Dixon	10/12/2018	Kansas	foster care system	1.50	\$	410.00	\$	615.00
		Kansas			· ·		т	
Stephen Dixon	10/12/2018		Travel home from Kansas.	2.00	\$	410.00	\$	820.00
			Electronic mail with potential client re new factual					
Stephen Dixon	10/13/2018	Kansas	developments	0.17	\$	410.00	\$	68.33
			Electronic mail to team re legal analysis for potential					
Stephen Dixon	10/13/2018	Kansas	claims	0.25	\$	410.00	\$	102.50
			Draft memo re recent meeting with foster care					
Stephen Dixon	10/15/2018	Kansas	advocate in Kansas and circulate to team	1.83	\$	410.00	\$	751.67
			Electronic mail with potential client re investigation					
Stephen Dixon	10/17/2018	Kansas	update	0.08	\$	410.00	\$	34.17
			Draft memo re recent meeting with foster care					
Stephen Dixon	10/17/2018	Kansas	advocate in Kansas and circulate to team	1.03	\$	410.00	\$	423.67
			Electronic mail with potential client re investigation					
Stephen Dixon	10/18/2018	Kansas	update	0.03	\$	410.00	\$	13.67

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		Electronic mail with potential client re investigation			
Stephen Dixon	10/19/2018 Kansas	update	0.08	\$ 410.00	\$ 34.17
		Electronic mail to co-counsel re legal analysis of			
Stephen Dixon	10/19/2018 Kansas	placement array problems	0.17	\$ 410.00	\$ 68.33
		Electronic mail to co-counsel re legal analysis of			
Stephen Dixon	10/21/2018 Kansas	placement array problems	0.22	\$ 410.00	\$ 88.83
		Electronic mail to co-counsel re legal analysis of			
Stephen Dixon	10/22/2018 Kansas	placement array problems	0.17	\$ 410.00	\$ 68.33
		Electronic mails with GAL in Kansas re screening			
Stephen Dixon	10/22/2018 Kansas	problems	0.58	\$ 410.00	\$ 239.17
		Electronic mails with GAL in Kansas re screening			
Stephen Dixon	10/23/2018 Kansas	problems	0.03	\$ 410.00	\$ 13.67
		Electronic mail to co-counsel re legal analysis of			
Stephen Dixon	10/24/2018 Kansas	potential claim	0.08	\$ 410.00	\$ 34.17
		Electronic mails with GAL in Kansas re screening			
Stephen Dixon	10/24/2018 Kansas	problems	0.13	\$ 410.00	\$ 54.67
		Telephone call re client updates and complaint			
Stephen Dixon	10/24/2018 Kansas	strategy	0.85	\$ 410.00	\$ 348.50
		Telephone call with potential client re fact pattern,			
Stephen Dixon	10/26/2018 Kansas	potentially joining lawsuit	0.25	\$ 410.00	\$ 102.50
		Electronic mail with potential client re fact pattern,			
Stephen Dixon	10/26/2018 Kansas	potentially joining lawsuit	0.47	\$ 410.00	\$ 191.33
		Electronic mail with co-counsel re update on			
Stephen Dixon	10/27/2018 Kansas	potential client	0.07	\$ 410.00	\$ 27.33
		Electronic mails with potential client re potentially			
Stephen Dixon	10/27/2018 Kansas	joining lawsuit	0.67	\$ 410.00	\$ 273.33
		Draft memo re fact pattern of potential client,			
Stephen Dixon	10/27/2018 Kansas	circulate to team	0.75	\$ 410.00	\$ 307.50
Stephen Dixon	10/29/2018 Kansas	Electronic mail with co-counsel re potential client	0.03	\$ 410.00	\$ 13.67
		Electronic mail to foster parents re potentially being			
Stephen Dixon	10/29/2018 Kansas	fact witness	1.25	\$ 410.00	\$ 512.50
		Electronic mail to potential fact witness re			
Stephen Dixon	10/30/2018 Kansas	investigation update, factual gaps	0.17	\$ 410.00	\$ 68.33

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			Electronic mail to potential fact witness re			
Stephen Dixon	10/30/2018	Kansas	investigation update, factual gaps	0.92	\$ 410.00	\$ 375.83
			Telephone call with potential fact witness re late-			
Stephen Dixon	10/30/2018	Kansas	night placements	1.43	\$ 410.00	\$ 587.67
Stephen Dixon	10/31/2018	Kansas	Electronic mail to client re investigation update	0.17	\$ 410.00	\$ 68.33
			Electronic mail to client re investigation update			
Stephen Dixon	10/31/2018	Kansas	(different client)	0.17	\$ 410.00	\$ 68.33
			Electronic mail to co-counsel re recent client			
Stephen Dixon	10/31/2018	Kansas	interaction	0.20	\$ 410.00	\$ 82.00
			Telephone call with co-counsel re complaint strategy,			
Stephen Dixon	10/31/2018	Kansas	clients' facts	0.77	\$ 410.00	\$ 314.33
			Telephone calls with potential next friend re factual			
Stephen Dixon	11/1/2018	Kansas	question	0.07	\$ 410.00	\$ 27.33
Stephen Dixon	11/1/2018	Kansas	Electronic mail to co-counsel re potential next friend	0.25	 410.00	\$ 102.50
Stephen Dixon	11/1/2018	Kansas	Electronic mail to potential next friend	0.75	\$ 410.00	\$ 307.50
			Telephone call with potential friend re investigation			
Stephen Dixon	11/2/2018	Kansas	status	0.05	\$ 410.00	\$ 20.50
			Electronic mail to co-counsel re conversation with			
Stephen Dixon	11/2/2018	Kansas	potential next friend	0.07	\$ 410.00	\$ 27.33
			Electronic mail with child advocates in Kansas re			
Stephen Dixon	11/2/2018	Kansas	finding more clients	0.17	\$ 410.00	\$ 68.33
			Electronic mail to co-counsel re analysis of draft			
Stephen Dixon	11/4/2018	Kansas	complaint	0.08	\$ 410.00	\$ 34.17
			Electronic mail to next friend re clarifying facts for			
Stephen Dixon	11/4/2018	Kansas	complaint	0.75	\$ 410.00	\$ 307.50
			Electronic mail to child advocate re sourcing for			
Stephen Dixon	11/5/2018	Kansas	complaint	0.03	\$ 410.00	\$ 13.67
			Electronic mail to team re additional fact for			
Stephen Dixon	11/5/2018	Kansas	complaint	0.07	\$ 410.00	\$ 27.33
			Electronic mail to co-counsel re feedback on draft			
Stephen Dixon	11/5/2018	Kansas	complaint	0.17	\$ 410.00	\$ 68.33

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Stephen Dixon	11/5/2018		Electronic mail to GAL re being potential fact witness	0.50	Ş	410.00	\$	205.00
		Kansas	Travel to Kansas for meetings with potential clients,		_		_	
Stephen Dixon	11/5/2018	Travel	foster care advocates.	2.00	\$	410.00	\$	820.00
Stephen Dixon	11/6/2018	Kansas	Electronic mail to team re conversation with GAL	0.27	\$	410.00	\$	109.33
			Electronic mail with foster care advocate from					
Stephen Dixon	11/6/2018	Kansas	meeting earlier re factual follow-up	0.42	\$	410.00	\$	170.83
			Meetings with foster care advocates re deficiencies					
Stephen Dixon	11/6/2018		in foster care system	3.50	\$	410.00	\$	1,435.00
		Kansas	Travel within Kansas for several meetings with					
Stephen Dixon	11/6/2018	Travel	potential clients, foster care advocates.	0.25	\$	410.00	\$	102.50
		Kansas	Travel within Kansas for several meetings with					
Stephen Dixon	11/6/2018	Travel	potential clients, foster care advocates.	0.25	\$	410.00	\$	102.50
			Electronic mail with foster care advocate from					
Stephen Dixon	11/7/2018	Kansas	meeting earlier re factual follow-up	0.03	\$	410.00	\$	13.67
		Kansas	Travel within Kansas for several meetings with					
Stephen Dixon	11/7/2018	Travel	potential clients, foster care advocates.	0.62	\$	410.00	\$	252.83
		Kansas	Travel within Kansas for several meetings with					
Stephen Dixon	11/7/2018	Travel	potential clients, foster care advocates.	0.62	\$	410.00	\$	252.83
			Electronic mail with foster care advocate from					
Stephen Dixon	11/8/2018	Kansas	meeting yesterday re factual follow-up	0.20	\$	410.00	\$	82.00
			Electronic mail with co-counsel team re major factual					
Stephen Dixon	11/8/2018	Kansas	findings from stakeholder meetings	0.37	\$	410.00	\$	150.33
		Kansas						
Stephen Dixon	11/8/2018	Travel	Travel home from Kansas.	2.00	\$	410.00	\$	820.00
			Electronic mail to foster care advocate about					
Stephen Dixon	11/9/2018	Kansas	potentially becoming client	0.03	\$	410.00	\$	13.67
			Draft memo re recent meeting with foster care					
Stephen Dixon	11/9/2018	Kansas	advocate in Kansas and circulate to team	1.50	\$	410.00	\$	615.00
•			Electronic mail with co-counsel re vetting potential					
Stephen Dixon	11/10/2018	Kansas	client	0.08	\$	410.00	\$	34.17
•			Telephone call with co-counsel re vetting potential		-			
Stephen Dixon	11/10/2018	Kansas	client	0.35	\$	410.00	\$	143.50

