

Motion for Attorneys' Fees and Expenses pursuant to 42 U.S.C. 1988 and Rules 23(h) and 54(d)(2) of the Federal Rules of Civil Procedure.

3. I submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees and Costs dated November 30, 2020 (the "Motion"), in which DLA seeks a total of \$246,934.70 in fees and expenses incurred for its work on this case. I make this declaration based on first-hand knowledge and on records contemporaneously made and kept by DLA during its work in this case.

4. This declaration describes the work performed, qualifications and experience of the DLA timekeepers for whom fees are being sought, and the hourly rates DLA is seeking for each of them. This declaration is being submitted together with declarations from co-counsel Ira Lustbader of Children's Rights, Leecia Welch of the National Center for Youth Law, Teresa Woody of Kansas Appleseed Center for Law and Justice, and Loretta Burns-Bucklew. These declarations describe the relevant background and complexity of this case.

A. Background and Qualifications

5. I am a graduate of the University of Virginia School of Law and have been a litigation partner at DLA since 2005. Prior to becoming partner, I was an associate at DLA since 2002. A substantial portion of my practice for my entire career has been devoted to the litigation of class action lawsuits. I have acted as defense counsel in numerous class actions in courts around the United States and have litigated class actions involving large putative classes including most recently *Police and Fire Retirement System of the City of Detroit v. Axogen, Inc. et al.* pending in Middle District of Florida and *Faulkner v. Akers Biosciences, Inc. et al.* in the District of New Jersey. I have substantial experience with all aspects of these types of cases, including supervising teams of attorneys, managing discovery, drafting and arguing motions, and developing litigation strategy.

6. Throughout my time at DLA, I have also been active in the firm's *pro bono* program, which is one of the largest providers of *pro bono* legal services in the world. A substantial part of my *pro bono* work has been dedicated to protecting the rights of children. In particular, I have managed numerous teams of associates in cases seeking the provision of special education services under the federal Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.*

7. In this case, I have led a team of DLA lawyers and paralegals, identified below, along with DLA partner Jeffrey Rotenberg. Mr. Rotenberg graduated from Columbia Law School in 2000 and joined DLA in 2008 after working at other law firms in New York. Over the course of his career, including at DLA, he has represented parties in numerous *pro bono* matters, such as involving appeals of criminal convictions, death penalty cases, and immigration and asylum proceedings. He is presently representing a number of Federal inmates in seeking compassionate release due to COVID-19.

B. Work Performed and Qualifications of DLA Attorneys and Staff

8. DLA became involved in this case in February 2019, and our role has mainly consisted of contributing strategic direction and assisting with the extensive discovery process leading up to settlement. In particular, DLA oversaw the process of collecting, storing and managing electronic discovery, chaired a 30(b)(6) deposition focused on the Defendants' ESI-management practices, frequently negotiated search terms and other ESI issues with opposing counsel, and reviewed and analyzed the documents produced by Defendants in response to Plaintiffs' requests. DLA lawyers also contributed drafting and research in support of Plaintiffs' anticipated motion for class certification. While that motion ultimately became unnecessary in

light of the settlement of the case, the work in support of the motion was necessary so that Plaintiffs would be in a position to file it in the event settlement negotiations proved unsuccessful.

9. Set forth below is an alphabetical list of the DLA team members for whom we are seeking fees. In an exercise of billing judgment, we have not included—and do not seek fees for—timekeepers who recorded fewer than 50 hours over the life of the case, prior to any discretionary reductions made in the exercise of billing judgment.

10. Judy Calderon is a senior litigation paralegal at DLA. She graduated from New Jersey City University in 2002 and earned a paralegal certification from Farleigh Dickinson University in 2005. She is currently pursuing a master of professional and paralegal studies at the George Washington University. Ms. Calderon has experience in all stages of complex litigation, including large-scale document production. She joined DLA in April 2017 and before then was a litigation paralegal for Lowenstein Sandler LLP and Latham & Watkins LLP. Ms. Calderon has served as the lead DLA paralegal on this case, managing the collection and organization of documents produced by Defendants and third parties. She has worked closely with DLA team members and team members from co-counsel on document-management issues. Ms. Calderon also assisted with drafting *pro hac vice* motions and preparing the filing of Plaintiffs' opposition to Governor Laura Kelly's motion to dismiss the case.

11. William J. Diggs is a senior litigation associate at DLA. He is a 2010 graduate of Seton Hall University School of Law, where he served as Managing Editor of the Seton Hall Law Review. Prior to entering private practice, Mr. Diggs served as an active-duty U.S. Air Force judge advocate from 2011 to 2015. In this case, Mr. Diggs assisted with preparing drafts of Plaintiffs' motion for class certification. He also helped to develop procedures for managing discovery.

12. Meg Fowler is a former DLA litigation associate. She is a 2018 graduate of Vanderbilt Law School, where she served as a Senior Managing Editor of the *Vanderbilt Journal of Entertainment and Technology Law*, as well as an Articles Editor of the *Environmental Law and Policy Annual Review*. Ms. Fowler joined DLA in October 2018 and left in June 2020 to start a clerkship with Judge Janis Jack in the U.S. District Court for the Southern District of Texas. In this case, Ms. Fowler took a primary role in researching and drafting Plaintiffs' motion for class certification. She also reviewed documents produced by Defendants, both to help prepare for mediation sessions with Defendants and in support of Plaintiffs' motion for class certification. Ms. Fowler also generally assisted with case management.

13. Joshua Kane is a senior litigation associate at DLA. He graduated from New York University School of Law in 2010 and joined DLA in November of that year. Mr. Kane has extensive *pro bono* experience, including working exclusively on *pro bono* matters his first year at DLA and playing a leading role in representing plaintiffs in state and federal class-action lawsuits. In this case, Mr. Kane helped to lead negotiations with Defendants' counsel over protocols for collecting electronic discovery. He also managed third-party discovery and conducted the deposition of Jason Koehn, Defendants' 30(b)(6) witness on the subject of their information-management practices.

14. Megan Kinney is a 2019-2020 Krantz Fellow at DLA. Krantz Fellows are first-year DLA associates who are selected through an application process and spend their first year at the firm working exclusively on *pro bono* cases. After completing her fellowship in January of 2021, Ms. Kinney will continue as a litigation associate at DLA. Ms. Kinney graduated from UCLA School of Law in 2019 and has been involved in the case since October 2019. Ms. Kinney's primary role has been to assist with reviewing documents produced by Defendants.

15. Kristin Pacio is a senior attorney at DLA. She graduated from Boston College Law School in 2005 and joined DLA in November 2010. Ms. Pacio has fifteen years of experience as a litigator and has been a member of Plaintiffs' counsel since April 2019. She has helped to form the litigation team's strategy and attended one of the mediation sessions between Plaintiffs and Defendants, in November 2019.

16. David J. Sager is a litigation partner at DLA. He is a graduate of Duke University School of Law and has more than 25 years of experience as an attorney. Mr. Sager's practice includes class-action defense, and he is a member of the firm's North American Pro Bono Committee. In this case, Mr. Sager helped to supervise DLA associates in motion-drafting and preparation for discovery. He also contributed to strategy discussions with co-counsel and participated in a settlement meeting with Defendants' counsel.

17. Olivia Tourgee is a junior litigation associate at DLA. She is a 2019 graduate of St. John's University School of Law, where she served as a Notes and Comments Editor for the St. John's Law Review and as Vice President of the International Law Students Association. Ms. Tourgee joined DLA in October 2019. In this case, Ms. Tourgee reviewed documents produced by Defendants, both to help prepare for mediation sessions with Defendants and in support of Plaintiffs' motion for class certification. Ms. Tourgee also assisted with third-party discovery and preparation of Plaintiffs' motion to approve the settlement in this case.

C. Amounts Requested

18. DLA respectfully seeks reimbursement for a total number of 639.2 hours spent on the case by the team members identified above. A chart reflecting the timekeepers' contemporaneous records of their time spent on this case is attached to this declaration as **Exhibit A**.

19. The hours submitted for reimbursement reflect a substantial reduction of the overall hours DLA has spent on this case. In addition to not requesting fees for lawyers, paralegals, and litigation support personnel who billed fewer than fifty total hours on the case, we have made additional reductions in the exercise of billing judgment, including not submitting time for administrative tasks or time entries that include multiple tasks without specifically identifying the time spent on each.

20. DLA requests a total apportioned fee award of \$202,870. This figure has been calculated using rates from the 2019 Missouri Lawyers' Media study of Missouri legal rates (attached as Exhibit E to Plaintiffs' fee application) and a 2017 Kansas Bar Association survey of billing rates in Kansas (attached as Exhibit F to Plaintiffs' fee application). The rates in these publications are explained further in the memorandum of law accompanying this motion. These rates are substantially below the prevailing rates in New York City, where the DLA team members practice. They are also far below the rates charged by DLA and its peer firms to paying clients. The standard rates for the DLA attorneys whose time is being submitted in this case range from \$555/hour to \$1,025/hour.

21. Below is a chart showing the total hours expended by each team member for whom DLA submits fees, with the corresponding rate and resulting requested fee per person. The amount requested for each individual time entry is identified in Exhibit A.

Name	Title	JD Class Year	Local Rate	Hours Submitted¹	Fees Submitted (rate multiplied by hours)
David J. Sager	Partner	1991	\$500/hour	42.9	\$16,450.00
Kristin Pacio	Senior Attorney	2005	\$410/hour	74.9	\$30,709.00
Joshua Kane	Senior Associate	2010	\$410/hour	108.8	\$44,608.00
William J. Diggs	Senior Associate	2010	\$410/hour	73.1	\$29,971.00

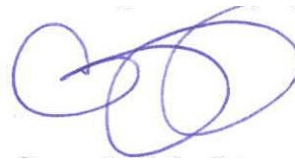
¹ All team members listed recorded more than 50 hours total on the case. The hours of David J. Sager and Judy Calderon have been reduced below 50 in the exercise of billing judgment.

Name	Title	JD Class Year	Local Rate	Hours Submitted ¹	Fees Submitted (rate multiplied by hours)
Meg Fowler	Junior Associate	2018	\$240/hour	100.5	\$24,120.00
Megan Kinney	Pro Bono Fellow	2019	\$240/hour	133.3	\$31,992.00
Olivia Tourgee	Junior Associate	2019	\$240/hour	97	\$23,280.00
Judy Calderon	Paralegal Specialist	N/A	\$200/hour	8.7	\$1,740.00
			TOTAL	639.2	\$202,870.00

22. In addition to attorneys' fees, DLA seeks the reimbursement of \$44,064.70 in costs and expenses it has advanced for this case. A chart identifying these costs is attached as **Exhibit B** to this declaration. As with the attorneys' fees requested by DLA, this figure reflects a substantial reduction of the costs actually expended by the firm. In particular, DLA is not requesting costs for legal research services like Westlaw and Lexis, meals during travel, copying costs, or mailing costs. The costs and expenses identified in Exhibit B were actually expended, reasonable, and necessary to litigate this case.

