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28 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA

Case No.14-2171-JGB-SP

DAN MCKIBBEN, et al.,

[Hon. Jesus G. Bernal]

Plaintiffs,

vs.

**DECLARATION OF AMANDA
GOAD IN SUPPORT OF MOTION
FOR ATTORNEYS' FEES**

JOHN MCMAHON, et al.,

Defendants

Date: February 11, 2019
Time: 9:00 A.M.
Place: Courtroom 1

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DECLARATION OF AMANDA GOAD

I, Amanda C. Goad, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. I am currently the Audrey Irmas Director of the LGBTQ, Gender & Reproductive Justice Project, and a Senior Staff Attorney, at the ACLU Foundation of Southern California (“ACLU SoCal”).

3. I am a member of the Bar of the State of California. I am admitted to practice before several federal courts, including the United States Supreme Court and this Court.

4. I am one of the counsel of record in *McKibben, et al. v. McMahan, et al.*

5. My professional experience and qualifications, as well as the experience and qualifications of the other ACLU SoCal staff members who took part in this case, were described in the Declaration of Melissa Goodman in support of Plaintiffs’ Motion for Class Certification, Dkt. #80.

Timekeeping Protocol and Fees Waived to Ensure Reasonableness

6. It is the practice of the attorneys and other legal staff in the ACLU of Southern California’s offices to keep track of their time through the use of contemporaneous timekeeping software. Over the course of this litigation, all of the attorneys and other legal staff in our office utilized one of two computerized billing programs that we use to maintain contemporaneous time records of all work performed on our cases. It is the policy and regular practice of the ACLU of Southern California for a paralegal or advocacy assistant to download those records into our billing software, and then print out a billing statement that lists, among other things, the hours worked on the matter, the billing rate for the person who worked those hours, a total “lodestar” for each person who billed time, and a cumulative lodestar for the office as a whole.

1 7. The billing statement reflecting the time of all attorneys and legal staff
2 from the ACLU of Southern California for whom we are seeking fees in this case
3 is attached as Exhibit E to this declaration. I worked with paralegal Sandra Kang
4 to generate this statement from ACLU SoCal's electronic records.

5 8. Once a billing statement has been generated, it is our usual practice
6 for a senior lawyer on the case to review the entries, note those that are duplicative,
7 improperly assigned to the matter, or otherwise unreasonable, and to delete such
8 entries in an exercise of billing judgment, and work with a paralegal to delete those
9 entries from the records. In this instance, given that Plaintiffs' counsel had already
10 agreed as part of a mediated settlement to a substantial discount of our billed time,
11 we did not invest time in reviewing the records to exercise billing judgment.

12 9. The ACLU SoCal billing statement attached as Exhibit E does not
13 reflect the time of several ACLU billers who contributed to the case but whose
14 total time did not exceed twenty hours per person as of the billing cut-off date of
15 September 21, 2018. These include numerous ACLU SoCal law student clerks
16 who contributed to pre-filing investigation, discovery efforts, client
17 communications, and document review; senior ACLU SoCal attorney Belinda
18 Escobosa Helzer, who provided strategic guidance in early phases of the case; and
19 multiple attorneys with the National ACLU who consulted with the ACLU SoCal
20 team over the course of the litigation regarding legal strategy questions in the case
21 and the specifics of Plaintiffs' requests for policy changes and injunctive relief.

22 10. The accompanying Declaration of Barrett S. Litt includes a discussion
23 of the specific tasks performed by individual lawyers and paralegals on this case.
24 It also details the bases for the billing rates that ACLU SoCal seeks in this case.

25 11. Below is a summary of the total hours, rates, and fees sought by the
26 ACLU of Southern California based on the records in Exhibit E.

27 12. Based on the records and calculations described above, the combined
28 fees sought by the ACLU of Southern California total \$611,677.35.

1 13. The ACLU SoCal has also incurred a total of \$3,988.43 in expenses
2 while litigating this case. The ACLU SoCal tracks all litigation expenses by
3 assigning cases a code, and tracking all employee reimbursement requests and
4 direct expenditures by the organization associated with that case code. Such
5 reimbursements and expenditures are then combined, and a cost report is generated
6 for a case. A summary of the ACLU of Southern California cost report generated
7 for this case is attached to this declaration as Exhibit F. Below is a summary of the
8 ACLU’s costs for this case, grouped by category of expenditure:
9

Category	Total Cost
Collect Calls	\$208.00
Correspondence	\$401.39
Court Fees	\$103.67
Online Research	\$163.00
Mileage	\$2,322.57
Parking	\$125.00
Meals	\$501.67
Transportation	\$163.13
GRAND TOTAL:	\$3,988.43

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18 I declare under penalty of perjury of the laws of the State of California and
19 the United States that the foregoing is true and correct.

20 Executed this 25th day of October, 2018 in Los Angeles, California.

21 /s/ Amanda C Goad
22 AMANDA C. GOAD
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Selection Criteria

Clie.Selection Include: 1573
 Time.Selection Include: AditiFruitwala; AmandaGoad; BrendanHamme; DianaGonzalez;
 Escobosa HelzerBelinda; MelissaGoodman; TashaHill

Nickname 1573 | McKibben
 Full Name McKibben v. McMahon (frmly WVDC (Oliver v McMahon)
 Address
 Phone 1 Phone 2
 Phone 3 Phone 4
 In Ref To McKibben v. McMahon (frmly WVDC (Oliver v McMahon)
 Fees Arrg. By billing value on each slip
 Expense Arrg. By billing value on each slip
 Tax Profile Exempt
 Round Fees 10 Minutes
 Last bill
 Last charge 9/19/2018
 Last payment Amount \$0.00

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
Timekeeper: Aditi Fruitwala					
1/26/2018	AditiFruitwala 100913 0	390.00	0.50	195.00	Billable
	Reviewed discovery documents to prepare for meeting				
1/26/2018	AditiFruitwala 100912 0	390.00	1.00	390.00	Billable
	Meeting with co-counsel to discuss produced discovery				
1/31/2018	AditiFruitwala 100940 0	390.00	0.17	66.30	Billable
	Call w/ team re discovery and strategizing				
2/1/2018	AditiFruitwala 100939 0	390.00	3.50	1,365.00	Billable
	Doc review				
2/2/2018	AditiFruitwala 100910 0	390.00	1.67	651.30	Billable
	Doc review				
2/5/2018	AditiFruitwala 100911 0	390.00	1.50	585.00	Billable
	Doc review				

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/7/2018 100938 0	AditiFruitwala Call w/ team re discovery and depo planning	390.00	0.67	261.30	Billable
2/8/2018 100937 0	AditiFruitwala Reviewed case documents to prepare for meetings w/ clients	390.00	3.33	1,298.70	Billable
2/9/2018 100936 0	AditiFruitwala Met with clients at WVDC	390.00	7.50	2,925.00	Billable
2/13/2018 100935 0	AditiFruitwala Call with team re settlement discussions	390.00	0.83	323.70	Billable
2/14/2018 100933 0	AditiFruitwala Call with team re discovery	390.00	0.33	128.70	Billable
2/14/2018 100934 0	AditiFruitwala Call with opposing counsel re discovery	390.00	0.50	195.00	Billable
2/21/2018 102053 0	AditiFruitwala Call with team re settlement negotiations	390.00	1.17	456.30	Billable
2/22/2018 102054 0	AditiFruitwala Typed meeting notes	390.00	0.33	128.70	Billable
3/2/2018 102057 0	AditiFruitwala Call with team re settlement discussions	390.00	0.83	323.70	Billable
Total: Aditi Fruitwala			23.83	\$9,293.70	
Timekeeper: Amanda Goad					
9/14/2017 100118 tc1	AmandaGoad Call with full case team re strategy and discovery/motion practice plan	615.00	1.33	817.95	Billable
9/27/2017 100172 tc1	AmandaGoad Call with ACLU team re discovery and motion plans	615.00	0.83	510.45	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/28/2017	AmandaGoad 100171 tc1 Call with our team re discovery and settlement strategies, client communications	615.00	0.83	510.45	Billable
10/11/2017	AmandaGoad 100216 0 Meetings with clients -- Ripple, Valenzuela, Vargas	615.00	2.50	1,537.50	Billable
10/11/2017	AmandaGoad 100217 0 Travel time to/from client meetings	615.00	2.17	1,334.55	Billable
10/19/2017	AmandaGoad 100228 0 Research re McKibben succession	615.00	0.33	202.95	Billable
10/20/2017	AmandaGoad 100227 0 Comms with team re Dan McKibben succession	615.00	0.33	202.95	Billable
10/27/2017	AmandaGoad 100249 0 Team call re settlement & discovery scenarios	615.00	1.17	719.55	Billable
10/31/2017	AmandaGoad 100283 tc1 Team call re discovery plan, plaintiff McKibben issues	615.00	1.00	615.00	Billable
11/8/2017	AmandaGoad 100332 tc1 Team call re discovery, plaintiff communications	615.00	0.50	307.50	Billable
11/9/2017	AmandaGoad 100333 crw1 Drafting response to Kaitlin Ripple letter	615.00	0.17	104.55	Billable
11/9/2017	AmandaGoad 100331 0 Communications with Brendan re depo prep, written discovery	615.00	0.50	307.50	Billable
11/15/2017	AmandaGoad 100401 tc1 Discuss strategy with MG	615.00	0.33	202.95	Billable
11/15/2017	AmandaGoad 100387 tc1 Call re discovery planning, client communications, Bernal prior decisions with full team	615.00	0.83	510.45	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/15/2017	AmandaGoad 100388 0 Review document discovery file	615.00	1.00	615.00	Billable
11/21/2017	AmandaGoad 100402 tc1 Full team discussion re discovery planning, settlement strategy, succession issue	615.00	0.50	307.50	Billable
11/30/2017	AmandaGoad 100420 tc1 Call with Brendan re discovery and settlement	615.00	0.17	104.55	Billable
11/30/2017	AmandaGoad 100421 tc1 Call with full team re discovery and settlement	615.00	0.33	202.95	Billable
12/5/2017	AmandaGoad 100440 0 Review priordiscovery	615.00	0.17	104.55	Billable
12/5/2017	AmandaGoad 100441 0 Call with Lindsay B re discovery	615.00	0.17	104.55	Billable
12/6/2017	AmandaGoad 100457 tc1 Call re discovery plan	615.00	0.83	510.45	Billable
12/20/2017	AmandaGoad 100590 tc1 Call with Dave & Brendan re depo defense	615.00	0.67	412.05	Billable
12/26/2017	AmandaGoad 100589 0 Editing outgoing discovery documents	615.00	0.33	202.95	Billable
12/26/2017	AmandaGoad 100588 tc1 Call with Dave & Lindsay re affirmative discovery plans	615.00	0.50	307.50	Billable
1/2/2018	AmandaGoad 100586 0 Emailing group re jail visits, possible subpoenas, class cert motion prep	640.00	0.33	211.20	Billable
1/3/2018	AmandaGoad 100602 tc1 Call with Dave. Lindsay, Diana re affirmative discovery, class cert strategy, and depo defense	640.00	1.33	851.20	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/5/2018 100603 0	AmandaGoad Client correspondence	640.00	0.17	108.80	Billable
1/16/2018 100780 0	AmandaGoad Discuss Vargas correspondence issues with Brendan	640.00	0.33	211.20	Billable
1/19/2018 100779 0	AmandaGoad Client correspondence (Vargas)	640.00	0.33	211.20	Billable
1/23/2018 100776 0	AmandaGoad Mtg with Brendan & Aditi re discovery	640.00	0.33	211.20	Billable
1/25/2018 100778 0	AmandaGoad Client correspondence (Pratt)	640.00	0.33	211.20	Billable
1/25/2018 100777 tc1	AmandaGoad Call with Julia, Diana, Dave re depo prep and client communications	640.00	0.50	320.00	Billable
1/26/2018 100762 0	AmandaGoad Meet w/ Aditi re doc review	640.00	0.17	108.80	Billable
1/26/2018 100761 tc1	AmandaGoad Discovery planning call with Aditi, Lindsay, Dave	640.00	0.83	531.20	Billable
1/31/2018 100807 tc1	AmandaGoad Team call re discovery	640.00	0.17	108.80	Billable
2/12/2018 100899 0	AmandaGoad Update Vanessa Pratt on case status, discuss depo prep, deliver documents	640.00	0.33	211.20	Billable
2/12/2018 100922 0	AmandaGoad Review Pratt booking jacket	630.00	0.33	207.90	Billable
2/13/2018 100901 tc1	AmandaGoad Call with full case team re potential settlement	640.00	0.83	531.20	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/14/2018 100902 tc1	AmandaGoad Call with full case team re discovery planning, deposition strategy issues	640.00	0.33	211.20	Billable
2/14/2018 100892 0	AmandaGoad Call with Dave McLane re depo planning	640.00	0.17	108.80	Billable
2/15/2018 100900 0	AmandaGoad Communication with V. Pratt and D. Gonzalez re confirming completeness of grievance file	640.00	0.17	108.80	Billable
2/18/2018 100908 0	AmandaGoad Travel time Pasadena <--> Highland to meet with Kennedy	640.00	1.83	1,171.20	Billable
2/18/2018 100909 0	AmandaGoad Depo prep meeting with W. Kennedy	640.00	2.50	1,600.00	Billable
2/19/2018 100907 0	AmandaGoad Emails with Nate re deposition scheduling	640.00	0.17	108.80	Billable
2/20/2018 100924 0	AmandaGoad Working with Diana on depo prep binders	630.00	0.17	107.10	Billable
2/20/2018 100923 0	AmandaGoad Emails re settlement proposals	630.00	0.33	207.90	Billable
2/28/2018 101009 tc1	AmandaGoad Team call re settlement efforts, class notification procedures, discovery needs	630.00	0.67	422.10	Billable
3/1/2018 101011 0	AmandaGoad Meeting with Melissa re strategy	630.00	0.17	107.10	Billable
3/1/2018 101012 0	AmandaGoad Emails and texts with Melissa re strategy	630.00	0.17	107.10	Billable
3/1/2018 101010 tc1	AmandaGoad Call with Barry, Dave, Lindsay re settlement vs. litigation strategies	630.00	0.33	207.90	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/5/2018	AmandaGoad 101027 0 Emails with co-counsel re status of settlement	630.00	0.17	107.10	Billable
4/16/2018	AmandaGoad 102028 0 Review Kennedy depo transcript	630.00	0.83	522.90	Billable
4/17/2018	AmandaGoad 102027 0 Meeting with William Kennedy re settlement and depo transcript	630.00	0.83	522.90	Billable
4/17/2018	AmandaGoad 102026 0 Travel to/from meeting with William Kennedy	630.00	2.00	1,260.00	Billable
6/19/2018	AmandaGoad 101558 0 Travel time to WVDC to meet with Caitlyn Ripple	630.00	0.83	522.90	Billable
6/19/2018	AmandaGoad 101557 0 Visit with Caitlyn Ripple	630.00	1.00	630.00	Billable
6/26/2018	AmandaGoad 101556 0 Email to KMBL/ACLU folks with proposed revision to injunctive relief	630.00	0.50	315.00	Billable
6/29/2018	AmandaGoad 102037 Supervision Review/edit Lucy's initial thoughts on cy pres	630.00	0.17	107.10	Billable
7/6/2018	AmandaGoad 102036 Supervision Review and edit Lucy's memo re cy pres	630.00	0.50	315.00	Billable
7/10/2018	AmandaGoad 102035 Supervision Review/edit Lucy's memo re cy pres	630.00	0.33	207.90	Billable
7/17/2018	AmandaGoad 102034 0 Call with Dave and Barry re cy pres	630.00	0.33	207.90	Billable
7/17/2018	AmandaGoad 102033 0 Call with Brendan re cy pres and other settlement issues	630.00	0.83	522.90	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/13/2018 102029 0	AmandaGoad Consultation with Brendan and ACLU communications staff about legal issues related to press release and potential interviews	630.00	0.33	207.90	Billable
8/13/2018 102031 tc1	AmandaGoad Call with IREN ED and board chair re cy pres award	630.00	0.33	207.90	Billable
9/10/2018 102022 0	AmandaGoad Preliminary approval hearing and subsequent conversation with opposing counsel	630.00	0.33	207.90	Billable
9/10/2018 102023 0	AmandaGoad Travel time to/from hearing	630.00	2.00	1,260.00	Billable
9/19/2018 102024 0	AmandaGoad Meeting with Veronica Pratt at WVDC	630.00	0.50	315.00	Billable
9/19/2018 102025 0	AmandaGoad Travel time to WVDC	630.00	1.00	630.00	Billable
Total: Amanda Goad			43.62	\$27,329.75	

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
<u>Timekeeper: Brendan Hamme</u>					
6/26/2014 87604 0	BrendanHamme Reviewing and editing complaint for LGBT inmate case	350.00	0.67	234.50	Billable
6/26/2014 87602 0	BrendanHamme Intern meeting re LGBT Jails Issue	350.00	1.00	350.00	Billable
6/30/2014 87608 0	BrendanHamme West Valley memo feedback and follow up w interns (52.1 and EPC)	350.00	0.83	290.50	Billable
7/1/2014 87609 0	BrendanHamme Meeting w/ interns to discuss next steps on research (Penal Code 4030, 8th Amendment, mandatory duties, etc.).	350.00	1.33	465.50	Billable
7/2/2014 87613 0	BrendanHamme Analysis of 52.1 claim	350.00	0.17	59.50	Billable
7/2/2014 87614 0	BrendanHamme Discussion of Penal Code 4030 Claims	350.00	0.67	234.50	Billable
7/2/2014 87610 0	BrendanHamme Investigation of other lawsuits against West Valley Detention	350.00	1.00	350.00	Billable
7/2/2014 87612 0	BrendanHamme Looking into procedures and coordinating schedules for visiting West Valley.	350.00	0.50	175.00	Billable
7/3/2014 87624 0	BrendanHamme Reading 4030 Case law	350.00	0.50	175.00	Billable
7/3/2014 87625 0	BrendanHamme Communication w/ Barry Litt re WVDC visit, complaint framing and 4030.	350.00	0.50	175.00	Billable
7/3/2014 87629 0	BrendanHamme Discussion/research of religious denials (RLUIPA) claim	350.00	1.00	350.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/3/2014 87623 0	BrendanHamme 8th Amendment claim research and discussion	350.00	0.67	234.50	Billable
7/4/2014 87399 0	BrendanHamme Researching potential alternative legal theories (51.7 and 52.4) and ways of getting damages (52)	350.00	1.17	409.50	Billable
7/7/2014 87630 0	BrendanHamme Meeting w/ interns to discuss 8th Amendment and EPC	350.00	0.50	175.00	Billable
7/7/2014 87394 0	BrendanHamme Talking to Sonya & Jordan re Equal Protection research	350.00	0.33	115.50	Billable
7/7/2014 87393 0	BrendanHamme Discussing 8th Amendment and PC 4030 claim research with Mackenzie.	350.00	0.33	115.50	Billable
7/9/2014 87392 0	BrendanHamme Communicating with Barry and team re strategic framing of complaint and causes of action (including reviewing revised complaint, reviewing applicable memos, and communications)	350.00	1.00	350.00	Billable
7/10/2014 87410 0	BrendanHamme Planning for WVDC visit (coordinating logistics, reviewing complaint and developing questions, etc.)	350.00	2.17	759.50	Billable
7/10/2014 87405 0	BrendanHamme Team meeting planning for visit to West Valley Detention Center tomorrow (determining questions to ask, individuals to meet, coordinating logistics, etc.)	350.00	2.17	759.50	Billable
7/11/2014 87413 0	BrendanHamme Most interviewing recap and discussion with team	350.00	1.17		
7/11/2014 87411 0	BrendanHamme Travel to and from WVDC.	350.00	2.00		
7/11/2014 87412 0	BrendanHamme Interviewing plaintiffs at WVDC	350.00	8.17		

