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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

RICHARD GARRIES; ANDREW
 YBARRA, individually and on behalf
 of all others similarly situated,

Plaintiff-Petitioners,

vs.

LOUIS MILUSNIC, in his capacity as
 Warden of Lompoc; and MICHAEL
 CARVAJAL, in his capacity as Director
 of the Bureau of Prisons,

Defendant-Respondents.

CASE NO. 2:20-cv-04450-CBM-PVCx

DECLARATION OF DONALD SPECTER IN SUPPORT OF PLAINTIFF-PETITIONER'S NOTICE OF MOTION AND UNOPPOSED MOTION FOR ATTORNEYS' FEES

Date: July 19, 2022
 Time: 8:30 a.m.

Assigned to Hon. Consuelo B. Marshall
 Courtroom 8D

1 I, Donald Specter, hereby declare:

2 1. I am an attorney at law admitted to practice before the courts of the
3 state of California and before this Court. I am Executive Director of the Prison Law
4 Office, and co-counsel for Plaintiff-Petitioner in this litigation. I make this
5 declaration in support of the unopposed motion for attorneys' fees. If called as a
6 witness, I would and could competently testify to the facts stated herein, all of which
7 are within my personal knowledge.

8 2. The Prison Law Office engages in class action and other impact
9 litigation to improve the conditions of prisons and jails for adults and children,
10 represents individual prisoners, educates the public about prison conditions, and
11 provides technical assistance to attorneys throughout the country. Because of our
12 expertise in litigating prison conditions, the ACLU of Southern California requested
13 that the Prison Law Office participate as co-counsel in this matter. My expertise
14 and that of my colleague Sara Norman was invaluable in obtaining the favorable
15 results Petitioners achieved in this action. We were joined in this matter by the
16 premier law firms of Bird Marella and Manatt. The expertise and skill of Naeun
17 Rim, who worked at both Bird Marella and Manatt during this litigation and
18 possesses a combined fourteen years of experience in federal criminal and civil
19 litigation, including civil rights and habeas litigation, as well as her colleague Oliver
20 Rocos of Bird Marella, was critical to obtaining the favorable results in the
21 litigation, particularly with respect to the home confinement issue.

22 3. The Prison Law Office has dedicated substantial resources to the
23 representation of this class, which prevented the office from pursuing other matters.
24 From May 1, 2020 through March 31, 2022 the office has spent 769 hours of
25 attorney time and \$14,481 in expenses prosecuting this case. Eleven attorneys
26 worked on this case, along with two investigators. To calculate the amount of fees
27 generated, Petitioners' counsel multiplied the number of hours actually worked by
28 either the EJA rate or a reasonable hourly market rate. If the office were billing

clients at market rates our total fees would be \$467,880, plus expenses. Under EJA rates, the amount would be \$171,111, plus expenses.

4. I am informed and therefore believe that the other firms who participated as counsel in this case also devoted substantial resources to the prosecution of this action, which also prevented them from pursuing other matters. Attached as Exhibit A is an itemized list of the hours, rates and expenses that were incurred in the prosecution of this case. The hours and rates of those firms are as follows:

<u>Firm</u>	<u>Hours</u>	<u>Market Rate</u>	<u>EJA Rate</u>
Bird Marella	2948.20	\$1,111,708	\$599,573
ACLU	49.40	\$31,966	\$10,210.
Manatt	162.10	\$141,773	\$35,363

5. The total amount of fees incurred by Petitioners' counsel using market rates is \$1,753,328, and the total amount under EAJA is \$830,740. Total expenses are \$22,890. The agreed upon amount of \$375,000 to be paid if the settlement is approved is only a small fraction of the amount of fees generated by Petitioners' counsel.

6. Prosecuting this action required review and analysis of numerous expert reports, reviewing thousands of pages of documents related to home confinement applications and continuous correspondence with scores of people confined at Lompoc. This action also required extensive communication with class members and the named petitioners as well as advocacy on behalf of individuals.

7. The parties unsuccessfully attempted to settle this case with a mediator in 2021. Further settlement discussions and proposals this year produced the Settlement Agreement. At all times the discussions were settlement discussions were conducted at arms-length, and were informed in substantial part by the written

1 reports of the neutral expert who evaluated policies, procedures, practices, and
2 conditions at the prison.

3 8. Petitioners' counsel is not charging, and has never charged, the named
4 plaintiffs or class members a fee for their services. All out-of-pocket expenses were
5 advanced by counsel for Petitioners.

6 9. I have been informed by counsel that Respondents do not oppose this
7 motion.

8
9 Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the
10 foregoing is true and correct. Executed this 17 day of June, 2022, in Berkeley,
11 California.

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13 s/ Donald Specter

14 Donald Specter
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EXHIBIT A

TORRES V. MILUSNIC
Case No. CV-20-4450 CBM-PVCx
5/1/20 - 3/31/22

	HOURS	MARKET RATE AMOUNT	EAJA AMOUNT
PRISON LAW OFFICE			
TIME	791.40	\$467,880.00	\$171,111.94
EXPENSES			\$14,481.50
TOTAL			\$185,593.44
BIRD MARELLA			
TIME	2948.20	\$1,111,708.00	\$599,573.37
EXPENSES			\$8,409.01
TOTAL			\$607,982.38
ACLU			
TIME	49.40	\$31,966.50	\$10,210.22
EXPENSES			\$0.00
TOTAL			\$10,210.22
MANATT			
TIME	162.10	\$141,773.50	\$35,363.23
EXPENSES			\$0.00
TOTAL			\$35,363.23
TOTAL			
TIME		\$1,753,328.00	\$830,740.26
EXPENSES			\$22,890.51
TOTAL ALL			\$853,630.77

TORRES V. MILUSNIC
BOP-LOMPOC
PRISON LAW OFFICE
TIME AND EXPENSES
05-01-20 thru 03-31-22

	<u>HOURS</u>	<u>MARKET RATE AMOUNT</u>	<u>EAJA AMOUNT</u>
<u>ATTORNEYS</u>			
Donald Specter	94.90	\$101,213.50	\$20,221.93
Alison Hardy	2.60	\$2,158.00	\$540.23
Sara Norman	163.90	\$138,717.00	\$35,258.55
Corene Kendrick	13.10	\$9,563.00	\$2,721.92
Rita Lomio	12.00	\$8,027.50	\$2,533.37
Margot Mendelson	2.10	\$1,365.00	\$456.83
Rana Anabtawi	1.10	\$715.00	\$239.29
Laura Bixby	0.90	\$495.00	\$195.79
Jacob Hutt	196.30	\$84,752.50	\$42,703.10
Sophie Hart	123.80	\$52,665.00	\$26,931.45
Patrick Booth	158.70	\$60,416.00	\$34,523.60
<u>INVESTIGATORS</u>			
Amber Norris	12.40	\$4,672.50	\$2,697.50
Tovah Ackerman	9.60	\$3,120.00	\$2,088.38
TOTAL	791.40	\$467,880.00	\$171,111.94
<u>EXPENSES</u>			
Prison Law Office			\$14,481.50
TOTAL EXPENSES			\$14,481.50
<u>TOTAL TIME AND EXPENSES REQUESTED</u>			\$185,593.44

Prison Law Office
1917 Fifth Street
Berkeley, CA, 94710

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Professional Services

			<u>Hours</u>	<u>Amount</u>
5/19/2020	DS	emails from family members	0.50	
5/30/2020	DS	review TRO/PI mtn	1.00	
6/4/2020	DS	emails with team re class definition and research re same	0.60	
6/9/2020	CK	legal research & worked on section of reply ISO Lompoc class cert motion	2.80	
	DS	team meeting to discuss strategy-	1.00	
	DS	review and revise Reply Brief re TRO	1.50	
	RL	Research and draft reply in support of ex parte application for provisional class certification; confer with CK regarding same.	3.50	
6/10/2020	DS	review class cert reply brief	1.00	
	RL	Research and draft reply in support of ex parte application for provisional class certification.	3.60	
	SN	Discovery review	0.80	
6/11/2020	AH	Cite checked reply re class cert	2.60	
	RL	Review edits from co-counsel; finalize reply in support of ex parte application for provision class certification.	0.80	
	SN	Discovery review	1.20	
7/7/2020	SN	Hearing on TRO and class cert	2.00	
	DS	hearing on TRO	2.00	
7/8/2020	SN	Phone call with Naeun, Jimmy, Don re: next steps	0.50	

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			Hours	Amount
7/8/2020	DS	zoom with NR, SN, JT re PI mtn	0.50	
7/13/2020	SN	Email to opp counsel following up from meet and confer re discovery	0.20	
	SN	Draft discovery email to opp counsel following up from meet and confer	0.20	
7/14/2020	DS	review PI	1.00	
7/16/2020	DS	phone call with SN re expert	0.30	
	SN	phone call with DS re expert	0.30	
7/17/2020	SN	Prep for meet and confer (review order, docs) + meet and confer	0.70	
7/20/2020	DS	zoom meeting with NR, SN, PE re discovery, class cert notice, appeal	0.60	
	DS	email to and from Dr. Rowe re site visit and doc request	0.30	
	SN	Review and edit joint statement	0.20	
	SN	Emails with Bart re case discovery etc.	0.20	
	SN	Meeting with Don, Naeun, Peter E re: case strategy, next steps (not present for entire meeting)	0.40	
7/21/2020	DS	email to and from Rowe	0.20	
7/22/2020	DS	emails to and from respondents	0.30	
7/30/2020	DS	phone call prospective expert	0.40	
	DS	email to AUSA re expert candidate	0.20	
	DS	emails with Naeun re expert	0.20	
8/4/2020	DS	emails to and from Bart re site inspection efforts	0.30	
	DS	phone call SN re expert visits	0.10	
	SN	phone call DS re expert visits	0.10	
8/7/2020	DS	read defs objections to expert	0.30	
8/9/2020	DS	revisions to reply brief	1.30	
8/10/2020	SN	Edit response to BOP expert filing	0.30	
	DS	incorporating comments from co-counsel and final revisions	1.40	
8/12/2020	DS	review court order re 706 expert and emails to expert and opp counsel re same	0.50	
8/13/2020	DS	phone call with Homer, Naeun, SN and Respondents re site visit	1.30	
	DS	draft site visit stip	0.50	
	SN	phone call with Homer, Naeun, DS and Respondents re site visit	1.30	
8/16/2020	DS	review opp to Venters order and email to co-counsel re same	0.50	
	DS	revising stipulation for site visit and email to Bart re same	1.00	
8/17/2020	DS	emails to and from USAO re site visit stip and review of proposed stip and order	0.50	
8/18/2020	DS	Review Order re site visit and email to Homer re same	0.30	
8/20/2020	DS	emails to and from opp counsel re protective order	0.40	
8/23/2020	SN	Review and analyze home confinement worksheets, phone call with Naeun Rim re: plan for analysis	3.10	
8/24/2020	SN	Review and analyze home confinement worksheets	2.50	
8/25/2020	SN	Review home confinement worksheets and draft plan for analysis; phone call with Naeun re same	1.10	
8/27/2020	CK	Phone call w/ Naeun, SN, AN, DS, SH re: review of home confinement worksheets	1.00	
	DS	meeting with co-counsel re home confinement decisions	1.00	
	DS	review and revise protective order and email to USAO re same	0.50	
8/28/2020	SN	Meeting with Naeun, Don, Corene, Amber, Sophie re home confinement worksheet review, followed by meeting with Naeun and Don re next steps in case	1.00	
	CK	Reviewed home confinement work sheets & compiled information for spreadsheets	3.10	
	CK	reviewed 185 home confinement review worksheets & summarized in spreadsheet for court filing	6.20	