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

Executed this 30th day of November, 2020 in New York, New York.



DLA PIPER LLP (US)

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CO-COUNSEL FOR PLAINTIFFS

Exhibit A

Date	Name	Title	Hours	Rate	Amount	Narrative
2/5/2019	Diggs, William J.	Associate	1.2	410	\$ 492.00	Reviewing complaint, press release.
2/25/2019	Diggs, William J.	Associate	0.5	410	\$ 205.00	Reviewing stipulated confidentiality and protective order, draft settlement term sheet agreement.
2/26/2019	Diggs, William J.	Associate	0.4	410	\$ 164.00	Call with David Sager, Anne Geraghty Helms, Natasha Kanerva, Meg Fowler concerning matter background, next steps.
2/27/2019	Sager, David S.	Partner	1.4	500	\$ 700.00	Prepare for and participate in call among plaintiffs' counsel re staffing, named plaintiffs, and case management (1); follow up with DLA team (.4).
2/27/2019	Diggs, William J.	Associate	1.1	410	\$ 451.00	Weekly strategy call with cocounsel, including discussion of staffing, named plaintiffs, and case management (1); follow-up discussion with David Sager, Meg Fowler (.1).
3/6/2019	Diggs, William J.	Associate	0.7	410	\$ 287.00	Weekly strategy call with cocounsel, including discussion of: gathering named plaintiff files and litigation timeline/strategy.
3/11/2019	Diggs, William J.	Associate	0.4	410	\$ 164.00	Revising pro hac vice application.
3/13/2019	Fowler, Meg	Associate	0.9	240	\$ 216.00	Participate in weekly conference call, including discussion of file management and prospective additional named plaintiffs.
3/13/2019	Sager, David S.	Partner	0.9	500	\$ 450.00	Attend status call re file management and prospective additional named plaintiffs.

Date	Name	Title	Hours	Rate	Amount	Narrative
3/13/2019	Diggs, William J.	Associate	1	410	\$ 410.00	Weekly strategy call with cocounsel, including discussion of file management and prospective additional named plaintiffs (.9); follow-up discussion with David Sager (.1).
3/14/2019	Calderon, Judy	Paralegal	1.2	200	\$ 240.00	Review and update draft key players list
3/14/2019	Fowler, Meg	Associate	0.3	240	\$ 72.00	Compile and edit a list of the key players involved in the class action litigation.
3/14/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Revising pro hac vice application.
3/15/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Reviewing correspondence concerning next steps, document collection, Relativity setup.
3/16/2019	Fowler, Meg	Associate	3.2	240	\$ 768.00	Compile and edit a list of the key players involved in the class action litigation.
3/19/2019	Fowler, Meg	Associate	0.7	240	\$ 168.00	Organize and review documents and emails in preparation for the next day's all-hands meeting.
3/20/2019	Sager, David S.	Partner	5.3	500	\$ 2,650.00	Prepare for and attend strategy meeting in NYC with national litigation team.
3/20/2019	Fowler, Meg	Associate	3	240	\$ 720.00	Attend team strategy meeting, including discussion of claims and strategy for complaint amendment, class certification, and discovery.
3/20/2019	Diggs, William J.	Associate	3	410	\$ 1,230.00	Meeting with cocounsel concerning claims and strategy for complaint amendment, class certification, and discovery.
3/21/2019	Diggs, William J.	Associate	0.3	410	\$ 123.00	Planning concerning tasks regarding brief in support of motion for class certification.

Date	Name	Title	Hours	Rate	Amount	Narrative
3/22/2019	Fowler, Meg	Associate	0.3	240	\$ 72.00	Correspond with DLA team members to plan next steps and to allocate research tasks.
3/22/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Coordinating with team concerning tasks in preparation for brief in support of motion for class certification.
3/27/2019	Fowler, Meg	Associate	0.9	240	\$ 216.00	Attend weekly strategy meeting, including discussion of Defendants' proposed stay and client updates.
3/27/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Reviewing correspondence concerning potential stay pending settlement discussions.
3/27/2019	Diggs, William J.	Associate	0.4	410	\$ 164.00	Weekly strategy call with cocounsel, including discussion of Defendants' proposed stay and client updates.
3/27/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Reviewing correspondence concerning next steps regarding discovery.
3/28/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Reviewing correspondence concerning case strategy.
3/28/2019	Diggs, William J.	Associate	2.3	410	\$ 943.00	Research concerning specificity requirement for Rule 23(b)(2) certification.
3/29/2019	Diggs, William J.	Associate	0.3	410	\$ 123.00	Reviewing correspondence concerning case strategy.
3/29/2019	Diggs, William J.	Associate	1.9	410	\$ 779.00	Research concerning specificity requirement for Rule 23(b)(2) certification.
4/1/2019	Sager, David S.	Partner	0.2	500	\$ 100.00	Email regarding case status, extension of time, and related issues (.1); review and sign undertaking (.1).

Date	Name	Title	Hours	Rate	Amount	Narrative
4/1/2019	Calderon, Judy	Paralegal	0.3	200	\$ 60.00	Finalize acknowledgements of confidentiality and protective orders for DLA team;
4/1/2019	Diggs, William J.	Associate	0.4	410	\$ 164.00	Research concerning specificity requirement for Rule 23(b)(2) certification.
4/3/2019	Sager, David S.	Partner	1	500	\$ 500.00	Attend weekly status call re 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint.
4/3/2019	Fowler, Meg	Associate	1	240	\$ 240.00	Participate in the weekly strategy call, including discussion re: 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint.
4/3/2019	Diggs, William J.	Associate	1.1	410	\$ 451.00	Weekly strategy call with cocounsel, concerning 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint (1); follow-up discussion with David Sager (.1).
4/4/2019	Sager, David S.	Partner	0.5	500	\$ 250.00	Call with L. Welch regarding strategy.
4/4/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Reviewing electronic correspondence concerning case strategy.
4/4/2019	Diggs, William J.	Associate	0.9	410	\$ 369.00	Research concerning specificity requirement for Rule 23(b)(2) certification.
4/4/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Coordinating with team concerning tasks in preparation for class certification briefing.
4/8/2019	Sager, David S.	Partner	0.3	500	\$ 150.00	Instructions to W. Diggs regarding research/class cert motion.

Date	Name	Title	Hours	Rate	Amount	Narrative
4/8/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Coordinating with team concerning outline for brief in support of motion for class certification.
4/8/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Drafting template for preparation of outline for brief in support of motion for class certification.
4/9/2019	Sager, David S.	Partner	0.4	500	\$ 200.00	Instructions to W. Diggs regarding class certification and preparation for upcoming meetings.
4/9/2019	Fowler, Meg	Associate	4.1	240	\$ 984.00	Research case law from District of Kansas and Tenth Circuit concerning class certification and bifurcation of discovery between merits and class certification issues.
4/9/2019	Diggs, William J.	Associate	0.4	410	\$ 164.00	Coordinating with team concerning outline for brief in support of motion for class certification.
4/10/2019	Sager, David S.	Partner	1	500	\$ 500.00	Attend weekly status call re 4/19/19 meeting with defendants, proposed additional substantive due process claim, and document management.
4/10/2019	Pacio, Kristin A.	Attorney	1	410	\$ 410.00	Conference call with team re 4/19/19 meeting with defendants, proposed additional substantive due process claim, and document management.
4/10/2019	Diggs, William J.	Associate	0.4	410	\$ 164.00	Call with David Sager, Kristin Pacio, Meg Fowler regarding outline for brief in support of motion for class certification.

Date	Name	Title	Hours	Rate	Amount	Narrative
4/10/2019	Diggs, William J.	Associate	0.6	410	\$ 246.00	Weekly strategy call with cocounsel, including discussion of 4/19/19 meeting with defendants, proposed additional substantive due process claim, and document management.
4/10/2019	Diggs, William J.	Associate	0.4	410	\$ 164.00	Coordinating with team concerning outline for brief in support of motion for class certification.
4/12/2019	Diggs, William J.	Associate	3.7	410	\$ 1,517.00	Drafting outline for brief in support of motion for class certification.
4/12/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Coordinating with team concerning outline for brief in support of motion for class certification.
4/14/2019	Sager, David S.	Partner	0.5	500	\$ 250.00	Review and provide comments to draft email and legal summary to counsel for State.
4/14/2019	Fowler, Meg	Associate	3.9	240	\$ 936.00	Conduct research for and outline a portion of the brief in support of class certification.
4/15/2019	Fowler, Meg	Associate	2.2	240	\$ 528.00	Conduct research for and edit a portion of an outline of the brief in support of class certification.
4/15/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Reviewing electronic correspondence concerning strategy for April 19 meeting with Plaintiffs.
4/15/2019	Diggs, William J.	Associate	3.4	410	\$ 1,394.00	Drafting outline for brief in support of motion for class certification.
4/16/2019	Pacio, Kristin A.	Attorney	1.6	410	\$ 656.00	Reviewing memorandum regarding class certification.
4/16/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Analyzing outline for brief in support of motion for class certification to identify primary caselaw.

Date	Name	Title	Hours	Rate	Amount	Narrative
4/16/2019	Diggs, William J.	Associate	3.5	410	\$ 1,435.00	Drafting outline for brief in support of motion for class certification.
4/17/2019	Sager, David S.	Partner	0.8	500	\$ 400.00	Prepare for and attend team status call re 4/19/19 meeting with defendants and early settlement strategy.
4/17/2019	Fowler, Meg	Associate	0.8	240	\$ 192.00	Participate in the weekly all-hands conference call, including discussion of 4/19/19 meeting with defendants and early settlement strategy.
4/18/2019	Sager, David S.	Partner	6	250	\$ 1,500.00	Prepare for and travel to Kansas City for meeting with State. (Half Rate for Travel Time)
4/19/2019	Sager, David S.	Partner	14	250	\$ 3,500.00	Prepare for and attend team meetings and meeting with lawyers for State; return travel. (Half Rate for Travel Time)
4/19/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Reviewing electronic correspondence concerning meeting with Plaintiffs, case strategy.
4/22/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Reviewing electronic correspondence concerning April 19 meeting with Plaintiffs, case strategy.
4/24/2019	Sager, David S.	Partner	1.3	500	\$ 650.00	Prepare for and attend weekly status call re local/stakeholder updates (.6); follow up call regarding strategy (.7).
4/24/2019	Fowler, Meg	Associate	1.6	240	\$ 384.00	Participate in the weekly all-hands conference call, including discussion of local/stakeholder updates (.6); confer with DLA team members about the motion for class certification (1).