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/12/2014 87414 0	BrendanHamme Reviewing component memoranda, conducting additional research and equal protection claims, and beginning drafting litigation memo.	350.00	6.00	2,100.00	Billable
7/14/2014 87417 0	BrendanHamme Drafting litigation memo.	350.00	4.83	1,690.50	Billable
7/15/2014 87421 0	BrendanHamme Continue drafting litigation memo, including discussions with Peter, Melissa, Amanda and interns.	350.00	7.00	2,450.00	Billable
7/15/2014 87436 0	BrendanHamme Analyzing First Amendment claims.	350.00	0.67	234.50	Billable
7/15/2014 87435 0	BrendanHamme Researching and advising intern on Govt Code 11135 claim.	350.00	0.50	175.00	Billable
7/16/2014 87437 0	BrendanHamme Discussion of retaliation claim.	350.00	0.67	234.50	Billable
7/16/2014 87438 0	BrendanHamme Reviewing memo on law library access and access to courts theory and following up w/ Jordan on additional research questions.	350.00	0.83	290.50	Billable
7/16/2014 87439 0	BrendanHamme Team discussion re propriety of raising retaliation and law library access claims.	350.00	0.67	234.50	Billable
7/17/2014 87469 0	BrendanHamme Continued work on litigation memo (statement of facts, 52.1, 8th Amendment, editing and refining)	350.00	4.00	1,400.00	Billable
7/17/2014 87485 0	BrendanHamme Team call.	350.00	1.50	525.00	Billable
7/21/2014 87495 0	BrendanHamme Communicating w/ ACLU team re litigation memo.	350.00	0.17	59.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/21/2014 87553 0	BrendanHamme Discussing entitlement to work programs under realignment.	350.00	0.33	115.50	Billable
7/21/2014 87493 0	BrendanHamme Corresponding w/ Barry and team re facts.	350.00	0.17	59.50	Billable
7/22/2014 87559 0	BrendanHamme Revising pre lit memo.	350.00	4.00	1,400.00	Billable
7/22/2014 87558 0	BrendanHamme Talk w/ Amanda re questions for HIV/AIDS patients at WVDC	350.00	0.17	59.50	Billable
7/23/2014 87566 0	BrendanHamme Communicating w/ Esther re inmate in general population for conditions comparison.	350.00	0.33	115.50	Billable
7/23/2014 87567 0	BrendanHamme Reviewing letters from WVDC inmates.	350.00	0.67	234.50	Billable
7/23/2014 87570 0	BrendanHamme Planning WVDC visit (who to interview, questions, logistics, intern prep, etc.)	350.00	1.00	350.00	Billable
7/23/2014 87571 0	BrendanHamme Ethical and tortious interference research re contacting represented party (including 7 minutes talking to Peter).	350.00	0.83	290.50	Billable
7/23/2014 87569 0	BrendanHamme Meeting w/ Melissa and Amanda to discuss strategy going forward, complaint and litigation memo.	350.00	1.00	350.00	Billable
7/24/2014 87588 0	BrendanHamme Meeting w/ Melissa to discuss trip to WVDC (additional questions, etc.).	350.00	0.33	115.50	Billable
7/25/2014 87582 0	BrendanHamme Discussing and assigning exhaustion research	350.00	0.17	59.50	Billable
7/25/2014 87590 0	BrendanHamme Post WVDC visit recap.	350.00	0.50	175.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/25/2014 87589 0	BrendanHamme Meeting w/ clients at WVDC (two hours traveling there and back, 6 and a half hours at facility).	350.00	8.50	2,975.00	Billable
7/28/2014 87597 0	BrendanHamme Reviewing, revising and discussing WVDC interview notes.	350.00	1.33	465.50	Billable
7/28/2014 87599 0	BrendanHamme Discussion w/ Mackenzie and Melissa re exhaustion of administrative remedies.	350.00	1.33	465.50	Billable
7/28/2014 87600 0	BrendanHamme Editing pre lit memo	350.00	3.17	1,109.50	Billable
7/29/2014 87639 0	BrendanHamme Researching standards under rational basis review	350.00	0.50	175.00	Billable
7/29/2014 87640 0	BrendanHamme Discussion of exhaustion of administrative remedies	350.00	0.83	290.50	Billable
7/29/2014 87646 0	BrendanHamme Reviewing research on programming at WVDC.	350.00	0.33	115.50	Billable
7/29/2014 87650 0	BrendanHamme Researching PLRA, Title 15 CCR, and administrative exhaustion and formulating argument.	350.00	2.17	759.50	Billable
7/29/2014 87654 0	BrendanHamme Calling Lilian Guzman	350.00	0.17	59.50	Billable
7/30/2014 87656 0	BrendanHamme Speaking w/ Lilian Guzman (Pedro Guzman's sister in law)	350.00	0.17	59.50	Billable
7/30/2014 87668 0	BrendanHamme Discussion of Title 15 applicability.	350.00	0.33	115.50	Billable
7/31/2014 87676 0	BrendanHamme Finalizing pre-lit memo	350.00	2.83	990.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/31/2014 87683 0	BrendanHamme Reviewing and editing complaint	350.00	3.17	1,109.50	Billable
7/31/2014 87685 0	BrendanHamme Discussion of administrative remedies.	350.00	0.50	175.00	Billable
8/1/2014 87689 0	BrendanHamme Reviewing research and continuing research on program and work access in jails.	350.00	0.50	175.00	Billable
8/1/2014 87690 0	BrendanHamme Reviewing WVDC trip notes, e-mail updates and communications with team.	350.00	1.33	465.50	Billable
8/4/2014 87703 0	BrendanHamme Drafting retainer agreements.	350.00	0.67	234.50	Billable
8/4/2014 87705 0	BrendanHamme Reviewing draft co-counsel agreement	350.00	0.17	59.50	Billable
8/5/2014 87711 0	BrendanHamme Team call w/ Barry, David & Melissa- discussing next steps, exhaustion, 52.1, complaint revision, etc.	350.00	1.50	525.00	Billable
8/6/2014 87731 0	BrendanHamme Litigation memo	350.00	0.50	175.00	Billable
8/7/2014 87748 0	BrendanHamme Communicating w/ Barry re 52.1 research	350.00	0.17	59.50	Billable
8/7/2014 87762 0	BrendanHamme Reviewing co-counsel agreement	350.00	0.17	59.50	Billable
8/7/2014 87764 0	BrendanHamme Reading research from Barry on 52.1 coercion theory.	350.00	0.17	59.50	Billable
8/7/2014 87761 0	BrendanHamme Reviewing revised retainer agreement.	350.00	0.17	59.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/8/2014 87778 0	BrendanHamme Communicating w/ David McClane re group grievance and logistics for WVDC visit	350.00	0.17	59.50	Billable
8/11/2014 87795 0	BrendanHamme Reviewing and revising draft group grievance.	350.00	0.83	290.50	Billable
8/11/2014 87799 0	BrendanHamme Research on 52.1	350.00	0.33	115.50	Billable
8/11/2014 87800 0	BrendanHamme Communications w/ team re document retention	350.00	0.17	59.50	Billable
8/11/2014 87807 0	BrendanHamme Team communications re Guzman as named plaintiff and filing 910 claim	350.00	0.17	59.50	Billable
8/12/2014 87828 0	BrendanHamme Communicating w/ team re grievance procedure and WVDC follow up visit	350.00	0.50	175.00	Billable
8/15/2014 87841 0	BrendanHamme Communications w/ team	350.00	0.17	59.50	Billable
8/18/2014 87843 0	BrendanHamme 52.1 section for litigation memo	350.00	0.83	290.50	Billable
8/19/2014 87855 0	BrendanHamme Team communications	350.00	0.17	59.50	Billable
8/20/2014 87863 0	BrendanHamme Communications re state v. federal venue	350.00	0.33	115.50	Billable
8/21/2014 87868 0	BrendanHamme Reviewing and editing revised complaint	350.00	0.17	59.50	Billable
8/21/2014 87870 0	BrendanHamme Researching application of Pennhurst doctrine to county jails	350.00	1.50	525.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/22/2014 87960 0	BrendanHamme Editing and commenting on revised complaint	350.00	2.67	934.50	Billable
8/22/2014 87873 0	BrendanHamme Editing revised complaint	350.00	4.00	1,400.00	Billable
8/23/2014 87961 0	BrendanHamme Reviewing and revising Melissa's edited complaint	350.00	0.67	234.50	Billable
8/25/2014 87872 0	BrendanHamme Conversion w/ M re timing of filing and litigation memo	350.00	0.17	59.50	Billable
8/26/2014 87963 0	BrendanHamme Reviewing litigation memo and revised complaint to brainstorm agenda items and discussion points for Thursday team call.	350.00	0.67	234.50	Billable
8/27/2014 87962 0	BrendanHamme Reviewing Barry's edits to complaint	350.00	0.33	115.50	Billable
8/28/2014 87964 0	BrendanHamme Personnell research for team	350.00	0.17	59.50	Billable
8/28/2014 87965 0	BrendanHamme Finalizing litigation memo	350.00	0.33	115.50	Billable
8/28/2014 87959 0	BrendanHamme Meeting with Lit Team re: complaint edits, communications with plaintiffs, exhaustion and filing timing strategy.	350.00	1.50	525.00	Billable
9/5/2014 88082 0	BrendanHamme Responding to additional litigation memo questions	350.00	0.83	290.50	Billable
9/8/2014 88083 0	BrendanHamme Coordinating visits with named plaintiffs to discuss media and sign retainers.	350.00	0.33	115.50	Billable
9/9/2014 88092 0	BrendanHamme Drafting letter to named plaintiffs re retainer agreement	350.00	0.67	234.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/9/2014 88086 0	BrendanHamme Talking w/ Peter Guzman re media	350.00	0.33	115.50	Billable
9/9/2014 88087 0	BrendanHamme Talking w/ Dan McKibben re media	350.00	0.50	175.00	Billable
9/9/2014 88088 0	BrendanHamme Meeting w/ M and discussing retainers, media conversations, letters to clients, and team call	350.00	2.00	700.00	Billable
9/9/2014 88089 0	BrendanHamme Team call- discussing complaint, timing, media, etc.	350.00	1.67	584.50	Billable
9/9/2014 88090 0	BrendanHamme Post meeting and plaintiff call recap with Melissa	350.00	0.33	115.50	Billable
9/10/2014 88093 0	BrendanHamme Revising letter to named plaintiffs re retainer	350.00	0.33	115.50	Billable
9/10/2014 88102 0	BrendanHamme Communications team meeting	350.00	1.50	525.00	Billable
9/10/2014 88104 0	BrendanHamme Communications re media spokespeople.	350.00	0.17	59.50	Billable
9/11/2014 88109 0	BrendanHamme Communications, correspondence, and coordination on retainer agreements	350.00	0.67	234.50	Billable
9/11/2014 88111 0	BrendanHamme Preparation for tomorrow's meeting	350.00	0.33	115.50	Billable
9/11/2014 88112 0	BrendanHamme Meeting w/ Melissa re WVDC meeting tomorrow, retainers, grievances, and scheduling Ou and McKibben.	350.00	0.67	234.50	Billable
9/24/2014 88149 0	BrendanHamme Reviewing and revising draft press release	350.00	0.33	115.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/24/2014 88150 0	BrendanHamme Reading letter from ALT inmate and e-mailing team	350.00	0.17	59.50	Billable
9/24/2014 88151 0	BrendanHamme Reviewing notes from last WVDC visit and determining who to add as named plaintiff	350.00	0.33	115.50	Billable
9/24/2014 88154 0	BrendanHamme Reviewing and revising talking points.	350.00	0.33	115.50	Billable
9/25/2014 88163 0	BrendanHamme Communications w/ team re named plaintiffs and next steps	350.00	0.33	115.50	Billable
10/6/2014 88197 0	BrendanHamme Call w/ Nick Ou re being spokesperson	350.00	0.17	59.50	Billable
10/7/2014 88204 0	BrendanHamme Discussions w/ communications	350.00	0.50	175.00	Billable
10/7/2014 88205 0	BrendanHamme Gathering biographical information from Nick Ou, writing it up for Sandra, and e-mailing team for input.	350.00	0.50	175.00	Billable
10/9/2014 88211 0	BrendanHamme West Valley Detention Center trip to speak with inmates, verify complaint allegations and do additional factual development (includes 1 hr travel to, 1 hr 15 minutes travel back, both of which included discussion of case w/ co-counsel)	350.00	6.83	2,390.50	Billable
10/9/2014 88212 0	BrendanHamme Reviewing grievances collected from 10 8 WVDC visit, summarizing information collected, and communicating w/ cocounsel	350.00	2.33	815.50	Billable
10/9/2014 88214 0	BrendanHamme Revising complaint	350.00	5.00	1,750.00	Billable
10/9/2014 88215 0	BrendanHamme Discussion w/ Marcus re video of plaintiffs	350.00	0.17	59.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/10/2014	BrendanHamme 88431 0 Additional complaint review and team communications re complaint	350.00	0.83	290.50	Billable
10/10/2014	BrendanHamme 88432 0 Retainer work	350.00	0.17	59.50	Billable
10/12/2014	BrendanHamme 88919 0 Phone call w/ Dan McKibben re bio	350.00	0.83	290.50	Billable
10/12/2014	BrendanHamme 88920 0 Phone call w/ Guzman re bio	350.00	0.83	290.50	Billable
10/13/2014	BrendanHamme 88921 0 Team call re filing and complaint finalization	350.00	1.00	350.00	Billable
10/13/2014	BrendanHamme 88923 0 Working on complaint- revising and fact checking	350.00	1.00	350.00	Billable
10/14/2014	BrendanHamme 88922 0 Updating spokespeople on media	350.00	0.17	59.50	Billable
10/14/2014	BrendanHamme 88543 0 Updates to spokespeople re media	350.00	0.17	59.50	Billable
10/15/2014	BrendanHamme 88544 0 Communications w/ spokespeople and scheduling media training	350.00	0.50	175.00	Billable
10/16/2014	BrendanHamme 88749 0 Communications w/ team re finalizing complaint	350.00	0.17	59.50	Billable
10/16/2014	BrendanHamme 88839 0 Revising Nick Ou's bio	350.00	0.17	59.50	Billable
10/16/2014	BrendanHamme 88896 0 Call w/ Dan McKibben re media and bio	350.00	0.17	59.50	Billable
10/17/2014	BrendanHamme 88928 0 Drafting and revising attorney blog	350.00	1.67	584.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/20/2014 88917 0	BrendanHamme Revising plaintiff bios	350.00	0.50	175.00	Billable
10/20/2014 88918 0	BrendanHamme Preparing for spokesperson arrival	350.00	0.17	59.50	Billable
10/20/2014 88927 0	BrendanHamme Prepping Peter Guzman for media	350.00	1.00	350.00	Billable
10/20/2014 88930 0	BrendanHamme Revisions to and work on attorney blog	350.00	0.17	59.50	Billable
10/20/2014 88946 0	BrendanHamme Prepping Ou and McKibben for media	350.00	1.33	465.50	Billable
10/20/2014 88965 0	BrendanHamme Editing plaintiff blog	350.00	0.67	234.50	Billable
10/20/2014 88980 0	BrendanHamme Reviewing and editing letter to class members	350.00	0.17	59.50	Billable
10/21/2014 88985 0	BrendanHamme Preparing for media	350.00	0.83	290.50	Billable
10/21/2014 88986 0	BrendanHamme Working on blogs, getting pictures of spokespeople, etc.	350.00	0.67	234.50	Billable
10/21/2014 88987 0	BrendanHamme Attempting to reach WVDC inmates re filing.	350.00	0.50	175.00	Billable
10/21/2014 88988 0	BrendanHamme Answering reporter's question on scope of relief	350.00	0.17	59.50	Billable
10/21/2014 88990 0	BrendanHamme Additional media prep and strategy session	350.00	1.17	409.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/21/2014 88997 0	BrendanHamme Reading PREA summary and responding to reporter's question about relationship to lawsuit	350.00	0.33	115.50	Billable
10/21/2014 89020 0	BrendanHamme Additional media prep	350.00	0.50	175.00	Billable
10/22/2014 89018 0	BrendanHamme Working on Plaintiff's blog with McKibben	350.00	0.83	290.50	Billable
10/22/2014 89019 0	BrendanHamme Explaining and getting signature on retainer w/ Sean Lint	350.00	0.33	115.50	Billable
10/22/2014 89021 0	BrendanHamme Preparing clients for media	350.00	0.83	290.50	Billable
10/22/2014 89022 0	BrendanHamme Speaking with the press	350.00	0.50	175.00	Billable
10/22/2014 89032 0	BrendanHamme Reading notice of judge and magistrate appointed to case, of mandatory mediation procedure and summons to defendants	350.00	0.17	59.50	Billable
10/23/2014 89076 0	BrendanHamme Team call to discuss class certification, declaration collection, questionnaires, experts and next steps	350.00	1.33	465.50	Billable
10/23/2014 89078 0	BrendanHamme Talking to NBC Universal	350.00	0.17	59.50	Billable
10/23/2014 89079 0	BrendanHamme E-mail communications with team re experts and protection of inmates in custody	350.00	0.33	115.50	Billable
10/23/2014 89080 0	BrendanHamme Reading inmate letter and responding	350.00	0.33	115.50	Billable
10/27/2014 89090 0	BrendanHamme Reading report from potential San Bernardino County witness	350.00	0.17 0.17	59.50 59.50	Do Not Bill