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			Hours	Amount
8/29/2020	SN	Home confinement worksheet analysis	0.70	
8/31/2020	SN	Review health care records of petitioners to prep for hearing	2.10	
	DS	team Meeting with to prepare for status conf	1.10	
9/1/2020	DS	status conference	1.00	
	DS	team Meeting with NR and SN re special master/briefing	0.50	
	DS	emails from SN re special master	0.20	
	DS	email to NR re sharing cost for special master	0.20	
	SN	Case management conference (present for part)	1.10	
	SN	Post-CMC meeting with Don, Naeun to determine next steps	0.50	
	SN	Emails to Don and Naeun re possible Special Master candidates	0.20	
9/2/2020	SN	Emails with Don and Naeun re additional possible Special Master candidates	0.40	
9/3/2020	SN	Emails with Don and Naeun re strategy	0.20	
	DS	interviews with perspective special master candidates	1.00	
	DS	emails with co-counsel and others re validity of Pattern	0.30	
9/4/2020	DS	review paper on validity of PATTERN	0.50	
	DS	phone call with PATTERN expert	0.40	
	DS	email to team re validity of PATTERN	0.40	
	DS	email traffic between opp and co-counsel	0.50	
	DS	email to opp counsel re special master	0.30	
9/8/2020	SN	Meet and confer with AUSAs	1.50	
	SN	Debrief and next steps with Don, Naeun, Ollie following meet and confer	0.40	
	DS	zoom meeting with NR and SN re special master and CR	0.40	
	DS	emails with NR and SN re special master	0.50	
	DS	conf call with defs re special master	0.80	
	SN	Meet and confer (second of the day) with AUSAs re special master	0.80	
	SN	Phone call with Naeun re special master filing	0.20	
	SN	Phone call with Don re special master filing, email to team	0.20	
	SN	Gather ct orders, draft email to opp counsel re special master versus ct expert	0.50	
9/9/2020	SN	Draft outline for special master/expert filing	0.40	
	SN	Meeting with Don and Ollie and Chris and Bird Marella re special master/expert filing	0.50	
	SN	Draft special master/expert filing	2.40	
	SN	Review draft for filing on urgent matters, phone call with Naeun re same	0.50	
	SN	Review ex parte filing by Respondents	0.20	
	DS	meeting with SN, Ollie, Chris re special master nomination	0.50	
	DS	email and phone call with Judge Segal	0.20	
	DS	email to and from Judge Walsh	0.20	
	DS	Draft section on special master compensation	0.70	
	DS	review Respondents' ex parte motion and draft response	0.70	
	DS	research CJA rate in central district	0.50	
9/10/2020	DS	review and revise mtn to enforce	0.70	
	DS	review and revise special master brief	1.30	
	DS	review Resp special master brief	0.30	
9/11/2020	DS	review court rder and respondents objection to same	0.30	
9/25/2020	SN	Review Venters report	0.30	
	DS	Read Homer Venter's report	0.50	
10/21/2020	DS	Status conference	1.80	
	SN	Status conference, with follow-up meeting with litigation team	2.60	

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		Hours	Amount
10/21/2020	SN	Review, edit meet and confer email	0.20
10/29/2020	SN	Prep for meeting and confer (review docs), meet and confer re outstanding issues	1.70
10/30/2020	SN	Review and edit notes on meet and confer	0.20
11/2/2020	DS	review Defs response to Venters report	0.40
11/13/2020	SN	Meet and confer on disputed points with AUSAs	0.80
	SN	Follow-up meeting with Jimmy and Oliver from Bird Marella	0.30
11/16/2020	SN	Edit joint statement section on home confinement	0.30
11/17/2020	DS	draft status conference statement	0.50
11/18/2020	DS	team call re status conf statement	0.50
	SN	Meeting with Don, Naeun, Jimmy, Ollie re strategy and next steps	0.50
11/20/2020	SN	Meet and confer on discovery	0.70
	SN	Phone call with Ollie and Jimmy re discovery	0.40
	SN	Phone call with Don re discovery dates, experts	0.40
	SN	Email to AUSAs re discovery dates	0.20
	DS	Phone call with SN re discovery dates, experts	0.40
11/23/2020	SN	Prep meeting for hearing tomorrow with Don, Naeun, Ollie (left before end)	0.30
	DS	Prep meeting for hearing tomorrow with SN, Naeun, Ollie	0.50
11/24/2020	SN	Status conference (not billing for the hour-long break in the middle)	2.30
	SN	Follow-up emails with team re strategy	0.20
	DS	Status conference	2.30
	DS	Email to Homer Venters re inspection	0.30
12/7/2020	DS	emails with co-counsel re medical records	0.20
12/21/2020	SN	Phone call with Ollie re discovery	0.30
12/23/2020	DS	emails re mediation with opp and co-counsel	0.30
	DS	phone call to Ramirez re mediation	0.10
	DS	phone call and email to Judge Ramirez re mediation.	0.50
1/4/2021	SN	Team meeting re case strategy	0.50
1/5/2021	DS	email to Ramirez re mediation	0.20
1/8/2021	DS	phone call with Judge Ramirez	0.80
1/12/2021	DS	Hearing on mtn to intervene	3.00
1/13/2021	PB	Read Homer Venters' Expert Report (0.4); conducted legal research for mediation brief (0.8)	1.20
1/15/2021	PB	Conducted legal research for mediation brief	0.80
1/19/2021	PB	Research for writing mediation brief	1.10
1/20/2021	DS	team meeting to prep for status conf	0.30
1/21/2021	DS	Status conference with MJ	0.50
	SN	Hearing with Magistrate Judge Castillo (present for part)	0.70
	DS	team meeting	0.20
1/25/2021	DS	email to venters re supp inspection	0.20
1/26/2021	PB	Drafted mediation brief	2.60
1/27/2021	PB	Continued drafting mediation brief and conducted legal research to draft brief	2.30
2/1/2021	DS	email to Patrick re mediation brief	0.30
	PB	Continued research and drafting mediation brief; sent draft to SN for review	8.60
2/2/2021	PB	Reviewed SN's comments to draft mediation brief (0.4); made edits to draft and sent revised version to DS and SN (3.8)	4.20
	SN	Edit mediation brief (including phone call with Patrick re edits)	0.60
2/3/2021	PB	Revised draft of mediation brief with DS's and SN's feedback; sent revised version of draft to DS and SN	2.40

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			Hours	Amount
2/3/2021	SN	Edit mediation brief	0.30	
	DS	review and revise mediation brief	1.00	
2/9/2021	DS	email to potential expert	0.20	
2/10/2021	SN	Edit mediation brief	0.60	
	DS	review and revise mediation brief	0.60	
2/17/2021	SN	Meet with team (Don, Jimmy, Ollie) re mediation strategy	0.50	
2/18/2021	SN	Mediation with Judge Ramirez, brief meeting with Nauen afterwards	1.60	
	SN	Second mediation call with Judge Ramirez (joined in the middle)	0.20	
	SN	Phone call with Don re mediation demands	0.10	
	SN	Final session of mediation	1.70	
	DS	Settlement negotiations	4.30	
2/19/2021	SN	Review and edit settlement proposal; emails with team re same	0.30	
	DS	drafting settlement term sheet	0.50	
	DS	revising email to opp counsel re settlement	0.30	
3/8/2021	DS	zoom meeting with co-counsel re settlement discussions	0.30	
	DS	email to team re settlement discussions	0.30	
	DS	2d meeting with co-counsel re settlement	0.30	
3/16/2021	DS	meeting with co-counsel re trial schedule	0.40	
	DS	phone call with SN re trial schedule	0.20	
	SN	Meet and confer with opposing counsel.	0.30	
3/17/2021	SN	Revise discovery requests for Friday filing on court deadlines	0.40	
3/18/2021	SN	Email response to AUSA email on discovery	0.20	
	SN	Revise discovery requests	0.20	
	DS	review proposed discovery	0.20	
	DS	email from SN to Bart re trial schedule	0.20	
	DS	email to Homer re inspection	0.20	
3/23/2021	SN	Draft discovery plan	1.10	
3/24/2021	SN	Complete application for appearance for Jacob Hutt, efile	0.30	
	SN	Draft discovery plan	0.30	
	SJH	Complete and file NOA	0.30	
	PB	Completed and filed NOA	0.30	
3/25/2021	SN	Team meeting (Jimmy and Ollie from Bird Marella, Sophie and Patrick and Jacob) re strategy, discovery, trial planning	1.20	
	SJH	Team meeting w/ SN, PB, JH + co-counsel at Bird Marella re strategy, discovery, trial planning	1.20	
	SJH	Draft 30(b)(6) depo notice	0.60	
	SJH	Review Dr. Venters report + OIG report to draft 30(b)(6) depo notice	1.40	
	PB	Meeting with SN, SH, JH, JT (Bird Marella) and OR (Bird Marella) re trial planning	1.20	
3/28/2021	JH	Drafting notices of expert deposition for Jeffrey Beard and Asma Tekbali	0.40	
	JH	Drafting notices of 30(b)(6) expert deposition of COVID-related practices at Lompoc	1.80	
3/29/2021	SN	Review depo notice draft; edit and discuss in emails	0.40	
	SN	Phone call with Patrick re depositions, emails to team re same	0.30	
	SN	Phone call with Ollie re depositions	0.20	
	SJH	Revise 30(b)(6) depo notice, emails w/ team re same	0.70	
	SN	Emails re depositions with Sophie, Jacob, Patric; edit notices and cover emails	0.70	
	PB	Drafted deposition notices for experts	0.60	
	JH	Drafting notice of 30(b)(6) expert deposition of COVID-related practices at Lompoc	0.50	