Date	Name	Title	Hours	Rate	Amount	Narrative
4/24/2019	Diggs, William J.	Associate	0.7	410	\$ 287.00	Weekly strategy call with cocounsel including discussion of local/stakeholder updates (.6); follow-up discussion with David Sager (.1).
4/24/2019	Diggs, William J.	Associate	0.6	410	\$ 246.00	Call with David Sager, Meg Fowler, cocounsel concerning motion for class certification, research regarding privilege.
4/25/2019	Calderon, Judy	Paralegal	1.7	200	\$ 340.00	Review and revise draft pro hac vice motion papers for D. Sager and W. Diggs
4/25/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Coordinating with team concerning applications for admission pro hac vice.
4/26/2019	Calderon, Judy	Paralegal	0.6	200	\$ 120.00	Finalize and file pro hac vice admission papers for D. Sager and W. Diggs
4/30/2019	Diggs, William J.	Associate	0.8	410	\$ 328.00	Reviewing answer.
5/2/2019	Fowler, Meg	Associate	2.5	240	\$ 600.00	Draft motion for class certification.
5/2/2019	Diggs, William J.	Associate	3.1	410	\$ 1,271.00	Drafting brief in support of motion for class certification.
5/2/2019	Diggs, William J.	Associate	0.9	410	\$ 369.00	Weekly strategy call with cocounsel, concerning Defendants' answer, possible amendments to complaint, and settlement strategy.
5/3/2019	Fowler, Meg	Associate	4.6	240	\$ 1,104.00	Draft motion for class certification.
5/3/2019	Diggs, William J.	Associate	3.1	410	\$ 1,271.00	Drafting brief in support of motion for class certification.
5/4/2019	Fowler, Meg	Associate	2.7	240	\$ 648.00	Draft motion for class certification.
5/5/2019	Fowler, Meg	Associate	12.5	240	\$ 3,000.00	Draft motion for class certification.
5/6/2019	Fowler, Meg	Associate	12.9	240	\$ 3,096.00	Draft motion for class certification.

Date	Name	Title	Hours	Rate	Amount	Narrative
5/7/2019	Fowler, Meg	Associate	0.2	240	\$ 48.00	Correspond with team members concerning the motion for class certification.
5/8/2019	Fowler, Meg	Associate	1.8	240	\$ 432.00	Attend the weekly team call, including discussion of scheduling order, complaint amendments, and terms sheet.
5/8/2019	Diggs, William J.	Associate	3.6	410	\$ 1,476.00	Drafting brief in support of motion for class certification.
5/8/2019	Diggs, William J.	Associate	0.9	410	\$ 369.00	Weekly strategy call with cocounsel, including discussion of scheduling order, complaint amendments, and terms sheet.
5/8/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Reviewing settlement term sheet.
5/8/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Reviewing memorandum concerning research regarding motion to dismiss governor.
5/9/2019	Diggs, William J.	Associate	6.3	410	\$ 2,583.00	Drafting brief in support of motion for class certification.
5/14/2019	Sager, David S.	Partner	0.6	500	\$ 300.00	Review and respond to email regarding term sheet, Rule 16 conference, and related issues.
5/14/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Reviewing electronic correspondence concerning conference with magistrate, discussions with Plaintiffs.
5/15/2019	Sager, David S.	Partner	0.7	500	\$ 350.00	Prepare for and attend status/strategy call re scheduling conference, term sheet, and complaint amendments.
5/15/2019	Pacio, Kristin A.	Attorney	1	410	\$ 410.00	Conference call with team re: scheduling conference, term sheet, and complaint amendments.

Date	Name	Title	Hours	Rate	Amount	Narrative
5/15/2019	Fowler, Meg	Associate	0.7	240	\$ 168.00	Participate in weekly all-hands team call, including discussion re: scheduling conference, term sheet, and complaint amendments.
5/15/2019	Diggs, William J.	Associate	1	410	\$ 410.00	Weekly strategy call with cocounsel, concerning scheduling conference, term sheet, and complaint amendments.
5/16/2019	Pacio, Kristin A.	Attorney	2.3	410	\$ 943.00	Reviewing draft class certification brief.
5/18/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Reviewing electronic correspondence concerning press coverage, case strategy.
5/20/2019	Sager, David S.	Partner	0.5	500	\$ 250.00	Email regarding possible amendment and related issues.
5/20/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Reviewing electronic correspondence concerning case strategy.
5/21/2019	Pacio, Kristin A.	Attorney	0.3	410	\$ 123.00	Reviewing correspondence regarding amendment of complaint.
5/22/2019	Pacio, Kristin A.	Attorney	1	410	\$ 410.00	Conference call with team including discussion of new clients, term sheet, and Medicaid claim.
5/22/2019	Sager, David S.	Partner	1	500	\$ 500.00	Attend team status/strategy call re new clients, term sheet, and Medicaid claim.
5/22/2019	Fowler, Meg	Associate	1.1	240	\$ 264.00	Participate in weekly all-hands team call, including discussion of new clients, term sheet, and Medicaid claim.
5/22/2019	Diggs, William J.	Associate	1	410	\$ 410.00	Weekly strategy call with cocounsel, including discussion of new clients, term sheet, and Medicaid claim.
5/29/2019	Pacio, Kristin A.	Attorney	0.8	410	\$ 328.00	Conference call with team re: response to settlement proposal from Defendants.

Date	Name	Title	Hours	Rate	Amount	Narrative
6/5/2019	Sager, David S.	Partner	0.5	500	\$ 250.00	Weekly status call re: term sheet, initial disclosures, RFPs, and case file reviews.
6/5/2019	Fowler, Meg	Associate	0.5	240	\$ 120.00	Attend the weekly team conference call, including discussion re: term sheet, initial disclosures, RFPs, and case file reviews.
6/5/2019	Diggs, William J.	Associate	0.5	410	\$ 205.00	Weekly strategy call with cocounsel, including discussion re: term sheet, initial disclosures, RFPs, and case file reviews.
6/7/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Reviewing electronic correspondence concerning case strategy.
6/12/2019	Pacio, Kristin A.	Attorney	0.7	410	\$ 287.00	Conference call re possible preliminary injunction motion and discovery management.
6/12/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Reviewing electronic correspondence concerning case strategy.
6/12/2019	Diggs, William J.	Associate	0.7	410	\$ 287.00	Weekly strategy call with cocounsel, including discussion of possible preliminary injunction motion and discovery management.
6/13/2019	Pacio, Kristin A.	Attorney	0.5	410	\$ 205.00	Conference call to discuss document review.
6/13/2019	Diggs, William J.	Associate	0.4	410	\$ 164.00	Call with NCYL, Kristin Pacio, Judy Calderon concerning discovery (0.3); follow-up discussion with Judy Calderon (0.1).
6/25/2019	Diggs, William J.	Associate	1.5	410	\$ 615.00	Revising ESI protocol.
6/26/2019	Sager, David S.	Partner	1.3	500	\$ 650.00	Attend weekly team call re 26(f) conference and statement, prospective mediators, and discovery.

Date	Name	Title	Hours	Rate	Amount	Narrative
6/26/2019	Pacio, Kristin A.	Attorney	1.3	410	\$ 533.00	Conference call re: 26(f) conference and statement, prospective mediators, and discovery.
6/26/2019	Fowler, Meg	Associate	1.5	240	\$ 360.00	Attend weekly call to plan for the 26(f) conference.
6/26/2019	Diggs, William J.	Associate	1.3	410	\$ 533.00	Weekly strategy call with cocounsel, including discussion re: 26(f) conference and statement, prospective mediators, and discovery (1); follow-up discussion with Judy Calderon regarding document production (.3).
6/26/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Reviewing electronic correspondence concerning discovery, case strategy.
6/26/2019	Diggs, William J.	Associate	0.3	410	\$ 123.00	Call with Judy Calderon, NCYL concerning discovery.
6/27/2019	Fowler, Meg	Associate	3.5	240	\$ 840.00	Attend the 26(f) conference with Defendants' counsel.
6/27/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Reviewing electronic correspondence concerning discovery, case strategy.
6/27/2019	Diggs, William J.	Associate	2.2	410	\$ 902.00	Rule 26(f) conference.
6/27/2019	Diggs, William J.	Associate	1.1	410	\$ 451.00	Reviewing material in preparation for Rule 26(f) conference.
6/27/2019	Diggs, William J.	Associate	1	410	\$ 410.00	Revising ESI protocol.
6/27/2019	Diggs, William J.	Associate	0.6	410	\$ 246.00	Coordinating with team concerning Rule 26(f) conference, next steps.
7/8/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Reviewing electronic correspondence concerning case strategy.
7/9/2019	Sager, David S.	Partner	0.3	500	\$ 150.00	Email regarding Rule 16 conference and next steps.

Date	Name	Title	Hours	Rate	Amount	Narrative
7/9/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Reviewing electronic correspondence concerning case management conference.
7/12/2019	Pacio, Kristin A.	Attorney	1.4	410	\$ 574.00	Team conference call re: scheduling conference & order, complaint amendment, and stakeholder interviews.
7/12/2019	Diggs, William J.	Associate	1.4	410	\$ 574.00	Weekly strategy call with cocounsel, including discussion re: scheduling conference & order, complaint amendment, and stakeholder interviews.
7/16/2019	Pacio, Kristin A.	Attorney	0.5	410	\$ 205.00	Reviewing settlement counteroffer.
7/16/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Reviewing Defendants' settlement counter-proposal.
7/17/2019	Pacio, Kristin A.	Attorney	1	410	\$ 410.00	Team conference call re: mediation, 30(b)(6) notice, and stakeholder conversations .
7/17/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Coordinating with team concerning case strategy.
7/17/2019	Diggs, William J.	Associate	2	410	\$ 820.00	Drafting third-party subpoena to Defendants' contractors.
7/18/2019	Sager, David S.	Partner	0.8	500	\$ 400.00	Strategy call with I. Lustbader and L. Welch.
7/18/2019	Diggs, William J.	Associate	0.4	410	\$ 164.00	Drafting third-party subpoena to Defendants' contractors.
7/19/2019	Pacio, Kristin A.	Attorney	0.6	410	\$ 246.00	Reviewing correspondence, settlement analysis and revisions to subpoenas.
7/19/2019	Sager, David S.	Partner	0.6	500	\$ 300.00	Review and revise subpoena.
7/19/2019	Diggs, William J.	Associate	1.5	410	\$ 615.00	Drafting chart assessing Defendants' response to settlement proposal.
7/23/2019	Diggs, William J.	Associate	0.7	410	\$ 287.00	Revising third-party subpoena to Defendants' contractors.