			Electronic mail to child advocate re fact needed for					
Stephen Dixon	11/11/2018	Kansas	complaint	0.03	\$	410.00	\$	13.67
Stephen Dixon	11/11/2018	Kansas	Electronic mail to client re complaint status	0.17	\$	410.00	\$	68.33
			Electronic mail with co-counsel re vetting potential					
Stephen Dixon	11/11/2018	Kansas	clients, fit to be class representatives	0.58	\$	410.00	\$	239.17
			Draft memo re recent meeting with foster care					
Stephen Dixon	11/11/2018	Kansas	advocate in Kansas and circulate to team	1.42	\$	410.00	\$	580.83
Stephen Dixon	11/12/2018	Kansas	Telephone call with client reviewing draft complaint	0.15	\$	410.00	\$	61.50
			Emails with clients re confirming complaint					
Stephen Dixon	11/12/2018	Kansas	allegations	2.50	\$	410.00	\$	1,025.00
			Emails with foster care advocates, co-counsel					
Stephen Dixon	11/12/2018	Kansas	confirming facts in draft complaint	3.47	\$	410.00	\$	1,421.33
			Electronic mail to foster care advocate re KDADS,					
Stephen Dixon	11/14/2018	Kansas	DCF structure	0.03	\$	410.00	\$	13.67
Stephen Dixon	11/14/2018	Kansas	Emails with co-counsel re client update	0.47	\$	410.00	\$	191.33
Stephen Dixon	11/14/2018	Kansas	Telephone call with team re complaint edits	0.58	\$	410.00	\$	239.17
		Kansas	Travel to Kansas for meetings with potential clients,					
Stephen Dixon	11/14/2018	Travel	foster care advocates.	2.00	\$	410.00	\$	820.00
Stephen Dixon	11/15/2018	Kansas	Electronic mail with client re status of complaint	0.03	\$	410.00	\$	13.67
Stephen Dixon	11/15/2018	Kansas	Electronic mail with potential client re status of complaint	0.13	\$	410.00	\$	54.67
			Electronic mail with co-counsel team re filling in		т		-	
Stephen Dixon	11/15/2018	Kansas	evidentiary gaps in complaint	0.17	\$	410.00	\$	68.33
			Telephone calls with foster care advocates re getting					
			help clarifying factual point to incorporate into					
Stephen Dixon	11/15/2018	Kansas	complaint	0.33	\$	410.00	\$	136.67
Stephen Dixon	11/15/2018	Kansas	Electronic mail with co-counsel re prospective clients	0.33	\$	410.00	\$	136.67
Stephen Dixon	11/15/2018	Kancac	Meeting with potential client re potentially joining lawsuit, fact patterns	0.42	\$	410.00	\$	170.83
Stephen Dixon	11/13/2016	Karisas	iawsuit, fact patterns	0.42	٧	410.00	٧	170.03

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			Meeting with client re new facts,			
Stephen Dixon	11/15/2018	Kansas	investigation/complaint status	0.75	\$ 410.00	\$ 307.50
			Meeting with another potential client re potentially			
Stephen Dixon	11/15/2018	Kansas	joining lawsuit, fact patterns	1.00	\$ 410.00	\$ 410.00
			Meeting with another client re new facts,			
Stephen Dixon	11/15/2018	Kansas	investigation/complaint status	1.25	\$ 410.00	\$ 512.50
		Kansas	Travel within Kansas for several meetings with			
Stephen Dixon	11/15/2018	Travel	potential clients, foster care advocates.	0.12	\$ 410.00	\$ 47.83
		Kansas	Travel within Kansas for several meetings with			
Stephen Dixon	11/15/2018	Travel	potential clients, foster care advocates.	0.12	\$ 410.00	\$ 47.83
		Kansas	Travel within Kansas for several meetings with			
Stephen Dixon	11/15/2018	Travel	potential clients, foster care advocates.	0.33	\$ 410.00	\$ 136.67
		Kansas	Travel within Kansas for several meetings with			
Stephen Dixon	11/15/2018	Travel	potential clients, foster care advocates.	0.33	\$ 410.00	\$ 136.67
Stephen Dixon	11/16/2018	Kansas	Telephone call with client re filing complaint	0.12	\$ 410.00	\$ 47.83
Stephen Dixon	11/16/2018	Kansas	Electronic mail with clients re filing complaint	0.42	\$ 410.00	\$ 170.83
Stephen Dixon	11/16/2018	Kansas	Do final review of complaint	0.75	\$ 410.00	\$ 307.50
Stephen Dixon	11/16/2018	Kansas	Meeting with client re final draft of complaint	1.25	\$ 410.00	\$ 512.50
			Electronic mail with clients re final factual edits to			
Stephen Dixon	11/16/2018	Kansas	complaint	1.57	\$ 410.00	\$ 642.33
		Kansas	Travel within Kansas for several meetings with			
Stephen Dixon	11/16/2018	Travel	potential clients, foster care advocates.	0.50	\$ 410.00	\$ 205.00
Stephen Dixon	11/17/2018	Kansas	Electronic mail to team re update from client	0.08	\$ 410.00	\$ 34.17
Stephen Dixon	11/17/2018	Kansas	Emails to client re complaint filing	0.08	\$ 410.00	\$ 34.17
		Kansas				
Stephen Dixon	11/17/2018	Travel	Travel home from Kansas.	2.00	\$ 410.00	\$ 820.00
			Research factual question for potential complaint			
Stephen Dixon	11/18/2018	Kansas	amendment	0.75	\$ 410.00	\$ 307.50
Stephen Dixon	11/19/2018	Kansas	Electronic mail to clients re litigation hold	0.42	\$ 410.00	\$ 170.83
			Research factual question for potential complaint			
Stephen Dixon	11/19/2018	Kansas	amendment	0.92	\$ 410.00	\$ 375.83
			Electronic mail to team re potential complaint			
Stephen Dixon	11/21/2018	Kansas	amendment	0.17	\$ 410.00	\$ 68.33

			Telephone call with foster care advocate re					
Stephen Dixon	11/21/2018	Kansas	complaint filing	0.22	\$	410.00	\$	88.83
			Telephone call with team re litigation strategy after					
Stephen Dixon	11/21/2018	Kansas	complaint filing	0.83	\$	410.00	\$	341.67
Stephen Dixon	11/28/2018	Kansas	Electronic mail with co-counsel re factual update	0.05	\$	410.00	\$	20.50
			Draft memo re recent meeting with foster care					
Stephen Dixon	11/28/2018		advocate in Kansas and circulate to team	0.42	\$	410.00		170.83
Stephen Dixon	11/28/2018	Kansas	Telephone call with team re witness outreach	1.08	\$	410.00	\$	444.17
			Electronic mail with child advocates in Kansas re					
Stephen Dixon	11/29/2018	Kansas	finding more clients	0.05	\$	410.00	\$	20.50
			Electronic mail with co-counsel re future discovery					
Stephen Dixon	11/29/2018	Kansas	items	0.33	\$	410.00	\$	136.67
			Review documents sent to me by Kansa s care					
Stephen Dixon	12/1/2018	Kansas	advocate	0.17	\$	410.00	\$	68.33
			Electronic mail to co-counsel re reaching out to					
Stephen Dixon	12/5/2018	Kansas	opposing counsel	0.20	\$	410.00	\$	82.00
Stephen Dixon	12/8/2018	Kansas	Electronic mail with counsel re litigation strategy	0.17	\$	410.00	\$	68.33
Stephen Dixon	12/10/2018	Kansas	Electronic mail with co-counsel	0.03	\$	410.00	\$	13.67
			Electronic mail with foster care advocates re new					
Stephen Dixon	12/11/2018	Kansas	facts for potential complaint amendment	0.13	\$	410.00	\$	54.67
·			Electronic mail to co-counsel re outreach strategy to					
Stephen Dixon	12/19/2018	Kansas	defendants	0.05	\$	410.00	\$	20.50
			Electronic mail to clients re defendants' motion for					
Stephen Dixon	12/31/2018	Kansas	an extension to answer complaint	0.50	\$	410.00	\$	205.00
			Electronic mail to client re opposition to extension of					
Stephen Dixon	1/3/2019	Kansas	time to answer	0.07	\$	410.00	\$	27.33
· ·			Electronic mail with foster care advocate re status		· ·		•	
Stephen Dixon	1/9/2019	Kansas	conference	0.08	\$	410.00	\$	34.17
Stephen Dixon	1/9/2019		Electronic mail to client re status conference	0.17	\$	410.00	\$	68.33
Stephen Dixon	1/10/2019		Electronic mails to clients re status conference	0.28	\$	410.00		116.17
	, , -				•		•	
Stephen Dixon	1/11/2019	Kansas	Electronic mail to counsel team re status of clients	0.13	\$	410.00	\$	54.67