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			Hours	Amount
3/30/2021	SJH	Further revise 30(b)(6) depo notice, emails w/ team re same	1.20	
	SN	Emails with team re depositions; edit notices and cover emails	1.20	
	PB	Finalized expert deposition notices and sent draft to co-counsel for comments (0.3); incorporated co-counsel's comments and finalized (0.2)	0.50	
	JH	Drafting correspondence to Defendants re: notices of expert deposition of Dr. Beard and Ms. Tekbali	0.20	
	JH	Drafting correspondence to Defendants re: notices of 30(b)(6) deposition re: COVID 19 related issues at Lompoc.	0.20	
	JH	Drafting and revising notices of expert depositions for Dr. Beard and Ms. Tekbali	0.60	
	JH	Drafting and revising notice of 30(b)(6) deposition	1.10	
3/31/2021	JH	Preparing for deposition of Dr. Jeffrey Beard by redlining his report on the COVID-19 related practices of Lompoc	1.70	
4/5/2021	SN	Emails from AUSAs re depositions; emails with team re same	0.30	
	PB	Emails from AUSAs re depositions; internal emails with team re same	0.30	
4/6/2021	SN	Email to team about meet and confer on discovery	0.20	
4/7/2021	SN	Prep for meet and confer	0.40	
	SN	Meet and confer re discovery	0.30	
	JH	Pre-meeting call to discuss 30(b)(6) M&C	0.50	
	JH	Meet and confer with Respondents regarding topics for 30(b)(6) deposition	0.30	
	SN	Pre-meeting call to discuss 30(b)(6) M&C	0.50	
4/12/2021	DS	emails with doctor re chart review for qualified conditions	0.30	
4/13/2021	SJH	Research and outline deposition questions for 30(b)(6) depo	4.00	
4/14/2021	PB	Edited stipulation re expert discovery (0.1); emails with AUSAs and team re stipulation (0.2)	0.30	
	JH	BOP Lompoc - Editing Defs' draft stipulation to modify discovery schedule	0.40	
4/15/2021	SJH	Research and outline deposition questions for 30(b)(6) depo	5.50	
4/16/2021	DS	emails from Ollie and SN re Venters tours	0.30	
	SJH	Research and outline deposition questions for 30(b)(6) depo	6.20	
4/19/2021	PB	Reviewed expert reports, deposition outlines, and other case-related materials to prepare for expert deposition	0.30	
	SJH	Research and outline deposition questions for 30(b)(6) depo	6.70	
4/20/2021	PB	Reviewed and edited SH's 30(b)(6) deposition preparation materials	0.50	
	SJH	Research and outline deposition questions for 30(b)(6) depo	3.40	
	SJH	Review PB comments on PMK depo outline, revise outline i/r/t comments	0.80	
	SJH	Review JH comments on PMK depo outline, revise outline i/r/t comments	0.70	
4/21/2021	SN	Review, edit, comments on 30(b)(6) draft	0.30	
	SJH	Review SN & OR comments on PMK depo outline, revise outline i/r/t comments	1.20	
4/23/2021	SN	Review discovery; emails with co-counsel re same	1.10	
	AN	review documents in preparation for SH depo	2.00	
	SJH	Review recent documents prod from Defs, revise PMK depo outline i/r/t doc production	5.00	
4/24/2021	SJH	Review recent documents prod from Defs, revise PMK depo outline i/r/t doc production	3.50	
4/25/2021	JH	Reviewing discovery from Defs and tagging items in discovery database.	4.20	

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			Hours	Amount
4/25/2021	SJH	Review recent documents prod from Defs, revise PMK depo outline i/r/t doc production	6.00	
4/26/2021	SN	30(b)(6) depo (includes work on depo and team meetings during breaks)	7.50	
	SJH	Conduct PMK depo (including work done during breaks)	7.50	
4/27/2021	DS	review Venters depo notice	0.20	
	DS	phone call with SJH re Warden depo	0.20	
4/28/2021	DS	phone call with mark chavez re Venters depo	0.40	
	DS	email to Venters re depo	0.20	
	JH	Meeting to discuss results of 30(b)(6) deposition and further strategy in preparing for Respondents' MSJ.	0.70	
4/29/2021	DS	email from Dan Beck re Dr. Venters and response	0.20	
	DS	email from Chavez re venters	0.10	
	PB	Reviewed and sorted discovery documents	0.80	
	JH	Preliminary research re: Respondents' anticipated motion to exclude Mark Chavez from representing the Court's Expert	0.70	
4/30/2021	SN	Meet and confer re representation for court expert	1.00	
	SN	Phone call with Ollie and Don re next steps for ct expert representation, ex parte	0.20	
	DS	review cases presented by respondent and prep for meet & confer	0.50	
	DS	M&C re atty for venters depo	1.00	
	DS	phone call with Jacob re prep for opp to ex parte request by respondents re venters depo	0.20	
	DS	review bio of Mark Chavez	0.10	
	PB	Reviewed and sorted discovery documents	1.00	
	PB	Reviewed Magistrate's Reports and Recommendations re home confinement	0.40	
	JH	Preliminary research re: Respondents' anticipated motion to exclude Mark Chavez from representing the Court's Expert	0.90	
5/1/2021	JH	Drafting Petitioners' opposition to Respondents' ex parte application to exclude Mark Chavez from representing the Court's Expert.	7.80	
5/3/2021	DS	email with rough draft of opp to ex parte request re depo	0.30	
	PB	Reviewed and sorted discovery documents	2.30	
5/4/2021	DS	review ex parte request re Venters' depo and draft response and phone call with Jacob re same	2.30	
	PB	Reviewed and sorted discovery documents	0.80	
	PB	Reviewed expert reports, deposition outlines, and other case-related materials to prepare for expert deposition	2.60	
	PB	Reviewed Respondents' ex parte application re court expert's counsel	0.50	
	JH	Drafting Petitioners' opposition to Respondents' ex parte application to exclude Mark Chavez from representing the Court's Expert.	3.80	
5/5/2021	DS	review and revise several drafts of opp to ex parte app re venters	2.50	
	PB	Reviewed expert reports, deposition outlines, and other case-related materials to prepare for expert deposition	0.90	
	PB	Reviewed and edited JH's draft opposition to Respondents' ex parte application	0.40	
	JH	Drafting Petitioners' opposition to Respondents' ex parte application to exclude Mark Chavez from representing the Court's Expert.	4.50	
5/6/2021	DS	review ct order and email to Mark Chavez re depo	0.20	
5/10/2021	PB	Reviewed and sorted discovery documents	1.20	
	JH	Reviewing Respondents' doc production for Torres.	3.10	
5/12/2021	SN	Review Venters report and email team re next steps	0.30	

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			Hours	Amount
5/12/2021	DS	review supp report from Homer	0.50	
	PB	Closely reviewed and took notes on Dr. Venters' second inspection report	1.90	
	PB	Reviewed Asma Tekbali's second expert report	0.50	
	PB	Conferred with JH re expert reports and deposition strategy	0.70	
	SJH	Review Court Expert supp report	0.50	
	JH	Conferred with PB re expert reports and deposition strategy	0.70	
5/13/2021	PB	Reviewed materials (September 2020 Court Expert report; court filings; and materials produced/published by Defendants' expert) to prepare for expert deposition	3.20	
	JH	Reviewing Dr. Beard's supplemental Lompoc report.	2.30	
5/14/2021	SN	Emails with team re depo doc production	0.30	
	SN	Phone call with Ollie re response to objections to Castillo's order	0.20	
	PB	Meet and confer with Respondents re motion for summary judgment and motion to dissolve preliminary injunction	0.20	
	PB	Conferred with JH and SN re document request for expert depositions	0.20	
	PB	Drafted and sent email to AUSAs re documents for expert depositions	0.20	
	PB	Reviewed materials (CDC guidance; court filings; reports by Defendants' two experts) to prepare for expert deposition	1.60	
	PB	Began drafting deposition outline for expert deposition (Tekbali deposition)	1.20	
	JH	Reviewing Defendants' objections to document requests.	1.70	
	JH	Conferred with PB and SN re document request for expert depositions	0.20	
	SN	Meeting with PB and JH re document request for expert depositions	0.20	
5/16/2021	PB	Continued drafting deposition outline	2.40	
5/17/2021	SN	Review objection to Magistrate's R&R; emails with Ollie re same	0.30	
	SN	Review Resp expert reports	0.30	
	PB	Reviewed expert reports (Court Expert's two reports and four reports of Respondents' experts) and continued drafting deposition outline	6.20	
	PB	Conferred with JH re expert deposition strategy	0.30	
	PB	Conferred with SN re expert deposition strategy	0.20	
	JH	Researching caselaw in preparation for opposition of MSJ.	0.60	
	JH	Preparation for Torres deposition of Dr. Jeffrey Beard.	0.60	
	JH	Conferred with PB re expert deposition strategy	0.30	
	SN	Meeting with PB re expert deposition strategy	0.20	
5/18/2021	SN	Review Patrick's depo plans; phone call with him re depo of expert	0.80	
	PB	Conferred with SN re expert deposition strategy	0.40	
	PB	Conferred with JH re expert deposition strategy	0.40	
	PB	Reviewed JH's, SN's, and SH's edits to deposition outline; incorporated edits and continued revising deposition outline	4.80	
	SJH	Review PB outline of Tekbali depo, suggest revisions	1.50	
	JH	Reviewing doc. production by Respondents.	2.70	
	JH	Preparing for deposition of Jeffrey Beard, Respondents' expert.	4.50	
	JH	Conferred with PB re expert deposition strategy	0.40	
5/19/2021	DS	Prep for Venters' depo; review first and second report	1.50	
	SN	Review depo draft, revise and comment	0.30	
	PB	Continued reviewing expert reports and drafting expert deposition outline; completed draft and sent email to SN and OR (Bird Marella) for edits	3.80	
	PB	Conferred with JH re FCC Lompoc COVID testing data	0.40	
	JH	Preparing for deposition of Jeffrey Beard, Respondents' expert.	2.50	
5/20/2021	SN	Meeting with Ollie, Jacob, Don, Sophie, Patrick re upcoming depositions, strategy	0.30	