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/27/2014 89084 0	BrendanHamme Seeking ethical advice re solicitation for representation of class members	350.00	0.17	59.50	Billable
10/27/2014 89085 0	BrendanHamme Reading about pre-class-certification contact by defendants with class members	350.00	0.33	115.50	Billable
10/28/2014 89101 0	BrendanHamme Team communications re potential experts	350.00	0.17 0.17	59.50 59.50	Do Not Bill
10/28/2014 89100 0	BrendanHamme Reading standing order of court and order to delivery chambers copy of complaint and team communications re same	350.00	0.33	115.50	Billable
10/28/2014 89103 0	BrendanHamme Conversation w/ Melissa re next steps in class certification and expert identification	350.00	0.33	115.50	Billable
10/28/2014 89105 0	BrendanHamme Communicating w/ team re declarations	350.00	0.17	59.50	Billable
10/28/2014 89109 0	BrendanHamme Researching potential experts	350.00	2.00	700.00	Billable
10/29/2014 89118 0	BrendanHamme Communication w/ legal assistant re retainers	350.00	0.17 0.17	59.50 59.50	Do Not Bill
10/29/2014 89113 0	BrendanHamme Communications re Araiza	350.00	0.17	59.50	Billable
10/29/2014 89114 0	BrendanHamme Communicating with team re additional potential expert identified	350.00	0.33	115.50	Billable
10/29/2014 89119 0	BrendanHamme Scheduling next team call and regular calls thereafter	350.00	0.17	59.50	Billable
10/31/2014 89124 0	BrendanHamme Trip to WVDC to discuss updates with plaintiffs (includes 1 hr travel there and 1 hr travel back)	350.00	7.00	2,450.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/31/2014 89120 0	BrendanHamme Call w/ Larry Meyers	350.00	0.17	59.50	Billable
11/3/2014 89130 0	BrendanHamme Team call- discussing class certification, declarations, experts, and next steps	350.00	1.50	525.00	Billable
11/5/2014 89145 0	BrendanHamme Communications about and trying to reach Taheash White	350.00	0.17	59.50	Billable
11/6/2014 89192 0	BrendanHamme Call w/ Nick Ou	350.00	0.17	59.50	Billable
11/7/2014 89210 0	BrendanHamme Talking to Dan McKibben	350.00	0.17	59.50	Billable
11/7/2014 89220 0	BrendanHamme Follow up letter w/ Dan	350.00	0.33	115.50	Billable
11/14/2014 89722 0	BrendanHamme Reviewing documents and past PRAs, discussing w/ Dave McClane (8 minutes) and drafting PRA to WVDC	350.00	1.17	409.50	Billable
11/17/2014 89739 0	BrendanHamme Call w/ Lynn Price and update to team.	350.00	0.17	59.50	Billable
11/18/2014 89835 0	BrendanHamme Team meeting	350.00	1.50	525.00	Billable
11/18/2014 89773 0	BrendanHamme Reviewing notes and e-mailing team re current housing placement for named plaintiffs and planning future trip to WVDC	350.00	0.17	59.50	Billable
11/18/2014 89774 0	BrendanHamme Reviewing shell declaration	350.00	0.17	59.50	Billable
11/18/2014 89775 0	BrendanHamme Reading about operation of K6G for contrast and effective operation of protective custody housing	350.00	0.50	175.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/21/2014 89781 0	BrendanHamme Coordinating and planning for trip to Glen Helen Rehabilitation Center	350.00	0.33	115.50	Billable
11/21/2014 89788 0	BrendanHamme Inmate letter	350.00	0.17	59.50	Billable
11/21/2014 89789 0	BrendanHamme Call w/ client from WVDC (15 min.) and update e-mail to team	350.00	0.50	175.00	Billable
11/21/2014 89793 0	BrendanHamme Revising PRA to San Bernardino County Sheriff's Department	350.00	0.33	115.50	Billable
11/21/2014 89794 0	BrendanHamme E-mail to David McClane re inmate visits on Tuesday.	350.00	0.17	59.50	Billable
11/25/2014 89813 0	BrendanHamme Revising PRA to WVDC re new policies	350.00	0.17	59.50	Billable
11/25/2014 89817 0	BrendanHamme Call w/ Taheash White re retainer and communications w/ Li re same	350.00	0.17	59.50	Billable
12/1/2014 89825 0	BrendanHamme E-mailing potential consulting experts about our case	350.00	0.33	115.50	Billable
12/2/2014 89834 0	BrendanHamme Revising PRA and communicating with Melissa re strategy for document requests	350.00	0.50	175.00	Billable
12/3/2014 89841 0	BrendanHamme Reading 9th Cir. decision on commonality requirement in class actions	350.00	0.33	115.50	Billable
12/8/2014 89910 0	BrendanHamme Coordinating press availability for Peter and Nick	350.00	0.33	115.50	Billable
12/8/2014 89911 0	BrendanHamme Discussing and coordinating PRA	350.00	0.17	59.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/8/2014 89914 0	BrendanHamme Call w/ Melissa & Amanda re National's involvement, whether to amend to plead gender discrimination, framing for equal protection argument, etc.	350.00	0.83	290.50	Billable
12/8/2014 89918 0	BrendanHamme Investigating inmates housed at Glen Helen Rehabilitation Center and communicating with team	350.00	0.17	59.50	Billable
12/9/2014 89932 0	BrendanHamme Team call re DOJ, PRA, experts, discovery, class cert, etc.	350.00	1.50	525.00	Billable
12/10/2014 89933 0	BrendanHamme Call w/ Lynn Price and Isaac Diaz-Ramos from Glen Helen and updating team	350.00	0.50	175.00	Billable
12/11/2014 89943 0	BrendanHamme Preparing to speak with and speaking with consulting expert Martin Horn	350.00	1.17	409.50	Billable
12/12/2014 89956 0	BrendanHamme Revising draft Walker declaration	350.00	0.50	175.00	Billable
12/15/2014 89977 0	BrendanHamme Call w/ Ally Shandell at DOJ re potential interest in case	350.00	0.67	234.50	Billable
12/15/2014 89978 0	BrendanHamme Meeting w/ Melissa to debrief call with DOJ and research involvement with statement of interest	350.00	0.33	115.50	Billable
12/15/2014 89979 0	BrendanHamme Meeting w/ Melissa to prepare for DOJ call and call with potential consulting expert	350.00	0.33	115.50	Billable
12/15/2014 89986 0	BrendanHamme Call w/ Sharon Dolovich re programming at K6G and potential expert role	350.00	0.83	290.50	Billable
12/17/2014 90004 0	BrendanHamme Review and editing of revised Walker declaration draft, communicating thoughts to co-counsel	350.00	0.33	115.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/17/2014 90005 0	BrendanHamme Team call re DOJ, expert conversations, and declarations	350.00	2.17	759.50	Billable
12/17/2014 90006 0	BrendanHamme Updating Melissa on PC 4019 issue and discussion of amending complaint	350.00	0.33	115.50	Billable
12/18/2014 90013 0	BrendanHamme Team call to discuss legislative history and next steps	350.00	0.33	115.50	Billable
1/5/2015 90036 0	BrendanHamme Drafting agenda for next team call	350.00	0.33	115.50	Billable
1/6/2015 90044 0	BrendanHamme Discussion w/ Melissa re agenda for next team meeting and e-mail correspondence with team	350.00	0.17	59.50	Billable
1/7/2015 90055 0	BrendanHamme Team call to discuss amendment of complaint, communications with opposing counsel and visits to Glen Helen	350.00	0.50	175.00	Billable
1/8/2015 90061 0	BrendanHamme Revising Walker declaration.	350.00	0.50	175.00	Billable
1/12/2015 90078 0	BrendanHamme Planning for and communicating about Wednesday trip to WVDC	350.00	0.33	115.50	Billable
1/12/2015 90081 0	BrendanHamme Reviewing and revising first amended complaint	350.00	0.33	115.50	Billable
1/13/2015 90091 0	BrendanHamme Reviewing and revising latest draft of first amended complaint	350.00	0.33	115.50	Billable
1/15/2015 90116 0	BrendanHamme Team call- updates, next visits, declaration statuses, meeting with opposing counsel, etc.	350.00	1.00	350.00	Billable
1/15/2015 90127 0	BrendanHamme Visiting Lynn Price at GHRC (36 min. booking and returning rental car, 1.5 hr travel there, 1 hr 18 min travel back, 1 hr 18 min. at GHRC).	350.00	4.83	1,690.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/16/2015 90407 0	BrendanHamme Visiting clients and putative class members at WVDC (includes 1 hr travel there and 1 hr, 6 min. travel back).	350.00	8.83	3,090.50	Billable
1/20/2015 90308 0	BrendanHamme Meeting w/ opposing counsel for Rule 26 conference (1.5 hrs meeting, 24 min. travel to and 24 min. travel back from Litt office)	350.00	2.33	815.50	Billable
1/20/2015 90309 0	BrendanHamme Post meeting w/ opposing counsel recap and next steps discussion (including preliminary discovery conversation)	350.00	0.83	290.50	Billable
1/22/2015 90307 0	BrendanHamme Internal discovery planning call with Belinda and Melissa	350.00	0.83	290.50	Billable
1/23/2015 90373 0	BrendanHamme Calendaring and next steps discussion with Michelle Ochoa	350.00	0.17	59.50	Billable
1/26/2015 90408 0	BrendanHamme Reviewing and summarizing notes from last visit for team.	350.00	0.83	290.50	Billable
1/26/2015 90409 0	BrendanHamme Reviewing and editing proposed stipulation and Rule 26 report.	350.00	0.83	290.50	Billable
1/28/2015 90411 0	BrendanHamme Scheduling follow up call w/ Martin Horn re administrability	350.00	0.17	59.50	Billable
1/29/2015 90413 0	BrendanHamme Discovery planning call	350.00	1.00	350.00	Billable
1/29/2015 90414 0	BrendanHamme Call w Amanda Goad re National ACLU's involvement, litigation memo, experts, etc.	350.00	0.50	175.00	Billable
1/29/2015 90415 0	BrendanHamme Reviewing and editing revised Rule 26 report	350.00	0.17	59.50	Billable
1/29/2015 90426 0	BrendanHamme Communications re Torres	350.00	0.17	59.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/29/2015 90428 0	BrendanHamme Reviewing and revising draft letter to and limited retainer with potential class members and communicating with team	350.00	0.33	115.50	Billable
2/5/2015 90475 0	BrendanHamme Conversation w/ Martin Horn re administrability of providing equal access	350.00	0.50	175.00	Billable
2/8/2015 90638 0	BrendanHamme Discovery planning, including attendant research on elements and subsequent court opinions laying out standards for 52.1, 14th Amendment, Ca. Const. Article 1, Section 7, and 815.6	350.00	14.67	5,134.50	Billable
2/9/2015 90511 0	BrendanHamme Team call re initial disclosures, experts, discovery plan, 12b6, etc.	350.00	1.00	350.00	Billable
2/10/2015 90512 0	BrendanHamme Call w/ Belinda re case-- discussing discovery plan, afternoon team call, etc.	350.00	0.33	115.50	Billable
2/10/2015 90518 0	BrendanHamme Conversation w/ Belinda re discovery planning and setting up for trial	350.00	0.33	115.50	Billable
2/11/2015 90639 0	BrendanHamme Conversation w/ Lynn Price	350.00	0.33	115.50	Billable
2/11/2015 90644 0	BrendanHamme Call w/ GTL re receiving collect calls from inmates	350.00	0.50	175.00	Billable
2/11/2015 90645 0	BrendanHamme Call w/ Li re conversation w/ GTL	350.00	0.17	59.50	Billable
2/12/2015 90659 0	BrendanHamme Reading and commenting on memo on standard of review for transgender discrimination claims under EPC	350.00	0.83	290.50	Billable
2/17/2015 90673 0	BrendanHamme Discussion w/ Belinda re discovery plan, filings, and timeline	350.00	0.33	115.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/18/2015	BrendanHamme 90689 0 Reading Defendants' motion to dismiss	350.00	0.33	115.50	Billable
2/19/2015	BrendanHamme 90755 0 Revising discovery plan	350.00	1.17	409.50	Billable
2/19/2015	BrendanHamme 90756 0 Team call re motion to dismiss and initial disclosures	350.00	0.67	234.50	Billable
2/20/2015	BrendanHamme 90769 0 Call w/ Lynn re move from GH back to WVDC	350.00	0.17	59.50	Billable
2/20/2015	BrendanHamme 90773 0 Reviewing our initial disclosures	350.00	0.33	115.50	Billable
2/20/2015	BrendanHamme 90776 0 Call w/ Victoria B re call w/ potential plaintiff and status of complaint	350.00	0.33	115.50	Billable
2/26/2015	BrendanHamme 90863 0 Reviewing and editing opposition to motion to dismiss	350.00	0.67	234.50	Billable
2/27/2015	BrendanHamme 90864 0 Reviewing and editing opposition to motion to dismiss (cont.)	350.00	0.50	175.00	Billable
2/28/2015	BrendanHamme 90862 0 Reading Rule 26 report	350.00	0.33	115.50	Billable
2/28/2015	BrendanHamme 90865 0 Reviewing and editing opposition to motion to dismiss	350.00	1.83	640.50	Billable
3/1/2015	BrendanHamme 90866 0 Editing opposition to motion to dismiss	350.00	0.83	290.50	Billable
3/2/2015	BrendanHamme 90861 0 Team call re Dave's trip to WVDC and discovery	350.00	0.33	115.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/2/2015 90871 0	BrendanHamme Reviewing Barry's comments to discovery plan and sending to interns with explanations for drafting discovery requests	350.00	0.50	175.00	Billable
3/4/2015 90898 0	BrendanHamme Discussing discovery assignment with interns	350.00	0.33	115.50	Billable
3/4/2015 90901 0	BrendanHamme Correspondence re Bart Lanni as potential expert witness	350.00	0.17	59.50	Billable
3/4/2015 90908 0	BrendanHamme Communications re Jonathan Robertson	350.00	0.17	59.50	Billable
3/9/2015 90936 0	BrendanHamme Reviewing draft production requests	350.00	0.67	234.50	Billable
3/11/2015 90991 0	BrendanHamme Call w/ Jonathan Robertson (12 min.) and update to team with follow up questions	350.00	0.50	175.00	Billable
3/11/2015 91004 0	BrendanHamme Communications w/ Global Tel Link re account for communications w incarcerated clients	350.00	0.67	234.50	Billable
3/12/2015 91034 0	BrendanHamme Communications w/ potential expert and Dave re upcoming meeting	350.00	0.17	59.50	Billable
3/12/2015 91035 0	BrendanHamme Communications w/ Esther and Melissa re upcoming meeting with potential expert	350.00	0.17	59.50	Billable
3/12/2015 91019 0	BrendanHamme Communications w/ Melissa and team re discovery and meeting w/ potential experts	350.00	0.33	115.50	Billable
3/13/2015 91042 0	BrendanHamme Reading Defendants' reply to our opposition to motion to dismiss and cross referencing with FAC	350.00	0.67	234.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/16/2015 91077 0	BrendanHamme Conversation w/ Melissa re meeting w/ potential experts	350.00	0.33	115.50	Billable
3/16/2015 91078 0	BrendanHamme Meeting w/ potential experts (2 hr. meeting, 1 hr 36 min. travel back and forth)	350.00	3.67	1,284.50	Billable
3/16/2015 91079 0	BrendanHamme Conversation w/ Esther re meeting with potential experts	350.00	0.33	115.50	Billable
3/16/2015 91080 0	BrendanHamme Call w/ legal team re complaint, co-counsel agreement, filing, conflicts, defendants, etc.	350.00	1.33	465.50	Billable
3/16/2015 91081 0	BrendanHamme Communications w/ Sandra re press release	350.00	0.33	115.50	Billable
3/16/2015 91083 0	BrendanHamme Communications w/ legal team re setting up meeting, defendants' initial disclosures, and draft agenda	350.00	0.17	59.50	Billable
3/17/2015 91099 0	BrendanHamme Communications w/ team re discovery, status of initial disclosures, and next steps	350.00	0.17	59.50	Billable
3/17/2015 91111 0	BrendanHamme Communications w/ named plaintiffs re upcoming hearing.	350.00	0.17	59.50	Billable
3/17/2015 91116 0	BrendanHamme Reading case on standard of review for transgender inmates in jails	350.00	0.50	175.00	Billable
3/20/2015 91165 0	BrendanHamme Scheduling meeting w/ former Men's Central jail monitor to discuss potential expert witnesses	350.00	0.17	59.50	Billable
3/20/2015 91172 0	BrendanHamme Continued editing and work on requests for production	350.00	1.00	350.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/20/2015 91174 0	BrendanHamme Conversation w/ Jonathan Robertson re treatment at WVDC	350.00	0.17	59.50	Billable
3/20/2015 91177 0	BrendanHamme Updating team on conversation with Jonathan Robertson	350.00	0.33	115.50	Billable
3/23/2015 91184 0	BrendanHamme Reviewing notes from meeting with potential experts	350.00	0.17	59.50	Billable
3/23/2015 91185 0	BrendanHamme Call w/ M re work opportunities at K6G, next steps w/ firm, discovery, and agenda for next call	350.00	0.33	115.50	Billable
3/23/2015 91191 0	BrendanHamme Call w/ potential expert re programming at men's central	350.00	0.50	175.00	Billable
3/23/2015 91193 0	BrendanHamme Updating Melissa on conversation w/ potential expert	350.00	0.33	115.50	Billable
3/24/2015 91206 0	BrendanHamme Drafting agenda for tomorrow's team call	350.00	0.33	115.50	Billable
3/24/2015 91210 0	BrendanHamme Call w/ former jail monitor re potential expert witnesses	350.00	0.50	175.00	Billable
3/24/2015 91211 0	BrendanHamme Updating Melissa on call with former jail monitor	350.00	0.33	115.50	Billable
3/25/2015 91216 0	BrendanHamme Team call re hearing, experts, discovery, initial disclosures, etc.	350.00	1.33	465.50	Billable
3/25/2015 91217 0	BrendanHamme Communications with Melissa re experts, work opportunities, and potential amendment to complaint	350.00	0.17	59.50	Billable
3/25/2015 91218 0	BrendanHamme Communications w/ Dave and Julia re Jonathan Robertson	350.00	0.17	59.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/27/2015 91318 0	BrendanHamme Research on standards for motion to compel initial discovery	350.00	0.83	290.50	Billable
4/2/2015 91417 0	BrendanHamme Communications w/ Nick Ou re declaration	350.00	0.17	59.50	Billable
4/2/2015 91418 0	BrendanHamme Conversation w/ Peter Guzman re case updates	350.00	0.33	115.50	Billable
4/2/2015 91419 0	BrendanHamme Communications w/ co-counsel re WVDC visits	350.00	0.33	115.50	Billable
4/3/2015 91420 0	BrendanHamme Reviewing initial disclosure letter and communicating w/ co counsel re same	350.00	0.33	115.50	Billable
4/3/2015 91421 0	BrendanHamme Conversation w/ jonathan robertson	350.00	0.17	59.50	Billable
4/6/2015 91403 0	BrendanHamme Drafting agenda for team call	350.00	0.33	115.50	Billable
4/6/2015 91410 0	BrendanHamme Conversation w/ Lynn re WVDC update	350.00	0.17	59.50	Billable
4/7/2015 91426 0	BrendanHamme Team call re WVDC visit updates, discovery, issues to follow up w/ Nathan, etc.	350.00	1.00	350.00	Billable
4/7/2015 91430 0	BrendanHamme Conversation w/ Lynn re retaliation and lockdowns at WVDC	350.00	0.33	115.50	Billable
4/8/2015 91439 0	BrendanHamme Conversation w/ Melissa re revising requests for production and approach to other discovery devices	350.00	0.50	175.00	Billable
4/10/2015 91465 0	BrendanHamme Revising draft RFPs	350.00	1.50	525.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/13/2015 91541 0	BrendanHamme Communications w/ team re visitation schedule and timing of discovery	350.00	0.67	234.50	Billable
4/14/2015 91531 0	BrendanHamme Team call re discovery, WVDC visitation, hearing, correspondence w/ Nate, etc.	350.00	1.00	350.00	Billable
4/15/2015 91529 0	BrendanHamme Reviewing suggested edits to RFPs (30 min.) and communicating w/ M re same (12 min)	350.00	0.83	290.50	Billable
4/16/2015 91527 0	BrendanHamme Reading inmate correspondence and communicating w/ team re same	350.00	0.17	59.50	Billable
4/16/2015 91530 0	BrendanHamme Communications w/ team re RFPs	350.00	0.17	59.50	Billable
4/16/2015 91545 0	BrendanHamme Additional edits to RFPs	350.00	0.50	175.00	Billable
4/17/2015 91569 0	BrendanHamme Reading order re defendants' motion to dismiss	350.00	0.50	175.00	Billable
4/21/2015 91609 0	BrendanHamme Conversation w/ Jonathan Robertson	350.00	0.33	115.50	Billable
4/21/2015 91612 0	BrendanHamme Finalizing RFPs	350.00	0.33	115.50	Billable
4/22/2015 91625 0	BrendanHamme Conversation w/ Lynn	350.00	0.17	59.50	Billable
4/23/2015 91642 0	BrendanHamme Reviewing and commenting on draft interrogatories	350.00	0.50	175.00	Billable
4/23/2015 91643 0	BrendanHamme Updating team on calls with Jonathan and Lynn	350.00	0.17	59.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/23/2015 91645 0	BrendanHamme Call w/ Lynn	350.00	0.17	59.50	Billable
4/30/2015 92115 0	BrendanHamme Reading inmate letter and communicating w/ team re same	350.00	0.17	59.50	Billable
5/2/2015 92107 0	BrendanHamme Reviewing and editing Second Amended Complaint	350.00	0.50	175.00	Billable
5/4/2015 92126 0	BrendanHamme Reviewing computer database rogs/RFP	350.00	0.67	234.50	Billable
5/5/2015 92138 0	BrendanHamme Call w/ Jonathan Robertson	350.00	0.17	59.50	Billable
5/6/2015 92225 0	BrendanHamme Prepping for West Valley visit (3 min. compiling booking information, 15 min. on the phone with WVDC notifying them of visit)	350.00	0.33	115.50	Billable
5/6/2015 92226 0	BrendanHamme Visiting inmates at WVDC (1 hr. 6 min. travel there, 1 hr 12 min. travel back, 5 hr. 6 min. talking to inmates at WVDC)	350.00	7.50	2,625.00	Billable
5/7/2015 92227 0	BrendanHamme Reviewing notes about trip and grievances given and summarizing same for team	350.00	1.33	465.50	Billable
5/14/2015 92280 0	BrendanHamme Conversation w/ Jonathan Robertson for updates on grievances	350.00	0.33	115.50	Billable
5/15/2015 92282 0	BrendanHamme Developing agenda for team call	350.00	0.33	115.50	Billable
5/15/2015 92283 0	BrendanHamme Reviewing and editing revised interrogatories from Plaintiff Guzman	350.00	0.50	175.00	Billable
5/15/2015 92284 0	BrendanHamme Reviewing and editing revised RFPs from Plaintiff Guzman	350.00	0.50	175.00	Billable