Stephen Dixon	1/18/2019	Kansas	Electronic mail to co-counsel re discovery strategy	0.08	\$	410.00	\$	34.17
			Electronic mail to clients updating them re status					
Stephen Dixon	1/22/2019	Kansas	conference, discovery strategy	0.25	\$	410.00	\$	102.50
a	1 /00 /00 10							
Stephen Dixon	1/23/2019	Kansas	Electronic mail to team re conversations with clients	0.03	\$	410.00	\$	13.67
			Electronic mail to co-counsel re case facts, potential					
Stephen Dixon	1/23/2019		experts	0.35	\$	410.00	\$	143.50
Stephen Dixon	1/23/2019	Kansas	Telephone call with team re protective order	0.42	\$	410.00	\$	170.83
Chamban Dissan	1/20/2010	W	Talanhana allusith tagas na stratago fan diagas an	0.20	<b>.</b>	440.00	<b>.</b>	45747
Stephen Dixon	1/30/2019		Telephone call with team re strategy for discovery	0.38	\$	410.00	•	157.17
Stephen Dixon	2/1/2019		Electronic mail to paralegal re potential expert	0.05	\$	410.00	\$	20.50
Stephen Dixon	2/7/2019		Electronic mail to contact re potential expert	0.03	\$	410.00	\$	13.67
Stephen Dixon	2/11/2019	Kansas	Electronic mail to team re potential expert	0.05	\$	410.00	\$	20.50
Stephen Dixon	2/11/2019	Kancac	Telephone call with internal team re terms sheet	1.50	\$	410.00	ć	615.00
Stephen Dixon	2/11/2019		Electronic mail with co-counsel re fact update	0.03	\$	410.00	\$	13.67
Stephen Dixon	2/13/2019	Nalisas	Electronic mail to clients re litigation update and	0.03	Ş	410.00	Ą	13.07
Stephen Dixon	2/13/2019	Vancas	facts	0.23	\$	410.00	\$	95.67
Stephen Dixon	2/13/2019	Nalisas	Idets	0.23	Ą	410.00	Ą	95.07
Stephen Dixon	2/13/2019	Kansas	Telephone call with team re investigation updates	1.38	\$	410.00	\$	567.17
			Electronic mail with Kansas foster care advocate re					
Stephen Dixon	2/15/2019	Kansas	factual question	0.03	\$	410.00	\$	13.67
•			Electronic mail with client re litigation and factual					
Stephen Dixon	2/15/2019	Kansas	update	0.05	\$	410.00	\$	20.50
·			Electronic mail with Kansas foster care advocate re					
Stephen Dixon	2/19/2019	Kansas	factual question	0.03	\$	410.00	\$	13.67
Stephen Dixon	2/19/2019	Kansas	Electronic mail with team re factual update	0.13	\$	410.00	\$	54.67
Stephen Dixon	2/20/2019	Kansas	Electronic mail to counsel re case strategy	0.03	\$	410.00	\$	13.67
Stephen Dixon	2/20/2019	Kansas	Electronic mail to paralegal re case facts	0.03	\$	410.00	\$	13.67
Stephen Dixon	2/20/2019	Kansas	Electronic mail to paralegal re case facts (cont'd)	0.03	\$	410.00	\$	13.67
	_,,		Electronic mail to GAL re changes under Kelly	3.30	т	5.00	т	
Stenhen Dixon	2/22/2019	Kansas		0.07	\$	410 00	\$	27.33
Stephen Dixon	2/22/2019	Kansas	administration	0.07	Ş	410.00	\$	27.3

			Electronic mail with confidential informant re			
Stephen Dixon	2/26/2019	Kansas	Medicaid delivery system	0.07	\$ 410.00	\$ 27.33
Stephen Dixon	2/27/2019	Kansas	Electronic mail to client re status update	0.03	\$ 410.00	\$ 13.67
			Electronic mail re document review and legal			
Stephen Dixon	2/27/2019	Kansas	analysis	0.25	\$ 410.00	\$ 102.50
			Electronic mail to foster parent re factual question			
Stephen Dixon	2/28/2019	Kansas	on placement shortage	0.03	\$ 410.00	\$ 13.67
			Email to co-counsel re factual research on placement			
Stephen Dixon	3/18/2019	Kansas	shortage	0.03	\$ 410.00	\$ 13.67
			Email and draft legal analysis on placement array			
Stephen Dixon	3/20/2019	Kansas	claims to co-counsel	0.25	\$ 410.00	\$ 102.50
Stephen Dixon	3/20/2019	Kansas	Research and email re venue issues	0.63	\$ 410.00	\$ 259.67
Stephen Dixon	3/21/2019	Kansas	Email team re venue issues	0.08	\$ 410.00	\$ 34.17
Stephen Dixon	3/22/2019	Kansas	Analyze and email team re venue issues	0.25	\$ 410.00	\$ 102.50
Stephen Dixon	3/27/2019	Kansas	Telephone call with team, settlement strategy	0.90	\$ 410.00	\$ 369.00
Stephen Dixon	4/3/2019	Kansas	Emails to co-counsel team re venue research	0.07	\$ 410.00	\$ 27.33
Stephen Dixon	4/3/2019	Kansas	Telephone call with team, settlement strategy	0.98	\$ 410.00	\$ 403.17
Stephen Dixon	4/4/2019	Kansas	Email to KS co-counsel re factual update on client	0.10	\$ 410.00	\$ 41.00
			Electronic mail with co-counsel re venue and factual			
Stephen Dixon	4/9/2019	Kansas	update	0.20	\$ 410.00	\$ 82.00
Stephen Dixon	4/10/2019	Kansas	Electronic mail with team re update on client	0.08	\$ 410.00	\$ 34.17
Stephen Dixon	4/11/2019	Kansas	Electronic mail to team re client update	0.03	\$ 410.00	\$ 13.67
Stephen Dixon	4/11/2019	Kansas	Electronic mail to client re case update	0.08	\$ 410.00	\$ 34.17
Stephen Dixon	4/11/2019	Kansas	Electronic mail to co-counsel re litigation strategy	0.17	\$ 410.00	\$ 68.33
-			Electronic mail with co-counsel re factual update on			
Stephen Dixon	4/14/2019	Kansas	client	0.08	\$ 410.00	\$ 34.17
•			Electronic mail to KS co-counsel re case facts and			
Stephen Dixon	4/16/2019	Kansas	litigation strategy	0.13	\$ 410.00	\$ 54.67
Stephen Dixon	4/18/2019	Kansas	Electronic mail with co-counsel re litigation strategy	0.10	\$ 410.00	\$ 41.00
			Electronic mail to co-counsel re briefing dates			
Stephen Dixon	4/18/2019	Kansas	strategy	0.25	\$ 410.00	\$ 102.50

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

Stephen Dixon	4/19/2019	Kansas	Electronic mail with co-counsel re litigation strategy	0.10	\$	410.00	\$	41.00
Stephen Dixon	4/24/2019	Kansas	Telephone call with team re case strategy	0.50	\$	410.00	\$	205.00
Stephen Dixon	5/2/2019	Kansas	Electronic mail with co-counsel re client update	0.03	\$	410.00	\$	13.67
Stephen Dixon	5/8/2019		Telephone call with team re litigation strategy	0.92	\$	410.00	\$	375.83
Stephen Dixon	5/9/2019		Electronic mail with client re factual updates	0.08	\$	410.00		34.17
•			Electronic mails with Kansas child advocate re					
Stephen Dixon	5/9/2019	Kansas	potential discovery	0.17	\$	410.00	\$	68.33
Stephen Dixon	5/9/2019	Kansas	Telephone call with Leecia Welch re client questions	0.22	\$	410.00	\$	88.83
Stephen Dixon	5/10/2019	Kansas	Electronic mail with client re case updates	0.08	\$	410.00	\$	34.17
Stephen Dixon	5/11/2019	Kansas	Electronic mail with client re case updates	0.13	\$	410.00	\$	54.67
Stephen Dixon	5/12/2019	Kansas	Electronic mail with client re case updates	0.08	\$	410.00	\$	34.17
Stephen Dixon	5/13/2019	Kansas	Electronic mail with client re case updates	0.33	\$	410.00	\$	136.67
Stephen Dixon	5/14/2019	Kansas	Electronic mail to co-counsel re clients' updates	0.03	\$	410.00	\$	13.67
Stephen Dixon	5/14/2019	Kansas	Electronic mail to team re factual research	0.07	\$	410.00	\$	27.33
Stephen Dixon	5/14/2019	Kansas	Electronic mail with client re case updates	0.37	\$	410.00	\$	150.33
Stephen Dixon	5/15/2019	Kansas	Electronic mail with Kansas child advocates re potential client	0.13	\$	410.00	\$	54.67
Stephen Dixon	5/15/2019		Electronic mail with client re case updates	0.17	\$	410.00	\$	68.33
·			Meeting with client and potential client in Wichita re problems in foster care system, potentially joining		<u>.</u>		<u>.</u>	
Stephen Dixon	5/15/2019		case	1.67	\$	410.00	\$	683.33
		Kansas	Travel within Kansas for several meetings with					
Stephen Dixon	5/15/2019	Travel	potential clients, foster care advocates.	2.00	\$	410.00	\$	820.00
Stephen Dixon	5/16/2019	Kancac	Electronic mail with potential client following up on meeting, asking remaining questions	0.13	\$	410.00	\$	54.67
Stephen Dixon	5/16/2019		Electronic mail with client re case updates	0.13	\$	410.00	\$	68.33
Stephen Dixon	3, 10, 2019	Kansas	Electronic mail with co-counsel re strategy for adding	0.17	٠,	710.00	٠	00.33
Stephen Dixon	5/16/2019	Kansas	new plaintiffs	0.50	\$	410.00	\$	205.00