Date	Name	Title	Hours	Rate	Amount	Narrative
7/24/2019	Pacio, Kristin A.	Attorney	0.9	410	\$ 369.00	Conference call with team re: mediation, experts, discovery, and information from stakeholders.
7/26/2019	Sager, David S.	Partner	0.5	500	\$ 250.00	Email regarding defendants' responses to RFP and related issues.
7/26/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Reviewing electronic correspondence concerning discovery, case strategy.
7/29/2019	Diggs, William J.	Associate	0.4	410	\$ 164.00	Revising chart assessing Defendants' response to settlement proposal.
7/31/2019	Pacio, Kristin A.	Attorney	0.7	410	\$ 287.00	Conference call with team re: mediation, discovery, and Task Force.
7/31/2019	Sager, David S.	Partner	0.9	500	\$ 450.00	Attend weekly status call re: mediation, discovery, and Task Force.
7/31/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Revising third-party subpoena to Defendants' contractors.
7/31/2019	Diggs, William J.	Associate	0.7	410	\$ 287.00	Weekly strategy call with cocounsel, including discussion re: mediation, discovery, and Task Force.
8/7/2019	Pacio, Kristin A.	Attorney	0.3	410	\$ 123.00	Conferring with team regarding matter status.
8/7/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Discussion with David Sager, Kristin Pacio, Meg Fowler concerning draft work plan.
8/13/2019	Sager, David S.	Partner	0.3	500	\$ 150.00	Email regarding settlement.
8/14/2019	Sager, David S.	Partner	0.7	500	\$ 350.00	Attend weekly status/strategy call re ADR, discovery, and complaint amendment.
8/16/2019	Pacio, Kristin A.	Attorney	0.3	410	\$ 123.00	Consideration of issues with respect to amending complaint.
8/16/2019	Diggs, William J.	Associate	0.3	410	\$ 123.00	Reviewing electronic correspondence concerning case strategy, potential amendment to complaint.

Date	Name	Title	Hours	Rate	Amount	Narrative
8/19/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	Reviewing electronic correspondence concerning case strategy, Relativity database.
8/21/2019	Pacio, Kristin A.	Attorney	7.5	410	\$ 3,075.00	Reviewing complaint and other materials in connection with amending complaint.
8/22/2019	Pacio, Kristin A.	Attorney	3	410	\$ 1,230.00	Reviewing complaint and background materials in connection with amending complaint.
8/23/2019	Pacio, Kristin A.	Attorney	4.4	410	\$ 1,804.00	Analyzing complaint in connection with potential amendments and conferring with co-counsel regarding same.
8/28/2019	Sager, David S.	Partner	0.6	500	\$ 300.00	Attend weekly status conference re ADR, amended complaint, local updates.
8/30/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Reviewing electronic correspondence concerning motion to amend complaint.
9/11/2019	Diggs, William J.	Associate	0.7	410	\$ 287.00	Reviewing draft mediation statement.
10/4/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	Call with Kristin Pacio concerning ESI protocol.
10/14/2019	Calderon, Judy	Paralegal	1.3	200	\$ 260.00	Draft and revise draft pro hac vice admission forms for team review;
10/16/2019	Pacio, Kristin A.	Attorney	0.4	410	\$ 164.00	Participating in weekly team conference call re: ADR and stakeholders.
10/16/2019	Kinney, Megan E.	Pro Bono Fellow	0.3	240	\$ 72.00	Attend weekly team call re: ADR and stakeholders.
10/16/2019	Tourgee, Olivia Morgan	Associate	0.5	240	\$ 120.00	Attend weekly team phone call re: ADR and stakeholders.
10/22/2019	Calderon, Judy	Paralegal	1.1	200	\$ 220.00	Review, revise, finalize and file motion for pro hac vice admission for J. Kane; review and update case files for same
10/23/2019	Kane, Joshua	Associate	1.3	410	\$ 533.00	Review Defendants' responses and objections to Plaintiffs' document requests.

Date	Name	Title	Hours	Rate	Amount	Narrative
10/23/2019	Fowler, Meg	Associate	0.7	240	\$ 168.00	Attend the counsel teleconference concerning discovery, ADR, meetings with experts.
10/28/2019	Kane, Joshua	Associate	2.1	410	\$ 861.00	Meet with M. Nardi, I. Lustbader, C. Schechtman, M. Fowler, and J. Rotenberg to discuss case status and strategy.
10/28/2019	Fowler, Meg	Associate	2.1	240	\$ 504.00	Meet with M. Nardi, I. Lustbader, C. Schechtman, J. Kane, and J. Rotenberg to discuss case status and strategy.
10/30/2019	Fowler, Meg	Associate	1.3	240	\$ 312.00	Attend the counsel teleconference concerning the status of the case, including re: motion to dismiss, discovery, and ADR.
11/1/2019	Kane, Joshua	Associate	1	410	\$ 410.00	Attend prep session for meet-and-confer with opposing counsel (.3); attend meet-and-confer with opposing counsel regarding discovery issues (.7).
11/6/2019	Kane, Joshua	Associate	1	410	\$ 410.00	Attend weekly team conference call, including discussion re: ADR, MTD, discovery, experts.
11/7/2019	Kane, Joshua	Associate	0.1	410	\$ 41.00	Exchange emails with J. Rotenberg and K. Pacio regarding upcoming mediation.
11/7/2019	Pacio, Kristin A.	Attorney	1.2	410	\$ 492.00	Consideration of issues with respect to mediation.
11/8/2019	Pacio, Kristin A.	Attorney	0.3	410	\$ 123.00	Consideration of issues with respect to mediation.
11/8/2019	Kinney, Megan E.	Pro Bono Fellow	0.5	240	\$ 120.00	Compose updated task list and matter activity email to distribute to DLA team.
11/8/2019	Tourgee, Olivia Morgan	Associate	0.8	240	\$ 192.00	Attend team call regarding mediation.

Date	Name	Title	Hours	Rate	Amount	Narrative
11/11/2019	Pacio, Kristin A.	Attorney	7	410	\$ 2,870.00	Preparing for mediation and consideration of issues with respect to same.
11/12/2019	Pacio, Kristin A.	Attorney	13	410	\$ 5,330.00	Preparing for and participating in mediation.
11/13/2019	Pacio, Kristin A.	Attorney	0.6	410	\$ 246.00	Consideration of issues with respect to post mediation matters.
11/15/2019	Pacio, Kristin A.	Attorney	0.6	410	\$ 246.00	Consideration of issues with respect to mediation and discovery.
11/15/2019	Fowler, Meg	Associate	0.9	240	\$ 216.00	Attend weekly counsel call, including re: mediation, experts, and media.
11/15/2019	Kinney, Megan E.	Pro Bono Fellow	0.9	240	\$ 216.00	Attend Kansas team call re: mediation, experts, and media.
11/20/2019	Pacio, Kristin A.	Attorney	0.7	410	\$ 287.00	Conference call re: mediation, document production issues, and experts.
11/20/2019	Kinney, Megan E.	Pro Bono Fellow	0.7	240	\$ 168.00	Attend weekly team call re: mediation, document production issues, and experts.
11/20/2019	Tourgee, Olivia Morgan	Associate	0.6	240	\$ 144.00	Participate and take notes on weekly team phone call re: mediation, document production issues, and experts.
11/21/2019	Pacio, Kristin A.	Attorney	0.5	410	\$ 205.00	Consideration of issues with respect to reviewing documents for mediation.
11/21/2019	Kinney, Megan E.	Pro Bono Fellow	5.9	240	\$ 1,416.00	Review Defendants' document production to identify documents relevant to upcoming mediation.
11/22/2019	Kinney, Megan E.	Pro Bono Fellow	5.5	240	\$ 1,320.00	Review Defendants' document production to identify documents relevant to upcoming mediation.
11/25/2019	Kinney, Megan E.	Pro Bono Fellow	1	240	\$ 240.00	Attend weekly team call re discussion of settlement draft edits.

Date	Name	Title	Hours	Rate	Amount	Narrative
11/25/2019	Tourgee, Olivia Morgan	Associate	3.7	240	\$ 888.00	Review documents on Relativity database in preparation for mediation (2.6); review mediation drafts, comments, and email updates (1.1).
11/27/2019	Tourgee, Olivia Morgan	Associate	0.5	240	\$ 120.00	Review final set of documents for mediation preparation.
12/2/2019	Kinney, Megan E.	Pro Bono Fellow	1.2	240	\$ 288.00	Attend team call to discuss final editing of settlement draft.
12/4/2019	Fowler, Meg	Associate	0.9	240	\$ 216.00	Attend the counsel teleconference concerning the status of the case, including discussion re: mediation.
12/4/2019	Tourgee, Olivia Morgan	Associate	0.9	240	\$ 216.00	Participate and take notes on the team's weekly phone call re: mediation.
12/6/2019	Pacio, Kristin A.	Attorney	0.8	410	\$ 328.00	Reviewing correspondence and materials regarding settlement.
12/9/2019	Pacio, Kristin A.	Attorney	0.4	410	\$ 164.00	Consideration of issues with respect to status of document review.
12/9/2019	Kinney, Megan E.	Pro Bono Fellow	4.5	240	\$ 1,080.00	Review Defendants' document production to identify documents relevant to upcoming mediation.
12/9/2019	Tourgee, Olivia Morgan	Associate	2.7	240	\$ 648.00	Review and analyze documents produced by Defendants.
12/10/2019	Kane, Joshua	Associate	0.3	410	\$ 123.00	Review documents produced by defendants to identify documents relevant to upcoming mediation.
12/10/2019	Kinney, Megan E.	Pro Bono Fellow	3.6	240	\$ 864.00	Review documents produced by Defendants to identify key documents for mediation preparation (2.7); Attend settlement drafting team call (.9).

Date	Name	Title	Hours	Rate	Amount	Narrative
12/11/2019	Kane, Joshua	Associate	2.1	410	\$ 861.00	Review documents produced by defendants to identify documents relevant to upcoming mediation.
12/11/2019	Kinney, Megan E.	Pro Bono Fellow	4.1	240	\$ 984.00	Review documents produced by Defendants for expedited mediation preparation; summarize key documents; disseminate key documents to the rest of the team.
12/11/2019	Tourgee, Olivia Morgan	Associate	0.8	240	\$ 192.00	Complete the mediation document review batches per review protocol.
12/14/2019	Kane, Joshua	Associate	1.6	410	\$ 656.00	Exchange emails with M. Nardi, K. Pacio, and C. Schechtman regarding mediation (.3); review background documents to mediation (1.3).
12/15/2019	Kane, Joshua	Associate	3.7	410	\$ 1,517.00	Review draft settlement proposals (1.9); attend mediation via telephone (1.8).
12/16/2019	Kane, Joshua	Associate	2.1	410	\$ 861.00	Attend mediation via telephone.
12/16/2019	Pacio, Kristin A.	Attorney	1	410	\$ 410.00	Reviewing updated settlement agreement and notes regarding mediation.
12/17/2019	Pacio, Kristin A.	Attorney	0.4	410	\$ 164.00	Reviewing correspondence regarding settlement.
12/18/2019	Pacio, Kristin A.	Attorney	0.8	410	\$ 328.00	Conference call with team re: mediation, discovery, and motion to stay.
12/18/2019	Tourgee, Olivia Morgan	Associate	0.8	240	\$ 192.00	Attend weekly team phone call re: mediation, discovery, and motion to stay, and take notes.
12/31/2019	Kane, Joshua	Associate	3.8	410	\$ 1,558.00	Review draft settlement documents.
1/6/2020	Kinney, Megan E.	Pro Bono Fellow	1.4	240	\$ 336.00	Attend team call to discuss edits to settlement draft.