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			Hours	Amount
5/20/2021	PB	Completed and reviewed deposition outline	5.40	
	PB	Conferred with JH, SH, SN, DS, and OR (Bird Marella) re expert deposition strategy	0.30	
	PB	Conferred with SN re expert deposition strategy	0.20	
	SJH	Review JH outline of Beard depo, suggest revisions	2.50	
	SJH	Team meeting re upcoming depositions	0.30	
	JH	Reviewing rates of active COVID cases at FCI Lompoc over the course of the pandemic.	1.40	
	JH	Preparing for deposition of Jeffrey Beard, Respondents' expert.	3.80	
	SN	Meeting with PB re expert deposition strategy	0.20	
	JH	Team meeting re upcoming depositions	0.30	
	DS	Team meeting re upcoming depositions	0.30	
5/21/2021	SN	Tekbali depo (work during breaks and some prep before)	4.80	
	PB	Prepared for deposition of Respondents' expert (Asma Tekbali) (reviewed deposition outline and both expert reports)	1.40	
	PB	Deposition of Asma Tekbali (including deposition and team meetings during breaks)	4.60	
5/22/2021	SN	Review and revise Beard depo draft, email to Jacob re same	0.80	
	JH	Preparing for deposition of Jeffrey Beard, Respondents' expert.	3.90	
5/23/2021	SN	Emails with Ollie re discovery	0.20	
	DS	Prep for Venters depo	4.00	
	JH	Preparing for deposition of Jeffrey Beard, Respondents' expert.	5.10	
5/24/2021	SN	Beard deposition (minus lunch break; worked during other breaks)	5.50	
	SN	Meeting with Sophie, Patrick, Ollie, Jacob re depo and trial strategy	0.50	
	DS	Venters depo	9.20	
	SJH	Team meeting re depositions	0.50	
	JH	Deposition of Jeffrey Beard, Respondents' Expert.	5.50	
	JH	Revisions to RFPs.	0.60	
	JH	Reviewing Respondents' MSJ.	2.30	
	JH	Meeting with SN, PB, SH, and OR (Bird Marella) re expert deposition debrief	0.50	
5/25/2021	DS	Read Defs Mtn to Vacate TRO	0.30	
	DS	read Defendants MSJ motion	0.50	
	DS	email to Ollie and SN re settlement	0.40	
	PB	Reviewed Respondents' Motion to Dissolve the Preliminary Injunction (Dkt. No. 250 and attachments)	0.80	
	PB	Reviewed Respondents' Motion for Summary Judgment (Dkt. No. 251 and attachments)	0.80	
	SN	Review MSJ and motion to dissolve injunction	0.30	
5/26/2021	DS	meeting with team re Summary Judgment motion	0.90	
	DS	meeting with SN, Ollie re MSJ and settlement	0.60	
	SN	Meeting with Don and Ollie re case strategy	0.60	
	SN	Emails with Ollie and Don re case strategy	0.40	
	SN	Meeting with team re MSJ opp	0.90	
	SN	Review MSJ, plan response	0.40	
	PB	Meeting with SN, JH, SH, DS, and OR (Bird Marella) re plan for opposition to motion for summary judgment motion and debrief of Court Expert deposition	0.90	
	PB	Meeting with SH and JH re outlining and dividing work for opposition to motion for summary judgment	0.60	
	PB	Reviewed Respondents' Statement of Uncontroverted Facts	0.60	

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			Hours	Amount
5/26/2021	PB	Researched Central District local rules and Judge Marshall's standing orders re requirements for Statement of Genuine Disputes of Material Fact	0.40	
	SJH	Team meeting re MSJ (DS, SN, OR, JH, PB)	0.90	
	SJH	Meeting w/ JH and PB re plan for opp to MSJ	0.60	
	SJH	Review depo transcripts, prep cites for MSJ opp	4.50	
	JH	Internal meeting re: Respondents' MSJ.	0.90	
	JH	Reviewing documents produced by Respondents for opposition to MSJ	3.60	
	JH	Drafting Petitioners' 56-2 statement	4.70	
	JH	Conferred with SH and PB re plan for opp to MSJ	0.60	
5/27/2021	SN	Doc review for MSJ opp	0.80	
	SN	Edit opp to objection to Judge Castillo's R&R	0.80	
	PB	Conferred with JH re Respondents' Statement of Uncontroverted Facts and our Statement of Genuine Disputes of Material Fact	0.50	
	PB	Created guidance document for colleagues reviewing FCC Lompoc discovery document	0.50	
	JH	Drafting Petitioners' 56-2 statement	5.20	
	JH	Doc review in preparation for opposition to MSJ.	2.10	
	JH	Conferred with PB re Respondents' Statement of Uncontroverted Facts and our Statement of Genuine Disputes of Material Fact	0.50	
5/28/2021	SN	Review discovery	1.10	
	SN	Revise initial disclosures	0.40	
	AN	review documents for MSJ opp	5.00	
	JH	Drafting opposition to MSJ.	3.10	
	TAA	Doc review in Relativity for MSJ opp	3.10	
5/29/2021	SN	Doc review for MSJ opp	1.00	
5/31/2021	SN	Doc review	4.90	
	AN	review documents	4.50	
	JH	Drafting opposition to MSJ.	3.30	
	TAA	Doc review in Relativity	4.00	
6/1/2021	SN	Meeting with Ollie, Sophie, Jacob, Patrick re MSJ opp	1.10	
	DS	review and summarize part of Venters depo	2.10	
	SN	Doc review and analysis for MSJ opp	2.50	
	PB	Meeting with JH and SH re outlining opposition to motion for summary judgment	0.50	
	PB	Meeting with JH, SH, SN, and OR (Bird Marella) re outlining opposition to motion for summary judgment	1.10	
	PB	Continued drafting Statement of Genuine Disputes of Material Fact	1.80	
	PB	Began drafting opposition to motion for summary judgment	4.70	
	SJH	Team meeting re MSJ	1.10	
	SJH	Meeting with JH and B re outlining opp to MSJ	0.50	
	JH	Meeting to prepare opposition to MSJ.	1.10	
	JH	Call with PB & SJH to discuss opposition to MSJ.	0.50	
	JH	Drafting opposition to MSJ.	2.90	
	JH	Reviewing doc production in preparation for opposition to MSJ.	1.40	
	TAA	Doc review in Relativity	2.50	
6/2/2021	SN	Review and analyze discovery for MSJ opp	1.00	
	PB	Continued drafting Statement of Genuine Disputes of Material Fact	4.20	
	PB	Continued drafting opposition to motion for summary judgment	2.60	
	JH	Reviewing doc production in preparation for opposition to MSJ.	0.90	
	JH	Drafting opposition to MSJ.	5.40	

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			Hours	Amount
6/3/2021	SN	Meet and confer with AUSAs on pretrial matters	0.50	
	SN	Phone call with Ollie re trial date proposal from AUSAs	0.40	
	SN	Email to co-counsel re trial date and strategy	0.30	
	DS	email to and from SN re trial setting strategy	0.30	
	PB	Continued drafting and revision opposition to motion for summary judgment	7.70	
	PB	Continued drafting and revising Statement of Genuine Disputes of Material Fact	2.10	
	SJH	Drafting opp. to summary judgment (fact section), including review of deposition transcript, doc production, expert reports, declarations, relevant public health guidance	3.20	
	JH	Drafting opposition to MSJ.	7.80	
	JH	Correspondence with Petitioners' Counsel re: declarations from class members.	0.30	
6/4/2021	SN	Draft brief sections	2.20	
	SN	Review and revise facts section	1.00	
	SN	Phone call with class member re declaration, facts for opp to MSJ	0.90	
	SN	Finalize class member dec	0.30	
	SN	Meeting with Sophie, Jacob, Patrick re strategy, facts, next steps on opp to MSJ	0.50	
	SN	Phone call with Ollie re MSJ opp	0.30	
	SN	Email to Bart re response to trial delay proposal	0.20	
	SN	Emails with co-counsel re: Respondents' trial delay proposal	0.30	
	SN	Draft MSJ opp sections	2.80	
	PB	Continued drafting and revising opposition to motion for summary judgment	5.80	
	PB	Continued drafting and revising Statement of Genuine Disputes of Material Fact	1.60	
	PB	Meeting with SN, JH, and SH re planning opposition to motion for summary judgment	0.50	
	SJH	Revising draft of opp. to summary judgment (fact section)	2.50	
	SJH	Meeting with SN, JH, and PB re planning opp to MSJ	0.50	
	JH	Drafting opposition to MSJ.	8.40	
	JH	Conferred with SN, SH, and PB re planning opp to MSJ	0.50	
6/5/2021	SN	Draft, revise, research MSJ opp	6.90	
	PB	Continued drafting and revising opposition to motion for summary judgment; continued drafting and revising Statement of Genuine Disputes of Material Fact	7.30	
	SJH	Drafting + researching opp. to summary judgment (objective prong)	8.00	
	JH	Drafting opposition to MSJ.	6.30	
6/6/2021	SN	Meeting with Sophie, Jacob, Patrick re MSJ opp	0.50	
	SN	Draft, revise, research MSJ opp	6.00	
	SN	Second meeting of the day with Sophie, Jacob, Patrick re MSJ opp	0.30	
	PB	Continued drafting and revising opposition to motion for summary judgment; continued drafting and revising Statement of Genuine Disputes of Material Fact	6.30	
	PB	Meeting with SN, JH, and SH re planning opposition to motion for summary judgment	0.50	
	PB	Conducted legal research for motion for summary judgment opposition	0.80	
	PB	Second meeting of the day with SN, SH, and JH re planning for opposition to motion for summary judgment	0.30	

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			Hours	Amount
6/6/2021	SJH	Drafting + researching opp. to summary judgment (objective prong + fact section), drafting/revising table of disputed facts	9.50	
	SJH	Meeting with SN, JH, and PB re planning opp to MSJ	0.50	
	JH	Drafting opposition to MSJ.	7.90	
	JH	Call #1 with SN, PB, and SH re: MSJ Opp.	0.50	
	JH	Call #2 with SN, PB, and SH re: MSJ Opp.	0.30	
	SJH	Second meeting of the day with SN, PB, and JH re planning for opposition to motion for summary judgment	0.30	
6/7/2021	PB	Prepared for legal call with class member at FCC Lompoc (reviewed recent correspondence with class member)	0.30	
	PB	Conducted legal call with class member at FCC Lompoc	0.50	
	PB	Continued drafting and revising opposition to motion for summary judgment; continued drafting and revising Statement of Genuine Disputes of Material Fact	12.30	
	SN	Draft, revise, emails and calls with co-counsel about MSJ opp, opp to mtn to dissolve injunction, statement of facts, dec, etc.	11.80	
	SJH	Revising opp. to summary judgment (objective prong + fact section), revising table of disputed facts i/r/t comments from SN and OR	14.00	
	JH	Legal call with class member.	1.00	
	JH	Drafting opposition to MSJ.	13.40	
6/8/2021	SN	Draft, edit, revise opp to summary judgment, opp to motion to dissolve injunction, my declaration, statements of facts and law	12.60	
	PB	Finished drafting and revising opposition to motion for summary judgment; finished drafting and revising Statement of Genuine Disputes of Material Fact	8.20	
	SJH	Revising opp. to summary judgment (objective prong + fact section), revising table of disputed facts, including review of cite checks, incorporation of edits, and finalization of docs for filing	13.00	
	RL	Cite check BOP summary judgment opposition.	1.60	
	RA	cite checking MSJ opp	1.10	
	JH	Drafting opposition to MSJ.	10.30	
	MKM	Cite check summary judgment brief and accompanying filings	2.10	
6/9/2021	SN	Review settlement proposal draft, edit, emails with Ollie and others re settlement	0.70	
6/10/2021	DS	review settlement proposal	0.20	
6/15/2021	SN	Review reply briefs	0.20	
	SJH	Review reply to opp to MSJ & assoc filings, call w/ PB re same	1.50	
	DS	review Reply to MSJ	0.50	
6/16/2021	DS	Team meeting to discuss Reply for MSJ and argument	1.00	
	SJH	Team meeting re: MSJ reply, plan for argument	1.00	
	SN	Team meeting re: MSJ reply, plan for argument	1.00	
6/22/2021	DS	review minute order and emails to co-counsel re trial deadlines	0.40	
7/19/2021	JH	Drafting update for Lompoc class members about the case's status	0.30	
7/22/2021	SN	Phone call with class rep Mr. Torres; draft letter to follow up	1.00	
7/23/2021	SN	Phone call with class rep Mr. Reed; draft letter to follow up	0.80	
8/2/2021	PB	Reviewed and drafted responses to 4 letters from class members re status of litigation and individual issues related to the case	0.40	
8/18/2021	SN	Phone call with named plaintiff Mr. Torres re case matters	0.50	
8/19/2021	SN	Call with named plaintiff re case issues	0.40	
12/28/2021	JH	Meeting with co-counsel to discuss 1/4 hearing	0.70	
	JH	Conferring with SN and PB re: MSJ oral argument	0.20	
	JH	Reviewing MSJ papers in preparation for 1/4 hearing	0.30	