			Meeting with foster care advocate in Witchita re			
Stephen Dixon	5/16/2019	Kansas	factual updates on Kansas foster care system	1.00	\$ 410.00	\$ 410.00
			Meeting with client and potential client in Topeka re			
			problems in foster care system, potentially joining			
Stephen Dixon	5/16/2019	Kansas	case	1.50	\$ 410.00	\$ 615.00
			Electronic mail to KS team re initial disclosures			
Stephen Dixon	5/17/2019	Kansas	strategy	0.07	\$ 410.00	\$ 27.33
			Electronic mail to KS co-counsel re clients and factual			
Stephen Dixon	5/17/2019	Kansas	updates	0.23	\$ 410.00	\$ 95.67
Stephen Dixon	5/17/2019	Kansas	Electronic mail with KS clients re initial disclosures	0.30	\$ 410.00	\$ 123.00
			Meeting with foster care advocate re potential			
Stephen Dixon	5/17/2019	Kansas	discovery items	1.25	\$ 410.00	\$ 512.50
			Meeting with GAL re problems in Kansas foster care			
Stephen Dixon	5/17/2019	Kansas	system	1.33	\$ 410.00	\$ 546.67
Stephen Dixon	5/18/2019	Kansas	Electronic mail to co-counsel re initial disclosures	0.03	\$ 410.00	\$ 13.67
Stephen Dixon	5/18/2019	Kansas	Electronic mail to team re factual development	0.05	\$ 410.00	\$ 20.50
Stephen Dixon	5/19/2019	Kansas	Electronic mail to client re case status	0.03	\$ 410.00	\$ 13.67
			Electronic mail to co-counsel team about potential			
Stephen Dixon	5/19/2019	Kansas	new named plaintiff	0.33	\$ 410.00	\$ 136.67
			Electronic mail with KS co-counsel re potential new			
Stephen Dixon	5/20/2019	Kansas	named plaintiff	0.13	\$ 410.00	\$ 54.67
		Kansas				
Stephen Dixon	5/20/2019	Travel	Travel home from Kansas.	2.00	\$ 410.00	\$ 820.00
			Telephone call with next friend re potential new			
Stephen Dixon	5/21/2019	Kansas	named plaintiff	0.30	\$ 410.00	\$ 123.00
			Electronic mail to KS co-counsel re named plaintiff			
Stephen Dixon	5/22/2019	Kansas	strategy	0.17	\$ 410.00	\$ 68.33
			Conference call with KS team re settlement, factual			_
Stephen Dixon	5/22/2019	Kansas	updates	1.05	\$ 410.00	\$ 430.50

			Electronic mail with KS co-counsel re gaps in current					
Stephen Dixon	5/24/2019	Kansas	clients' facts	0.17	\$	410.00	\$	68.33
Stephen Dixon	5/24/2019	Kansas	Electronic mail to clients initial disclosures	0.20	\$	410.00	\$	82.00
Stephen Dixon	5/26/2019	Kansas	Electronic mail with co-counsel re initial disclosures	0.13	\$	410.00	\$	54.67
Stephen Dixon	5/29/2019	Kansas	Electronic mail to client re initial disclosures	0.08	\$	410.00	\$	34.17
			Electronic mail with co-counsel re clients' initial					
Stephen Dixon	5/29/2019	Kansas	disclosures preparation	0.12	\$	410.00	\$	47.83
Stephen Dixon	5/29/2019	Kansas	Conference call with team KS call re discovery	0.72	\$	410.00	\$	293.83
-			Electronic mail with co-counsel re document					
Stephen Dixon	5/30/2019	Kansas	preparation for clients	0.05	\$	410.00	\$	20.50
			Electronic mail with co-counsel team re clients'					
Stephen Dixon	6/5/2019	Kansas	document collection	0.08	\$	410.00	\$	34.17
Stephen Dixon	6/5/2019	Kansas	Telephone call with team KS team re discovery	0.28	\$	410.00	\$	116.17
			Electronic mail with co-counsel re thoughts on					
Stephen Dixon	6/11/2019	Kansas	settlement strategy	0.03	\$	410.00	\$	13.67
Stephen Dixon	6/11/2019	Kansas	Electronic mail to client re case updates	0.13	\$	410.00	\$	54.67
Stephen Dixon	6/12/2019	Kansas	Electronic mail with client re case updates	0.13	\$	410.00	\$	54.67
Stephen Dixon	6/12/2019	Kansas	Electronic mail with co-counsel re litigation strategy	0.17	\$	410.00	\$	68.33
			Conference call with KS team re named plaintiff files,					
Stephen Dixon	6/12/2019	Kansas	other discovery	0.67	\$	410.00	\$	273.33
Stephen Dixon	6/18/2019	Kansas	Electronic mail to co-counsel re: new case facts	0.07	\$	410.00	\$	27.33
Stephen Dixon	6/18/2019	Kansas	Electronic mail to co-counsel re: document collection	0.07	\$	410.00	\$	27.33
					·			225.22
Stephen Dixon	6/18/2019	Kansas	Telephone call with client re document collection	0.50	\$	410.00	Ş	205.00
Stephen Dixon	6/19/2019	Kansas	Electronic mail with client re document collection	0.03	\$	410.00	\$	13.67
			Electronic mail with counsel re: analysis of					
Stephen Dixon	6/19/2019	Kansas	procedural rule.	0.07	\$	410.00	\$	27.33

			Electronic mail with confidential Kansas child			
Stephen Dixon	6/19/2019	Kansas	advocate re: case facts	0.07	\$ 410.00	\$ 27.33
			Telephone call with KS team re settlement and			
Stephen Dixon	6/19/2019	Kansas	discovery strategy	0.67	\$ 410.00	\$ 273.33
Stephen Dixon	6/27/2019	Kansas	Electronic mail to clients re: case update	1.33	\$ 410.00	\$ 546.67
Stephen Dixon	6/28/2019	Kansas	Electronic mail to clients re: case update	0.20	\$ 410.00	\$ 82.00
Stephen Dixon	7/1/2019	Kansas	Telephone call with client re case update	0.12	\$ 410.00	\$ 47.83
			Electronic mail to co-counsel re potential new client			
Stephen Dixon	7/15/2019	Kansas	facts	0.03	\$ 410.00	\$ 13.67
Stephen Dixon	7/19/2019	Kansas	Electronic mail with client re settlement strategy	0.08	\$ 410.00	\$ 34.17
·			Conference call with KS team re discovery review			
Stephen Dixon	7/24/2019	Kansas	and motion to dismiss	0.72	\$ 410.00	\$ 293.83
•			Conference call with KS team re document review,			
Stephen Dixon	7/31/2019	Kansas	litigation strategy	0.67	\$ 410.00	\$ 273.33
			Electronic mail with client re settlement strategy,			
Stephen Dixon	8/1/2019	Kansas	potential new named plaintiffs	0.07	\$ 410.00	\$ 27.33
			Electronic mail with foster parent re problems with			
Stephen Dixon	8/5/2019	Kansas	multiple placement moves	0.17	\$ 410.00	\$ 68.33
			Conference call with KS team re discovery and			
Stephen Dixon	8/7/2019	Kansas	settlement strategy	0.63	\$ 410.00	\$ 259.67
Stephen Dixon	8/13/2019	Kansas	Electronic mail with client re settlement strategy	0.10	\$ 410.00	\$ 41.00
Stephen Dixon	8/13/2019	Kansas	Telephone call with client re settlement strategy	0.17	\$ 410.00	\$ 68.33
·			Electronic mail with potential next friend re			
Stephen Dixon	8/13/2019	Kansas	problems in foster care system	0.45	\$ 410.00	\$ 184.50
Stephen Dixon	8/13/2019	Kansas	Electronic mail with co-counsel.	0.53	\$ 410.00	\$ 218.67
Stephen Dixon	8/14/2019	Kansas	Electronic mail with client re settlement	0.03	\$ 410.00	\$ 13.67
			Electronic mail with co-counsel re facts for amending			
Stephen Dixon	8/14/2019	Kansas	complaint	0.37	\$ 410.00	\$ 150.33
			Meeting with current client re case update,			
Stephen Dixon	8/14/2019	Kansas	settlement positions	1.50	\$ 410.00	\$ 615.00