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Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/18/2015 92292 0	BrendanHamme Litigation team call (discussing discovery, experts, SAC, law student access, trip update, etc.	350.00	1.00	350.00	Billable
5/18/2015 92295 0	BrendanHamme Communicating w/ Lindsay re individual inmate RFPs	350.00	0.17	59.50	Billable
5/19/2015 92311 0	BrendanHamme Reviewing updated database Rogs	350.00	0.17	59.50	Billable
5/19/2015 92312 0	BrendanHamme Reviewing updated RFPs	350.00	0.17	59.50	Billable
5/19/2015 92313 0	BrendanHamme Conversation w/ Lynn and other inmate	350.00	0.33	115.50	Billable
5/19/2015 92315 0	BrendanHamme Updating team on conversation w/ inmate and flagging next steps	350.00	0.33	115.50	Billable
5/27/2015 92436 0	BrendanHamme Updating team on conversation w/ inmate re conditions at WVDC and recommending further action	350.00	0.33	115.50	Billable
5/27/2015 92438 0	BrendanHamme Reading correspondence, grievances and appeals from Jonathan Robertson	350.00	0.33	115.50	Billable
5/27/2015 92442 0	BrendanHamme Discussing case with intern to bring him up to speed	350.00	0.33	115.50	Billable
5/27/2015 92401 0	BrendanHamme Communications w/ team re letter on retaliation	350.00	0.33	115.50	Billable
5/27/2015 92429 0	BrendanHamme Call w/ WVDC inmate re update	350.00	0.33	115.50	Billable
6/1/2015 92458 0	BrendanHamme Call w/ M re coordinating intern assignments	350.00	0.33	115.50	Billable

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Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
		6/1/2015	0.33	115.50	Billable
	92464 0	BrendanHamme	350.00		
	Explaining work opportunity literature review assignment to Alex				
		6/2/2015	0.17	59.50	Billable
		BrendanHamme			
		350.00			
6/2/2015	BrendanHamme 92481 0	350.00	0.17	59.50	Billable
	Reading correspondence from putative class member				
6/4/2015	BrendanHamme 92503 0	350.00	0.33	115.50	Billable
	Call w/ M re agenda for team call and expert issues				
6/4/2015	BrendanHamme 92515 0	350.00	1.17	409.50	Billable
	Litigation team call re experts, next visits, retaliation, etc.				
6/8/2015	BrendanHamme 92538 0	350.00	0.33	115.50	Billable
	Reviewing New York City's Transgender Housing Unit specifications				
6/8/2015	BrendanHamme 92540 0	350.00	0.17	59.50	Billable
	Conversation w/ Lynn at WVDC				
6/8/2015	BrendanHamme 92543 0	350.00	0.17	59.50	Billable
	Discussing NYC THU research assignment				
6/16/2015	BrendanHamme 92603 0	350.00	0.33	115.50	Billable
	Reading Defendants' answer				
6/17/2015	BrendanHamme 92600 0	350.00	0.17	59.50	Billable
	Conversation w/ Lindsay re RFPs for individual docs				
6/17/2015	BrendanHamme 92604 0	350.00	0.33	115.50	Billable
	Call w/ Melissa re RFP for individual docs				
6/17/2015	BrendanHamme 92605 0	350.00	0.17	59.50	Billable
	Additional communications w/ Lindsay and Melissa re scope of RFP for individual docs				

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/22/2015 92679 0	BrendanHamme Communications w/ team re RFPs	350.00	0.33	115.50	Billable
6/23/2015 92671 0	BrendanHamme communications w/ team re RFP	350.00	0.33	115.50	Billable
6/24/2015 92667 0	BrendanHamme Call w Melissa and Lindsay re RFP for individual plaintiff docs	350.00	0.33	115.50	Billable
6/30/2015 92709 0	BrendanHamme Communications re next people to visit at WVDC	350.00	0.17	59.50	Billable
7/2/2015 92777 0	BrendanHamme Conversation w/ Dan McKibben re case status	350.00	0.33	115.50	Billable
7/15/2015 92797 0	BrendanHamme Conversation w/ Jonathan Robertson re conditions at WVDC	350.00	0.33	115.50	Billable
7/16/2015 92799 0	BrendanHamme Communications re Defendants' discovery requests	350.00	0.17	59.50	Billable
7/22/2015 92977 0	BrendanHamme Discovery review and document prep to prepare for WVDC visit	350.00	1.83	640.50	Billable
7/22/2015 92978 0	BrendanHamme WVDC client visit for updates and to explain discovery (54 min. travel to WVDC) (7 hr visiting clients) (48 min. travel from WVDC)	350.00	8.83	3,090.50	Billable
7/23/2015 92979 0	BrendanHamme Reviewing WVDC trip notes	350.00	0.17	59.50	Billable
7/28/2015 93012 0	BrendanHamme Call w/ Lynn re discovery requests	350.00	0.33	115.50	Billable
7/31/2015 93069 0	BrendanHamme Call w/ Jonathan Robertson re updates, lost property, etc.	350.00	0.17	59.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/31/2015 93070 0	BrendanHamme Communications w/ team re Jonathan Robert's property 'loss'	350.00	0.17	59.50	Billable
8/4/2015 93159 0	BrendanHamme Call w/ Jonathan Robertson re WVDC updates	350.00	0.33	115.50	Billable
8/6/2015 93198 0	BrendanHamme Legal team meeting re discovery and potential settlement discussions with Nathan	350.00	1.83	640.50	Billable
8/6/2015 93199 0	BrendanHamme Reading potential expert bios	350.00	0.33	115.50	Billable
8/7/2015 93200 0	BrendanHamme Began researching Cook County's separate housing program for transgender inmates	350.00	0.33	115.50	Billable
8/7/2015 93202 0	BrendanHamme Reviewing transgender housing policies in Harris, Denver and Cumberland County and communications re same	350.00	0.50	175.00	Billable
8/10/2015 93230 0	BrendanHamme Call w/ Jonathan Robertson	350.00	0.33	115.50	Billable
8/19/2015 93837 0	BrendanHamme Reviewing defendants' discovery responses and team communications re same (18 min.)	350.00	1.33	465.50	Billable
8/20/2015 93838 0	BrendanHamme Call w/ Lindsay re discovery responses	350.00	0.33	115.50	Billable
8/21/2015 93832 0	BrendanHamme Meeting w/ WVDC clients re discovery (4 hr 48 min.) (2 hr. travel there and back)	350.00	6.83	2,390.50	Billable
8/21/2015 93833 0	BrendanHamme Prep for WVDC visit re discovery	350.00	0.33	115.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/24/2015 93829 0	BrendanHamme Call w/ Melissa and Diana re WVDC visit, discovery next steps, experts, etc.	350.00	0.67	234.50	Billable
8/24/2015 93843 0	BrendanHamme Call w/ Jonathan Robertson	350.00	0.33	115.50	Billable
8/25/2015 93862 0	BrendanHamme Communications with Diana re Vargas discovery	350.00	0.17	59.50	Billable
8/27/2015 93881 0	BrendanHamme Call w/ Peter Guzman	350.00	0.17	59.50	Billable
8/27/2015 93882 0	BrendanHamme Communications w/ team re client contact	350.00	0.33	115.50	Billable
8/28/2015 93987 0	BrendanHamme Reviewing Vargas discovery response draft	350.00	1.00	350.00	Billable
9/14/2015 93985 0	BrendanHamme Communications re meet and confer w/ opposing counsel	350.00	0.33	115.50	Billable
9/14/2015 93989 0	BrendanHamme Reading meeting and confer letter to opposing counsel	350.00	0.33	115.50	Billable
9/16/2015 93999 0	BrendanHamme Communications w/ Melissa and Diana re Diana's visit	350.00	0.33	115.50	Billable
9/16/2015 94009 0	BrendanHamme Call w/ Diana and Melissa re discovery next steps	350.00	0.50	175.00	Billable
9/16/2015 94012 0	BrendanHamme Communications w/ team re expert outreach and meet and confer with opposing counsel	350.00	0.17	59.50	Billable
9/18/2015 94030 0	BrendanHamme Meet and confer w/ opposing counsel re discovery production (includes 1 hr travel each way)	350.00	3.33	1,165.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/18/2015 94031 0	BrendanHamme Debrief w/ Lindsay re meet and confer	350.00	0.33	115.50	Billable
9/18/2015 94032 0	BrendanHamme Reviewing notes from meet and confer, drafting letter to opposing counsel, and e-mailing Lindsay re same	350.00	0.83	290.50	Billable
9/21/2015 94071 0	BrendanHamme Call w/ Jonathan Robertson	350.00	0.33	115.50	Billable
9/21/2015 94072 0	BrendanHamme Communications w/ Diana re Jonathan	350.00	0.17	59.50	Billable
9/23/2015 94073 0	BrendanHamme Call w/ Jonathan Robertson	350.00	0.33	115.50	Billable
9/23/2015 94074 0	BrendanHamme Communication w/ team re Jonathan Robertson call	350.00	0.17	59.50	Billable
9/24/2015 94083 0	BrendanHamme Reviewing potential expert CV and e-mailing	350.00	0.33	115.50	Billable
9/25/2015 94101 0	BrendanHamme Mtg. w/ Diana re visit to WVDC	350.00	0.17	59.50	Billable
9/29/2015 94133 0	BrendanHamme Call w/ Melissa, Diana, and Lindsay re discovery and reply to Chris	350.00	1.50	525.00	Billable
9/29/2015 94134 0	BrendanHamme Call w/ Damien Liggins to give case update	350.00	0.17	59.50	Billable
9/30/2015 94148 0	BrendanHamme Drafting e-mail to opposing counsel re response to letter memorializing meet and confer	350.00	0.33	115.50	Billable
10/1/2015 94150 0	BrendanHamme Finalizing and sending e-mail to opposing counsel re response to letter memorializing meet and confer	350.00	0.17	59.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/14/2015	BrendanHamme 94270 0 communications w/ diana and m re supplemental responses	350.00	0.17	59.50	Billable
10/19/2015	BrendanHamme 94279 0 Editing and revising response to Defendants' RFPs	350.00	1.33	465.50	Billable
10/19/2015	BrendanHamme 94281 0 Call w/ jonathan Robertson	350.00	0.33	115.50	Billable
10/19/2015	BrendanHamme 94282 0 Follow up call w/ Jonathan Robertson	350.00	0.33	115.50	Billable
10/21/2015	BrendanHamme 94321 0 Meeting w/ Diana re RFPs	350.00	0.33	115.50	Billable
10/22/2015	BrendanHamme 94322 0 Continued work on RFPs	350.00	1.33	465.50	Billable
10/23/2015	BrendanHamme 94324 0 Final review of Vargas' RFP response	350.00	0.67	234.50	Billable
10/23/2015	BrendanHamme 94325 0 Call w/ Lindsay re RFPs	350.00	0.17	59.50	Billable
10/26/2015	BrendanHamme 94330 0 Reviewing Kennedy Rog response	350.00	0.33	115.50	Billable
10/26/2015	BrendanHamme 94331 0 Call w/ Diana, melissa, and Lindsay re RFPs and Rogs	350.00	0.67	234.50	Billable
10/26/2015	BrendanHamme 94333 0 Call w/ Diana re RFPs and next visit	350.00	1.17	409.50	Billable
10/26/2015	BrendanHamme 94334 0 Communications w/ team re Vargas RFPs	350.00	0.17	59.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/27/2015 94339 0	BrendanHamme Call w/ M, Tasha and Diana re finalizing and coordinating discovery responses	350.00	0.83	290.50	Billable
10/27/2015 94340 0	BrendanHamme Coordinating logistics for WVDC trip	350.00	0.33	115.50	Billable
10/27/2015 94347 0	BrendanHamme Call w/ Diana re RFPs and RFAs	350.00	0.17	59.50	Billable
10/28/2015 94349 0	BrendanHamme Reviewing RFAs for Price, Robertson and Kennedy	350.00	1.50	525.00	Billable
10/28/2015 94352 0	BrendanHamme Call w/ Diana and Tasha preparing for WVDC visit tomorrow and discovery process	350.00	1.67	584.50	Billable
10/28/2015 94354 0	BrendanHamme Reviewing RFPs for Price and Robertson	350.00	0.83	290.50	Billable
10/29/2015 94392 0	BrendanHamme Visiting clients at WVDC to discuss/review discovery (including 2.5 hrs travel time)	350.00	8.33	2,915.50	Billable
11/4/2015 94391 0	BrendanHamme Call re responding to D's discovery requests	350.00	1.00	350.00	Billable
11/4/2015 94393 0	BrendanHamme Trying to contact William Kennedy	350.00	0.17	59.50	Billable
11/5/2015 94402 0	BrendanHamme Call w/ Jonathan Robertson	350.00	0.33	115.50	Billable
11/5/2015 94404 0	BrendanHamme E-mail to Diana and melissa re call w/ Jonathan	350.00	0.17	59.50	Billable
11/9/2015 94419 0	BrendanHamme Convo w/ Diana re production & privilege log	350.00	0.50	175.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/9/2015	BrendanHamme 94420 0 Outreach to William Kennedy	350.00	0.17	59.50	Billable
11/9/2015	BrendanHamme 94422 0 Revising Price RFA	350.00	0.50	175.00	Billable
11/9/2015	BrendanHamme 94423 0 Reviewing letter to Lore Kennedy re brother	350.00	0.17	59.50	Billable
11/9/2015	BrendanHamme 94424 0 Revising Robertson RFAs	350.00	0.33	115.50	Billable
11/9/2015	BrendanHamme 94427 0 Revising Vargas RFAs.	350.00	0.33	115.50	Billable
11/9/2015	BrendanHamme 94428 0 Communications w/ team re RFAs.	350.00	0.17	59.50	Billable
11/9/2015	BrendanHamme 94429 0 Reviewing Defendants' supplementary responses to Pratt's RFPs and communication w/ team re same	350.00	0.33	115.50	Billable
11/10/2015	BrendanHamme 94438 0 Reviewing Vargas' additional documents for production	350.00	3.33	1,165.50	Billable
11/10/2015	BrendanHamme 94439 0 Call w/ Lindsay re discovery responses	350.00	0.50	175.00	Billable
11/11/2015	BrendanHamme 94444 0 Reviewing Robertson production	350.00	0.67	234.50	Billable
11/11/2015	BrendanHamme 94445 0 Communications w/ Diana re Rogs	350.00	0.33	115.50	Billable
11/12/2015	BrendanHamme 94442 0 Compiling and categorizing Robertson RFPs	350.00	1.67	584.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/12/2015	BrendanHamme 94443 0 Call w/ William Kennedy	350.00	0.17	59.50	Billable
11/12/2015	BrendanHamme 94446 0 Compiling and categorizing Vargas docs for RFPs	350.00	1.83	640.50	Billable
11/12/2015	BrendanHamme 94447 0 Communications w/ team re RFPs	350.00	0.33	115.50	Billable
11/13/2015	BrendanHamme 94453 0 Mtg w/ Diana re Kennedy discovery	350.00	0.33	115.50	Billable
11/16/2015	BrendanHamme 94460 0 Team call re discovery, Vargas, and Robertson	350.00	1.00	350.00	Billable
11/16/2015	BrendanHamme 94464 0 Preparing for Kennedy discovery call w/ Diana	350.00	0.17	59.50	Billable
11/17/2015	BrendanHamme 94478 0 Responding to Lindsay re production and privilege log	350.00	0.33	115.50	Billable
11/17/2015	BrendanHamme 94479 0 Communications w/ ACLU team re additional plaintiffs	350.00	0.33	115.50	Billable
11/17/2015	BrendanHamme 94485 0 Finalizing RFAs for Price, Robertson and Vargas	350.00	1.33	465.50	Billable
11/17/2015	BrendanHamme 94486 0 Communications w/ firm and team re additional injunctive relief plaintiffs	350.00	0.33	115.50	Billable
11/17/2015	BrendanHamme 94487 0 11th Amendment research	350.00	0.33	115.50	Billable
11/18/2015	BrendanHamme 94489 0 Review of Jesse letter and communications w/ Lindsay re same	350.00	0.33	115.50	Billable
11/18/2015	BrendanHamme 94491 0 Call w/ Lindsay re RFPs	350.00	0.33	115.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/18/2015 94496 0	BrendanHamme Reviewing initial disclosures for documents re RFP 40	350.00	0.67	234.50	Billable
11/18/2015 94490 0	BrendanHamme	350.00	1.17	409.50	Billable
11/19/2015 94503 0	BrendanHamme Call w/ William Kennedy re rogs	350.00	1.00	350.00	Billable
11/19/2015 94504 0	BrendanHamme Team call re defendants' production and next steps	350.00	0.33	115.50	Billable
11/19/2015 94505 0	BrendanHamme Finalizing Price RFP	350.00	1.00	350.00	Billable
11/19/2015 94506 0	BrendanHamme Finalizing Robertson RFPs	350.00	0.83	290.50	Billable
11/19/2015 94509 0	BrendanHamme Finalizing Vargas' RFPs	350.00	0.83	290.50	Billable
11/19/2015 94513 0	BrendanHamme Communications w/ team re RFPs	350.00	0.33	115.50	Billable
11/30/2015 94537 0	BrendanHamme Team call	350.00	0.83	290.50	Billable
12/2/2015 94564 0	BrendanHamme Call w/ diana re discovery, visiting WVDC	350.00	0.50	175.00	Billable
12/2/2015 94565 0	BrendanHamme Call w/ William Kennedy re discovery	350.00	0.17	59.50	Billable
12/2/2015 94566 0	BrendanHamme Call w/ Veronica re discovery	350.00	0.17	59.50	Billable
12/4/2015 94563 0	BrendanHamme Mtg w/ inmates at WVDC (includes 2 hr. 18 min. travel to facility and back)	350.00	9.00	3,150.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/4/2015 94569 0	BrendanHamme Reviewing discovery responses w/ William Kennedy	350.00	0.83	290.50	Billable
12/8/2015 94575 0	BrendanHamme Working on notes from WVDC trip for co-counsel	350.00	0.50	175.00	Billable
12/8/2015 94576 0	BrendanHamme Reviewing RFA responses with Kennedy	350.00	0.17	59.50	Billable
12/9/2015 94586 0	BrendanHamme Meeting w/ Veronica Pratt re discovery and general interviewing re experience at WVDC (includes 4 hr. 15 min. travel to San Bernardino and back)	350.00	9.83	3,440.50	Billable
12/10/2015 94583 0	BrendanHamme Team call	350.00	0.83	290.50	Billable
12/15/2015 94607 0	BrendanHamme Review of and communications re Pratt RFAs.	350.00	0.33	115.50	Billable
12/15/2015 94609 0	BrendanHamme Call w/ Chris & Lindsay re discovery	350.00	0.83	290.50	Billable
12/15/2015 94610 0	BrendanHamme Call w/ William Kennedy re discovery	350.00	0.17	59.50	Billable
12/15/2015 94612 0	BrendanHamme Communications re Pratt RFAs	350.00	0.17	59.50	Billable
12/16/2015 94617 0	BrendanHamme Call w/ Kennedy re RFAs	350.00	0.83	290.50	Billable
12/16/2015 94618 0	BrendanHamme Trip to WVDC (includes 2 hr. 6 min. travel time)	350.00	3.33	1,165.50	Billable
12/16/2015 94620 0	BrendanHamme Finalizing Pratt RFAs	350.00	0.33	115.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/16/2015 94621 0	BrendanHamme Finalizing Pratt RFPs	350.00	0.50	175.00	Billable
12/16/2015 94624 0	BrendanHamme Finalizing Kennedy RFAs	350.00	0.50	175.00	Billable
12/16/2015 94625 0	BrendanHamme Finalizing Kennedy RFPs	350.00	0.33	115.50	Billable
1/5/2016 94658 0	BrendanHamme Call w/ WVDC inmate re lockdown	420.00	0.17	71.40	Billable
1/5/2016 94659 0	BrendanHamme Communications w/ team re lockdown	420.00	0.17	71.40	Billable
1/7/2016 94690 0	BrendanHamme Team call re discovery, experts, next steps, etc.	420.00	0.83	348.60	Billable
1/7/2016 94692 0	BrendanHamme reviewing draft stipulation and order re briefing schedule	420.00	0.17	71.40	Billable
1/8/2016 94689 0	BrendanHamme Meeting w/ inmates at WVDC for conditions update (includes 2 hr. 18 min. travel time)	420.00	6.17	2,591.40	Billable
1/14/2016 95417 0	BrendanHamme Document production review	420.00	1.83	768.60	Billable
1/14/2016 95418 0	BrendanHamme Call w/ Jonathan Robertson	420.00	0.33	138.60	Billable
1/14/2016 95425 0	BrendanHamme Call w/ M, TH, DG, and NA re ACLU approach to depositions	420.00	0.67	281.40	Billable
1/15/2016 95441 0	BrendanHamme Updates to team from Jan. 8th visit to WVDC	420.00	0.50	210.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/19/2016 95459 0	BrendanHamme Discovery review	420.00	0.33	138.60	Billable
1/21/2016 95474 0	BrendanHamme Document review	420.00	1.67	701.40	Billable
1/21/2016 95475 0	BrendanHamme Team call re doc review and next steps	420.00	1.00	420.00	Billable
2/1/2016 95560 0	BrendanHamme Call w/ Lynn Price	420.00	0.33	138.60	Billable
2/1/2016 95565 0	BrendanHamme Reading correspondence from inmate	420.00	0.33	138.60	Billable
2/1/2016 95566 0	BrendanHamme Communications w/ cocounsel re letter from inmate and conversation w/ Lynn	420.00	0.17	71.40	Billable
2/2/2016 95575 0	BrendanHamme Informational privacy research, write up, and communication to ACLU team	420.00	0.83	348.60	Billable
2/4/2016 95579 0	BrendanHamme Team call re site inspection, privacy cause of action and amendment, settlement negotiations, <i>discovery, etc.</i>	420.00	0.83	348.60	Billable
2/23/2016 95681 0	BrendanHamme Call w/ Jonathan Robertson	420.00	0.67	281.40	Billable
3/10/2016 95773 0	BrendanHamme Call re experts, site visits, etc.	420.00	0.83	348.60	Billable
3/11/2016 95776 0	BrendanHamme Call w/ Lynn Price	420.00	0.33	138.60	Billable
3/11/2016 95777 0	BrendanHamme Updating team re call w/ Lynn	420.00	0.17	71.40	Billable