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			Hours	Amount
12/28/2021	SN	Meeting with co-counsel to prep for MSJ hearing	0.70	
	SN	Follow-up with Jacob to prep for MSJ hearing	0.20	
12/29/2021	JH	Preparing for 1/4 hearing	2.10	
	SN	Prep for MSJ hearing	0.50	
1/4/2022	SN	Hearing on MSJ (attended only part)	0.60	
	SN	Phone calls and emails with Naeun, Ollie re hearing on MSJ; follow up work on additional briefing	0.80	
	SJH	Attend (remotely) MSJ hearing (left early due to conflict w/ another meeting)	1.00	
1/5/2022	SN	Meeting with Naeun, Ollie re hearing on MSJ	0.60	
	SN	Emails with co-counsel re follow-up briefing to MSJ	0.20	
1/7/2022	SN	Phone call with Amber re task for briefing on court expert	0.10	
	SN	Review Amber's memo for briefing on court expert; email to co-counsel re same	0.10	
	AN	confer w/ SN re quotes from the record re Dr. Venters	0.10	
	AN	collect quotes/cites from the record re Dr. Venters	0.80	
	JH	Reviewing and revising brief re: admissibility of court expert's report	0.80	
1/10/2022	SN	Legal research on class cert	1.00	
	SN	Emails with team re class cert	0.20	
	SN	Review and comment on draft filing for tomorrow	0.40	
	JH	Reviewing report from class member	0.20	
	JH	Emailing Pltfs' counsel re: report from class member at Lompoc	0.10	
1/12/2022	SN	Phone call with Jacob re class cert	0.30	
	JH	Writing to Deputy Clerk re: notice of appearance	0.10	
	JH	Conferred with SN re class cert	0.30	
1/14/2022	JH	Researching and drafting motion for non-provisional class certification	4.20	
1/15/2022	JH	Researching and drafting motion for non-provisional class certification	0.30	
1/17/2022	SN	Review draft motion for class cert	0.30	
	JH	Researching and drafting motion for class cert	4.70	
1/18/2022	SN	Review and revise draft motion for trial date, expert visit	0.30	
	RL	Cite check motion for non-provisional class certification.	0.70	
	SN	Review Order on Venters site visit; emails with team re next steps; email to Dr. V re third site visit	0.40	
	JH	Researching and drafting class cert motion	3.50	
	JH	filing class cert motion	0.50	
	LB	Cite checked motion for non-provisional class certification	0.90	
	RL	Cite check motion for non-provisional class certification.	0.70	
1/25/2022	JH	Researching for class cert reply	1.60	
1/26/2022	JH	Researching for class cert reply	0.90	
1/27/2022	JH	Researching for class cert reply	1.80	
1/30/2022	SN	Review class cert motion opp and reply	0.40	
1/31/2022	PB	Reviewed Court Expert's deposition transcripts in advance of upcoming tour	2.90	
	JH	Call with PB re: Venters site visit	0.50	
	JH	Drafting reply brief	2.30	
	PB	Conferred with JH re: Venters site visit	0.50	
2/1/2022	RL	Cite check reply in support of motion for non-provisional class certification.	1.10	
	JH	Drafting and filing reply brief	2.10	
	JH	Call with PB re: reply brief	0.30	
	PB	Conferred with JH regarding reply brief	0.30	
2/2/2022	SN	Review and respond to emails re ct expert plans	0.30	

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			Hours	Amount
2/2/2022	SN	Phone call with Patrick re ct expert plans	0.30	
	PB	Reviewed previous court filings and deposition transcripts of Court Expert to draft email re upcoming site visit	1.30	
	PB	Conferred with SN re email to the Court Expert about upcoming site visit of FCC Lompoc	0.30	
2/3/2022	SN	Phone call with Patrick re ct expert plans; emails with co-counsel re same	0.30	
	PB	Conferred via email with co-counsel re email to Court Expert about upcoming site visit of FCC Lompoc	0.20	
2/14/2022	JH	Emailing co-counsel re: class cert motion	0.40	
2/15/2022	SN	Hearing on class cert (present for part)	0.60	
	JH	Hearing on class cert motion	1.80	
3/2/2022	SN	Draft Venters declaration	0.20	
3/4/2022	DS	Meeting with co-counsel re Venters' report	0.70	
	DS	review Venters report	0.50	
3/7/2022	SN	Draft settlement proposal, phone call with Naeun re same	0.80	
3/8/2022	SN	Draft settlement proposal	0.70	
3/18/2022	SN	Meeting with co-counsel to prep for hearing; review docs to prep	0.80	
	DS	co-counsel meeting to prep for 3/21 hearing	0.80	
	DS	review objections to Venters report	0.40	
3/19/2022	JH	Conferring with SH & PB re: correspondence from Lompoc Class member	0.10	
3/21/2022	SN	Remote appearance at court hearing (partial)	1.30	
	DS	Court hearing	1.60	
3/23/2022	DS	emails with co-counsel re settlement	0.40	
3/24/2022	DS	review settlement counter-proposal and emails to and from co-counsel re same	0.50	
	SN	Review settlement counter-offer; emails with co-counsel re possible settlement	0.40	
3/25/2022	SN	Emails with co-counsel re possible settlement; email to AUSA responding to counter-offer	0.50	
3/29/2022	DS	settlement discussions with defendants	0.50	
	SN	settlement discussions with defendants	0.50	
For professional services rendered			791.40	

User Summary

Name	Hours
Alison Hardy	2.60
Amber Norris	12.40
Corene Kendrick	13.10
Donald Specter	94.90
Jacob Hutt	196.30
Laura Bixby	0.90
Margot Mendelson	2.10
Patrick Booth	158.70
Rana Anabtawi	1.10
Rita Lomio	12.00
Sara Norman	163.90
Sophie J. Hart	123.80
Tovah Anna Ackerman	9.60

Prison Law Office
1917 Fifth Street
Berkeley, CA, 94710

BOP-Lompoc

Additional Charges :

	<u>Amount</u>
9/7/2020 PLO Homer D. Venters, MD - Invoice no. 1 - Lompoc Inspection	4,404.50
9/25/2020 PLO Homer D. Venters, MD - Invoice no. 2 - Write inspection report	3,500.00
2/21/2021 PLO Ramirez Arbitration and Mediation Services - Invoice no. 01-2021	1,375.00
5/12/2021 PLO Homer D. Venters, MD - Invoice no. 4 - Writing second inspection report	3,250.00
5/14/2021 PLO US Legal Support, Inc. - Invoice no. 110462218: Copy of Transcript of Brian Birkholz	1,452.00
5/26/2021 PLO Homer D. Venters, MD - Invoice no. 7 - Deposition of Pltfs counsel 5/24/21	500.00
Total costs	<u>\$14,481.50</u>

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
TWB	5/5/2020	1	990	990	217.54	217.54	Co-counsel meeting re case work
TWB	5/6/2020	0.2	198	990	43.51	217.54	Emails re work
SEB	5/8/2020	4.5	2610	580	978.93	217.54	Review file for facts; review intake email and respond with suggestions re same; legal research re TRO; edit questionnaire; review Stern Dec.; lengthy email discussion re same
TWB	5/8/2020	0.5	495	990	108.77	217.54	Review emails and draft pleadings; video conference; research
NXR	5/9/2020	3.5	1925	550	761.39	217.54	Revise complaint; calls with contacts for plaintiffs; team strategy meeting; emails with co-counsel and team
SEB	5/9/2020	4	2320	580	870.16	217.54	Outline for TRO; email to J. Threatt re research topics; team zoom call; review research results; legal research re TRO
NXR	5/10/2020	4.7	2585	550	1022.44	217.54	Revise complaint; calls with contacts for plaintiffs; calls with co-counsel; revise fact declarations; meeting with co-counsel re plaintiff intake
SEB	5/10/2020	3.5	2030	580	761.39	217.54	Review revised draft complaint; review Stern Dec; email re thoughts on same; legal research re TRO
TWB	5/10/2020	2	1980	990	435.08	217.54	Review pleadings; emails to team re case work and strategies
NXR	5/11/2020	2.4	1320	550	522.10	217.54	Revise questionnaire; draft form email for interested parties; calls with contacts for plaintiffs; calls with co-counsel; numerous calls re motion, experts, and plaintiffs
SEB	5/11/2020	4.5	2610	580	978.93	217.54	Attention to brief bank; telephone call with K. Fisher re same; call with ██████ review and edit draft complaint; legal research re TRO
TWB	5/11/2020	2	1980	990	435.08	217.54	Email ██████ re representation; telephone call with Neman re possible Lompoc clients; emails with team re scope and focus of class action
NXR	5/12/2020	3.1	1705	550	674.37	217.54	Call with expert; calls with J. Threatt with expert; emails with co-counsel; emails re remedies
SEB	5/12/2020	7.8	4524	580	1696.81	217.54	Work on TRO papers; legal research; factual research; review brief bank on p drive; review new order; emails re all of the above
TWB	5/12/2020	1.5	1485	990	326.31	217.54	Telephone call with ██████ re potential clients; telephone call with client representative re case; research relevant cases and data; emails re same; emails with team re strategies and arguments
NXR	5/13/2020	1.7	935	550	369.82	217.54	Revise expert witness declarations; call with expert; calls with J. Threatt with expert; emails and calls with co-counsel; emails re remedies