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		Kansas	Travel to Kansas for meetings with potential clients,			
Stephen Dixon	8/14/2019	Travel	foster care advocates.	2.00	\$ 410.00	\$ 820.00
			Electronic mail with KS client re case updates, views			
Stephen Dixon	8/15/2019	Kansas	on settlement	0.08	\$ 410.00	\$ 34.17
			Electronic mail with Kansas child advocate re			
Stephen Dixon	8/15/2019	Kansas	potential expert	0.10	\$ 410.00	\$ 41.00
			Telephone call with Kansas child advocate re			
Stephen Dixon	8/15/2019	Kansas	potential expert	0.72	\$ 410.00	\$ 293.83
			Meetings with potential fact witness re problems in			
Stephen Dixon	8/15/2019	Kansas	Kansas foster care system	1.25	\$ 410.00	\$ 512.50
		Kansas	Travel within Kansas for several meetings with			
Stephen Dixon	8/15/2019	Travel	potential clients, foster care advocates.	0.37	\$ 410.00	\$ 150.33
		Kansas	Travel within Kansas for several meetings with			
Stephen Dixon	8/15/2019	Travel	potential clients, foster care advocates.	0.37	\$ 410.00	\$ 150.33
			Electronic mail with potential fact witness re			
Stephen Dixon	8/16/2019	Kansas	problems in Kansas foster care system	0.05	\$ 410.00	\$ 20.50
			Electronic mail to co-counsel team re new facts from			
Stephen Dixon	8/16/2019	Kansas	potential fact witness	0.08	\$ 410.00	\$ 34.17
			Perform factual research to potentially include in			
Stephen Dixon	8/16/2019	Kansas	amended complaint	0.37	\$ 410.00	\$ 150.33
			Meeting with potential client re their fact patterns,			
Stephen Dixon	8/16/2019	Kansas	potential additional allegations	1.25	\$ 410.00	\$ 512.50
			Meetings with foster care advocates re deficiencies			
Stephen Dixon	8/16/2019	Kansas	in foster care system	2.25	\$ 410.00	\$ 922.50
		Kansas	Travel within Kansas for several meetings with			
Stephen Dixon	8/16/2019	Travel	potential clients, foster care advocates.	0.50	\$ 410.00	\$ 205.00
		Kansas	Travel within Kansas for several meetings with			
Stephen Dixon	8/16/2019	Travel	potential clients, foster care advocates.	0.50	\$ 410.00	\$ 205.00
			Electronic mail with Kansas child advocate, potential			
Stephen Dixon	8/17/2019	Kansas	client re joining lawsuit	0.03	\$ 410.00	\$ 13.67
			Electronic mail to co-counsel re strategy for			
Stephen Dixon	8/17/2019	Kansas	amending complaint	0.08	\$ 410.00	\$ 34.17
		Kansas				
Stephen Dixon	8/17/2019	Travel	Travel home from Kansas.	2.00	\$ 410.00	\$ 820.00

			Electronic mail to co-counsel re strategy for					
Stephen Dixon	8/18/2019	Kansas	amending complaint	0.17	\$	410.00	\$	68.33
			Electronic mail to Kansas GAL re facts in amended					
Stephen Dixon	8/20/2019	Kansas	complaint draft	0.03	\$	410.00	\$	13.67
			Electronic mail to co-counsel re new facts for					
Stephen Dixon	8/20/2019	Kansas	amended complaint	0.03	\$	410.00	\$	13.67
Stephen Dixon	8/20/2019	Kansas	Electronic mail with Kansas co-counsel.	0.08	\$	410.00	\$	34.17
			Conference call with Kansas team re litigation					
Stephen Dixon	8/21/2019	Kansas	strategy, mediator	0.75	\$	410.00	\$	307.50
			Electronic mail with EM re communicating with KS					
Stephen Dixon	8/22/2019	Kansas	clients.	0.05	\$	410.00	\$	20.50
			Electronic mail with co-counsel re named plaintiff					
Stephen Dixon	8/22/2019	Kansas	facts for amending complaint	0.08	\$	410.00	\$	34.17
			Electronic mail with co-counsel re named plaintiff					
Stephen Dixon	8/23/2019	Kansas	facts for amending complaint	0.03	\$	410.00	\$	13.67
			Electronic mail with Erin re communicating with KS					
Stephen Dixon	8/23/2019	Kansas	clients.	0.07	\$	410.00	\$	27.33
			Electronic mail with co-counsel re named plaintiff					
Stephen Dixon	8/24/2019	Kansas	facts for amending complaint	0.05	\$	410.00	\$	20.50
Stephen Dixon	8/24/2019	Kansas	Draft memo re Named Plaintiffs facts.	0.83	\$	410.00	\$	341.67
Stephen Dixon	8/25/2019	Kansas	Draft memo re Named Plaintiffs facts.	0.67	\$	410.00	\$	273.33
			Electronic mail with co-counsel re named plaintiff					
Stephen Dixon	8/26/2019	Kansas	facts for amending complaint	0.13	\$	410.00	\$	54.67
			Electronic mail with co-counsel re named plaintiff					
Stephen Dixon	8/26/2019	Kansas	facts for amending complaint	0.50	\$	410.00	\$	205.00
Stephen Dixon	8/26/2019	Kansas	Draft memo re Named Plaintiffs facts.	0.58	\$	410.00	\$	239.17
Stephen Dixon	8/27/2019	Kansas	Draft memo re Named Plaintiffs facts.	1.33	\$	410.00	\$	546.67
Stephen Dixon	8/28/2019	Kansas	Email to Ira and Marissa re Named Plaintiffs	0.25	\$	410.00	\$	102.50
Stephen Dixon	8/28/2019	Kansas	Draft memo re Named Plaintiffs facts.	0.50	\$	410.00	\$	205.00
Stephen Dixon	8/28/2019	Kansas	Conference call with KS team re mediation strategy	0.83	\$	410.00	\$	341.67
•	. ,		Electronic mail to foster care advocate re factual		-		-	
Stephen Dixon	9/4/2019	Kansas	updates	0.03	\$	410.00	\$	13.67

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Stephen Dixon	9/5/2019	Kansas	Electronic mail with co-counsel re discovery strategy	0.05	\$	410.00	Ş	20.50
			Electronic mail to foster care advocate re factual					
Stephen Dixon	9/5/2019		updates	0.10	•	410.00	•	41.00
Stephen Dixon	9/5/2019	Kansas	Electronic mail with client re case updates	0.15	\$	410.00	\$	61.50
			Electronic mail with KS co-counsel re investigation,					
Stephen Dixon	9/18/2019		discovery, and mediation planning	0.25		410.00		102.50
Stephen Dixon	9/18/2019	Kansas	Telephone call with team re legal strategy	1.00	\$	410.00	\$	410.00
			Review and analysis of facts in Kansas case supplied					
Stephen Dixon	9/25/2019	Kansas	by co-counsel, email to team	0.17	\$	410.00	\$	68.33
Stephen Dixon	9/25/2019	Kansas	Telephone call with team re legal strategy, experts	0.92	\$	410.00	\$	375.83
			Electronic mail with co-counsel re factual					
Stephen Dixon	9/30/2019	Kansas	investigation	0.17	\$	410.00	•	68.33
Stephen Dixon	10/2/2019	Kansas	Telephone call with team re legal strategy	0.97	\$	410.00	\$	396.33
Stephen Dixon	10/9/2019	Kansas	Legal team call re discovery strategy	0.70	\$	410.00	\$	287.00
Stephen Dixon	10/20/2019	Kansas	Electronic mail discussing new facts with co-counsel	0.08	\$	410.00	\$	34.17
			Electronic mail to team re facts and investigation of					
Stephen Dixon	10/23/2019	Kansas	harm to children in care	0.08	\$	410.00	\$	34.17
			Electronic mail to co-counsel re litigation strategy,					
Stephen Dixon	10/24/2019	Kansas	facts	0.05	\$	410.00	\$	20.50
			Electronic mails to team re facts and investigation of					
Stephen Dixon	10/24/2019	Kansas	harm to children in care	0.08	\$	410.00	\$	34.17
Stephen Dixon	10/26/2019	Kansas	Electronic mail to co-counsel re motion to dismiss	0.03	\$	410.00	\$	13.67
Stephen Dixon	10/28/2019	Kansas	Electronic mails to clients re motion to dismiss	0.58	\$	410.00	\$	239.17
			Research and email with person about harm to					
Stephen Dixon	10/30/2019	Kansas	children in placements	0.25	\$	410.00	\$	102.50
			Telephone call with team of attorneys re case					
Stephen Dixon	11/6/2019	Kansas	strategy	0.50	\$	410.00	\$	205.00
			Electronic mail with Kansas child advocates re					
Stephen Dixon	11/8/2019	Kansas	investigation of harm to foster children	0.08	\$	410.00	\$	34.17