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Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/17/2016 95804 0	BrendanHamme Team call	420.00	0.67	281.40	Billable
3/21/2016 95823 0	BrendanHamme Call w/ potential expert	420.00	0.83	348.60	Billable
3/24/2016 95839 0	BrendanHamme Reading PREA Resource Center report	420.00	0.67	281.40	Billable
3/28/2016 95859 0	BrendanHamme Team call re expert meeting, 26(f) report, etc.	420.00	0.50	210.00	Billable
3/30/2016 95941 0	BrendanHamme Team call w/ potential expert	420.00	0.83	348.60	Billable
3/30/2016 95943 0	BrendanHamme Post expert call debrief w/ Lindsay and Melissa	420.00	0.33	138.60	Billable
4/5/2016 95960 0	BrendanHamme Call w/ Melissa re WVDC discovery	420.00	0.33	138.60	Billable
4/10/2016 95976 0	BrendanHamme Reviewing and cataloguing discovery- work and programming policy docs	420.00	5.17	2,171.40	Billable
4/11/2016 95977 0	BrendanHamme Reading Joint 26(f) report and scheduling order to prepare for scheduling conference	420.00	0.33	138.60	Billable
4/11/2016 96039 0	BrendanHamme Scheduling conference (includes 2 hr. 12 min. travel+ 30 min waiting)	420.00	3.00	1,260.00	Billable
4/11/2016 96040 0	BrendanHamme Talk to Dave McClane re Nate's e-mail	420.00	0.33	138.60	Billable
4/12/2016 96041 0	BrendanHamme Continued cataloguing defendant's production re work policies	420.00	4.83	2,028.60	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/12/2016 96042 0	BrendanHamme Team call re preparing for meeting w/ opposing counsel	420.00	1.50	630.00	Billable
4/12/2016 96044 0	BrendanHamme Continued review of work policy documents	420.00	1.83	768.60	Billable
4/12/2016 96045 0	BrendanHamme Summarizing notes re work policies for team	420.00	0.67	281.40	Billable
4/12/2016 96046 0	BrendanHamme Reviewing and commenting on notes/agenda for mtg w/ opposing counsel	420.00	0.50	210.00	Billable
4/13/2016 96056 0	BrendanHamme Meeting w/ opposing counsel (includes 1 hr. 54 min. travel time)	420.00	4.33	1,818.60	Billable
4/13/2016 96057 0	BrendanHamme Post meeting debrief and discussion of next steps with team	420.00	1.33	558.60	Billable
4/18/2016 96078 0	BrendanHamme Team call re amendment, site inspection, deadlines, meet and confer, etc.	420.00	0.50	210.00	Billable
4/25/2016 96152 0	BrendanHamme Call w/ Diana re Wednesday trip, attorney letter, and booking jackets	420.00	0.17	71.40	Billable
4/25/2016 96155 0	BrendanHamme Reading summary of booking jacket review	420.00	0.17	71.40	Billable
4/27/2016 96217 0	BrendanHamme At WVDC interviewing inmates (includes 2 hr. 30 min. travel)	420.00	9.33	3,918.60	Billable
5/4/2016 96270 0	BrendanHamme Reviewing notes from WVDC visit for circulation to team	420.00	0.33	138.60	Billable
5/5/2016 96282 0	BrendanHamme Conversation w/ Jonathan Robertson	420.00	0.33	138.60	Billable
5/12/2016 96320 0	BrendanHamme Team call	420.00	0.50	210.00	Billable

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Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/12/2016	BrendanHamme 96321 0 Reviewing melissa's notes on religion and classification	420.00	0.33	138.60	Billable
5/17/2016	BrendanHamme 96365 0 Call w/ Jonathan Robertson	420.00	0.33	138.60	Billable
5/17/2016	BrendanHamme 96366 0 Reviewing and commenting on draft e-mail to opposing counsel	420.00	0.33	138.60	Billable
5/17/2016	BrendanHamme 96367 0 Call w/ Lynn Price	420.00	0.33	138.60	Billable
5/23/2016	BrendanHamme 96418 0 Communications re site inspection	420.00	0.33	138.60	Billable
5/23/2016	BrendanHamme 96426 0 Reviewing e-mail production	420.00	1.50	630.00	Billable
5/24/2016	BrendanHamme 96430 0 Call w/ Lynn	420.00	0.17	71.40	Billable
5/24/2016	BrendanHamme 96442 0 Team call to prepare for site inspection	420.00	2.50	1,050.00	Billable
6/1/2016	BrendanHamme 96469 0 Call w/ David Lake	420.00	0.33	138.60	Billable
6/1/2016	BrendanHamme 96470 0 Explaining PRA background to David	420.00	0.33	138.60	Billable
6/2/2016	BrendanHamme 96473 0 Review of summary of recordings of interviews with plaintiffs and discussion w/ intern re same and areas for follow up	420.00	1.17	491.40	Billable
6/7/2016	BrendanHamme 96490 0 Reviewing e-mail production	420.00	0.67	281.40	Billable