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SEB	5/13/2020	6.1	3538	580	1326.99	217.54	Attention to complaint; factual and legal research for TRO; review prisoner letters for facts; telephone call with [REDACTED]; follow up emails re same; work on drafting of TRO
TWB	5/13/2020	2	1980	990	435.08	217.54	Emails re complaint and case strategy; review declarations and drafts
NXR	5/14/2020	3.6	1980	550	783.14	217.54	Revise fact witness declarations; team meeting; emails with co-counsel re drafting; revise complaint
SEB	5/14/2020	7	4060	580	1522.78	217.54	Review draft declarations and suggest edits; review new Supreme Court opinion; email re same; review and mine CDC guidance; review and edit draft complaints; draft TRO papers
TWB	5/14/2020	1.5	1485	990	326.31	217.54	Emails re complaint and case strategy
NXR	5/15/2020	3.1	1705	550	674.37	217.54	Revise declarations; revise complaint; prepare for filing
SEB	5/15/2020	9.1	5278	580	1979.61	217.54	Work on drafting TRO papers; revise and cite check complaints; and attention to numerous filing-related tasks
NXR	5/16/2020	3.1	1705	550	674.37	217.54	Revise complaint; supervise filing; email to witnesses; email to joint defense counsel
SEB	5/16/2020	6	3480	580	1305.24	217.54	Work on filing of complaints; draft supporting papers for complaint filing; research re rules on service of summons
NXR	5/17/2020	3.1	1705	550	674.37	217.54	Revise complaint; supervise filing; email to witnesses; email to joint defense counsel
SEB	5/17/2020	7	4060	580	1522.78	217.54	Draft TRO papers
AHM	5/18/2020	0.5	495	990	108.77	217.54	Memo to N. Rim re [REDACTED]
JST	5/18/2020	2.3	1046.5	455	500.34	217.54	Meetings and email correspondence with N. Rim, S. Barnett, C. Lee, ACLU, Prison Law Office; research; email correspondence with BOP; phone calls with S. Barnett
NXR	5/18/2020	1.2	660	550	261.05	217.54	Meeting with ACLU re preliminary injunction and intake; analyze preliminary injunction motion
SEB	5/18/2020	7.1	4118	580	1544.53	217.54	Zoom and teams meetings re strategy and logistics; work on draft TRO motion; legal research re various procedural issues connected with motions, including whether to bring as TRO or PI, ability to have special master appointed, etc.
CJL	5/19/2020	0.8	364	455	174.03	217.54	Call with case team; review of prisoner emails

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
JST	5/19/2020	2.2	1001	455	478.59	217.54	Meetings and email correspondence with N. Rim, S. Barnett, C. Lee, ACLU, Prison Law Office; research; email correspondence with BOP; phone call with BOP; email correspondence with medical experts; phone calls with S. Barnett
NXR	5/19/2020	4.1	2255	550	891.91	217.54	Meeting with ACLU; team meeting re intake procedures and next pleadings; revise discovery requests; comments for preliminary injunction motion; email re intake procedures
SEB	5/19/2020	5.2	3016	580	1131.21	217.54	Zoom call re logistics and strategy; work on draft TRO motion
SKG	5/19/2020	2.1	661.5	315	456.83	217.54	Review Complaints; confer with team regarding strategy; develop intake spreadsheet; review incoming contacts and populate intake sheet with same
AHM	5/20/2020	0.3	297	990	65.26	217.54	Telephone call with D. Wolpert re TRO and other relief
CJL	5/20/2020	0.4	182	455	87.02	217.54	Document management, draft questionnaire
JST	5/20/2020	2.2	1001	455	478.59	217.54	Meetings and email correspondence with N. Rim, S. Barnett, C. Lee, ACLU, Prison Law Office; research; email correspondence with BOP; phone call with BOP; email correspondence with medical experts; draft form response to inmates/family members; phone calls with S. Barnett
NXR	5/20/2020	3.9	2145	550	848.41	217.54	Revise TRO and PI motion; revise discovery requests; draft form response letters; calls with J. Threatt re form response; emails with prosecutor
SEB	5/20/2020	6.2	3596	580	1348.75	217.54	Continue drafting TRO and circulate new draft; review and revise request for extra pages; t.c. P. Eliasberg re Lompoc witness interview; review Lompoc draft declaration; review JST dec
SKG	5/20/2020	2.1	661.5	315	456.83	217.54	Continue review and documentation of incoming contacts; revise and update Intake Index accordingly
CJL	5/21/2020	0.9	409.5	455	195.79	217.54	Team call; manage form response packets; draft notice of errata
NXR	5/21/2020	4.7	2585	550	1022.44	217.54	Revise TRO and OSC; revise proposed order; emails with co-counsel; meet and confer calls and emails with AUSAs
PKF	5/21/2020	3.75	450	120	450.00	120	Gather docket and TRO information
SEB	5/21/2020	6	3480	580	1305.24	217.54	Draft proposed order for TRO; finalize brief for filing; work on class certification order; zoom calls re strategy and logistics; emails re filings
SKG	5/21/2020	0.5	157.5	315	108.77	217.54	Review communications and strategy regarding filings; confer with paralegal clerk regarding file organization and offer instruction in research, retrieval and maintenance of federal filings
JST	5/22/2020	0.7	318.5	455	152.28	217.54	Phone call with prisoner [REDACTED] memo to file; update spreadsheet

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
NXR	5/22/2020	0.5	275	550	108.77	217.54	Meet and confer emails with AUSAs
PKF	5/22/2020	5	600	120	600.00	120	Organize Prisoner folders
SEB	5/22/2020	1.2	696	580	261.05	217.54	Draft motion for class certification
SKG	5/22/2020	2.2	693	315	478.59	217.54	Review communications and strategy regarding filings; confer with paralegal clerk regarding file organization and offer instruction in research, retrieval and maintenance of federal filings
NXR	5/23/2020	2.2	1210	550	478.59	217.54	Draft TRO and OSC; revise form responses for prisoners and third party contacts; revise motion for provisional class certification; strategy email to team and co-counsel; send meet and confer email to opposing counsel
CJL	5/24/2020	0.5	227.5	455	108.77	217.54	Draft declaration
JST	5/24/2020	1.7	773.5	455	369.82	217.54	Draft declaration in support of TRO; review notes of phone calls with prisoners; draft ex parte application for oversized brief
NXR	5/24/2020	4.5	2475	550	978.93	217.54	Revising discovery documents for filing; emails with prosecutor and J. Threatt re meet and confer on discovery; draft TRO and OSC for PI for Lompoc case; revise notice of errata; emails with co-counsel
JST	5/25/2020	0.2	91	455	43.51	217.54	Email correspondence with PLO, ACLU, N. Rim, S. Barnett, C. Lee; email correspondence with us attorney's office
NXR	5/25/2020	4.5	2475	550	978.93	217.54	Revising discovery documents for filing; emails with prosecutor and J. Threatt re meet and confer on discovery; draft TRO and OSC for PI for Lompoc case; revise notice of errata; emails with co-counsel
JST	5/26/2020	1.4	637	455	304.56	217.54	Meeting with N. Rim, S. Barnett, C. Lee, ACLU, PLO; meeting with N. Rim; meet and confer with government; revise discovery motion and requests; email summary to government of meet and confer; email correspondence with medical expert; phone call with S. Barnett; email correspondence with C. Lee, N. Rim, S. Barnett
NXR	5/26/2020	2.2	1210	550	478.59	217.54	Meeting with ACLU and PLO; meet and confer with government re discovery; emails with J. Threatt re same; revise and send meet and confer email to government
PKF	5/26/2020	3	360	120	360.00	120	Extract declarations and CVs from Complaints and put them in folders
SEB	5/26/2020	2.5	1450	580	543.85	217.54	Draft supporting papers for motion for class certification; attention to discovery; telephone calls with members of team re strategy and status of projects
SKG	5/26/2020	1.5	472.5	315	326.31	217.54	Meet and confer regarding organization of prisoner and third party communications and response to same; continue intake of contact information; review news
CJL	5/27/2020	1.4	637	455	304.56	217.54	Team meeting; research on discovery issues; review of brief in MCC case

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
NXR	5/27/2020	2.4	1320	550	522.10	217.54	Strategy meeting re class member intake; draft application for TRO and OSC re PI
PKF	5/27/2020	2	240	120	240.00	120	Teams meeting and putting docs in folders
SEB	5/27/2020	1.1	638	580	239.29	217.54	Team call; attention to class certification filing
SKG	5/27/2020	2.1	661.5	315	456.83	217.54	Meet and confer regarding organization of prisoner and third party communications and response to same; continue intake of contact information; review and circulate news
JST	5/28/2020	0.2	91	455	43.51	217.54	Meet with N. Rim; email correspondence with N. Rim, S. Bannett, C. Lee, ACLU, PLO
NXR	5/28/2020	7.5	4125	550	1631.55	217.54	Draft TRO and OSC re PI in Lompoc
PKF	5/28/2020	1	120	120	120.00	120	Read complaint, declarations and letters
SEB	5/28/2020	1	580	580	217.54	217.54	Telephone calls re reply brief; review and respond to email; review news articles; review correctional officer complaint
SKG	5/28/2020	2.3	724.5	315	500.34	217.54	Continue intake of contact information; review and circulate news; return calls from friends and family members; provide FAQ sheet and questionnaire links to contacts
DW	5/29/2020	0.7	574	820	152.28	217.54	Review Lompoc TRO
JST	5/29/2020	1.2	546	455	261.05	217.54	Email correspondence with N. Rim, S. Bannett, C. Lee, ACLU, PLO; revise declaration in support of TRO; revise ex parte application; email correspondence with government; phone call with N. Rim; email correspondence with Sara Norman re medical records
NXR	5/29/2020	8.2	4510	550	1783.83	217.54	Draft TRO and OSC re PI in Lompoc; emails with co-counsel re same
PKF	5/29/2020	0.5	60	120	60.00	120	Read news stories put on P drive
SEB	5/29/2020	1.5	870	580	326.31	217.54	Review Lompoc TRO; legal research re Lompoc TRO
SKG	5/29/2020	3	945	315	652.62	217.54	Continue intake of contact information; review and circulate news; return calls from friends and family members; provide FAQ sheet and questionnaire links to contacts
CJL	5/30/2020	0.5	227.5	455	108.77	217.54	Team meeting; correspondence with case team

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
JST	5/30/2020	1.2	546	455	261.05	217.54	Meet with S. Barnett, C. Lee, N. Rim; revise declaration and ex parte application
NXR	5/30/2020	0.6	330	550	130.52	217.54	Emails re revisions to TRO and OSC re PI; call with S. Barnett re same
SEB	5/30/2020	2.5	1450	580	543.85	217.54	Team call re filings; revise Lompoc TRO
JST	5/31/2020	0.7	318.5	455	152.28	217.54	Revise declaration and ex parte application; email correspondence with N. Rim, S. Barnett, C. Lee
NXR	5/31/2020	1.2	660	550	261.05	217.54	Emails re filing TRO and OSC re PI
SEB	5/31/2020	1.5	870	580	326.31	217.54	Continue to work on Lompoc TRO
AHM	6/1/2020	0.6	594	990	130.52	217.54	Email exchanges with N. Rim
CJL	6/1/2020	4	1820	455	870.16	217.54	Revise and file TRO/PI
JST	6/1/2020	0.6	273	455	130.52	217.54	Email correspondence with N. Rim, C. Lee, S. Barnett, O. Rocos, K. Shin; email correspondence with ██████████ finalize ex parte application; finalize declaration in support of TRO
KSS	6/1/2020	6.5	2957.5	455	1414.01	217.54	Research and revise TRO ex parte; draft ex parte papers and numerous supporting docs; quality check exhibits and cite checking; numerous related team discussions
NXR	6/1/2020	8.2	4510	550	1783.83	217.54	Emails re revisions to TRO and OSC re PI; supervise filing
PKF	6/1/2020	0.2	24	120	24.00	120	Put PDFs in folders
SEB	6/1/2020	2	1160	580	435.08	217.54	Work on Lompoc TRO; review and respond to email re various
AHM	6/2/2020	1.9	1881	990	413.33	217.54	Review numerous filings; send detailed suggestions to N. Rim
JST	6/2/2020	0.3	136.5	455	65.26	217.54	Email correspondence with N. Rim, C. Lee, S. Barnett, O. Rocos, K. Shin; email correspondence with ██████████
KSS	6/2/2020	6.2	2821	455	1348.75	217.54	Research and draft ex parte app for provisional class cert. and supporting papers; numerous related team emails