Date	Name	Title	Hours	Rate	Amount	Narrative
1/6/2020	Tourgee, Olivia Morgan	Associate	2.4	240	\$ 576.00	Review Plaintiffs' Integrated Draft Settlement (.9); attend team phone call to strategize draft for Plaintiffs' Integrated Draft Settlement (1.5).
1/7/2020	Pacio, Kristin A.	Attorney	0.6	410	\$ 246.00	Reviewing correspondence regarding settlement negotiations and mediation.
1/10/2020	Tourgee, Olivia Morgan	Associate	0.4	240	\$ 96.00	Review the 12(b)(1) Discovery Letter drafts and team correspondence.
1/14/2020	Pacio, Kristin A.	Attorney	0.3	410	\$ 123.00	Reviewing correspondence regarding settlement.
1/15/2020	Tourgee, Olivia Morgan	Associate	1.4	240	\$ 336.00	Review team correspondence regarding strategizing mediation plans and responses to opposing counsel's emails and review related articles to the case (.4); attend weekly team phone call discussing mediation, discovery requests, discovery plan, class certification motion plan, and local updates (1).
1/16/2020	Fowler, Meg	Associate	1	240	\$ 240.00	Confer via teleconference with Ms. Juneja, Ms. Pitts, and the DLA team members regarding discovery tasks.
1/16/2020	Tourgee, Olivia Morgan	Associate	0.5	240	\$ 120.00	Attend phone call to discuss discovery preparation with M. Fowler, M. Kinney, P. Juneja, and F. Pitts.
1/21/2020	Pacio, Kristin A.	Attorney	0.4	410	\$ 164.00	Reviewing correspondence and consideration of issues with respect to discovery.

Date	Name	Title	Hours	Rate	Amount	Narrative
1/21/2020	Fowler, Meg	Associate	1	240	\$ 240.00	Correspond with DLA team members, Ms. Juneja, and Ms. Pitts to plan and schedule discovery meetings and document review.
1/22/2020	Pacio, Kristin A.	Attorney	0.4	410	\$ 164.00	Consideration of issues with respect to discovery.
1/22/2020	Fowler, Meg	Associate	0.1	240	\$ 24.00	Correspond with Ms. Juneja, Ms. Pacio, Ms. Tourgee, Ms. Kinney, and Ms. Pitts regarding upcoming discovery-related tasks.
1/23/2020	Pacio, Kristin A.	Attorney	1.1	410	\$ 451.00	Conference call with team re: mediation and discovery planning.
1/23/2020	Fowler, Meg	Associate	0.2	240	\$ 48.00	Correspond with Ms. Juneja, Ms. Pacio, Ms. Tourgee, Ms. Kinney, and Ms. Pitts regarding upcoming discovery-related tasks.
1/23/2020	Kinney, Megan E.	Pro Bono Fellow	1.1	240	\$ 264.00	Attend weekly team call re: mediation and discovery planning.
1/23/2020	Tourgee, Olivia Morgan	Associate	1.1	240	\$ 264.00	Attend and take notes on the team weekly phone call addressing: mediation and the settlement draft from Defendants; the opposition to Defendants' motion to dismiss; discovery plan; plan for class certification motion; ongoing research needs; and local/stakeholder updates.
1/24/2020	Fowler, Meg	Associate	0.4	240	\$ 96.00	Correspond with Ms. Juneja, Ms. Pacio, Ms. Tourgee, Ms. Kinney, and Ms. Pitts regarding upcoming discovery-related tasks.

Date	Name	Title	Hours	Rate	Amount	Narrative
1/24/2020	Tourgee, Olivia Morgan	Associate	0.6	240	\$ 144.00	Finalize and edit notes from yesterday's team call and summarize running task list for team (.3); send call notes and summary to K. Pacio for review and then circulate to M. Kinney, K. Pacio, C. Schechtman, J. Rotenberg, M. Fowler, J. Calderon, J. Kane, and A. Helms (.3)
1/28/2020	Pacio, Kristin A.	Attorney	1	410	\$ 410.00	Reviewing brief in opposition to motion to dismiss.
1/29/2020	Kinney, Megan E.	Pro Bono Fellow	1.7	240	\$ 408.00	Attend weekly team call re: mediation and opposition to motion to dismiss (.8); Attend call with mediator (.9).
1/30/2020	Calderon, Judy	Paralegal	0.5	200	\$ 100.00	Teleconference call with P. Juneja regarding edits and second level review in relativity
1/31/2020	Fowler, Meg	Associate	0.2	240	\$ 48.00	Correspond with Ms. Juneja, Ms. Pacio, Ms. Tourgee, Ms. Kinney, and Ms. Pitts regarding upcoming discovery-related tasks.
2/4/2020	Fowler, Meg	Associate	0.1	240	\$ 24.00	Correspond with Ms. Pacio and Ms. Tourgee regarding scheduled coverage for the week's counsel call; correspond with Ms. Juneja to schedule a call to discuss discovery.
2/5/2020	Pacio, Kristin A.	Attorney	0.7	410	\$ 287.00	Conference call with team re: mediation, discovery, and opposition to motion to dismiss.
2/5/2020	Kinney, Megan E.	Pro Bono Fellow	2.2	240	\$ 528.00	Review documents produced by Defendants.
2/5/2020	Tourgee, Olivia Morgan	Associate	1	240	\$ 240.00	Attend discovery team call discussing document review protocol on Relativity.

Date	Name	Title	Hours	Rate	Amount	Narrative
2/6/2020	Kinney, Megan E.	Pro Bono Fellow	2.1	240	\$ 504.00	Review documents produced by Defendants.
2/7/2020	Kinney, Megan E.	Pro Bono Fellow	5	240	\$ 1,200.00	Review documents produced by Defendants.
2/11/2020	Kinney, Megan E.	Pro Bono Fellow	2.2	240	\$ 528.00	Conduct document review.
2/12/2020	Kane, Joshua	Associate	2.5	410	\$ 1,025.00	Review draft motion to dismiss and mediation documents (1.5); attend status call with plaintiff team re opposition to Governor's MTD, mediation updates and next steps (1).
2/12/2020	Kinney, Megan E.	Pro Bono Fellow	1	240	\$ 240.00	Attend weekly team call re opposition to Governor's motion to dismiss, mediation updates and next steps.
2/19/2020	Kane, Joshua	Associate	0.3	410	\$ 123.00	Review notes from team call regarding discovery and mediation.
2/19/2020	Tourgee, Olivia Morgan	Associate	1.3	240	\$ 312.00	Attend Kansas Discovery Team call and discuss document review (.3); attend Kansas Team call and take notes (1).
2/20/2020	Tourgee, Olivia Morgan	Associate	2.6	240	\$ 624.00	Review documents produced by Defendants.
2/24/2020	Fowler, Meg	Associate	2.5	240	\$ 600.00	Review and analyze documents from the file of the original named plaintiff, M.J., produced to Plaintiffs by the Defendants.
2/26/2020	Fowler, Meg	Associate	6.3	240	\$ 1,512.00	Review and analyze documents produced to Plaintiffs by the Defendants; review and analyze documents from the file of the original named plaintiff, M.J., produced to Plaintiffs by the Defendants.
2/27/2020	Kinney, Megan E.	Pro Bono Fellow	6	240	\$ 1,440.00	Review documents produced by Defendants.

Date	Name	Title	Hours	Rate	Amount	Narrative
2/27/2020	Tourgee, Olivia Morgan	Associate	0.2	240	\$ 48.00	Confer with M. Fowler about the document review status and progress moving forward.
2/28/2020	Kinney, Megan E.	Pro Bono Fellow	7.5	240	\$ 1,800.00	Review documents produced by Defendants.
3/1/2020	Fowler, Meg	Associate	0.1	240	\$ 24.00	Review emails and documents concerning Plaintiffs' responses to Defendants' responses and objections to Plaintiffs' first set of RFPs.
3/4/2020	Kane, Joshua	Associate	0.8	410	\$ 328.00	Attend co-counsel status call re mediation, ESI, third party discovery, stakeholder/local updates.
3/4/2020	Tourgee, Olivia Morgan	Associate	0.7	240	\$ 168.00	Attend weekly team phone call to discuss mediation, upcoming discovery priorities, and stakeholder/local outreach.
3/10/2020	Pacio, Kristin A.	Attorney	0.5	410	\$ 205.00	Reviewing correspondence and consideration of issues with respect to discovery.
3/11/2020	Pacio, Kristin A.	Attorney	1	410	\$ 410.00	Conference call with team re experts, settlement negotiations, discovery.
3/13/2020	Pacio, Kristin A.	Attorney	0.5	410	\$ 205.00	Consideration of issues with respect to ESI.
3/13/2020	Kinney, Megan E.	Pro Bono Fellow	0.5	240	\$ 120.00	Attend weekly Kansas foster care discovery strategy call.
3/13/2020	Tourgee, Olivia Morgan	Associate	0.5	240	\$ 120.00	Attend weekly discovery call with P. Juneja, M. Kinney, D. Adamek, K. Pacio, F. Pitts, M. Fowler, M. Nardi, E. Gretter, K. Setren, J. King, C. Glasspiegel, N. Taykhman, and C. Connaughton.

Date	Name	Title	Hours	Rate	Amount	Narrative
3/16/2020	Kane, Joshua	Associate	0.9	410	\$ 369.00	Discuss case assignments with M. Fowler.
3/16/2020	Fowler, Meg	Associate	0.9	240	\$ 216.00	Confer with Mr. Kane regarding the status of current tasks for DLA.
3/18/2020	Kane, Joshua	Associate	0.9	410	\$ 369.00	Attend case status call with co-counsel re discovery updates, coronavirus issues, experts, local/stakeholder updates.
3/20/2020	Kane, Joshua	Associate	0.1	410	\$ 41.00	Exchange emails with M. Fowler regarding case assignments.
3/20/2020	Calderon, Judy	Paralegal	1	200	\$ 200.00	Review and update case files and HighQ for team review
3/20/2020	Kinney, Megan E.	Pro Bono Fellow	0.8	240	\$ 192.00	Attend weekly team discovery call.
3/23/2020	Kinney, Megan E.	Pro Bono Fellow	8.1	240	\$ 1,944.00	Review named plaintiff files.
3/24/2020	Calderon, Judy	Paralegal	1	200	\$ 200.00	Review and update case files (HighQ and DMS) for team review
3/24/2020	Kinney, Megan E.	Pro Bono Fellow	8	240	\$ 1,920.00	Review named plaintiff files.
3/25/2020	Kinney, Megan E.	Pro Bono Fellow	6.5	240	\$ 1,560.00	Review named plaintiff files.
3/25/2020	Tourgee, Olivia Morgan	Associate	5.5	240	\$ 1,320.00	Attend weekly team phone call re: COVID-19 response, discovery disputes, and experts, and take notes (.7); review and analyze documents relating to one of the named plaintiffs (4.8).
3/26/2020	Kinney, Megan E.	Pro Bono Fellow	8.3	240	\$ 1,992.00	Review named plaintiff files.
3/26/2020	Tourgee, Olivia Morgan	Associate	3.9	240	\$ 936.00	Review and analyze documents relating to one of the named plaintiffs.
3/27/2020	Kinney, Megan E.	Pro Bono Fellow	8.2	240	\$ 1,968.00	Review named plaintiff files.
3/27/2020	Tourgee, Olivia Morgan	Associate	5.2	240	\$ 1,248.00	Review and analyze documents relating to one of the named plaintiffs.