			Electronic mail to contacts re updating facts re harm				
Stephen Dixon	11/12/2019	Kansas	to children in care	0.25	\$ 410.00	\$	102.50
			Electronic mail to contacts re investigation updating				
Stephen Dixon	11/13/2019	Kansas	facts re harm to children in use	0.07	\$ 410.00	\$	27.33
Stephen Dixon	11/14/2019	Kansas	Discussion with expert re placement array problems	0.17	\$ 410.00	\$	68.33
			Electronic mail with co-counsel re expert for harm to				
Stephen Dixon	11/14/2019	Kansas	children in care	0.25	\$ 410.00	\$	102.50
			Case analysis and email with co-counsel re harm to				
Stephen Dixon	11/15/2019	Kansas	children and remedy	0.33	\$ 410.00	\$	136.67
			Case analysis and emails with co-counsel re harm to				
Stephen Dixon	11/16/2019	Kansas	children and remedy	0.25	\$ 410.00	\$	102.50
			Electronic mail with foster care advocate in order to				
Stephen Dixon	11/16/2019	Kansas	update facts re claims and harm to children	0.78	410.00		321.17
Stephen Dixon	11/17/2019	Kansas	Electronic mail to co-counsel re fact update	0.03	\$ 410.00	\$	13.67
Stephen Dixon	11/18/2019	Kansas	Telephone call with client re settlement	0.03	\$ 410.00	\$	13.67
Stephen Dixon	11/19/2019	Kansas	Electronic mail with counsel and client re settlement	0.33	\$ 410.00	\$	136.67
Stephen Dixon	11/19/2019		Meeting with contact re continuing investigation	1.00	\$ 410.00		410.00
Stephen Dixon	11/19/2019	Kansas	Meeting with client re settlement	1.00	\$ 410.00	\$	410.00
Stephen Dixon	11/19/2019		Meeting with contacts re continuing investigation	1.50	\$ 410.00		615.00
Stephen Dixon	11/24/2019	Kansas	Electronic mail to team re settlement strategy	0.10	\$ 410.00	\$	41.00
a	10/0/0010		Electronic mail with co-counsel re settlement				
Stephen Dixon	12/6/2019	Kansas	strategy	0.17	\$ 410.00	\$	68.33
			Electronic mail and memo with co-counsel re facts			_	
Stephen Dixon	12/10/2019	Kansas	and settlement strategy	0.58	\$ 410.00	\$	239.17
			Electronic mail with co-counsel re settlement				
Stephen Dixon	12/13/2019		strategy	0.13	\$ 410.00	\$	54.67
Stephen Dixon	12/19/2019	Kansas	Telephone call with client re settlement	0.10	\$ 410.00	\$	41.00
			Electronic mail to co counsel re motion to dismiss	_			
Stephen Dixon	1/16/2020	Kansas	opposition strategy	0.17	\$ 410.00	\$	68.33

			Research and emails with co-counsel re motion to			
Stephen Dixon	1/30/2020	Kansas	dismiss opposition strategy	0.08	\$ 410.00	\$ 34.17
Stephen Dixon	2/28/2020	Kansas	Updating clients on mediation, settlement	0.58	\$ 410.00	\$ 239.17
Stephen Dixon	3/3/2020	Kansas	Electronic mails to clients giving updates on case	0.25	\$ 410.00	\$ 102.50
Stephen Dixon	3/4/2020	Kansas	Electronic mail to lead attorneys re client case update	0.07	\$ 410.00	\$ 27.33
Stephen Dixon	3/20/2020	Kansas	Telephone call with client re settlement	0.33	\$ 410.00	\$ 136.67
Stephen Dixon	3/20/2020	Kansas	Telephone call with KS client re settlement and email to team with update	0.50	\$ 410.00	\$ 205.00
Stephen Dixon	3/24/2020		Electronic mail to co-counsel re settlement	0.13	\$ 410.00	54.67
Stephen Dixon	3/25/2020	Kansas	Electronic mail to all clients re mediation, settlement	0.33	\$ 410.00	\$ 136.67
Stephen Dixon	4/1/2020	Kansas	Electronic mails to team re clients and fact updates	0.33	\$ 410.00	\$ 136.67
Stephen Dixon	4/1/2020	Kansas	Telephone call with attorney team re case strategy and fact updates	0.83	\$ 410.00	\$ 341.67
Stephen Dixon	4/2/2020	Kansas	Electronic mail to co-counsel re client update	0.03	\$ 410.00	\$ 13.67
Stephen Dixon	4/3/2020	Kansas	Electronic mail with MN re case update as to Next Friends	0.03	\$ 410.00	\$ 13.67
Stephen Dixon	4/3/2020	Kansas	Electronic mail with internal team re Next Friend updates	0.30	\$ 410.00	\$ 123.00
Stephen Dixon	4/10/2020	Kansas	Electronic mail to team members re Next Friend substitution	0.28	\$ 410.00	\$ 116.17
Stephen Dixon	4/13/2020	Kansas	Telephone call with new client re potentially conflicting legal matter	0.43	\$ 410.00	\$ 177.67
Stephen Dixon	4/15/2020	Kansas	Electronic mail with paralegal re case fact update	0.08	\$ 410.00	\$ 34.17
Stephen Dixon	4/22/2020	Kansas	Electronic mail with co-counsel re client updates	0.03	\$ 410.00	\$ 13.67
Stephen Dixon	4/22/2020	Kansas	Electronic mail to clients and counsel re case updates and fact gathering	0.37	\$ 410.00	\$ 150.33
Stephen Dixon	4/24/2020	Kansas	Electronic mail to Kansas advocate re potential client	0.03	\$ 410.00	\$ 13.67

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			Electronic mail to potential witness re facts,			
Stephen Dixon	4/24/2020 k	Kansas	experiences with foster care system	0.07	\$ 410.00	\$ 27.33
			Electronic mail with clients and counsel re updating			
Stephen Dixon	4/24/2020 k	Kansas	facts	0.25	\$ 410.00	\$ 102.50
Stephen Dixon	4/26/2020 k	Kansas	Electronic mail to client re update of case	0.08	\$ 410.00	\$ 34.17
			Electronic mail to client re settlement updates,			
Stephen Dixon	4/27/2020 k	Kansas	strategy	0.08	\$ 410.00	\$ 34.17
Stephen Dixon	4/27/2020 k	Kansas	Electronic mail to co-counsel re client update	0.08	\$ 410.00	\$ 34.17
			Telephone call with client re litigation, settlement			
Stephen Dixon	4/27/2020 k	Kansas	update	0.13	\$ 410.00	\$ 54.67
Stephen Dixon	4/28/2020 k	Kansas	Electronic mail and memo to team re client update	0.50	\$ 410.00	\$ 205.00
			Electronic mail to client re litigation, settlement			
Stephen Dixon	4/29/2020 k	Kansas	update	0.05	\$ 410.00	\$ 20.50
			Electronic mail with co-counsel team re clients			
Stephen Dixon	4/29/2020 k	Kansas	updates	0.20	\$ 410.00	\$ 82.00
			Electronic mail to KS client re litigation, settlement			
Stephen Dixon	5/1/2020 k	Kansas	update	0.08	\$ 410.00	\$ 34.17
Stephen Dixon	5/6/2020 k	Kansas	Electronic mail with client re settlement update	0.13	\$ 410.00	\$ 54.67
Stephen Dixon	5/8/2020 k	Kansas	Electronic mail with client re settlement update	0.08	\$ 410.00	\$ 34.17
			Telephone call with client re case update and			
Stephen Dixon	5/8/2020 k	Kansas	discovery issues	0.43	\$ 410.00	\$ 177.67
			Electronic mail to contact re case update and			
Stephen Dixon	5/9/2020 k	Kansas	discovery issues	0.08	\$ 410.00	\$ 34.17
			Telephone call with client re case update and			
Stephen Dixon	5/10/2020 k	Kansas	discovery issues	0.25	\$ 410.00	\$ 102.50
			Electronic mail and memo to co-counsel team re			
Stephen Dixon	5/11/2020 k	Kansas	client and witness update	0.63	\$ 410.00	\$ 259.67
			Telephone call with client re case update and			
Stephen Dixon	5/12/2020 k	Kansas	discovery issues	0.12	\$ 410.00	\$ 47.83