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
NXR	6/2/2020	2.5	1375	550	543.85	217.54	Email to K. Shin and O. Rocos re TRO reply, discovery requests, and class certification; strategy call with O. Rocos re Lompoc TRO reply; call with T. Bird and H. Matz re litigation strategy
OXR	6/2/2020	2.4	1248	520	522.10	217.54	Review background materials; call with N. Rim regarding matter background
PKF	6/2/2020	0.2	24	120	24.00	120	Review news clips and PDFing emails
SKG	6/2/2020	2.4	756	315	522.10	217.54	Continue intake of contact information; review and circulate news; organize intake communications; respond to communications from friends and family members; provide FAQ sheet and questionnaire links to contacts
AHM	6/3/2020	1.3	1287	990	282.80	217.54	Further exchanges re briefing
CJL	6/3/2020	0.5	227.5	455	108.77	217.54	Call with case team
JST	6/3/2020	1.2	546	455	261.05	217.54	Email correspondence and meeting with N. Rim, C. Lee, S. Barnett, O. Rocos, K. Shin; email correspondence with [REDACTED] prepare meet and confer follow up; email correspondence with corrections officers
KSS	6/3/2020	7.2	3276	455	1566.29	217.54	Continue drafting ex parte app for provisional class cert. and supporting papers, prepare exhibits; cite checking; numerous related team emails; related research; team conference
NXR	6/3/2020	2.1	1155	550	456.83	217.54	Revise ex parte for class certification; strategy meeting
OXR	6/3/2020	2.1	1092	520	456.83	217.54	Review background materials
SEB	6/3/2020	1	580	580	217.54	217.54	Review Lompoc class cert motion; team meeting; review and respond to email
SKG	6/3/2020	0.4	126	315	87.02	217.54	Continue intake of contact information; reivew and circulate news
CJL	6/4/2020	1.1	500.5	455	239.29	217.54	Research re: first step act and cares act
JST	6/4/2020	1.2	546	455	261.05	217.54	Phone calls with corrections officers; phone call with [REDACTED] phone call; phone call with [REDACTED] email correspondence with N. Rim, C. Lee, S. Barnett, O. Rocos, K. Shin; email correspondence with Keith Staub
KSS	6/4/2020	4.8	2184	455	1044.19	217.54	Revise ex parte app for provisional class cert. and supporting papers; research, cite checking and supervise filing; related team discussions
NXR	6/4/2020	3.5	1925	550	761.39	217.54	Revise ex parte application for class certification; emails re class definition; meet and confer emails re discovery

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	6/4/2020	2.3	1196	520	500.34	217.54	Call with N. Rim regarding matter background; draft reply in support of TRO
SEB	6/4/2020	0.25	145	580	54.39	217.54	Review and respond to email re strategy; review stay order by USSC in Williams
SKG	6/4/2020	2.1	661.5	315	456.83	217.54	Continue intake of contact information; reivew news; return calls to family members; send Form Response; review filings
JST	6/5/2020	0.6	273	455	130.52	217.54	Memos to file; email correspondence with N. Rim, C. Lee, S. Barnett, O. Rocos, K. Shin; email correspondence with [REDACTED] email correspondence with Sara Norman
KSS	6/5/2020	0.9	409.5	455	195.79	217.54	Review supreme court materials and opp to ex parte; team discussions
OXR	6/5/2020	4.3	2236	520	935.42	217.54	Review opposition to TRO; draft reply in support of TRO
SEB	6/5/2020	0.25	145	580	54.39	217.54	Analyze impact from Williams S. Ct order; emails re various
SKG	6/5/2020	0.8	252	315	174.03	217.54	Continue intake of contact information; reivew news; return calls to family members; send Form Response; review filings
OXR	6/6/2020	6.7	3484	520	1457.52	217.54	Draft reply in support of TRO
CJL	6/7/2020	0.4	182	455	87.02	217.54	Fact investigation re: client; correspondence with case team
KSS	6/7/2020	0.2	91	455	43.51	217.54	Team emails re pending issues
NXR	6/7/2020	5	2750	550	1087.70	217.54	Draft and revise reply ISO TRO; call with S. Barnett and O. Rocos re same
SEB	6/7/2020	1.5	870	580	326.31	217.54	Analyze and respond to questions re TRO arguments; call with N. Rim and O. Rocos re reply; review and revise brief; factual research for same
AHM	6/8/2020	1.8	1782	990	391.57	217.54	Numerous emails exchanges with N. Rim; review filings; send 2 emails with suggestions
JST	6/8/2020	4.1	1865.5	455	891.91	217.54	Phone call with inmates at Lompoc; email correspondence and meeting with N. Rim, C. Lee, S. Barnett, O. Rocos, K. Shin, prison law office, ACLU; email correspondence with medical experts; memos to file; phone call with S. Barnett; email correspondence with [REDACTED]
OXR	6/8/2020	5.4	2808	520	1174.72	217.54	revise draft reply in support of TRO; review draft notices of appearance

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SEB	6/8/2020	3	1740	580	652.62	217.54	respond to emails re caselaw; research re PLRA; attention to reply brief
SKG	6/8/2020	0.8	252	315	174.03	217.54	Review and circulate news
JST	6/9/2020	2.7	1228.5	455	587.36	217.54	Phone call with S. Barnett; legal research; phone call with inmates; memos to file; email correspondence with N. Rim, C. Lee, S. Barnett, O. Rocos, K. Shin, PLO, ACLU
KSS	6/9/2020	7.9	3594.5	455	1718.57	217.54	Analysis of recent Sixth Cir opinion; review and analyze BOP opp to ex parte re class cert; research and revise reply iso TRO; numerous related team discussions and conferences
NXR	6/9/2020	6.8	3740	550	1479.27	217.54	Draft reply ISO TRO; revise reply ISO TRO; strategy meeting with ACLU and PLO; call with D. Spector; analyze new Sixth Circuit opinion
OXR	6/9/2020	7.4	3848	520	1609.80	217.54	Revise and finalize draft reply in support of TRO; telephone calls with team regarding revisions to TRO reply; revise draft declaration
SEB	6/9/2020	3	1740	580	652.62	217.54	Call with ACLU; revise reply brief; legal research review case law for reply; review Sixth circuit opinion
SKG	6/9/2020	1.9	598.5	315	413.33	217.54	Continue intake of contact information; reivew news; review filings
JST	6/10/2020	0.2	91	455	43.51	217.54	Email correspondence with [REDACTED] N. Rim, S. Barnett, C. Lee, PLO, ACLU, O. Rocos, K. Shin
KSS	6/10/2020	3.2	1456	455	696.13	217.54	Review docs produced by BOP and recent filings; review articles and witness interviews; multiple team emails
OXR	6/10/2020	2.1	1092	520	456.83	217.54	Research regarding potential supplemental TRO
SKG	6/10/2020	1.7	535.5	315	369.82	217.54	Continue intake of contact information; reivew and circulate news; return calls to family members; send Form Response; review filings
JST	6/11/2020	0.2	91	455	43.51	217.54	Memos to file; email correspondence with sister of client; email correspondence with C. Lee, S. Barnett, N. Rim, O. Rocos, K. Shin, PLO, ACLU
KSS	6/11/2020	3	1365	455	652.62	217.54	Multiple team discussions re upcoming hearing; conf with paralegal re discovery
NXR	6/11/2020	1.3	715	550	282.80	217.54	Legal research on direct Eighth Amendment claim
OXR	6/11/2020	4.3	2236	520	935.42	217.54	Attend call regarding next steps; draft brief for supplemental TRO

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SEB	6/11/2020	0.75	435	580	163.16	217.54	Team call; review class cert reply; emails re deadlines; review notes of prisoner calls; emails re various
SKG	6/11/2020	0.5	157.5	315	108.77	217.54	Review news; review filings; plan for Discovery organization; review strategy discussions
JST	6/12/2020	0.6	273	455	130.52	217.54	Phone call with [REDACTED] memo to file; email correspondence with PLO, ACLU, S. Bannett, C. Lee, N. Rim, K. Shin, O. Rocos
SKG	6/12/2020	1.3	409.5	315	282.80	217.54	Review news; review filings; review and process incoming data on inmates
CJL	6/14/2020	0.3	136.5	455	65.26	217.54	Draft letter to families
JST	6/15/2020	0.4	182	455	87.02	217.54	Phone call with PLO
OXR	6/15/2020	1.3	676	520	282.80	217.54	Research regarding supplemental TRO brief
SEB	6/15/2020	0.1	58	580	21.75	217.54	Review correspondence re various
SKG	6/15/2020	2.6	819	315	565.60	217.54	Review news; review filings; review and process incoming data on inmates; review and organize medical records and policy documents produced by the Government
OXR	6/16/2020	2.9	1508	520	630.87	217.54	Research regarding supplemental TRO brief; draft supplemental TRO brief
SKG	6/16/2020	1.6	504	315	348.06	217.54	Review news; review and process incoming data on inmates; review and organize medical records and policy documents produced by the Government
OXR	6/17/2020	3.2	1664	520	696.13	217.54	Review draft joint statement; review emails regarding experts; research and draft supplemental TRO brief
SEB	6/17/2020	0.2	116	580	43.51	217.54	Call re briefing; review emails re same; review emails re site visit expert
SKG	6/17/2020	1.2	378	315	261.05	217.54	Review news; review and process incoming data on inmates
OXR	6/18/2020	4.5	2340	520	978.93	217.54	Research and draft supplemental TRO brief
SKG	6/18/2020	0.2	63	315	43.51	217.54	Forward email list to ACLU