Date	Name	Title	Hours	Rate	Amount	Narrative
3/28/2020	Fowler, Meg	Associate	0.2	240	\$ 48.00	Correspond with Ms. Tourgee and Ms. Kinney regarding the status of the review of the documents of former named plaintiff, M.J.
3/30/2020	Kane, Joshua	Associate	0.2	410	\$ 82.00	Discuss delegation of case assignments with K. Pacio.
3/30/2020	Fowler, Meg	Associate	0.2	240	\$ 48.00	Review and analyze documents from former named plaintiff's (M.J.'s) file.
3/30/2020	Kinney, Megan E.	Pro Bono Fellow	8.1	240	\$ 1,944.00	Review named plaintiff files.
3/31/2020	Fowler, Meg	Associate	0.1	240	\$ 24.00	Correspond with Ms. Tourgee and Ms. Kinney regarding the status of the review of the former named plaintiff's file.
4/1/2020	Kinney, Megan E.	Pro Bono Fellow	0.8	240	\$ 192.00	Attend weekly team call re: COVID-19 response, discovery, experts, and named plaintiffs.
4/1/2020	Tourgee, Olivia Morgan	Associate	0.8	240	\$ 192.00	Attend weekly team phone call to discuss COVID-19 and our response, discovery updates and plan, and experts.
4/3/2020	Kane, Joshua	Associate	0.1	410	\$ 41.00	Review draft discovery letters to defendants.
4/3/2020	Pacio, Kristin A.	Attorney	1	410	\$ 410.00	Reviewing letter regarding discovery.
4/3/2020	Kinney, Megan E.	Pro Bono Fellow	0.5	240	\$ 120.00	Attend weekly team discovery call.
4/3/2020	Kinney, Megan E.	Pro Bono Fellow	1	240	\$ 240.00	Attend team call to discuss meet and confer with Defendants.

Date	Name	Title	Hours	Rate	Amount	Narrative
4/3/2020	Tourgee, Olivia Morgan	Associate	2	240	\$ 480.00	Attend weekly discovery check-in with P. Juneja, M. Kinney, D. Adamek, K. Pacio, F. Pitts, M. Fowler, M. Nardi, E. Gretter, K. Setren, J. King, C. Glasspiegel, N. Taykhman, and C. Connaughton (.3); attend team call to discuss discovery strategy and moving forward after the passing of one of the Next Friends (1); reach out to docketing to find process servers and begin the process of preparing for service (.7).
4/4/2020	Kane, Joshua	Associate	0.1	410	\$ 41.00	Review emails from co-counsel regarding potential experts.
4/7/2020	Fowler, Meg	Associate	0.1	240	\$ 24.00	Review email from Ms. Juneja regarding the various scenarios for extensions in the case and discovery due to the coronavirus.
4/8/2020	Kane, Joshua	Associate	0.4	410	\$ 164.00	Exchange emails with co-counsel team and DLA team regarding upcoming meet-and-confer with defendants.
4/8/2020	Fowler, Meg	Associate	0.9	240	\$ 216.00	Participate in weekly all-counsel call re meet and confer with Defendants, discovery issues, next friend/client updates, experts, local updates.
4/8/2020	Tourgee, Olivia Morgan	Associate	0.9	240	\$ 216.00	Attend and take notes on Kansas weekly team call discussing meet and confer with defendants, discovery issues, Next Friends developments, experts, and local/stakeholder updates.

Date	Name	Title	Hours	Rate	Amount	Narrative
4/9/2020	Kane, Joshua	Associate	0.6	410	\$ 246.00	Exchange emails with O. Tourgee regarding service of third-party subpoenas.
4/9/2020	Tourgee, Olivia Morgan	Associate	0.9	240	\$ 216.00	Coordinate with P. Juneja, J. Kane, and K. Owens regarding service of subpoenas on Amerigroup Kansas, Aetna, Sunflower, and United.
4/10/2020	Fowler, Meg	Associate	0.3	240	\$ 72.00	Correspond with Ms. Tourgee regarding the review of the named plaintiff file.
4/10/2020	Tourgee, Olivia Morgan	Associate	1.4	240	\$ 336.00	Coordinate with K. Owens regarding service of subpoenas on Amerigroup Kansas, Aetna, Sunflower, and United and circulate the certified receipts to T. Woody, P. Juneja, M. Nardi, F. Pitts, and J. Kane.
4/14/2020	Kane, Joshua	Associate	0.4	410	\$ 164.00	Review previous discovery-related correspondence in preparation for meet and confer with opposing counsel.
4/15/2020	Kane, Joshua	Associate	1.3	410	\$ 533.00	Review correspondence with defendants in preparation for meet and confer regarding discovery issues.
4/15/2020	Pacio, Kristin A.	Attorney	1.2	410	\$ 492.00	Conferring with team regarding discovery meet and confer, Named Plaintiffs, Next Friends, and potential experts
4/16/2020	Fowler, Meg	Associate	0.2	240	\$ 48.00	Review emails planning Friday's meet and confer.
4/16/2020	Pacio, Kristin A.	Attorney	3.4	410	\$ 1,394.00	Legal research regarding scheduling order and preparing summary of research.

Date	Name	Title	Hours	Rate	Amount	Narrative
4/17/2020	Kane, Joshua	Associate	1.2	410	\$ 492.00	Participate in meet and confer with Defendants regarding discovery.
4/17/2020	Kinney, Megan E.	Pro Bono Fellow	2	240	\$ 480.00	Attend meet and confer with Defendants to discuss outstanding discovery issues.
4/19/2020	Fowler, Meg	Associate	5	240	\$ 1,200.00	Summarize key documents from DLA's general document review; circulate summaries to the group.
4/20/2020	Kane, Joshua	Associate	0.2	410	\$ 82.00	Exchange emails with co-counsel regarding 4/17 meet-and-confer.
4/20/2020	Pacio, Kristin A.	Attorney	0.5	410	\$ 205.00	Reviewing memorandum regarding key documents from discovery.
4/20/2020	Tourgee, Olivia Morgan	Associate	0.3	240	\$ 72.00	Discuss third party subpoenas with P. Juneja and K. Owens.
4/21/2020	Kane, Joshua	Associate	3.3	410	\$ 1,353.00	Discuss case schedule and discovery with co-counsel (.5); exchange emails with Sunflower Health Plan regarding third-party subpoena (.4); attend meet-and-confer with opposing counsel regarding discovery and case schedule (2.4).
4/21/2020	Kinney, Megan E.	Pro Bono Fellow	1.5	240	\$ 360.00	Attend meet and confer with Defendants to discuss outstanding discovery issues.
4/21/2020	Tourgee, Olivia Morgan	Associate	0.7	240	\$ 168.00	Attend meet and confer call to discuss discovery follow-up items and schedule.
4/22/2020	Kane, Joshua	Associate	1.9	410	\$ 779.00	Review privilege log, redaction log, and litigation hold letters provided by Defendants (.9); attend status call with co-counsel (1.0).

Date	Name	Title	Hours	Rate	Amount	Narrative
4/22/2020	Fowler, Meg	Associate	0.9	240	\$ 216.00	Attend the weekly counsel call, including discussion re discovery, experts, next friends and take notes on the call for circulation to the DLA group.
4/23/2020	Kane, Joshua	Associate	3.1	410	\$ 1,271.00	Review subpoena to Sunflower Health (.8); review list of proposed search terms in preparation for meet and confer (2.1); exchange emails with opposing counsel and co-counsel regarding meet and confer (.2).
4/25/2020	Kane, Joshua	Associate	0.3	410	\$ 123.00	Review discovery requests to Defendants in preparation for meet and confer regarding ESI search terms.
4/26/2020	Kane, Joshua	Associate	1.1	410	\$ 451.00	Review discovery requests and correspondence in preparation for meet and confer regarding ESI.
4/27/2020	Kane, Joshua	Associate	4.1	410	\$ 1,681.00	Review document requests, correspondence between parties, and ESI search terms to prepare for meet and confer regarding ESI (2.6); participate in meet and confer (1.1); exchange emails with Amerigroup Kansas regarding subpoena (.4).
4/28/2020	Kane, Joshua	Associate	0.8	410	\$ 328.00	Prepare for and attend meet and confer with Amerigroup regarding third-party subpoena.

Date	Name	Title	Hours	Rate	Amount	Narrative
4/29/2020	Kane, Joshua	Associate	4	410	\$ 1,640.00	Participate in meet and confer regarding ESI terms (2.5); participate in case status call with co-counsel re: Defendants' productions, third party subpoenas, experts, and Next Friends (1.5).
4/29/2020	Tourgee, Olivia Morgan	Associate	2.2	240	\$ 528.00	Attend and take notes on Kansas weekly call (1.4); draft email summarizing notes from call to circulate to DLA Piper's internal Kansas team (.8).
5/1/2000	Kane, Joshua	Associate	3.2	410	\$ 1,312.00	Attend co-counsel strategy call in advance of meet and confer on discovery issues (1.3); review draft amended case schedule (.2); draft email to defendants regarding production deficiencies (1.6); review Defendants' initial interrogatories and requests for production (.1).
4/30/2020	Fowler, Meg	Associate	0.2	240	\$ 48.00	Correspond with Mr. Kane regarding the production issues with the file of former named plaintiff, M.J.
5/1/2020	Fowler, Meg	Associate	0.9	240	\$ 216.00	Correspond with Mr. Kane regarding production issues with the file of former named plaintiff, M.J.; review the file for specific production issues.
5/1/2020	Tourgee, Olivia Morgan	Associate	1.4	240	\$ 336.00	Analyze documents previously reviewed in connection with production deficiencies being identified to Defendants for discussion (.6); attend KS Foster Care Discovery Follow-up call (.8).