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Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/8/2016 96495 0	BrendanHamme Conversation w/ Lynn Price re GHRC	420.00	0.33	138.60	Billable
6/8/2016 96498 0	BrendanHamme Communications re intern visits to WVDC	420.00	0.17	71.40	Billable
6/8/2016 96500 0	BrendanHamme Reviewing e-mail production	420.00	2.33	978.60	Billable
6/9/2016 96506 0	BrendanHamme Team call to prepare for call with Nate	420.00	0.83	348.60	Billable
6/9/2016 96507 0	BrendanHamme Call w/ Nate re list of questions	420.00	1.00	420.00	Billable
6/14/2016 96525 0	BrendanHamme Reading correspondence from inmate and communicating with team re same	420.00	0.33	138.60	Billable
6/14/2016 96526 0	BrendanHamme Reviewing intern notes on audio recordings produced	420.00	0.67	281.40	Billable
6/15/2016 96527 0	BrendanHamme Reviewing Harris County policy	420.00	0.33	138.60	Billable
6/22/2016 96548 0	BrendanHamme GHRC Site Inspection (includes 2 hr. 54 min. travel)	420.00	4.50	1,890.00	Billable
6/23/2016 96551 0	BrendanHamme Team call debriefing GHRC site inspection	420.00	1.33	558.60	Billable
6/27/2016 96563 0	BrendanHamme Team call to prep for tomorrow's meeting with opposing counsel	420.00	1.33	558.60	Billable
6/28/2016 96580 0	BrendanHamme Settlement discussion with opposing counsel (includes 2 hr. travel)	420.00	5.00	2,100.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/28/2016 96581 0	BrendanHamme Pre-meeting discussion w/ team	420.00	0.33	138.60	Billable
6/29/2016 96583 0	BrendanHamme Reviewing and commenting on questionnaire	420.00	0.33	138.60	Billable
6/30/2016 96591 0	BrendanHamme Call w/ Lynn	420.00	0.50	210.00	Billable
6/30/2016 96592 0	BrendanHamme Reviewing and providing feedback on communications w/ opposing counsel	420.00	0.17	71.40	Billable
7/7/2016 96603 0	BrendanHamme ACLU team call re next steps and roles	420.00	0.83	348.60	Billable
7/7/2016 96604 0	BrendanHamme Reading and analysis of Judge's order re dismissal without leave to amend 815.6 claim	420.00	0.33	138.60	Billable
7/12/2016 96636 0	BrendanHamme Reviewing updated questionnaire	420.00	0.17	71.40	Billable
7/13/2016 96649 0	BrendanHamme Prep call for meeting with opposing counsel re discovery/settlement	420.00	0.50	210.00	Billable
7/14/2016 96660 0	BrendanHamme Reviewing interview recordings	420.00	0.33	138.60	Billable
7/25/2016 96713 0	BrendanHamme Call w/ Lynn	420.00	0.17	71.40	Billable
7/27/2016 96714 0	BrendanHamme Reviewing intern summary of audio recorded interviews (12 min.) and communicating re same with team	420.00	0.50	210.00	Billable
7/27/2016 96719 0	BrendanHamme Call w/ M re mediation brief	420.00	0.33	138.60	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/11/2016	BrendanHamme 96887 0 Drafting mediation brief (including 48 min. of additional equal protection research)	420.00	3.33	1,398.60	Billable
8/11/2016	BrendanHamme 96888 0 Communications w/ M re EPC mediation brief draft	420.00	0.17	71.40	Billable
8/12/2016	BrendanHamme 96900 0 Communications w/ M re mediation brief	420.00	0.33	138.60	Billable
8/18/2016	BrendanHamme 96924 0 Call w/ Jeanne Woodford and team re mediation	420.00	0.83	348.60	Billable
8/25/2016	BrendanHamme 96981 0 Working on EPC section of mediation brief	420.00	2.33	978.60	Billable
8/26/2016	BrendanHamme 96990 0 Work on mediation brief	420.00	3.17	1,331.40	Billable
8/26/2016	BrendanHamme 96993 0 Conversation w/ Tasha re facts section of mediation brief	420.00	0.33	138.60	Billable
8/27/2016	BrendanHamme 96995 0 Reviewing time out of cell and religion fact summaries	420.00	0.17	71.40	Billable
8/27/2016	BrendanHamme 96996 0 Drafting work portion of fact section for mediation brief	420.00	1.83	768.60	Billable
8/29/2016	BrendanHamme 97049 0 Revising EPC section of mediation brief	420.00	1.33	558.60	Billable
8/29/2016	BrendanHamme 97055 0 Responding to comments and edits on mediation brief	420.00	0.67	281.40	Billable
8/29/2016	BrendanHamme 97058 0 Call w/ M re finalizing brief	420.00	0.33	138.60	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/29/2016 97059 0	BrendanHamme Finalizing draft EPC section of brief to send to team for review	420.00	0.33	138.60	Billable
8/30/2016 97067 0	BrendanHamme Communications w/ Lynn- updating on case	420.00	0.33	138.60	Billable
8/30/2016 97068 0	BrendanHamme Reviewing files for Brett Carpenter and communications with him re case and current whereabouts	420.00	0.33	138.60	Billable
9/7/2016 97083 0	BrendanHamme Reviewing, editing, and commenting on mediation brief	420.00	1.00	420.00	Billable
9/12/2016 97186 0	BrendanHamme Mediation session (includes 2 hr 12 min travel)	420.00	6.33	2,658.60	Billable
10/3/2016 97185 0	BrendanHamme Reviewing e-mails	420.00	0.33	138.60	Billable
10/20/2016 97220 0	BrendanHamme Call w/ mediator re discovery	420.00	0.17	71.40	Billable
10/20/2016 97221 0	BrendanHamme Team communications re discovery produced	420.00	0.33	138.60	Billable
10/26/2016 97276 0	BrendanHamme Team call prepping for mediation and discussing most recent discovery	420.00	0.50	210.00	Billable
10/27/2016 97281 0	BrendanHamme Mediation call (including 10 min. discussion w/ Woerhle)	420.00	0.83	348.60	Billable
10/31/2016 97305 0	BrendanHamme Reading update re conditions at WVDC	420.00	0.17	71.40	Billable
11/2/2016 97310 0	BrendanHamme Call w/ Diana re WVDC visit	420.00	0.17	71.40	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/2/2016 97319 0	BrendanHamme Reviewing and suggesting edits/additions to e-mail to Nate	420.00	0.33	138.60	Billable
11/2/2016 97309 0	BrendanHamme Call w/ inmates at WVDC	420.00	0.33	138.60	Billable
11/4/2016 97348 0	BrendanHamme Mtg w/ clients and inmates at WVDC (includes 3 hr. 18 min travel back and forth)	420.00	8.17	3,431.40	Billable
11/7/2016 97342 0	BrendanHamme Call w/ Veronica	420.00	0.17	71.40	Billable
11/10/2016 97376 0	BrendanHamme Call w/ Lynn	420.00	0.33	138.60	Billable
11/16/2016 97531 0	BrendanHamme Call w/ John Harrington re religious diet and services issue	420.00	0.33	138.60	Billable
11/16/2016 97532 0	BrendanHamme Communications w/ team re Harrington, Hubbard, Blanco and Porter	420.00	0.33	138.60	Billable
11/16/2016 97535 0	BrendanHamme Watching inmate reception video	420.00	0.50	210.00	Billable
11/21/2016 97551 0	BrendanHamme Reviewing notes from WVDC trip	420.00	0.33	138.60	Billable
11/22/2016 97561 0	BrendanHamme Reviewing Nate's letter re PREA, classification, etc. and communications w/ team re same (6 min.)	420.00	0.33	138.60	Billable
11/22/2016 97562 0	BrendanHamme Call w/ Woerle, Nate, Dave, and Lindsay	420.00	0.33	138.60	Billable
11/22/2016 97567 0	BrendanHamme Communications w/ team re follow up w/ Nate	420.00	0.17	71.40	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/28/2016	BrendanHamme 97588 0 Drafting letter to opposing counsel	420.00	0.83	348.60	Billable
11/29/2016	BrendanHamme 97601 0 Call w/ Afoa re issues in ALT	420.00	0.33	138.60	Billable
11/29/2016	BrendanHamme 97604 0 Reading inmate grievance, appeals and responses	420.00	0.17	71.40	Billable
11/29/2016	BrendanHamme 97605 0 Communications w/ team re inmate grievance, appeals and responses	420.00	0.17	71.40	Billable
11/29/2016	BrendanHamme 97607 0 Communications w/ team re Afoa call	420.00	0.17	71.40	Billable
11/30/2016	BrendanHamme 97612 0 Team call re settlement proposals	420.00	1.67	701.40	Billable
12/7/2016	BrendanHamme 97639 0 Drafting work policy section of settlement proposal	420.00	1.17	491.40	Billable
12/8/2016	BrendanHamme 97650 0 Reviewing settlement proposal re time out of cell, lockdowns, etc.	420.00	0.33	138.60	Billable
12/8/2016	BrendanHamme 97651 0 team communications re settlement proposals	420.00	0.17	71.40	Billable
12/8/2016	BrendanHamme 97657 0 Team call re settlement proposals	420.00	1.50	630.00	Billable
12/8/2016	BrendanHamme 97658 0 Reviewing and commenting on education policy proposal	420.00	0.33	138.60	Billable
12/14/2016	BrendanHamme 97669 0 Reviewing letter from Nate, analyzing and summarizing for team	420.00	0.33	138.60	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/15/2016 98775 0	BrendanHamme Attending mediation (7 hrs.), travel to mediation (42 min.), travel back from mediation (2 hr. 12 min.-- try driving to Long Beach in LA traffic in the rain)	420.00	10.00	4,200.00	Billable
1/17/2017 98849 0	BrendanHamme Mtg re settlement negotiations (3 hr. 18 min.) (+54 min. drive there) (+48 min. drive back)	450.00	5.00	2,250.00	Billable
1/24/2017 98880 0	BrendanHamme Communications re ALT conditions	450.00	0.33	148.50	Billable
1/26/2017 98890 0	BrendanHamme e-mails with team re rescheduling settlement negotiation and pre-planning conference call	450.00	0.33	148.50	Billable
1/27/2017 98894 0	BrendanHamme Team call prepping for next settlement negotiation	450.00	1.17	526.50	Billable
1/27/2017 98897 0	BrendanHamme Communications w/ Luis re community liaison and religious orgs	450.00	0.33	148.50	Billable
1/29/2017 98903 0	BrendanHamme Team communications re e-mail to nate	450.00	0.17	76.50	Billable
1/29/2017 98905 0	BrendanHamme Communications re prea community liaison	450.00	0.17	76.50	Billable
1/29/2017 98906 0	BrendanHamme Communications re visiting plaintiffs and work proposals	450.00	0.17	76.50	Billable
2/2/2017 98916 0	BrendanHamme Reading inmate communications and corresponding with team re same	450.00	0.33	148.50	Billable
2/7/2017 98949 0	BrendanHamme E-mail communications w/ team re mtg w/ plaintiffs and site visit	450.00	0.33	148.50	Billable
2/8/2017 98950 0	BrendanHamme Call w/ Lynn re meeting and updates	450.00	0.33	148.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/9/2017 98953 0	BrendanHamme Communications w/ firm re client mtg	450.00	0.17	76.50	Billable
2/13/2017 98956 0	BrendanHamme Call w/ Tasha re plaintiff call	450.00	0.33	148.50	Billable
2/14/2017 99138 0	BrendanHamme Settlement mtg - 3 hr 36 min. (includes 2 hr. 36 min. travel there and back)	450.00	6.33	2,848.50	Billable
2/15/2017 98971 0	BrendanHamme Team call re settlement negotiations	450.00	0.83	373.50	Billable
2/16/2017 99031 0	BrendanHamme Communications w/ expert re request	450.00	0.17	76.50	Billable
2/22/2017 99222 0	BrendanHamme Call w/ expert and Dave re programming accommodations and e-mails re same (6 min.)	450.00	0.83	373.50	Billable
2/27/2017 99237 0	BrendanHamme Call w/ Luis re religious service providers and community advocates for PREA committee	450.00	0.50	225.00	Billable
2/27/2017 99238 0	BrendanHamme Call w/ Ami Davis re PREA committee	450.00	0.33	148.50	Billable
3/8/2017 99261 0	BrendanHamme Team call re next settlement negotiation	450.00	1.50	675.00	Billable
3/13/2017 99271 0	BrendanHamme Reviewing settlement proposal doc	450.00	0.67	301.50	Billable
4/4/2017 99338 0	BrendanHamme Call w/ Veronica re settlement, conditions, visits, etc.	450.00	0.50	225.00	Billable
4/5/2017 99339 0	BrendanHamme Communications w/ team re veronica call	450.00	0.33	148.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/7/2017 99392 0	BrendanHamme Call w/ Veronica and communications w/ team re same	450.00	0.50	225.00	Billable
4/11/2017 99400 0	BrendanHamme Call w/ veronica and otis	450.00	0.50	225.00	Billable
4/12/2017 99403 0	BrendanHamme Settlement negotiation (2 hr 30 min.) (+6 min debrief w/ team) (+2 hr 36 min. travel)	450.00	5.33	2,398.50	Billable
4/18/2017 99425 0	BrendanHamme Conversation w/ Otis Hubbard and Veronica (and communications w/ team re same)	450.00	0.67	301.50	Billable
5/30/2017 99571 0	BrendanHamme Communications w/ team re visit tomorrow	450.00	0.33	148.50	Billable
5/30/2017 99572 0	BrendanHamme Checking custody status	450.00	0.17	76.50	Billable
6/5/2017 99591 0	BrendanHamme Drafting letter to Jonathan Robertson	450.00	0.33	148.50	Billable
7/24/2017 99886 0	BrendanHamme Call w/ Lynn	450.00	0.17	76.50	Billable
9/14/2017 100103 0	BrendanHamme Reading and communicating w/ team re other WVDC settlement	450.00	0.17	76.50	Billable
9/14/2017 100106 0	BrendanHamme Team call re call w/ Nate	450.00	1.50	675.00	Billable
10/20/2017 100223 0	BrendanHamme Communications w/ team re Dan McKibben	450.00	0.33	148.50	Billable
10/25/2017 100242 0	BrendanHamme Reading correspondence re notice of death of client	450.00	0.17	76.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/25/2017 100243 0	BrendanHamme Reading deposition notices and communications w/ co-counsel re same	450.00	0.17	76.50	Billable
10/30/2017 100264 0	BrendanHamme Call w/ Lynn re developments	450.00	0.33	148.50	Billable
11/3/2017 100273 0	BrendanHamme Communications with ACLU team re subpoenas	450.00	0.17	76.50	Billable
11/8/2017 100320 0	BrendanHamme Team re finding plaintiffs, mediator call, and discovery	450.00	0.67	301.50	Billable
11/9/2017 100327 0	BrendanHamme call w/ amanda re depo prep	450.00	0.50	225.00	Billable
11/15/2017 100385 0	BrendanHamme Team call re discovery, EPC re transgender people, settlement negotiations, etc.	450.00	0.83	373.50	Billable
11/30/2017 100418 0	BrendanHamme Team call re depositions, vargas, etc.	450.00	0.33	148.50	Billable
11/30/2017 100419 0	BrendanHamme Mtg follow up call w/ Amanda	450.00	0.17	76.50	Billable
12/4/2017 100434 0	BrendanHamme Call re deposition scheduling	450.00	0.50	225.00	Billable
12/4/2017 100437 0	BrendanHamme Call w/ Amanda re depos	450.00	0.17	76.50	Billable
12/6/2017 100456 0	BrendanHamme Team call re discovery, depositions, etc.	450.00	0.83	373.50	Billable
12/22/2017 100579 0	BrendanHamme Communications w/ michelle re depo binders	450.00	0.33	148.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/10/2018 100630 0	BrendanHamme call w/ amanda re k6g	480.00	0.50	240.00	Billable
1/10/2018 100631 0	BrendanHamme team call re discovery, depositions, etc.	480.00	1.17	561.60	Billable
1/23/2018 100709 0	BrendanHamme team call re new calendar	480.00	0.33	158.40	Billable
1/24/2018 100730 0	BrendanHamme Team call re depositions	480.00	0.50	240.00	Billable
1/24/2018 100731 0	BrendanHamme Post call ACLU team discussion of handling of depos	480.00	0.33	158.40	Billable
1/24/2018 100733 0	BrendanHamme team communications re depos	480.00	0.17	81.60	Billable
1/31/2018 100810 0	BrendanHamme Team call re depositions and meet and confer	480.00	0.33	158.40	Billable
2/6/2018 100840 0	BrendanHamme Call w/ Nate and Lindsay re discovery	480.00	0.33	158.40	Billable
2/20/2018 100921 0	BrendanHamme communications w Diana and team re fees	450.00	0.17	76.50	Billable
2/21/2018 100946 0	BrendanHamme Team call re mediator's proposal and discovery	450.00	1.33	598.50	Billable
3/21/2018 101077 0	BrendanHamme Team call	450.00	1.33	598.50	Billable
3/23/2018 101081 0	BrendanHamme Communications re seeking client approval for settlement	450.00	0.33	148.50	Billable
3/23/2018 101086 0	BrendanHamme Call w/ Aditi and Amanda re class rep notice, stip, etc.	450.00	0.67	301.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/12/2018 101267 0	BrendanHamme Call w/ Lynn Price	450.00	0.33	148.50	Billable
4/23/2018 101322 0	BrendanHamme Mtg w/ Lynn re settlement, declaration (includes 48 min. travel to Ontario and 1 hr. 18 min. travel back)	450.00	3.33	1,498.50	Billable
5/2/2018 101356 0	BrendanHamme Team meeting re media on settlement	450.00	0.50	225.00	Billable
5/7/2018 101377 0	BrendanHamme team call re comms, vargas' concern, class rep decs	450.00	0.33	148.50	Billable
5/11/2018 101403 0	BrendanHamme Editing MG's dec in support of class cert (includes 12 min. conversation Amanda) w/	450.00	0.50	225.00	Billable
5/11/2018 101406 0	BrendanHamme Editing class cert motion (including identifying sentenced plaintiffs eligible forwork)	450.00	1.00	450.00	Billable
5/11/2018 101407 0	BrendanHamme Editing motion for preliminary approval	450.00	0.33	148.50	Billable
5/16/2018 101428 0	BrendanHamme Additional review of class cert motion	450.00	0.33	148.50	Billable
5/17/2018 101431 0	BrendanHamme Revising work section of class cert memo and communications w/ team re same	450.00	0.33	148.50	Billable
5/21/2018 101451 0	BrendanHamme Call w/ Lynn Price re media and settlement	450.00	0.17	76.50	Billable
5/21/2018 101452 0	BrendanHamme Call w/ Peter Guzman re media and settlement	450.00	0.50	225.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/21/2018 101453 0	BrendanHamme Attempted contact w/ Timothy Walker (voicemail, checking last booking number, and e-mail)	450.00	0.33	148.50	Billable
5/23/2018 101454 0	BrendanHamme Communications w/ Amanda and Melissa re client media reps	450.00	0.33	148.50	Billable
6/11/2018 101493 0	BrendanHamme Brainstorming quotes for Veronica for press release and communications w/ Amanda re same	450.00	0.33	148.50	Billable
7/13/2018 101627 0	BrendanHamme Reading intern cy pres memo (18 min.) and communications w/ aclu team re same (6 min)	450.00	0.50	225.00	Billable
7/17/2018 101637 0	BrendanHamme Call re media, cy pres, settlement negotiations	450.00	0.83	373.50	Billable
7/17/2018 101639 0	BrendanHamme Communications w/ team re cy pres and media	450.00	0.17	76.50	Billable
7/23/2018 101753 0	BrendanHamme Reviewing and revising draft talking points for media on settlement	450.00	0.33	148.50	Billable
7/24/2018 101754 0	BrendanHamme Call w/ ACLU comms folks re media	450.00	0.50	225.00	Billable
7/25/2018 101898 0	BrendanHamme Review of and communications re settlement talking points	450.00	0.33	148.50	Billable
7/31/2018 101925 0	BrendanHamme Call w/ Peter Guzman re media	450.00	0.33	148.50	Billable
8/8/2018 101951 0	BrendanHamme call w/ Lynn re media	450.00	0.33	148.50	Billable
8/8/2018 101952 0	BrendanHamme communications w/ Peter re media	450.00	0.17	76.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/10/2018	BrendanHamme 101955 0 Communications w/ comms re client prep	450.00	0.17	76.50	Billable
8/10/2018	BrendanHamme 101956 0 Call w/ Veronica Pratt re media	450.00	0.17	76.50	Billable
8/13/2018	BrendanHamme 101959 0 Revising draft press release and communications w/ plaintiffs re same/media	450.00	0.67	301.50	Billable
8/14/2018	BrendanHamme 101969 0 Prep w/ Veronica	450.00	0.50	225.00	Billable
8/14/2018	BrendanHamme 101962 0 Call w/ Lynn and comms folks and debrief with comms (6 min.)	450.00	0.50	225.00	Billable
8/14/2018	BrendanHamme 101963 0 Additional preparation with Lynn	450.00	0.83	373.50	Billable
8/14/2018	BrendanHamme 101964 0 communications w/ other spokespeople	450.00	0.17	76.50	Billable
8/14/2018	BrendanHamme 101965 0 Additional work on press release	450.00	0.33	148.50	Billable
8/15/2018	BrendanHamme 101970 0 communications re release	450.00	0.33	148.50	Billable
Total: Brendan Hamme			606.09		\$228,216.50
Do Not Bill			0.51	\$174.99	
Timekeeper: Diana Gonzalez					
8/21/2015	DianaGonzalez 95520 0 Visit to WVDC with BH - meeting with Plaintiffs	170.00	8.00	1,360.00	Billable
8/21/2015	DianaGonzalez 93856 0 Reviewed discovery with clients at West Valley Detention Center	170.00	4.83	821.10	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/21/2015 93857 0	DianaGonzalez Travel time to and from West Valley Detention Center to review discovery with clients	170.00	2.00	340.00	Billable
8/25/2015 93867 0	DianaGonzalez Worked on drafting discovery responses	170.00	4.00	680.00	Billable
8/26/2015 93868 0	DianaGonzalez Continued working on drafting discovery responses	170.00	6.00	1,020.00	Billable
9/4/2015 93962 0	DianaGonzalez Continued drafting discovery responses for set one	170.00	5.00	850.00	Billable
9/8/2015 93963 0	DianaGonzalez Edited discovery after MG's edits	170.00	2.50	425.00	Billable
9/9/2015 93965 0	DianaGonzalez Continued editing discovery after MG's edits	170.00	2.00	340.00	Billable
9/14/2015 95521 0	DianaGonzalez Visit to WVDC - meeting with Plaintiffs to review discovery responses	170.00	8.00	1,360.00	Billable
9/25/2015 95522 0	DianaGonzalez Visit to WVDC - meeting with Plaintiffs to review discovery	170.00	8.00	1,360.00	Billable
9/25/2015 94136 0	DianaGonzalez Reviewing discovery with clients at West Valley Detention Center	170.00	9.00	1,530.00	Billable
9/25/2015 94173 0	DianaGonzalez Reviewing discovery with clients at West Valley Detention Center	170.00	9.00	1,530.00	Billable
9/29/2015 94135 0	DianaGonzalez Meeting with MG, BH, LB discussing discovery	170.00	1.50	255.00	Billable
9/30/2015 94174 0	DianaGonzalez Editing plaintiffs' discovery responses for set one	170.00	2.50	425.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/1/2015	DianaGonzalez 94175 0 Continued editing plaintiffs' discovery responses for set one	170.00	4.50	765.00	Billable
10/8/2015	DianaGonzalez 94215 0 Drafting discovery (ROGS) and reviewing doc prod	170.00	1.00	170.00	Billable
10/16/2015	DianaGonzalez 95503 0 Drafting discovery - interrogatories	170.00	2.00	340.00	Billable
10/22/2015	DianaGonzalez 95504 0 Continued drafting discovery responses	170.00	6.00	1,020.00	Billable
10/23/2015	DianaGonzalez 95505 0 Continued drafting discovery responses	170.00	1.50	255.00	Billable
10/25/2015	DianaGonzalez 95506 0 Continued drafting discovery responses	170.00	2.50	425.00	Billable
10/27/2015	DianaGonzalez 95507 0 Revised discovery responses incorporating MG edits	170.00	2.00	340.00	Billable
10/29/2015	DianaGonzalez 95523 0 Visit to WVDC with BH - meeting with Plaintiffs to review discovery	170.00	8.00	1,360.00	Billable
11/3/2015	DianaGonzalez 95508 0 Continued editing and drafting discovery	170.00	9.50	1,615.00	Billable
11/6/2015	DianaGonzalez 95509 0 Continued drafting discovery	170.00	3.50	595.00	Billable
11/9/2015	DianaGonzalez 95510 0 Continued editing and drafting discovery	170.00	4.00	680.00	Billable
11/11/2015	DianaGonzalez 95512 0 Continued drafting discovery	170.00	3.50	595.00	Billable
11/11/2015	DianaGonzalez 95524 0 Visit to WVDC - meeting with Plaintiffs to review discovery	170.00	8.00	1,360.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/12/2015	DianaGonzalez 95511 0 Continued drafting discovery	170.00	2.00	340.00	Billable
11/19/2015	DianaGonzalez 95513 0 Call with BH & plaintiff to review discovery responses	170.00	1.00	170.00	Billable
12/4/2015	DianaGonzalez 95514 0 Review discovery edits and incorporate into drafts	170.00	9.00	1,530.00	Billable
12/7/2015	DianaGonzalez 95526 0 Team call with co-counsel & BH & MG	170.00	1.00	170.00	Billable
12/9/2015	DianaGonzalez 95519 0 Mtg with Plaintiff and BH to review discovery responses	170.00	6.50	1,105.00	Billable
12/10/2015	DianaGonzalez 95525 0 Team call with co-counsel & BH & MG	170.00	1.00	170.00	Billable
12/10/2015	DianaGonzalez 95518 0 Continued editing discovery responses	170.00	3.00	510.00	Billable
1/14/2016	DianaGonzalez 95527 0 Internal team meeting re division of labor when reviewing doc prod with MG & BH & TH	185.00	0.50	92.50	Billable
1/21/2016	DianaGonzalez 95528 0 Team call with co-counsel	185.00	1.00	185.00	Billable
3/14/2016	DianaGonzalez 95784 0 reviewed doc prod	185.00	3.00	555.00	Billable
4/6/2016	DianaGonzalez 96514 0 worked on reviewing discovery - booking jackets	185.00	6.50	1,202.50	Billable
4/15/2016	DianaGonzalez 96515 0 worked on reviewing discovery - booking jackets	185.00	6.50	1,202.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/21/2016 96516 0	DianaGonzalez worked on reviewing discovery - booking jackets	185.00	6.50	1,202.50	Billable
4/25/2016 96517 0	DianaGonzalez worked on reviewing discovery - booking jackets	185.00	6.50	1,202.50	Billable
4/27/2016 96202 0	DianaGonzalez Travel to/from West Valley	185.00	2.67	493.95	Billable
4/27/2016 96203 0	DianaGonzalez Meeting with Brendan to speak to inmates at West Valley	185.00	6.83	1,263.55	Billable
5/4/2016 96519 0	DianaGonzalez worked on reviewing discovery - grievances	185.00	6.50	1,202.50	Billable
5/11/2016 96520 0	DianaGonzalez worked on reviewing discovery - grievances	185.00	6.50	1,202.50	Billable
5/19/2016 96522 0	DianaGonzalez worked on reviewing discovery - grievances	185.00	6.50	1,202.50	Billable
5/25/2016 96518 0	DianaGonzalez WV site inspection	185.00	3.00	555.00	Billable
7/7/2016 96607 0	DianaGonzalez Internal team call to discuss allocation of work responsibilities to prep for mediation, depositions & further discovery review	185.00	0.50	92.50	Billable
7/22/2016 97355 0	DianaGonzalez Travel to/from WV to speak to clients	185.00	2.00	370.00	Billable
7/22/2016 96718 0	DianaGonzalez Visit to West Valley to speak with class members & conduct interviews	185.00	4.00	740.00	Billable
10/28/2016 97354 0	DianaGonzalez Met with clients at WV to discuss ongoing conditions in the ALT	185.00	5.50	1,017.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/28/2016 97353 0	DianaGonzalez Travel time to/from West Valley to visit clients	185.00	2.00	370.00	Billable
11/4/2016 97351 0	DianaGonzalez Met with clients to learn about ongoing conditions in ALT unit	185.00	4.83	893.55	Billable
11/4/2016 97350 0	DianaGonzalez Travel back from WV - met with clients	185.00	1.50	277.50	Billable
11/7/2016 97352 0	DianaGonzalez Phone call with Brendan re grievance procedures	185.00	0.33	61.05	Billable
11/17/2016 97575 0	DianaGonzalez Travel time - Visit to WV to speak with clients	185.00	2.00	370.00	Billable
11/17/2016 97576 0	DianaGonzalez Visit to WV to speak with clients	185.00	4.00	740.00	Billable
12/8/2016 97661 0	DianaGonzalez Team call with TH, MG, & BH & co-counsel	185.00	1.50	277.50	Billable
4/6/2017 99433 0	DianaGonzalez Visit to WV to get update on conditions	185.00	6.33	1,171.05	Billable
4/6/2017 99435 0	DianaGonzalez Travel to West Valley April 6, 2017 trip	185.00	2.00	370.00	Billable
8/15/2017 100018 0	DianaGonzalez Meeting with clients at West Valley Detention Center	185.00	4.50	832.50	Billable
8/15/2017 100017 0	DianaGonzalez travel to WVDC to speak to clients	185.00	2.50	462.50	Billable
8/21/2017 100049 0	DianaGonzalez call with co-counsel & mediator	185.00	1.00	185.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/1/2017 100085 0	DianaGonzalez Visiting clients at WVDC & typing up handwritten notes; emailing team re visit	185.00	2.17	401.45	Billable
9/1/2017 100084 0	DianaGonzalez Travel to/from WVDC	185.00	3.00	555.00	Billable
9/28/2017 100168 0	DianaGonzalez Call with co-counsel	185.00	1.00	185.00	Billable
10/11/2017 100208 0	DianaGonzalez Speaking with clients at WVDC	185.00	4.00	740.00	Billable
10/11/2017 100207 0	DianaGonzalez Travel to/from WVDC to speak to clients	185.00	2.00	370.00	Billable
10/27/2017 100248 0	DianaGonzalez Call with co-counsel re damages	185.00	1.17	216.45	Billable
10/31/2017 100266 0	DianaGonzalez Call with co-counsel	185.00	1.00	185.00	Billable
11/15/2017 100386 0	DianaGonzalez call with co-counsel	185.00	1.00	185.00	Billable
2/9/2018 100879 0	DianaGonzalez Meeting with inmates in the ALT unit	195.00	3.33	649.35	Billable
2/9/2018 100878 0	DianaGonzalez Travel to and from West Valley Detention Center for visit	195.00	2.50	487.50	Billable
2/21/2018 100945 0	DianaGonzalez Team call	195.00	1.33	259.35	Billable
2/28/2018 101002 0	DianaGonzalez Call with co-counsel	195.00	0.67	130.65	Billable