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5/13/2020	Kansas		0.17	\$	410.00	\$	68.33
5/14/2020	Kansas		0.37	\$	410.00	\$	150.33
		Electronic mail with co-counsel re discovery analysis					
5/17/2020	Kansas	and discovery strategy	0.13	\$	410.00	\$	54.67
5/17/2020	Kansas	Electronic mail to clients re case, settlement updates	0.33	\$	410.00	\$	136.67
5/18/2020	Kansas	Electronic mail to client re settlement updates	0.03	\$	410.00	\$	13.67
5/18/2020	Kansas	Telephone call with client for settlement updates	0.53	\$	410.00	\$	218.67
5/18/2020	Kansas	Electronic mails with team members re client update and memo	0.53	\$	410.00	\$	218.67
		Electronic mail to client re settlement update	0.10	\$	410.00	\$	41.00
		Electronic mail with case analysis to co-counsel re					
5/20/2020	Kansas	deliberate indifference and discovery	0.20	\$	410.00	\$	82.00
5/27/2020	Kansas	Internal legal team call re strategy and discovery	0.67	\$	410.00	\$	273.33
5/29/2020	Kansas	Electronic mail to foster care advocate re factual update	0.17	\$	410.00	\$	68.33
						· ·	
5/29/2020	Kansas	Electronic mail with co-counsel re discovery strategy	0.20	\$	410.00	\$	82.00
6/1/2020	Kansas	Electronic mail with co-counsel re discovery strategy	0.03	\$	410.00	\$	13.67
6/3/2020	Kansas	Electronic mail to co-counsel re potential witness and factual analysis	0.07	\$	410.00	\$	27.33
		Discuss with co-counsel strategy on client updating	0.03	ċ	410.00	ċ	13.67
0/4/2020	Nalisas		0.03	Ą	410.00	Ą	13.07
6/5/2020	Kansas	contact and factual updates	0.50	\$	410.00	\$	205.00
6/5/2020	Kansas	Telephone call with co-counsel and key contact re	O 77	\$	410.00	\$	314.33
	5/14/2020 5/17/2020 5/17/2020 5/18/2020 5/18/2020 5/18/2020 5/20/2020 5/20/2020 5/29/2020 5/29/2020 6/1/2020 6/3/2020 6/4/2020 6/5/2020	5/13/2020 Kansas  5/14/2020 Kansas  5/17/2020 Kansas  5/17/2020 Kansas  5/18/2020 Kansas  5/18/2020 Kansas  5/18/2020 Kansas  5/20/2020 Kansas  5/20/2020 Kansas  5/27/2020 Kansas  5/29/2020 Kansas  6/1/2020 Kansas  6/1/2020 Kansas  6/1/2020 Kansas  6/3/2020 Kansas  6/3/2020 Kansas  6/3/2020 Kansas	Electronic mail with co-counsel re discovery analysis and discovery strategy  Electronic mail with co-counsel re discovery analysis and discovery strategy  5/17/2020 Kansas Electronic mail to clients re case, settlement updates  5/18/2020 Kansas Electronic mail to client re settlement updates  5/18/2020 Kansas Electronic mail to client re settlement updates  5/18/2020 Kansas Electronic mails with client for settlement updates  Electronic mails with team members re client update and memo  5/20/2020 Kansas Electronic mail to client re settlement update  Electronic mail with case analysis to co-counsel re deliberate indifference and discovery  5/27/2020 Kansas Internal legal team call re strategy and discovery  Electronic mail to foster care advocate re factual update  5/29/2020 Kansas Electronic mail with co-counsel re discovery strategy  6/1/2020 Kansas Electronic mail with co-counsel re potential witness and factual analysis  Discuss with co-counsel strategy on client updating for mediation  Electronic mail and contact memo for team re client contact and factual updates  Telephone call with co-counsel and key contact re	Electronic mail with co-counsel re discovery analysis and discovery strategy 0.37  Electronic mail with co-counsel re discovery analysis and discovery strategy 0.13  5/17/2020 Kansas Electronic mail to clients re case, settlement updates 0.33  5/18/2020 Kansas Electronic mail to client re settlement updates 0.03  5/18/2020 Kansas Electronic mail to client re settlement updates 0.53  Electronic mail with client for settlement updates 0.53  Electronic mails with team members re client update and memo 0.53  5/20/2020 Kansas Electronic mail to client re settlement update 0.10  Electronic mail with case analysis to co-counsel re deliberate indifference and discovery 0.20  5/27/2020 Kansas Internal legal team call re strategy and discovery 0.67  Electronic mail to foster care advocate re factual update 0.17  5/29/2020 Kansas Electronic mail with co-counsel re discovery strategy 0.20  6/1/2020 Kansas Electronic mail with co-counsel re discovery strategy 0.20  6/1/2020 Kansas Electronic mail with co-counsel re potential witness and factual analysis 0.07  Discuss with co-counsel strategy on client updating 6/4/2020 Kansas Clectronic mail and contact memo for team re client contact and factual updates 0.50  Electronic mail and contact memo for team re client contact and factual updates 0.50	Electronic mail with co-counsel re discovery analysis and discovery strategy  5/17/2020 Kansas  Electronic mail with co-counsel re discovery analysis and discovery strategy  5/17/2020 Kansas  Electronic mail with co-counsel re discovery analysis and discovery strategy  0.13 \$  5/17/2020 Kansas  Electronic mail to clients re case, settlement updates  0.33 \$  5/18/2020 Kansas  Electronic mail to client re settlement updates  0.53 \$  Electronic mails with client for settlement updates  5/18/2020 Kansas  Electronic mails with team members re client update and memo  0.53 \$  Electronic mail to client re settlement update  5/20/2020 Kansas  Electronic mail to client re settlement update  5/20/2020 Kansas  Electronic mail with case analysis to co-counsel re deliberate indifference and discovery  0.20 \$  5/27/2020 Kansas  Internal legal team call re strategy and discovery  0.67 \$  Electronic mail to foster care advocate re factual update  0.17 \$  5/29/2020 Kansas  Electronic mail with co-counsel re discovery strategy  0.20 \$  6/1/2020 Kansas  Electronic mail with co-counsel re discovery strategy  0.20 \$  6/3/2020 Kansas  Electronic mail with co-counsel re potential witness  and factual analysis  0.07 \$  Discuss with co-counsel strategy on client updating  6/4/2020 Kansas  Electronic mail and contact memo for team re client  contact and factual updates  Telephone call with co-counsel and key contact re	Electronic mail with co-counsel re discovery analysis and discovery strategy  5/17/2020 Kansas and discovery strategy  5/18/2020 Kansas Electronic mail to clients re case, settlement updates  5/18/2020 Kansas Electronic mail to client re settlement updates  5/18/2020 Kansas Electronic mail to client for settlement updates  5/18/2020 Kansas Telephone call with client for settlement updates  5/18/2020 Kansas and memo  5/18/2020 Kansas Electronic mails with team members re client update  5/18/2020 Kansas Electronic mail to client re settlement update  5/20/2020 Kansas Electronic mail with case analysis to co-counsel re  5/20/2020 Kansas Internal legal team call re strategy and discovery  5/27/2020 Kansas Internal legal team call re strategy and discovery  5/29/2020 Kansas Electronic mail with co-counsel re factual  5/29/2020 Kansas Electronic mail with co-counsel re discovery strategy  6/1/2020 Kansas Electronic mail with co-counsel re discovery strategy  6/1/2020 Kansas Electronic mail with co-counsel re discovery strategy  6/1/2020 Kansas Electronic mail with co-counsel re potential witness  6/3/2020 Kansas and factual analysis  6/3/2020 Kansas Electronic mail and contact memo for team re client  6/5/2020 Kansas Contact and factual updates  Telephone call with co-counsel and key contact re	Electronic mail with co-counsel re discovery analysis and discovery strategy  Electronic mail with co-counsel re discovery analysis and discovery strategy  5/17/2020 Kansas and discovery strategy  5/17/2020 Kansas  Electronic mail to clients re case, settlement updates  5/18/2020 Kansas  Electronic mail to clients re case, settlement updates  5/18/2020 Kansas  Electronic mail to client re settlement updates  5/18/2020 Kansas  Telephone call with client for settlement updates  5/18/2020 Kansas  Electronic mails with team members re client update  and memo  5/20/2020 Kansas  Electronic mail to client re settlement update  5/20/2020 Kansas  Electronic mail to client re settlement update  5/20/2020 Kansas  Electronic mail with case analysis to co-counsel re  deliberate indifference and discovery  0.20 \$ 410.00 \$  Electronic mail with case analysis to co-counsel re  deliberate indifference and discovery  0.20 \$ 410.00 \$  5/29/2020 Kansas  Internal legal team call re strategy and discovery  0.67 \$ 410.00 \$  Electronic mail to foster care advocate re factual  update  0.17 \$ 410.00 \$  6/1/2020 Kansas  Electronic mail with co-counsel re discovery strategy  0.20 \$ 410.00 \$  Electronic mail with co-counsel re discovery strategy  0.21 \$ 410.00 \$  6/1/2020 Kansas  Electronic mail with co-counsel re discovery strategy  0.22 \$ 410.00 \$  Electronic mail with co-counsel re potential witness  and factual analysis  0.07 \$ 410.00 \$  Electronic mail to co-counsel re potential witness  and factual analysis  0.07 \$ 410.00 \$  Electronic mail and contact memo for team re client  contact and factual updates  7-20/2020 Kansas  Electronic mail and contact memo for team re client  contact and factual updates  7-20/2020 Kansas  Felephone call with co-counsel and key contact re