Date	Name	Title	Hours	Rate	Amount	Narrative
5/4/2020	Kane, Joshua	Associate	1.5	410	\$ 615.00	Review Defendants' response to settlement proposal.
5/5/2020	Kane, Joshua	Associate	0.9	410	\$ 369.00	Exchange emails with co-counsel and opposing counsel regarding meet and confer on ESI.
5/5/2020	Fowler, Meg	Associate	0.5	240	\$ 120.00	Coordinate review of the file of the former named plaintiff, M.J.
5/6/2020	Kane, Joshua	Associate	2.5	410	\$ 1,025.00	Revise draft ESI terms (1.8); attend case status call with co-counsel re: case schedule, meet and confer with Defendants, and settlement strategy (1.2); attend internal DLA case status call (.5).
5/6/2020	Pacio, Kristin A.	Attorney	0.5	410	\$ 205.00	Conferring with team re: case schedule, meet and confer with Defendants, and settlement strategy.
5/6/2020	Tourgee, Olivia Morgan	Associate	1.6	240	\$ 384.00	Attend call with C. Schechtman, K. Pacio, A. Helms, J. Kane, M. Fowler, J. Rotenberg, J. Calderon, and M. Kinney to discuss status of Kansas case and strategy moving forward (.5); attend weekly Kansas call (1.1).
5/7/2020	Kane, Joshua	Associate	2.5	410	\$ 1,025.00	Revise and supplement list of draft ESI search terms.
5/8/2020	Kane, Joshua	Associate	3.4	410	\$ 1,394.00	Revise draft ESI search terms (2.5); exchange emails with co-counsel regarding search terms (.9).
5/8/2020	Fowler, Meg	Associate	0.5	240	\$ 120.00	Confer with Ms. Juneja, Ms. Nardi, and team regarding discovery issues.
5/8/2020	Tourgee, Olivia Morgan	Associate	0.5	240	\$ 120.00	Attend Meet and Confer with opposing counsel.
5/10/2020	Kane, Joshua	Associate	0.2	410	\$ 82.00	Review co-counsel's edits to draft ESI search terms.

Date	Name	Title	Hours	Rate	Amount	Narrative
5/11/2020	Kane, Joshua	Associate	3.6	410	\$ 1,476.00	Discuss ESI search terms with NCYL (.6); revise draft list of search terms (2.5); exchange emails with opposing counsel regarding search terms (.3); exchange emails with Aetna regarding subpoena (.2).
5/12/2020	Kane, Joshua	Associate	0.4	410	\$ 164.00	Discuss third-party subpoena with Aetna (.1); exchange emails with M. Fowler regarding document review (.1); exchange emails with co-counsel regarding discovery (.2).
5/13/2020	Kane, Joshua	Associate	1.4	410	\$ 574.00	Prepare for deposition of Jason Koehn (.1); attend case status call with co-counsel re: settlement, depositions, and responding to Defendants' discovery requests (1.3).
5/13/2020	Fowler, Meg	Associate	1.1	240	\$ 264.00	Attend weekly counsel call, including discussion re: settlement, depositions, and responding to Defendants' discovery requests.
5/13/2020	Tourgee, Olivia Morgan	Associate	1.2	240	\$ 288.00	Attend weekly call to discuss the settlement draft; case schedule; discovery updates regarding upcoming deposition, redaction log issue, responding to defendants' discovery requests, and third party discovery; potential experts; and local updates.
5/14/2020	Kane, Joshua	Associate	0.2	410	\$ 82.00	Exchange emails with Aetna regarding third-party subpoena.

Date	Name	Title	Hours	Rate	Amount	Narrative
5/15/2020	Kane, Joshua	Associate	1.3	410	\$ 533.00	Discuss ESI issues with opposing counsel (.5); exchange emails with P. Juneja and M. Nardi regarding deposition preparation (.4); review emails with Sunflower's counsel regarding subpoena (.1); exchange emails with opposing counsel regarding subpoena to United Healthcare (.3).
5/15/2020	Tourgee, Olivia Morgan	Associate	0.1	240	\$ 24.00	Attend weekly discovery call.
5/18/2020	Kane, Joshua	Associate	1	410	\$ 410.00	Discuss deposition of Jason Koehn with P. Juneja.
5/19/2020	Kane, Joshua	Associate	1.1	410	\$ 451.00	Discuss logistics of deposition of Jason Koehn with co-counsel and deposition services provider.
5/20/2020	Kane, Joshua	Associate	0.8	410	\$ 328.00	Exchange emails with co-counsel, opposing counsel, and deposition vendor regarding deposition of Jason Koehn.
5/20/2020	Tourgee, Olivia Morgan	Associate	2.1	240	\$ 504.00	Create DLA weekly call schedule for June and July and circulate to DLA team (.3); attend and take notes on weekly team call re: discovery, mediation, and experts (1.1); draft notes of weekly call and circulate to DLA team (.7).
5/21/2020	Kane, Joshua	Associate	1.9	410	\$ 779.00	Draft deposition outline for Jason Koehn (.8); exchange emails with co-counsel and vendor regarding deposition (1.1).

Date	Name	Title	Hours	Rate	Amount	Narrative
5/22/2020	Kane, Joshua	Associate	3.7	410	\$ 1,517.00	Participate in ESI meet-and-confer (.8); discuss deposition of Jason Koehn with M. Nardi and P. Juneja, including participating in remote deposition trial (2.9).
5/23/2020	Kane, Joshua	Associate	2.8	410	\$ 1,148.00	Draft outline for deposition of Jason Koehn.
5/24/2020	Kane, Joshua	Associate	6.4	410	\$ 2,624.00	Draft outline for deposition of Jason Koehn (6.3); exchange emails with P. Juneja and M. Nardi regarding outline (.1).
5/25/2020	Kane, Joshua	Associate	5.7	410	\$ 2,337.00	Revise outline for deposition of Jason Koehn.
5/26/2020	Kane, Joshua	Associate	7.2	410	\$ 2,952.00	Take deposition of Jason Koehn.
5/26/2020	Kinney, Megan E.	Pro Bono Fellow	2.5	240	\$ 600.00	Conduct named plaintiff file review.
5/27/2020	Kane, Joshua	Associate	0.9	410	\$ 369.00	Participate in case status call with co-counsel.
5/27/2020	Kinney, Megan E.	Pro Bono Fellow	1	240	\$ 240.00	Attend team call re: case schedule, depositions, third party discovery, responding to Defendants' discovery requests, and experts.
5/27/2020	Tourgee, Olivia Morgan	Associate	1	240	\$ 240.00	Attend weekly Kansas team call re: case schedule, depositions, third party discovery, responding to Defendants' discovery requests, and experts.
5/28/2020	Kinney, Megan E.	Pro Bono Fellow	5.5	240	\$ 1,320.00	Conduct named plaintiff document review.
5/28/2020	Tourgee, Olivia Morgan	Associate	7.8	240	\$ 1,872.00	Review and analyze named plaintiff documents.
5/29/2020	Fowler, Meg	Associate	0.4	240	\$ 96.00	Confer and coordinate with Ms. Kinney and Ms. Tourgee regarding the named plaintiff files.
5/29/2020	Kinney, Megan E.	Pro Bono Fellow	4.5	240	\$ 1,080.00	Conduct named plaintiff document review.

Date	Name	Title	Hours	Rate	Amount	Narrative
5/29/2020	Tourgee, Olivia Morgan	Associate	7.1	240	\$ 1,704.00	Review and analyze named plaintiff documents (4.1); attend internal settlement discussion to discuss settlement strategy, Defendants' proposals, and various terms and approaches used in the settlement (1.5); attend Kansas updates call with M. Fowler and M. Kinney to discuss status of discovery (.5).
6/1/2020	Kane, Joshua	Associate	0.2	410	\$ 82.00	Discuss third-party subpoena to Sunflower with Sunflower counsel (.1); exchange emails regarding third-party subpoenas with P. Juneja (.1).
6/2/2020	Tourgee, Olivia Morgan	Associate	1.4	240	\$ 336.00	Review and analyze named plaintiff documents as per the Named Plaintiff Document Review Protocol.
6/3/2020	Kane, Joshua	Associate	0.2	410	\$ 82.00	Review correspondence regarding settlement negotiations (.1); correspond with counsel for Amerigroup Kansas regarding third-party subpoena (.1).
6/3/2020	Fowler, Meg	Associate	1	240	\$ 240.00	Attend the weekly counsel call, including discussion re: MTD order, settlement prep, and discovery.
6/3/2020	Tourgee, Olivia Morgan	Associate	4.9	240	\$ 1,176.00	Review and analyze named plaintiff documents (3.9); attend and take notes on weekly team call (1).
6/4/2020	Kane, Joshua	Associate	0.3	410	\$ 123.00	Discuss third-party subpoena with counsel for Amerigroup Kansas.
6/4/2020	Pacio, Kristin A.	Attorney	0.5	410	\$ 205.00	Reviewing order on motion to dismiss.

Date	Name	Title	Hours	Rate	Amount	Narrative
6/4/2020	Kinney, Megan E.	Pro Bono Fellow	6.1	240	\$ 1,464.00	Review named plaintiff files.
6/5/2020	Kane, Joshua	Associate	1	410	\$ 410.00	Attend meet and confer with opposing counsel regarding ESI.
6/5/2020	Tourgee, Olivia Morgan	Associate	1.6	240	\$ 384.00	Review and analyze named plaintiff documents.
6/8/2020	Kane, Joshua	Associate	0.3	410	\$ 123.00	Review revised ESI search terms (.2); exchange emails with P. Juneja and M. Nardi regarding search terms (.1).
6/8/2020	Tourgee, Olivia Morgan	Associate	3.1	240	\$ 744.00	Review and analyze named plaintiff documents.
6/12/2020	Kane, Joshua	Associate	0.1	410	\$ 41.00	Review correspondence regarding case settlement.
6/14/2020	Fowler, Meg	Associate	0.2	240	\$ 48.00	Correspond with Ms. Tourgee and Ms. Kinney regarding the status of the file review for former named plaintiff M.J.
6/15/2020	Fowler, Meg	Associate	0.1	240	\$ 24.00	Correspond with Ms. Tourgee and Ms. Kinney regarding the review of the file of former named plaintiff M.J.
6/15/2020	Tourgee, Olivia Morgan	Associate	0.2	240	\$ 48.00	Send M. Fowler updated excel sheet with the coding and comments for the Named Plaintiff Document Review.
6/16/2020	Kane, Joshua	Associate	0.5	410	\$ 205.00	Review correspondence relating to third-party subpoenas.
6/16/2020	Pacio, Kristin A.	Attorney	0.5	410	\$ 205.00	Reviewing correspondence regarding settlement.
6/17/2020	Kane, Joshua	Associate	1.8	410	\$ 738.00	Review correspondence with third parties regarding third-party subpoenas (.5); attend internal team status call (1.3).

Date	Name	Title	Hours	Rate	Amount	Narrative
6/17/2020	Tourgee, Olivia Morgan	Associate	1.2	240	\$ 288.00	Attend weekly team phone call to discuss proposed settlement revisions; dismissal of certain Named Plaintiffs; client approval and next steps; preliminary approval motion and notice; contacting chambers about the preferred schedule; third party discovery; call with Defendants tomorrow; calls with Judy and Karen on Monday; motion for attorney's fees; and the press release.
6/18/2020	Pacio, Kristin A.	Attorney	0.5	410	\$ 205.00	Reviewing correspondence regarding settlement.
6/18/2020	Tourgee, Olivia Morgan	Associate	1	240	\$ 240.00	Attend Settlement Process Discussion with Defendants' counsel.
6/24/2020	Fowler, Meg	Associate	1.6	240	\$ 384.00	Attend the weekly counsel call, including discussion re: Attorney General's proposed settlement revisions and media strategy.
6/24/2020	Tourgee, Olivia Morgan	Associate	0.8	240	\$ 192.00	Attend weekly team phone call to discuss our response to the Attorney General's proposed settlement changes; client approvals; timeline for preliminary approval motion, notice, final approval motion, and fee motion; press release and local updates.
7/1/2020	Pacio, Kristin A.	Attorney	1	410	\$ 410.00	Conference call with team re: next steps re: settlement approval, dismissal of certain Named Plaintiffs, preliminary approval motion, and press strategy.