Total: Diana Gonzalez 281.99 \$49,969.00

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
<u>Timekeeper: Melissa Goodman</u>					
7/25/2014	MelissaGoodman 87641 dd1 Editing Complaint	525.00	2.00	1,050.00	Billable
7/26/2014	MelissaGoodman 87642 dd1 Editing Complaint	525.00	1.00	525.00	Billable
7/27/2014	MelissaGoodman 87643 dd1 Editing Pre-Litigation Memo	525.00	1.50	787.50	Billable
7/28/2014	MelissaGoodman 87644 rd1 Reading equal protection memo	525.00	0.83	435.75	Billable
8/3/2014	MelissaGoodman 87694 rd1 Reviewing last round of pre-lit memo edits (exhaustion)	525.00	1.17	614.25	Billable
8/4/2014	MelissaGoodman 87695 dd1 Drafting co-counsel agreement	525.00	0.33	173.25	Billable
8/5/2014	MelissaGoodman 87712 mw23 Meeting with legal team about exhaustion and next steps on grievances and complanit.	525.00	1.50	787.50	Billable
8/7/2014	MelissaGoodman 87758 rd1 Editing retainer agreement	525.00	0.50	262.50	Billable
8/26/2014	MelissaGoodman 87957 mw23 Meeting with Ahilan to review retainer and co-counsel drafts	525.00	0.50	262.50	Billable
8/28/2014	MelissaGoodman 87956 mw23 Meeting with Lit Team re: complaint edits, communications with plaintiffs, exhaustion and filing timing strategy.	525.00	0.17	89.25	Billable
8/28/2014	MelissaGoodman 87958 rd1 Reviewing Barry's edits to complaint	525.00	0.33	173.25	Billable
9/4/2014	MelissaGoodman 88074 rd1 Reviewing exhaustion memos/analysis and doing independent exhaustion research to confirm	525.00	1.33	698.25	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/10/2014	MelissaGoodman 88670 rd1 reviewing and editing complaint	525.00	2.17	1,139.25	Billable
10/13/2014	MelissaGoodman 88673 mw23 Meeting with legal team to discuss complaint	525.00	1.00	525.00	Billable
10/14/2014	MelissaGoodman 88671 rd1 reviewing and editing complaint	525.00	3.00	1,575.00	Billable
10/16/2014	MelissaGoodman 88669 rd1 Final skim of complaint, flagging last issues to deal with	525.00	0.67	351.75	Billable
10/17/2014	MelissaGoodman 88924 crw1 emails with co-counsel re: remaining issues in complaint	525.00	0.33	173.25	Billable
10/18/2014	MelissaGoodman 88925 dd1 Drafting plaintiff blog	525.00	0.83	435.75	Billable
10/20/2014	MelissaGoodman 88926 mw23 Meeting with 3 clients to prepare them for communications work the day of filing	525.00	1.67	876.75	Billable
10/22/2014	MelissaGoodman 89075 mw23 press interviews	525.00	0.17	89.25	Billable
10/23/2014	MelissaGoodman 89074 mw23 legal team meeting: summons, next steps re: research and strategy	525.00	0.17	89.25	Billable
10/28/2014	MelissaGoodman 89108 crw1 Conversation w/bremdam re next steps in class certification and expert identification- 12 minutes	525.00	0.33	173.25	Billable
10/28/2014	MelissaGoodman 89104 mw23 Conversation w/bremdam re next steps in class certification and expert identification- 12 minutes	525.00	0.33	173.25	Billable
11/3/2014	MelissaGoodman 89133 mw23	525.00	1.67	876.75	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/10/2014 89273	MelissaGoodman rs1 research on class certification and reviewing old briefs and affidavits for purpose of draftin class cert declaration shells.	525.00	0.33	173.25	Billable
11/11/2014 89683	MelissaGoodman rs1 Reading Sharon Dolovich's article about LA County's jail and program access there for purposes of assessing her as a potential expert witness or consultant.	525.00	1.50	787.50	Billable
11/13/2014 89846	MelissaGoodman dd1 drafting shell declaraton	525.00	2.17	1,139.25	Billable
11/18/2014 89770	MelissaGoodman mw23 Legal team meeting re: declarations, visits, factual developments	525.00	1.50	787.50	Billable
12/2/2014 89845	MelissaGoodman rd1 reviewing and editing PRA	525.00	0.67	351.75	Billable
12/15/2014 89975	MelissaGoodman mw23 Meeting with Brendan to debrief on call with DOJ and researched past DOJ action re: statement of interest	525.00	0.33	173.25	Billable
12/15/2014 89976	MelissaGoodman mw23 Meeting with Brendan to prepare for our call with DOJ and our call with possible consulting expert Sharon Dolovich	525.00	0.33	173.25	Billable
12/15/2014 89974	MelissaGoodman mw23 Call with Ally Shandell from DOJ Special Programs Branch (with Brendan)	525.00	0.67	351.75	Billable
1/7/2015 90111	MelissaGoodman mw23 Legal team meeting re: amended complaint content	525.00	0.33	173.25	Billable
1/8/2015 90112	MelissaGoodman rd1 Reviewing Walker Declaration	525.00	0.33	173.25	Billable
1/12/2015 90113	MelissaGoodman rd1 Reviewing and editing amended complaint	525.00	0.67	351.75	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/20/2015	Melissa Goodman 90149 mw23 Meeting with opposing counsel, Rule 26f conference	525.00	0.17	89.25	Billable
1/20/2015	Melissa Goodman 90150 mw23 Meeting with legal team to de-brief after meeting with opposing counsel and to talk about next steps in discvoery.	525.00	0.50	262.50	Billable
1/21/2015	Melissa Goodman 90151 rs1 Researching "similarly situated requirement" latest developments	525.00	0.67	351.75	Billable
2/27/2015	Melissa Goodman 90856 rd1 Reviewing opposition to motion to dismiss brief	525.00	0.67	351.75	Billable
2/27/2015	Melissa Goodman 90855 rd1 Reviewing opposition to motion to dismiss brief and editing	525.00	1.67	876.75	Billable
4/4/2015	Melissa Goodman 91366 rd1 Reviewing and editing policy request for document production.	525.00	1.50	787.50	Billable
4/20/2015	Melissa Goodman 91583 mw23 Legal team meeting: discussed discovery, client visiting	525.00	0.67	351.75	Billable
4/20/2015	Melissa Goodman 91584 rd1 Reviewing and editing policy request for production	525.00	0.67	351.75	Billable
5/3/2015	Melissa Goodman 92106 rd1 Reviewing Guzman's first request for production and interrogatories.	525.00	0.50	262.50	Billable
5/3/2015	Melissa Goodman 92105 rd1 Reviewing and editing second amended complaint	525.00	0.83	435.75	Billable
6/4/2015	Melissa Goodman 92504 dd1 Drafting agenda for team call	525.00	0.17	89.25	Billable
6/4/2015	Melissa Goodman 92502 mw23 meeting with Brendan re: agenda for team call	525.00	0.33	173.25	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/4/2015 92505	Melissa Goodman mw23 Team call re: visits, discovery, and experts	525.00	1.00	525.00	Billable
7/1/2015 92728	Melissa Goodman rd1 reviewing guzman's second request for documents	525.00	0.33	173.25	Billable
8/24/2015 93895	Melissa Goodman mw23 Meeting with Brendan and Diana to discuss client discovery responses, visit to WVDC and next steps on completing drafts of the responses for clients currently incarcerated at WVDC	525.00	0.50	262.50	Billable
8/28/2015 93894	Melissa Goodman rd1 Reviewing potential expert Wendy Sill's declaration in another case to assess her as a potential expert	525.00	0.67	351.75	Billable
8/31/2015 93911	Melissa Goodman rd1 reviewing meet and confer letter re: Pratt Doc Request and Guzman Rogs	525.00	0.33	173.25	Billable
9/6/2015 93956	Melissa Goodman rd1 Reviewing and editing Illich Vargas' Response to Def. First Set of Interrogatories	525.00	2.67	1,401.75	Billable
9/6/2015 93955	Melissa Goodman rd1 Editing Illich Vargas' Response to Defendant's First Set of Interrogatories.	525.00	2.33	1,223.25	Billable
9/7/2015 93957	Melissa Goodman rd1 Reviewing and editing Illich Vargas' Response to Def. First Set of Doc Requests	525.00	0.50	262.50	Billable
9/7/2015 94004	Melissa Goodman rd1 Reviewing and editing Vargas' response to defendants' request for production.	525.00	4.33	2,273.25	Billable
9/21/2015 94043	Melissa Goodman mw23 Internal ACLU team meeting re: finalizing discovery responses and visit schedule	525.00	0.50	262.50	Billable
9/29/2015 94132	Melissa Goodman mw23 Meeting with Brendan, Diana, & Liindsay re: RPF and ROG responses	525.00	1.50	787.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/6/2015	MelissaGoodman 94226 rd1 review edits to Vargas doc production	525.00	0.33	173.25	Billable
10/11/2015	MelissaGoodman 94227 rd1 final review of Vargas rog response.	525.00	0.67	351.75	Billable
11/3/2015	MelissaGoodman 94389 rd1 Final review of Lynne Price's rog response	525.00	0.33	173.25	Billable
11/4/2015	MelissaGoodman 94498 rv1 final review of Vargas & Price responses	525.00	0.50	262.50	Billable
11/4/2015	MelissaGoodman 94500 rd1 Final review of Vargas & Price rog responses	525.00	0.50	262.50	Billable
11/4/2015	MelissaGoodman 94499 mw23 Meeting with team re: discovery	525.00	1.00	525.00	Billable
11/5/2015	MelissaGoodman 94501 rd1 Final review of Robertson rog responses	525.00	0.50	262.50	Billable
11/16/2015	MelissaGoodman 94459 mw23 Team meeting re: discovery responses, plaintiff status, outstanding discovery from Ds and motion to compel.	525.00	1.00	525.00	Billable
11/30/2015	MelissaGoodman 94538 mw23 Team meeting re: discovery responses, motion to compel, and experts.	525.00	0.83	435.75	Billable
12/13/2015	MelissaGoodman 94602 rd1 Reviewing Pratt rog response	525.00	0.17	89.25	Billable
12/13/2015	MelissaGoodman 94626 rd1 Reviewing Veronica Pratt rog response	525.00	0.67	351.75	Billable
12/17/2015	MelissaGoodman 94628 mw23 Meeting with potential expert Wendy Still	525.00	1.00	525.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/17/2015 94627	MelissaGoodman rv1 reviewing notes and materials to prepare for meeting with potential expert Wendy Still	525.00	0.67	351.75	Billable
1/4/2016 94645	MelissaGoodman rd1 Reviewing discovery produced Dec. 18th	525.00	0.33	173.25	Billable
2/22/2016 95679	MelissaGoodman rd1 Reviewing discovery documents received.	525.00	4.67	2,451.75	Billable
3/3/2016 95767	MelissaGoodman mw23 Team meeting re: discovery and next steps	525.00	0.83	435.75	Billable
3/11/2016 95774	MelissaGoodman mw23 Meeting with team to discuss new expert, site inspection, and remedies.	525.00	0.83	435.75	Billable
3/13/2016 95781	MelissaGoodman rd1 Reviewing discovery documents defendants produced in february.	525.00	1.67	876.75	Billable
3/14/2016 95783	MelissaGoodman rd1 Reviewing discovery produced by defendants in February.	525.00	0.33	173.25	Billable
3/30/2016 95949	MelissaGoodman mw23 Meeting with new expert Jeanne Woodward to discuss our needs for a preliminary expert report and her view of the case.	525.00	0.83	435.75	Billable
4/11/2016 96038	MelissaGoodman rd1 Reviewing Lindsay's memo on classification documents and reviewing defendant's "proposal" email	525.00	0.67	351.75	Billable
4/12/2016 96049	MelissaGoodman rd1 Reviewing Brendan's summary of work-related discovery documents	525.00	0.67	351.75	Billable
4/12/2016 96048	MelissaGoodman mw23 Meeting with team to review classification discovery summary and prepare for meeting with opposing counsel on 4/13.	525.00	1.67	876.75	Billable
4/20/2016 96091	MelissaGoodman rd1 Reviiewing religion-related discovery documents	525.00	0.83	435.75	Billable

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Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/23/2016 96131	MelissaGoodman rd1 Reviiewing religion-related discovery documents	525.00	0.67	351.75	Billable
4/24/2016 96132	MelissaGoodman rd1 Reviiewing religion-related discovery documents	525.00	0.83	435.75	Billable
4/30/2016 96211	MelissaGoodman rd1 Reviiewing religion-related discovery documents	525.00	1.17	614.25	Billable
5/2/2016 96278	MelissaGoodman rd1 Reviewing religion documents and drafting memo for team on religion documents - policies and emails.	525.00	1.67	876.75	Billable
5/5/2016 96279	MelissaGoodman dd1 Reviewing notes from client visits week of 4/25 and emails re: next steps.	525.00	0.33	173.25	Billable
5/19/2016 96396	MelissaGoodman mw23 Phone call with Dave McLane and Lindsay Battles to prepare for phone call with opposing counsel re: settlement, outstanding questions/documents, and site inspection.	525.00	0.50	262.50	Billable
5/19/2016 96395	MelissaGoodman mw23 Phone call with opposing counsel and Dave McLane re: potential settlement and site inspection on 5/25	525.00	0.83	435.75	Billable
5/25/2016 96451	MelissaGoodman mw23 meeting with team to debrief from site inspection at West Valley Detention Center	525.00	1.00	525.00	Billable
5/25/2016 96448	MelissaGoodman ad1 Traveling to site inspection at West Valley Detention Center	525.00	1.33	698.25	Billable
5/25/2016 96450	MelissaGoodman ad1 traveling home from site inspection at West Valley Detention Center	525.00	2.00	1,050.00	Billable
5/25/2016 96449	MelissaGoodman ad1 Conducting site inspection at West Valley Detention Center	525.00	2.50	1,312.50	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/9/2016 96509	Melissa Goodman mw23 Meeting with team to prepare for meeting with opposing counsel about outstanding discovery questions and Glen Helen site visit.	525.00	0.83	435.75	Billable
6/9/2016 96510	Melissa Goodman mw23 Meeting with opposing counsel about outstanding discovery questions and Glen Helen site visit.	525.00	1.00	525.00	Billable
6/22/2016 96571	Melissa Goodman mw23 Lunch meeting with legal team to process site inspection and discuss next steps.	525.00	1.00	525.00	Billable
6/22/2016 96578	Melissa Goodman mw23 Travel to Glen Helen Inspection	525.00	1.33	698.25	Billable
6/22/2016 96572	Melissa Goodman mw23 Travel home from site inspection	525.00	1.67	876.75	Billable
6/22/2016 96579	Melissa Goodman mw23 Site Inspection at Glen Helen	525.00	2.00	1,050.00	Billable
6/23/2016 96573	Melissa Goodman mw23 team meeting re: site inspection and settlement meeting	525.00	1.33	698.25	Billable
6/24/2016 96575	Melissa Goodman dd1 Drafting list of principles/goals for settlement	525.00	0.50	262.50	Billable
6/24/2016 96574	Melissa Goodman rd1 reviewing nate's response and emails w/team	525.00	0.50	262.50	Billable
6/25/2016 96576	Melissa Goodman dd1 emails with team re: discovery and planning	525.00	0.50	262.50	Billable
6/27/2016 96577	Melissa Goodman mw23 meeting with team re: settelment and principles of settlement and documents we still need to make settlement proposal	525.00	1.17	614.25	Billable
6/28/2016 96590	Melissa Goodman rd1 reviewing emails re: drafting scheduling stipulation	525.00	0.17	89.25	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/28/2016 96589	MelissaGoodman mw23 travel back from meeting with opposing counsel to discuss possibility of settlement	525.00	0.33	173.25	Billable
6/28/2016 96587	MelissaGoodman mw23 Travel to meeting with opposing counsel to discuss possibility of settlement	525.00	1.00	525.00	Billable
6/28/2016 96588	MelissaGoodman mw23 Meeting with opposing counsel to discuss possibility of settlement	525.00	4.17	2,189.25	Billable
6/28/2016 96568	MelissaGoodman dd1 Editing notes for principles and goals we want to acheive for settlement in advance of settlement meeting with opposing counsel.	525.00	0.33	173.25	Billable
7/1/2016 96597	MelissaGoodman rd1 Reviewing stipulaton and emails about edits to the stipulation	525.00	0.33	173.25	Billable
8/1/2016 96892	MelissaGoodman rd1 Reviewing Jeanne's memos and documents provided on best practice.	525.00	1.00	525.00	Billable
8/11/2016 96894	MelissaGoodman 0 Emails with team re: scheduling meeting with Jeanne and internal team meeting	525.00	0.17	89.25	Billable
8/12/2016 96891	MelissaGoodman 0 Communicating with Brendan about draft sectioin of mediation brief	525.00	0.17	89.25	Billable
8/12/2016 96893	MelissaGoodman rs1 Research on importance of programming access for incarcerated people	525.00	0.50	262.50	Billable
8/12/2016 96889	MelissaGoodman rd1 Reviewing draft equal protection section of mediation brief and providing edits.	525.00	0.83	435.75	Billable
8/12/2016 96890	MelissaGoodman rd1 Reviewing draft equal protection section of mediation brief and providing edits.	525.00	0.83	435.75	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/25/2016	MelissaGoodman 97053 0 writing religion fact section of mediation brief	665.00	0.83	551.95	Billable
8/28/2016	MelissaGoodman 97051 rd1 Reviewing and editing equal protection sction of mediation brief	665.00	0.83	551.95	Billable
8/29/2016	MelissaGoodman 97052 rd1 Editing equal protection section of mediation brief	665.00	1.83	1,216.95	Billable
9/6/2016	MelissaGoodman 97077 rd1 Editing mediation brief	665.00	1.33	884.45	Billable
9/7/2016	MelissaGoodman 97099 rd1 Reviewing and editing mediation letter	665.00	0.83	551.95	Billable
9/12/2016	MelissaGoodman 97100 0 Travel to mediation	665.00	0.83	551.95	Billable
9/12/2016	MelissaGoodman 97101 0 Mediation Session	665.00	4.67	3,105.55	Billable
11/15/2016	MelissaGoodman 97615 0 reviewing emails and letters to Natre re: Madison & health care access	665.00	0.67	445.55	Billable
11/17/2016	MelissaGoodman 97616 0 reviewing notes fromand emails scheduling meetings	665.00	0.50	332.50	Billable
11/19/2016	MelissaGoodman 97617 0 reviewing Nate's letter	665.00	0.33	219.45	Billable
11/28/2016	MelissaGoodman 97618 0 editing/reviewing email to Nate	665.00	0.33	219.45	Billable
11/30/2016	MelissaGoodman 97619 0 reviewing Tasha's memo re: settlement and transgender issues	665.00	0.50	332.50	Billable
11/30/2016	MelissaGoodman 97620 0 team call re: seteelment proposal	665.00	1.67	1,110.55	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/1/2016	MelissaGoodman 97621 0 corresponding with Tasha and expert about crafting settlement proposal	665.00	0.17	113.05	Billable
12/1/2016	MelissaGoodman 97622 0 reviewing expert's bullet points on training	665.00	0.17	113.05	Billable
12/3/2016	MelissaGoodman 97634 crw1 Corresponding w/expert re: settlement prooposal and reviewing her two portions on training and PREA audits	665.00	0.50	332.50	Billable
12/4/2016	MelissaGoodman 97635 dd1 Drafting housing and classification proposal outline	665.00	0.67	445.55	Billable
12/4/2016	MelissaGoodman 97636 dd1 Drafting housing and classification proposal segments	665.00	2.17	1,443.05	Billable
12/7/2016	MelissaGoodman 97653 crw1 emails w/Diana re: attorney fee projection and reviewing email to Barry	665.00	0.33	219.45	Billable
12/7/2016	MelissaGoodman 97643 dd1 Drafting housing/classification/security proposal and incorporating edits from expert and Tasha	665.00	0.67	445.55	Billable
12/8/2016	MelissaGoodman 97656 rd1 revieing brendan's work proposal	665.00	8.00	5,320.00	Billable
12/8/2016	MelissaGoodman 97671 mw23 team meeting re: settlement proposal	665.00	1.50	997.50	Billable
12/8/2016	MelissaGoodman 97655 crw1 emails with brendan re: work proposal	665.00	0.17	113.05	Billable
12/8/2016	MelissaGoodman 97654 rd1 Reviewing dave's portion of proposal	665.00	0.33	219.45	Billable
12/9/2016	MelissaGoodman 97674 crw1 editing housing/safety proposal, emailing with team	665.00	0.17	113.05	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/9/2016 97673 rd1	MelissaGoodman editing housing/safety proposal	665.00	0.50	332.50	Billable
12/12/2016 97665 rd1	MelissaGoodman Doing final edits to settlement proposal and emailing team the document	665.00	0.67	445.55	Billable
12/13/2016 97676 crw1	MelissaGoodman Correspondence with team re: proposal	665.00	0.33	219.45	Billable
12/15/2016 97677	MelissaGoodman Mediation travel to mediation	665.00	0.67	445.55	Billable
12/20/2016 98787	MelissaGoodman Mediation	665.00	1.50	997.50	Billable
12/22/2016 98931 crw1	MelissaGoodman Emails to LASD and SB Counsel to put them in touch to discuss changes LA has made	665.00	0.33	219.45	Billable
12/28/2016 98932 rd1	MelissaGoodman Reviewing class cert extension stip draft	665.00	0.33	219.45	Billable
1/10/2017 98933 crw1	MelissaGoodman Emailing team about client intakes to refer to PLO, scheduling visits and correspondence with clients & meeting in advance of 17th settlement meeting.	690.00	0.33	227.70	Billable
1/12/2017 98934 crw1	MelissaGoodman Email to team re: settlement meeting prep/planning	690.00	0.17	117.30	Billable
1/16/2017 98935 rd1	MelissaGoodman Preparing to lead settlement meeting w/defendants & emailing logistics to team	690.00	0.83	572.70	Billable
1/17/2017 98938 n1	MelissaGoodman Travel back to office from Settlement meeting with defendants	690.00	0.33	227.70	Billable
1/17/2017 98936 n1	MelissaGoodman Travel to settlement meeting	690.00	1.50	1,035.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/17/2017 98937	MelissaGoodman n1 Settlement meeting with defendants	690.00	3.33	2,297.70	Billable
1/22/2017 98939	MelissaGoodman crw1 Emailing internal team re: outreach to LASD on policy status to share with SB	690.00	0.17	117.30	Billable
1/23/2017 98940	MelissaGoodman crw1 Emailing internal team re: meeting to prep fo rnext settlment meeting & reviewing emails	690.00	0.33	227.70	Billable
1/27/2017 98942	MelissaGoodman mw23 Meeting with team about substantive settlement positions, client visits and communications with clients	690.00	1.17	807.30	Billable
1/27/2017 98943	MelissaGoodman mw23 Meeting with team about substantive settlement positions, client visits and communications with clients	690.00	1.17	807.30	Billable
2/13/2017 98955	MelissaGoodman n1 Preparing for settlement negotiation on 2/14; doc review and correspondence	690.00	0.50	345.00	Billable
2/14/2017 99244	MelissaGoodman n1 travel to office from settlement meeting with Opp counsel and Cpt. Rose	690.00	0.50	345.00	Billable
2/14/2017 99242	MelissaGoodman n1 travel to settlement meeting with Opp counsel and Cpt. Rose	690.00	1.00	690.00	Billable
2/14/2017 99243	MelissaGoodman n1 settlement meeting with Opp counsel and Cpt. Rose	690.00	3.83	2,642.70	Billable
2/15/2017 99245	MelissaGoodman mw23 team call to debrief on settlement meeting & plan next steps on call with expert	690.00	1.17	807.30	Billable
2/26/2017 99246	MelissaGoodman rd1 reviewing expert's document on work and program access and steps needed to ensure safety.	690.00	1.17	807.30	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/28/2017 99240	MelissaGoodman n1 research to craft settlement proposal	690.00	6.17	4,257.30	Billable
2/28/2017 99241	MelissaGoodman crw1 correspondence re: potential PREA committee community liaison	690.00	0.17	117.30	Billable
3/3/2017 99280	MelissaGoodman crw1 correspondence setting next meeting with team	690.00	0.17	117.30	Billable
3/5/2017 99281	MelissaGoodman crw1 correspondence with team re: LASD policies and sharing with SB	690.00	0.17	117.30	Billable
3/8/2017 99283	MelissaGoodman mw23 Call with team and expert re: settlement strategy and prep for settlement meeting	690.00	1.50	1,035.00	Billable
3/10/2017 99284	MelissaGoodman rd1 Reviewiing and editing settlement progress letter to defendants	690.00	0.67	462.30	Billable
3/13/2017 99286	MelissaGoodman crw1 Correspondence with team re: sharing LASD policies	690.00	0.17	117.30	Billable
3/13/2017 99285	MelissaGoodman rd1 Reviewiing and editing settlement progress letter to defendants	690.00	0.50	345.00	Billable
3/15/2017 99287	MelissaGoodman crw1 Correspondence with team re: rescheduling settlement meeting	690.00	0.33	227.70	Billable
4/11/2017 99731	MelissaGoodman 0 prep for settlement meeting reading docs & notes for	690.00	1.17	807.30	Billable
4/12/2017 99732	MelissaGoodman 0 settlement meeting (1 hour 2 min drive);settlement meeting; travel back to office strategy	690.00	3.83	2,642.70	Billable
4/13/2017 99733	MelissaGoodman 0 editing stipulation to extend trial and motion dates.	690.00	0.33	227.70	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/18/2017 99734 0	MelissaGoodman reading and responding to team correspondence on clients and follow up with Nate	690.00	0.50	345.00	Billable
5/12/2017 99488 crw1	MelissaGoodman Correspondence with team re: visits and conference calls with clients	690.00	0.33	227.70	Billable
5/30/2017 99735 0	MelissaGoodman correspondence with team on interviews with ALT folks tomorrow	690.00	0.83	572.70	Billable
5/31/2017 99736 0	MelissaGoodman travel to West Valley to speak with clients 1 hour and 18 min; interviews with clients; travel drive home	690.00	7.33	5,057.70	Billable
6/8/2017 99737 0	MelissaGoodman correspondence with team re: scheduling call with clients and follow up with nate	690.00	0.33	227.70	Billable
6/15/2017 99738 0	MelissaGoodman correspondence with team and expert re settlement proposal	690.00	0.33	227.70	Billable
6/16/2017 99739 0	MelissaGoodman reviewing and editing D's settlement proposal	690.00	0.83	572.70	Billable
6/19/2017 99740 0	MelissaGoodman wvdc team meeting re response to settlement meeting in 1 hour	690.00	1.00	690.00	Billable
6/19/2017 99741 0	MelissaGoodman meeting with our clients re settlement proposal	690.00	1.00	690.00	Billable
6/20/2017 99742 0	MelissaGoodman reviewing settlement proposal notes to prepare for settlement meeting	690.00	0.50	345.00	Billable
6/21/2017 99614 mw23	MelissaGoodman Meeting with defendants for settlement discussion	690.00	1.67	1,152.30	Billable
6/21/2017 99615 mw23	MelissaGoodman Meeting with team to debrief settlement discusison	690.00	15.00	10,350.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/24/2017 99743 0	MelissaGoodman revising settlement proposal response	690.00	0.50	345.00	Billable
6/25/2017 99744 0	MelissaGoodman revising settlement proposal response	690.00	0.83	572.70	Billable
6/26/2017 99718 rd1	MelissaGoodman Reviewing and editing settlement proposal in advance of mediation on July 10	690.00	0.50	345.00	Billable
6/26/2017 99745 0	MelissaGoodman revising settlement proposal response	690.00	1.17	807.30	Billable
7/4/2017 99762 rd1	MelissaGoodman Reviewing co-counsel's edit to settlement proposal response for mediation	690.00	11.67	8,052.30	Billable
7/10/2017 99873	MelissaGoodman Mediation Travel to mediation	690.00	0.17	117.30	Billable
7/10/2017 99874	MelissaGoodman Mediation Mediation session	690.00	8.67	5,982.30	Billable
7/21/2017 99877 dd1	MelissaGoodman Corresponding with team to explain our time break down documents for settlement discussions	690.00	0.33	227.70	Billable
7/21/2017 99876 rd1	MelissaGoodman Reviewing excel and word time breakdowns by time period and tasks DG created for purpose of settlement discussions	690.00	1.50	1,035.00	Billable
8/5/2017 99928 rd1	MelissaGoodman Reviewing time breakdown chart and corresponding with team about edits	690.00	0.17	117.30	Billable
8/14/2017 100020 crw1	MelissaGoodman Reading and writing correspondence with team re: D's settlement counter-offer and setting team meeting	690.00	0.33	227.70	Billable
8/17/2017 100019 rd1	MelissaGoodman Reviewing paralegal notes on visit to clients to check in on status.	690.00	0.17	117.30	Billable