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			Electronic mail to clients re named plaintiff update,					
Stephen Dixon	6/7/2020	Kansas	mental health update	0.03	\$	410.00	\$	13.67
Stephen Dixon	6/7/2020	Kansas	Electronic mail to co-counsel team re named plaintiff	0.05	\$	410.00	\$	20.50
			Electronic mail to client re named plaintiff update					
Stephen Dixon	6/7/2020	Kansas	and mental health update	0.07	\$	410.00	\$	27.33
			Electronic mail with co-counsel re client's position on					
Stephen Dixon	6/8/2020	Kansas	settlement	0.05	\$	410.00	\$	20.50
			Telephone call with foster care advocate with					
Stephen Dixon	6/8/2020	Kansas	information about client	0.73	\$	410.00	\$	300.67
Stephen Dixon	6/9/2020	Kansas	Electronic mail to potential witness re factual update	0.03	\$	410.00	\$	13.67
Stephen Dixon	6/9/2020	Kansas	Electronic mail to team re update on client in crisis	0.30	\$	410.00	\$	123.00
Stephen Dixon	6/9/2020	Kansas	Telephone call with potential client or witness re case update	0.42	\$	410.00	\$	170.83
			Electronic mail and draft memo for team re		· ·			
Stephen Dixon	6/9/2020	Kansas	interview of potential witness	0.50	\$	410.00	\$	205.00
			Telephone call with client re updating re named					
Stephen Dixon	6/9/2020	Kansas	plaintiff in crisis and settlement updates	0.50	\$	410.00	\$	205.00
			Electronic mail and memo for team re potential					
Stephen Dixon	6/9/2020	Kansas	witness	0.67	\$	410.00	\$	273.33
G. 1 5.	6/40/0000	.,	Electronic mail with clients and counsel with case		_		_	
Stephen Dixon	6/10/2020	Kansas	update on mediation and fact inquiry	0.75	\$	410.00	\$	307.50
Circles Bires	6/44/2020		Electronic mail with co-counsel re settlement and	0.00	_	440.00	_	42.67
Stephen Dixon	6/11/2020	Kansas	client updates and approvals	0.03	\$	410.00	\$	13.67
Stephen Dixon	6/12/2020	Kansas	Electronic mail with co-counsel re settlement and client updates and approvals	0.20	\$	410.00	\$	82.00
•	, , , , ,				•		•	
			Electronic mails with co-counsel re legal procedural					
Stephen Dixon	6/13/2020	Kansas	issues of standing, Rule 17 and settlement	0.25	\$	410.00	\$	102.50
			Electronic mails with clients and co-counsel re					
Stephen Dixon	6/14/2020	Kansas	discussing proposed settlement	0.58	\$	410.00	\$	239.17

			Telephone calls with clients and co-counsel re				
Stephen Dixon	6/14/2020	Kansas	settlement proposals	1.37	\$ 410.00	\$	560.33
			Electronic mail with KS co-counsel re settlement				
Stephen Dixon	6/15/2020	Kansas	approval by clients	0.08	\$ 410.00	\$	34.17
Stephen Dixon	6/15/2020	Kansas	Telephone call with client re settlement approval	0.50	\$ 410.00	\$	205.00
			Telephone call with co-counsel re client approval and				
Stephen Dixon	6/16/2020	Kansas	settlement agreement	0.15	\$ 410.00	\$	61.50
			Electronic mail with co-counsel re client approval				
Stephen Dixon	6/16/2020	Kansas	and settlement agreement	0.30	\$ 410.00	\$	123.00
			Electronic mail to co-counsel re client approval and				
Stephen Dixon	6/17/2020	Kansas	settlement agreement	0.07	\$ 410.00	\$	27.33
Stephen Dixon	6/17/2020	Kansas	Telephone call with client re settlement approval	0.30	\$ 410.00	\$	123.00
			Electronic mail re settlement approval with co-				
Stephen Dixon	6/18/2020	Kansas	counsel and client	0.33	\$ 410.00	\$	136.67
			Telephone call with contact re settlement and				
Stephen Dixon	6/18/2020	Kansas	communications with client	0.38	\$ 410.00	\$	157.17
			Electronic mail re strategy for settlement approval				
Stephen Dixon	6/19/2020	Kansas	with co-counsel	0.03	\$ 410.00	\$	13.67
			Electronic mail to clients and co-counsel re				
Stephen Dixon	6/20/2020	Kansas	settlement approval	0.50	\$ 410.00	\$	205.00
			Electronic mail to legal team re settlement approval				
Stephen Dixon	6/21/2020	Kansas	updates and planning	0.25	\$ 410.00	\$	102.50
Stephen Dixon	6/21/2020	Kansas	Electronic mail to clients re settlement approval	0.92	\$ 410.00	\$	375.83
			Electronic mail with co-counsel re client updating re				
Stephen Dixon	6/22/2020		settlement	0.08	 410.00	•	34.17
Stephen Dixon	6/22/2020	Kansas	Emails with client re settlement approval	0.30	\$ 410.00	\$	123.00
			Electronic mail updating co-counsel re clients'				
Stephen Dixon	6/23/2020	Kansas	settlement approval	0.08	\$ 410.00	\$	34.17
			Electronic mail and legal analysis with co-counsel re				
Stephen Dixon	6/23/2020	Kansas	settlement	0.13	\$ 410.00	\$	54.67

			Telephone call with client re case update and			
Stephen Dixon	6/23/2020	Kansas	settlement	0.25	\$ 410.00	\$ 102.50
			Electronic mail to Kansas child advocates re case fact			
Stephen Dixon	6/23/2020	Kansas	updates	0.37	\$ 410.00	\$ 150.33
			Electronic mail with Kansas child advocate re fact			
Stephen Dixon	6/24/2020	Kansas	update	0.03	\$ 410.00	\$ 13.67
			Electronic mail with co-counsel re settlement			
Stephen Dixon	6/24/2020	Kansas	analysis	0.30	\$ 410.00	\$ 123.00
Stephen Dixon	6/25/2020	Kansas	Electronic mail with contact re fact update	0.03	\$ 410.00	\$ 13.67
Stephen Dixon	6/25/2020	Kansas	Update re client contact to paralegal	0.03	\$ 410.00	\$ 13.67
			Telephone call with confidential Wichita source re			
Stephen Dixon	6/25/2020	Kansas	factual updates	0.27	\$ 410.00	\$ 109.33
Stephen Dixon	6/27/2020	Kansas	Electronic mail to client re settlement approval	0.17	\$ 410.00	\$ 68.33
•			Electronic mail to legal team and clients re			
Stephen Dixon	7/1/2020	Kansas	settlement approvals	0.25	\$ 410.00	\$ 102.50
Stephen Dixon	7/2/2020	Kansas	Electronic mail to team re client updates	0.20	\$ 410.00	\$ 82.00
Stephen Dixon	7/6/2020	Kansas	Electronic mail to client re settlement agreement	0.17	\$ 410.00	\$ 68.33
			Electronic mail with co-counsel re settlement, for			
Stephen Dixon	7/7/2020	Kansas	fairness hearing and monitoring fact gathering	0.27	\$ 410.00	\$ 109.33
-			Electronic mail with co-counsel re settlement and			
Stephen Dixon	7/7/2020	Kansas	voluntary dismissals	0.42	\$ 410.00	\$ 170.83
Stephen Dixon	7/8/2020	Kansas	Telephone call with clients re settlement agreement	0.27	\$ 410.00	\$ 109.33
			Electronic mail with co-counsel and clients re			
Stephen Dixon	7/8/2020	Kansas	settlement	0.58	\$ 410.00	\$ 239.17
Stephen Dixon	7/8/2020	Kansas	Legal team call re strategy for preliminary approval	0.83	\$ 410.00	\$ 341.67
•			Electronic mail to co-counsel re fairness hearing			
Stephen Dixon	7/9/2020	Kansas	strategy	0.25	\$ 410.00	\$ 102.50
·			Telephone call with contacts re facts for fairness			
Stephen Dixon	7/9/2020	Kansas	hearing or monitoring	0.27	\$ 410.00	\$ 109.33

			Electronic mail with co-counsel re monitoring under			
Stephen Dixon	7/10/2020	Kansas	settlement	0.03	\$ 410.00	\$ 13.67
			Electronic mail to contacts re settlement, preparing			
Stephen Dixon	7/10/2020	Kansas	for monitoring	0.10	\$ 410.00	\$ 41.00
			Electronic mail to KS potential witness for fairness			
Stephen Dixon	7/13/2020	Kansas	hearing	0.08	\$ 410.00	\$ 34.17
			Electronic mail to co-counsel re monitoring and			
Stephen Dixon	7/15/2020	Kansas	fairness hearing	0.03	\$ 410.00	\$ 13.67
			Electronic mail to contacts re fairness hearing and			
Stephen Dixon	7/15/2020	Kansas	monitoring	0.17	\$ 410.00	\$ 68.33
			Electronic mail to contact re fairness hearing			
Stephen Dixon	7/16/2020	Kansas	planning	0.05	\$ 410.00	\$ 20.50
			Electronic mail with co-counsel re case planning for			
Stephen Dixon	7/16/2020	Kansas	fairness hearing	0.07	\$ 410.00	\$ 27.33
			Electronic mail with contacts re case planning for			
Stephen Dixon	7/16/2020	Kansas	fairness hearing	1.25	\$ 410.00	\$ 512.50
			Electronic mail with contact re fairness hearing and			
Stephen Dixon	7/17/2020	Kansas	monitoring	0.03	\$ 410.00	\$ 13.67
			Telephone call with contact re monitoring and			
Stephen Dixon	7/17/2020	Kansas	fairness hearing	0.75	\$ 410.00	\$ 307.50
			Electronic mails with counsel and contact re fairness			
Stephen Dixon	7/20/2020	Kansas	hearing preparation and monitoring	0.08	\$ 410.00	\$ 34.17
			Telephone call with legal team re preliminary			
Stephen Dixon	7/22/2020	Kansas	approval strategy	0.58	\$ 410.00	\$ 239.17
			Electronic mail with co-counsel re potential witness			
Stephen Dixon	7/24/2020	Kansas	for fairness hearing and monitoring	0.37	\$ 410.00	\$ 150.33
			Telephone call with potential witness for fairness			
Stephen Dixon	7/24/2020	Kansas	hearing and monitoring	0.60	\$ 410.00	\$ 246.00