Date	Name	Title	Hours	Rate	Amount	Narrative
7/1/2020	Kinney, Megan E.	Pro Bono Fellow	1	240	\$ 240.00	Attend weekly team call re: next steps re: settlement approval, dismissal of certain Named Plaintiffs, preliminary approval motion, and press strategy.
7/1/2020	Tourgee, Olivia Morgan	Associate	1.5	240	\$ 360.00	Revise and create weekly call schedule for DLA team and circulate to the DLA team (.4); attend weekly team call to discuss the settlement, next steps with the Attorney General, resuming litigation, discovery schedule, press release and media plan, and preliminary approval papers (1.1).
7/2/2020	Kane, Joshua	Associate	0.5	410	\$ 205.00	Exchange emails with T. Woody regarding third-party discovery.
7/8/2020	Pacio, Kristin A.	Attorney	0.5	410	\$ 205.00	Reviewing correspondence regarding settlement.
7/8/2020	Tourgee, Olivia Morgan	Associate	1	240	\$ 240.00	Attend team call discussing the settlement agreement, dismissals for aged out Named Plaintiffs, media strategy, preliminary approval motion, and discovery.
7/15/2020	Tourgee, Olivia Morgan	Associate	2	240	\$ 480.00	Attend team call to discuss the preliminary approval motion, third party discovery, the fee motion, and local updates (1.5); confer with M. Kinney, K. Pacio, P. Juneja, and F. Pitts to discuss drafting the supporting declarations (.5).
7/16/2020	Kane, Joshua	Associate	0.3	410	\$ 123.00	Exchange emails with O. Tourgee regarding declaration in support of motion to approve settlement.

Date	Name	Title	Hours	Rate	Amount	Narrative
7/16/2020	Tourgee, Olivia Morgan	Associate	1.2	240	\$ 288.00	Confer with J. Kane about drafting the supporting declarations (.3); email DLA team to discuss drafting the supporting declarations (.2); draft supporting declaration of DLA Piper and send to J. Kane for review (.7).
7/17/2020	Kane, Joshua	Associate	0.8	410	\$ 328.00	Revise declaration in support of motion to approve settlement (.7); exchange emails with O. Tourgee regarding declaration (.1).
7/17/2020	Tourgee, Olivia Morgan	Associate	0.2	240	\$ 48.00	Circulate draft of supporting declaration to DLA team.
7/20/2020	Kane, Joshua	Associate	1	410	\$ 410.00	Revise declaration in support of appointment of class counsel.
7/20/2020	Tourgee, Olivia Morgan	Associate	0.6	240	\$ 144.00	Confer with J. Kane about supporting declaration (.2); revise and send draft to J. Kane for review (.4).
7/21/2020	Kane, Joshua	Associate	0.5	410	\$ 205.00	Revise declaration in support of appointment of class counsel (.2); exchange emails with O. Tourgee and B. Yang regarding declaration (.3).
7/21/2020	Tourgee, Olivia Morgan	Associate	1.1	240	\$ 264.00	Confer with J. Kane, B. Yang, and C. Schechtman regarding draft of declaration in support of approval motion and pro hac vice motion.
7/22/2020	Kane, Joshua	Associate	1	410	\$ 410.00	Exchange emails with O. Tourgee regarding pro hac vice papers and declaration in support of appointment of class counsel (.5); attend team status call (.5).

Date	Name	Title	Hours	Rate	Amount	Narrative
7/22/2020	Tourgee, Olivia Morgan	Associate	3.1	240	\$ 744.00	Confer with J. Kane, B. Yang, and P. Juneja regarding draft of declaration and pro hac vice motion (2.5); attend weekly team call to discuss preliminary approval motion, pro hac vice applications, fee motion, communications received from class members and others (.6).
7/23/2020	Tourgee, Olivia Morgan	Associate	1.5	240	\$ 360.00	Confer with J. Kane, B. Yang, P. Juneja , and J. Rotenberg to revise and finalize declaration.
Total			639.2		\$ 202,870.00	

Exhibit B

Date	Name	Title	Description	Amount	Narrative
4/29/2019	Sager, David S.	Partner	Parking/Mileage Reimbursement	\$ 78.00	04/20/19 - TRAVEL FROM NEWARK TO KANSAS CITY FOR MEETING WITH ATTORNEYS AND ENTIRE TEAM. - NEWARK AIRPORT PARKING.
4/29/2019	Sager, David S.	Partner	Hotel	\$ 211.37	04/18/19 - TRAVEL FROM NEWARK TO KANSAS CITY FOR MEETING WITH ATTORNEYS AND ENTIRE TEAM. - ONE NIGHT STAY AT CROSSROADS HOTEL.
4/29/2019	Sager, David S.	Partner	Car Service/Taxi	\$ 26.53	04/21/19 - TRAVEL FROM NEWARK TO KANSAS CITY FOR MEETING WITH ATTORNEYS AND ENTIRE TEAM. - UBER FROM HOTEL TO AIRPORT.
4/29/2019	Sager, David S.	Partner	Car Service/Taxi	\$ 33.98	04/18/19 - TRAVEL FROM NEWARK TO KANSAS CITY FOR MEETING WITH ATTORNEYS AND ENTIRE TEAM. - UBER FROM AIRPORT TO HOTEL.
5/14/2019	Griffin, Marcus Lee	Docketing Mgr.	Filing/Recording Fees	\$ 50.00	FILING THE MOTION FOR ATTORNEY DAVID S. SAGER TO APPEAR PRO HAC VICE.
5/14/2019	Griffin, Marcus Lee	Docketing Mgr.	Filing/Recording Fees	\$ 50.00	FILING THE MOTION FOR ATTORNEY WILLIAM J. DIGGS TO APPEAR PRO HAC VICE.
5/31/2019	Sager, David S.	Partner	Out-of-Town Travel	\$ 35.00	MEETING TRAVEL TO: NEW YORK - NEWARK/HOUSTON/CORP US CHRISTI/KANSAS CITY, MO 08-APR-19 TICKET #0765228971

Date	Name	Title	Description	Amount	Narrative
5/31/2019	Sager, David S.	Partner	Air Fare	\$ 313.32	MEETING TRAVEL TO: NEW YORK - NEWARK/HOUSTON/CORP US CHRISTI/KANSAS CITY, MO 16-APR-19 TICKET #7348067573
5/31/2019	Sager, David S.	Partner	Out-of-Town Travel	\$ 35.00	MEETING TRAVEL TO: NEW YORK - NEWARK/KANSAS CITY, MO 18-APR-19 TICKET #0765755611
5/31/2019	Sager, David S.	Partner	Air Fare	\$ 547.69	MEETING TRAVEL TO: NEW YORK - NEWARK/KANSAS CITY, MO 18-APR-19 TICKET #7351359168
11/15/2019	Griffin, Marcus Lee	Docketing Mgr.	Filing/Recording Fees	\$ 50.00	FILING MOTION FOR ATTORNEY JOSHUA KANE TO APPEAR PRO HAC VICE ON BEHALF OF PLAINTIFFS KATHRYN ASHBURN, ED BIGUS, ALLAN HAZLETT, KATHARYN MCINTYRE, ASHLEY THORNE 2019-10- 22
11/19/2019	Helms, Anne Geraghty	Of Counsel	Mediation Fee	\$ 9,394.05	VENDOR: PUBLIC CATALYST GROUP CORPORATION MEDIATION
11/22/2019	Pacio, Kristin A.	Attorney	Hotel	\$ 253.27	11/12/19 - TRAVEL TO KANSAS CITY FOR MEDIATION - HILTON
11/22/2019	Pacio, Kristin A.	Attorney	Car Service/Taxi	\$ 134.99	CAR SERVICE/TAXI - VENDOR: KRISTIN PACIO - 11/11/19 - TRAVEL TO KANSAS CITY FOR MEDIATION - CAR SERVICE FROM HOME TO AIRPORT

Date	Name	Title	Description	Amount	Narrative
11/22/2019	Pacio, Kristin A.	Attorney	Car Service/Taxi	\$ 155.49	CAR SERVICE/TAXI - VENDOR: KRISTIN PACIO - 11/12/19 - TRAVEL TO KANSAS CITY FOR MEDIATION - CAR SERVICE FROM AIRPORT TO HOME
11/22/2019	Pacio, Kristin A.	Attorney	Car Service/Taxi	\$ 34.58	CAR SERVICE/TAXI - VENDOR: KRISTIN PACIO - 11/11/19 - TRAVEL TO KANSAS CITY FOR MEDIATION - UBER FROM AIRPORT TO HOTEL
11/22/2019	Pacio, Kristin A.	Attorney	Car Service/Taxi	\$ 30.97	CAR SERVICE/TAXI - VENDOR: KRISTIN PACIO - 11/12/19 - TRAVEL TO KANSAS CITY FOR MEDIATION - UBER FROM HOTEL TO AIRPORT
12/20/2019	Schechtman, Caryn G.	Partner	Out-of-Town Travel	\$ 35.00	TRAVEL TO: NEW YORK - NEWARK/KANSAS CITY, MO 11-NOV-19 TICKET #0790841197
12/20/2019	Schechtman, Caryn G.	Partner	Air Fare	\$ 529.00	TRAVEL TO: NEW YORK - NEWARK/KANSAS CITY, MO 11-NOV-19 TICKET #7471491457
12/20/2019	Pacio, Kristin A.	Attorney	Out-of-Town Travel	\$ 35.00	TRAVEL TO: NEW YORK - NEWARK/KANSAS CITY, MO 11-NOV-19 TICKET #0791235231
12/20/2019	Pacio, Kristin A.	Attorney	Air Fare	\$ 734.75	TRAVEL TO: NEW YORK - NEWARK/KANSAS CITY, MO 11-NOV-19 TICKET #7473745886
2/14/2020	Helms, Anne Geraghty	Of Counsel	Miscellaneous	\$ 9,263.54	VENDOR: PUBLIC CATALYST GROUP CORPORATION PAYMENT FOR DOCUMENT REVIEW, TRAVEL, CONFERENCES WITH COURT

Date	Name	Title	Description	Amount	Narrative
3/11/2020	Helms, Anne Geraghty	Of Counsel	Mediation Fee	\$ 17,378.57	MEDIATION FEE - VENDOR: PUBLIC CATALYST GROUP CORPORATION KANSAS DCF MEDIATION: DECEMBER 29, 2019 TO FEBRUARY 20, 2020
6/23/2020	Kane, Joshua	Associate	Transcript for Deposition of Jason Koehn	\$ 4,654.60	TRANSCRIPTS - VENDOR: HENDERSON LEGAL SERVICES, INC. TRANSCRIPTION SERVICES RENDERED
Total				\$ 44,064.70	