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Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/14/2017	MelissaGoodman 100105 Mediation Mediation call	690.00	1.17	807.30	Billable
12/31/2017	MelissaGoodman 100582 rd1 editing 30(b)(6) depo notice	690.00	0.83	572.70	Billable
2/13/2018	MelissaGoodman 100887 0 Team call re: defendant's settlement offer and preparation for depositions	715.00	1.00	715.00	Billable
2/21/2018	MelissaGoodman 100948 mw23 Meeting with team re: mediator's proposal	0.00	0.83	0.00	Billable
2/28/2018	MelissaGoodman 101007 mw23 Meeting with team to discuss mediator's proposal	0.00	0.50	0.00	Billable
3/21/2018	MelissaGoodman 101092 dd1 Editing proposed settlement notice	0.00	0.17	0.00	Billable
3/21/2018	MelissaGoodman 101090 mw23 Meeting with team to discuss injunctive relief settlement next steps	0.00	0.67	0.00	Billable
3/21/2018	MelissaGoodman 101091 dd1 Editing injunctive relief settlement document	0.00	0.83	0.00	Billable
5/11/2018	MelissaGoodman 101416 rd1 reviewing settlement documents	0.00	0.83	0.00	Billable
5/14/2018	MelissaGoodman 101598 rd1 editing injunctive relief settlement doc	0.00	0.83	0.00	Billable
5/15/2018	MelissaGoodman 101599 rd1 editing injunctive relief settlement doc and drafting email to Nate for team review	0.00	0.67	0.00	Billable
5/23/2018	MelissaGoodman 101600 rd1 prepping for negotiation call with defendants	0.00	0.33	0.00	Billable

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Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/23/2018 101601	MelissaGoodman mw23 Call with defendnats re: IR settlement edits	0.00	0.50	0.00	Billable
5/23/2018 101455	MelissaGoodman mw23 meeting with opposing counsel about injunctive relief settlement terms and comments on class papers	0.00	0.83	0.00	Billable
5/31/2018 101602	MelissaGoodman rd1 reviewing defendants refuther IR edits and communicating about one last contested provisions with defendants and team	0.00	0.50	0.00	Billable
7/20/2018 101662	MelissaGoodman rd1 reviewing emails and editing emails to Nate about settlement timing and need for interim steps for safet	0.00	0.67	0.00	Billable
7/21/2018 101661	MelissaGoodman rd1 writing settlement talking points	0.00	1.50	0.00	Billable
Total: Melissa Goodman			246.66		\$144,327.30
<u>Timekeeper: Tasha Hill</u>					
10/8/2015 99141	TashaHill 0 Meeting with staff regarding my role in litigation. Review case disposition and discovery received	300.00	1.00	300.00	Billable
10/8/2015 99142	TashaHill 0 Review Amended Complaint	300.00	3.17	951.00	Billable
10/27/2015 97623	TashaHill 0 Discovery Drafting Timeline meeting - Resolve setting up visit schedule to get all these (Vargas, Price, Kennedy, Robertson) plus Veronica Pratt's discovery drafts done	300.00	0.67	201.00	Billable
10/27/2015 99143	TashaHill 0 Discovery drafting timeline meeting - Resolve setting up visit schedule to get all these (Vargas, Price, Kennedy, Robertson) plus Veronica Pratt's discovery drafts done	300.00	0.67	201.00	Billable
10/27/2015 99144	TashaHill 0 Review ""shell"" RFA's and RFP's and ROGS	300.00	2.67	801.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/28/2015 99145 0	TashaHill Review client declarations prior to interviews	300.00	1.00	300.00	Billable
10/29/2015 97638 0	TashaHill Travel to West Valley Detention Center for client interviews	300.00	3.00	900.00	Billable
10/29/2015 99146 0	TashaHill Travel to West Valley Detention Center to attempt client interviews: I was notified by WVDC staff that the client I came to see had been released without notice to us (and was in the system as at the jail when I checked the night before)	300.00	5.00	1,500.00	Billable
11/4/2015 99147 0	TashaHill Compose and send overnight letter(s) to missing client regarding setting up and interview	300.00	1.17	351.00	Billable
11/4/2015 99149 0	TashaHill Call with co-counsel to finalize discovery plan, discuss class certification, declarations, experts and next steps	300.00	1.50	450.00	Billable
11/5/2015 99150 0	TashaHill Review supplemental discovery responses and log sections/topics	300.00	2.50	750.00	Billable
11/16/2015 99151 0	TashaHill Meeting with staff to review discovery plan and responses	300.00	0.67	201.00	Billable
11/30/2015 99152 0	TashaHill Call with co-counsel	300.00	1.00	300.00	Billable
12/10/2015 99153 0	TashaHill Call with co-counsel re DOJ, PRA, experts, discovery, class cert, etc	300.00	1.50	450.00	Billable
1/14/2016 99154 0	TashaHill Internal staff meeting re client search and possible contacts	330.00	0.50	165.00	Billable
1/21/2016 99155 0	TashaHill Call with co-counsel - document review and next steps.	330.00	1.00	330.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/4/2016 99156 0	TashaHill Call with co-counsel to discuss site inspection, privacy clause of action and amendment, settlement negotiations, discovery, etc.	330.00	1.00	330.00	Billable
3/3/2016 99157 0	TashaHill Call with co-counsel re discovery	330.00	0.67	221.10	Billable
3/17/2016 99158 0	TashaHill Call with co-counsel re hearing, experts, discovery, initial disclosures, etc	330.00	1.50	495.00	Billable
3/30/2016 99159 0	TashaHill Call with potential expert	330.00	0.83	273.90	Billable
4/7/2016 99160 0	TashaHill Call with co-counsel - prepare for settlement meeting, discuss WVDC visit updates, discovery, issues to follow up with Nate, etc.	330.00	1.00	330.00	Billable
4/12/2016 99161 0	TashaHill Call with co-counsel - prepare for settlement meeting	330.00	1.50	495.00	Billable
4/13/2016 99164 0	TashaHill Travel from Initial Settlement Meeting	330.00	0.67	221.10	Billable
4/13/2016 99162 0	TashaHill Travel to Initial Settlement Meeting	330.00	1.00	330.00	Billable
4/13/2016 99163 0	TashaHill Initial Settlement Meeting with Opposing Counsel	330.00	2.50	825.00	Billable
4/18/2016 99165 0	TashaHill Call with co-counsel to discuss amendment, site inspection, deadlines, meet and confer, etc, etc.	330.00	1.00	330.00	Billable
5/12/2016 99166 0	TashaHill Call with co-counsel to discuss discovery, etc.	330.00	1.00	330.00	Billable
5/19/2016 99167 0	TashaHill Call with co-counsel - pre-settlement meeting, discussion of discovery, experts, law student access, trip update, etc.	330.00	1.00	330.00	Billable

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Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/24/2016 99168 0	TashaHill Call with co-counsel to prepare for site inspection	330.00	2.50	825.00	Billable
5/25/2016 99169 0	TashaHill Travel to West Valley Detention Center for site inspection	330.00	2.00	660.00	Billable
5/25/2016 99171 0	TashaHill Lunch meeting with co-counsel to discuss WVDC site inspection	330.00	2.00	660.00	Billable
5/25/2016 99172 0	TashaHill Travel from West Valley Detention Center for site inspection	330.00	2.00	660.00	Billable
5/25/2016 99170 0	TashaHill West Valley Detention Center tour by staff and site inspeciton	330.00	3.00	990.00	Billable
6/9/2016 99173 0	TashaHill Call with co-counsel pre- call with Opposing Counsel.	330.00	1.00	330.00	Billable
6/9/2016 99174 0	TashaHill Conference call with Opposing Counsel re missing discovery, items still needed	330.00	1.00	330.00	Billable
6/22/2016 99175 0	TashaHill Travel to Glen Helen for site inspection	330.00	2.00	660.00	Billable
6/22/2016 99177 0	TashaHill Travel from Glen Helen for site inspection	330.00	2.00	660.00	Billable
6/22/2016 99176 0	TashaHill Glen Helen tour with staff and site inspection	330.00	3.00	990.00	Billable
6/23/2016 99178 0	TashaHill Call with co-counsel debrief from site visit to Glen Helen	330.00	1.33	438.90	Billable
6/27/2016 99179 0	TashaHill Call with co-counsel - pre call with opposing counsel	330.00	1.67	551.10	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/28/2016	TashaHill 99180 0 Followup on site visit meeting with Opposing Counsel	330.00	3.00	990.00	Billable
7/7/2016	TashaHill 99181 0 Internal staff meeting to discuss next steps and roles	330.00	0.83	273.90	Billable
8/18/2016	TashaHill 99182 0 Settlement injunctive relief principles document - edit	330.00	0.67	221.10	Billable
8/18/2016	TashaHill 99183 0 Call with expert re PREA requirements and compliant policies	330.00	2.00	660.00	Billable
8/26/2016	TashaHill 99184 0 Discuss time out of cell brief section with staff	330.00	0.33	108.90	Billable
8/26/2016	TashaHill 99185 0 Review discovery notes and draft time out of cell section of brief	330.00	2.33	768.90	Billable
9/7/2016	TashaHill 99186 0 Review and edit Mediation letter	330.00	3.33	1,098.90	Billable
9/12/2016	TashaHill 99188 0 Travel to Mediation conference	330.00	0.33	108.90	Billable
9/12/2016	TashaHill 99190 0 Travel from Mediation conference	330.00	0.33	108.90	Billable
9/12/2016	TashaHill 99187 0 Find and print Mediation Letter copies for all staff and co-counsel	330.00	0.50	165.00	Billable
9/12/2016	TashaHill 99189 0 Mediation conference	330.00	5.00	1,650.00	Billable
10/26/2016	TashaHill 99191 0 Call with co-counsel prepping for mediation and discussion most recent discovery	330.00	1.00	330.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/4/2016 99148 0	TashaHill Call with client's sister to try to ascertain whereabouts	330.00	0.50	165.00	Billable
11/9/2016 99192 0	TashaHill Research and Draft advocacy letter to opposing counsel re: failure to medically treat trans women with hormones and provide bras	330.00	2.50	825.00	Billable
11/10/2016 99193 0	TashaHill Research and Draft advocacy letter to opposing counsel re: failure to medically treat trans women with hormones and provide bras	330.00	3.00	990.00	Billable
11/14/2016 99194 0	TashaHill Format and send final advocacy letter to oposing counsel re trans mendical care and bras	330.00	0.50	165.00	Billable
11/29/2016 99195 0	TashaHill Reaserch and draft memo to co-counsel per trans housing, classification, medical care, etc policies and settlement requirements	330.00	3.00	990.00	Billable
11/30/2016 99196 0	TashaHill Edit and Send trans medical care memo to co-counsel	330.00	1.00	330.00	Billable
11/30/2016 99197 0	TashaHill Draft email to oposing counsel re: trans medical care	330.00	1.00	330.00	Billable
11/30/2016 99198 0	TashaHill Call with co-counsel re settlement proposals	330.00	1.67	551.10	Billable
11/30/2016 97614 0	TashaHill Team call re mediation	330.00	1.67	551.10	Billable
12/5/2016 99199 0	TashaHill Finalize and email letter to opposing counsel re: trans medical care problems	330.00	0.50	165.00	Billable
12/6/2016 99200 0	TashaHill Draft medicaion brief points regarding trans and intersex housing, classification and medical care, etc.	330.00	2.00	660.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/7/2016 99201 0	TashaHill Mediation brief section edits	330.00	1.00	330.00	Billable
12/8/2016 99202 0	TashaHill Call with co-counsel reviewing each section of medication letter	330.00	1.83	603.90	Billable
12/14/2016 99203 0	TashaHill Review and print mediation letter for all	330.00	0.33	108.90	Billable
12/14/2016 99204 0	TashaHill Prepare memo re GBLTI incarceration and email to mediator and opposing counsel	330.00	0.67	221.10	Billable
12/15/2016 99207 0	TashaHill Travel from Mediation conference	330.00	0.83	273.90	Billable
12/15/2016 99205 0	TashaHill Travel to Mediation conference	330.00	1.00	330.00	Billable
12/15/2016 99206 0	TashaHill Mediation	330.00	7.00	2,310.00	Billable
1/17/2017 99210 0	TashaHill Travel from Settlement conference	360.00	0.50	180.00	Billable
1/17/2017 99208 0	TashaHill Travel to Settlement conference	360.00	1.00	360.00	Billable
1/17/2017 99209 0	TashaHill Settlement conference	360.00	1.50	540.00	Billable
1/27/2017 99211 0	TashaHill Call with co-counsel re client visits and updates	360.00	1.17	421.20	Billable
2/13/2017 99212 0	TashaHill Prepare for client call with Brendan	360.00	0.50	180.00	Billable

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1573:McKibben v. McMahon (frmly WVDC (Oliver v McMahon) (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/13/2017 99213 0	TashaHill Call with clients and co-counsel to update them on the status of the litigation and solicit feedback on proposed settlement terms	360.00	1.00	360.00	Billable
2/14/2017 99216 0	TashaHill Travel from Settlement conference	360.00	0.50	180.00	Billable
2/14/2017 99214 0	TashaHill Travel to Settlement conference	360.00	1.00	360.00	Billable
2/14/2017 99215 0	TashaHill Settlement conference	360.00	3.00	1,080.00	Billable
2/15/2017 99225 0	TashaHill Team call re settlement negotiations	360.00	0.83	298.80	Billable
2/15/2017 99217 0	TashaHill Call with co-counsel to discuss status of settlement and proposed terms, strategy	360.00	0.83	298.80	Billable
2/16/2017 99726 0	TashaHill Discussion with community advocate in IE (Luis) re resources for settlement	360.00	0.50	180.00	Billable
2/27/2017 99727 0	TashaHill Call w/Luis & Brendan re religious service providers and community advocates for PREA committee	360.00	0.50	180.00	Billable
2/27/2017 99728 0	TashaHill Call w/ Ami Davis re PREA committee	360.00	0.33	118.80	Billable
3/8/2017 99729 0	TashaHill Team call re next settlement negotiation	360.00	1.50	540.00	Billable
4/12/2017 99730 0	TashaHill Settlement negotiation (2hr 30min) (+6min debrief w/ team) (+ 2hrs 36min travel)	360.00	5.33	1,918.80	Billable
TOTAL: Tasha Hill			133.83	\$43,998	

Exhibit F

ACLU Case Cost Report

McKibben v. McMahon

Category	Total Cost
Collect Calls	\$83.00
Correspondence	\$401.39
Court Fees	\$103.67
Online Research	\$163.00
Mileage	\$2,322.57
Parking	\$125.00
Meals	\$501.67
Transportation	\$163.13
Collect Calls	\$125.00
GRAND TOTAL:	3,988.43