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	6/19/2020	3.1	1612	520	674.37	217.54	Revise supplemental TRO brief
SKG	6/19/2020	1.7	535.5	315	369.82	217.54	Forward email list to ACLU; review and circulate news; organize intake communications
OXR	6/22/2020	2.8	1456	520	609.11	217.54	Revise, finalize, and file supplemental TRO brief
SEB	6/22/2020	0.1	58	580	21.75	217.54	Review draft brief and comment on same
SKG	6/22/2020	1.8	567	315	391.57	217.54	Review and circulate news; organize intake communications
SKG	6/23/2020	1.7	535.5	315	369.82	217.54	Review and circulate news; organize intake communications; review filings
SKG	6/24/2020	1.8	567	315	391.57	217.54	Review news; organize intake communications; review filings
JST	6/25/2020	0.3	136.5	455	65.26	217.54	Meeting with N. Rim, S. Barnett, C. Lee, K. Shin
OXR	6/25/2020	0.6	312	520	130.52	217.54	Review opposition to TRO
SEB	6/25/2020	0.25	145	580	54.39	217.54	Team call
SKG	6/25/2020	1.9	598.5	315	413.33	217.54	Review and circulate news; organize intake communications; review filings
OXR	6/26/2020	0.6	312	520	130.52	217.54	Draft summary regarding opposition to TRO
SKG	6/26/2020	1.2	378	315	261.05	217.54	Review news; organize intake communications; review filings; confer with attorney regarding intake and organization; transmit updates to inmate contact
OXR	6/29/2020	1.3	676	520	282.80	217.54	Discuss matter with intern, send her materials
SEB	6/29/2020	0.2	116	580	43.51	217.54	Review and respond to emails re experts for site visit
SKG	6/29/2020	0.8	252	315	174.03	217.54	Review news; organize intake communications

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SEB	6/30/2020	0.15	87	580	32.63	217.54	Emails re various
SEB	6/30/2020	0.15	87	580	32.63	217.54	Emails re various
SKG	6/30/2020	0.7	220.5	315	152.28	217.54	Review news; organize intake communications; draft summary report for team identifying key [REDACTED] and new plaintiffs
SKG	7/1/2020	0.6	189	315	130.52	217.54	Review and circulate news; organize intake communications; review work report; identify individuals seeking legal referrals and communicate with team regarding same
CJL	7/2/2020	1.4	637	455	304.56	217.54	Team meeting; review of potential plaintiffs information
DW	7/2/2020	0.6	492	820	130.52	217.54	Attend meeting
JST	7/2/2020	0.4	182	455	87.02	217.54	Meet with N. Rim, S. Barnett, C. Lee, K. Shin; email correspondence with N. Rim and S. Barnett
NXR	7/2/2020	1.6	880	550	348.06	217.54	Team meeting re TRO hearing, discovery, and motion to dismiss; call with S. Barnett re TRO hearing; draft meet and confer email to government
OXR	7/2/2020	0.4	208	520	87.02	217.54	Team meeting regarding matter status
SEB	7/2/2020	0.4	232	580	87.02	217.54	Emails re various; team meeting
SKG	7/2/2020	1.2	378	315	261.05	217.54	Review and circulate news; Organize intake communications; review work report; meet with team; begin review and organization of letters
AHM	7/3/2020	1.7	1683	990	369.82	217.54	Review materials N. Rim sent; prepare memo re oral argument
DW	7/3/2020	4	3280	820	870.16	217.54	Review briefs and cases; outline TRO argument
OXR	7/3/2020	1.5	780	520	326.31	217.54	Research opposition to motion to dismiss
OXR	7/4/2020	5.4	2808	520	1174.72	217.54	Draft opposition to motion to dismiss
DW	7/5/2020	2.5	2050	820	543.85	217.54	Draft TRO argument and review class cert briefs and prepare argument

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	7/5/2020	3.4	1768	520	739.64	217.54	Revise draft opposition to motion to dismiss; emails with N. Rim regarding key authorities
DW	7/6/2020	0.8	656	820	174.03	217.54	Review opposition to motion to dismiss and prepare comments
JST	7/6/2020	1.4	637	455	304.56	217.54	Email correspondence with N. Rim and S. Barnett; memos for oral argument; phone call with N. Rim; email correspondence with Sara Norman
KSS	7/6/2020	0.4	182	455	87.02	217.54	Review mtn to dismiss
NXR	7/6/2020	4.8	2640	550	1044.19	217.54	Call with S. Barnett re hearing; review TRO papers; draft hearing outline; preparation for oral argument
SEB	7/6/2020	1.4	812	580	304.56	217.54	Prepare for argument; review file to respond to questions from N. Rim
SKG	7/6/2020	2.6	819	315	565.60	217.54	Review news; continue review and organization of inmate letters
CJL	7/7/2020	2	910	455	435.08	217.54	Hearing
DW	7/7/2020	2	1640	820	435.08	217.54	Attend hearing on TRO
JST	7/7/2020	4.4	2002	455	957.18	217.54	Email correspondence with N. Rim; court conference; meet with N. Rim, S. Barnett, C. Lee; draft meet and confer; draft declaration; draft site visit topics; email correspondence with N. Rim
KSS	7/7/2020	3	1365	455	652.62	217.54	Prepare for and appear TRO hearing; numerous team emails
NXR	7/7/2020	6.7	3685	550	1457.52	217.54	Hearing prep; argue hearing; debrief call; call with J. Threatt re meet and confer; emails with government; draft declaration ISO TRO; emails re supplemental briefing
OXR	7/7/2020	3.6	1872	520	783.14	217.54	Prepare for and attend TRO hearing; telephone call with intern regarding hearing
SEB	7/7/2020	4	2320	580	870.16	217.54	Prepare for and attend argument on Lompoc TRO
SKG	7/7/2020	2.7	850.5	315	587.36	217.54	Review news; continue review and organization of inmate letters; review strategy communications; begin identification of key inmates to add as potential plaintiffs
AHM	7/8/2020	0.2	198	990	43.51	217.54	Exchanges with N. Rim and S. Barnett

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
CJL	7/8/2020	0.2	91	455	43.51	217.54	Correspondence with S. Grisham; ACLU
JST	7/8/2020	2.1	955.5	455	456.83	217.54	Phone call with N. Rim; email correspondence with N. Rim; draft meet and confer email; finalize and file declaration
KSS	7/8/2020	0.6	273	455	130.52	217.54	Review inmates correspondences; emails re today's filing
NXR	7/8/2020	5.1	2805	550	1109.45	217.54	Meet and confer emails with prosecutors; draft supplemental filing in support of TRO; draft notice of non-opposition to convert TRO to preliminary injunction; strategy call with prison law office; call with J. Threatt re discovery meet and confer
SEB	7/8/2020	0.1	58	580	21.75	217.54	Draft email summarizing my thoughts on hearing
SKG	7/8/2020	2.4	756	315	522.10	217.54	Review news; continue review and organization of inmate letters; review strategy communications; continue identification of key inmates to add as potential plaintiffs; prepare to mail releases to key inmates
JST	7/9/2020	0.7	318.5	455	152.28	217.54	Meet and confer with government; draft agenda; email correspondence with Sara Norman
KSS	7/9/2020	0.8	364	455	174.03	217.54	Various team emails and review of latest filings
OXR	7/9/2020	1.4	728	520	304.56	217.54	Review filings
SKG	7/9/2020	2.2	693	315	478.59	217.54	Review news; review strategy communications; continue identification of key inmates to add as potential plaintiffs; process incoming emails; update contact list; return family phone calls; send initial Form Response to new contacts
CJL	7/12/2020	2	910	455	435.08	217.54	Draft opposition to MTD
OXR	7/12/2020	3.8	1976	520	826.65	217.54	Draft opposition to motion to dismiss
JST	7/13/2020	0.1	45.5	455	21.75	217.54	Email correspondence with Sara Norman; review discovery materials
NXR	7/13/2020	0.2	110	550	43.51	217.54	Email re site visit meet and confer; email with counsel for [REDACTED]
OXR	7/13/2020	7.7	4004	520	1675.06	217.54	Draft opposition to motion to dismiss
SEB	7/13/2020	0.5	290	580	108.77	217.54	Review and edit opp to Lompoc motion to dismiss; review Sixth Circuit decision reversing Cameron

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	7/13/2020	2.1	661.5	315	456.83	217.54	Review news; draft/review/reply to communications with family members of key inmates to request medical record; upload records; coordinate transmittal of ████████ to inmate
AHM	7/14/2020	1.5	1485	990	326.31	217.54	Read CBM ruling; send email to team
CJL	7/14/2020	0.3	136.5	455	65.26	217.54	Review of decision re TRO
JST	7/14/2020	0.4	182	455	87.02	217.54	Email correspondence with N. Rim, S. Bannett; draft summary email to clients; review judges' rulings
KSS	7/14/2020	5.6	2548	455	1218.22	217.54	Research and revise opposition to motion to dismiss; cite-checking, finalize brief and supervise filing; related team emails; review court's TRO order and team discussions
NXR	7/14/2020	1.8	990	550	391.57	217.54	Revise opposition to motion to dismiss; review order granting preliminary injunction
OXR	7/14/2020	5.5	2860	520	1196.47	217.54	Revise, finalize opposition to motion to dismiss; review rulings on TRO and preliminary injunction
SEB	7/14/2020	1	580	580	217.54	217.54	Revise reply brief; emails re same; review Lompoc order; emails re same and next steps; telephone calls with O. Rocos re revising brief in wake of Lompoc order
SKG	7/14/2020	0.5	157.5	315	108.77	217.54	Review news; review filings; review communications
JST	7/15/2020	0.2	91	455	43.51	217.54	Email correspondence with N. Rim, PLO, ACLU, S. Bannett, opposing counsel
NXR	7/15/2020	0.2	110	550	43.51	217.54	Emails re meet and confer and site visit
SKG	7/15/2020	2.7	850.5	315	587.36	217.54	Review news; coordinate transmittal of update and key rulings to loved ones; revise Initial Form Response to summarize TRO ruling; process intake from loved ones, including updating chart and responding to voicemails; follow up on and document requests for ████████
SKG	7/16/2020	2.3	724.5	315	500.34	217.54	Review news; process intake from loved ones, including updating chart and responding to voicemails; identify incoming messages requesting individual representation, assistance for loved ones at other facilities, and counsel in wrongful death suits; draft appropriate form response
JST	7/17/2020	0.5	227.5	455	108.77	217.54	Phone correspondence with government, PLO, N. Rim, N. Solomon; email correspondence with PLO, N. Rim, K. Shin, S. Bannett
KSS	7/17/2020	0.3	136.5	455	65.26	217.54	Meet and confer telephonic conference
NXR	7/17/2020	1.2	660	550	261.05	217.54	Preparation for NBC interview; NBC interview; emails with representatives for named petitioners; emails with joint defense counsel re next steps

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SEB	7/17/2020	0.2	116	580	43.51	217.54	Emails with N. Rim re class members
SKG	7/17/2020	0.5	157.5	315	108.77	217.54	Review news; circulate form response declining individual representation; review incoming messages
KSS	7/18/2020	0.6	273	455	130.52	217.54	Review proposed protective order and various media coverage; team emails
JST	7/20/2020	0.6	273	455	130.52	217.54	Draft and file join statement; email correspondence with govt, N. Rim, Sara Norman
NXR	7/20/2020	0.3	165	550	65.26	217.54	Review joint statement; review and revise protective order stipulation; emails with government re same
OXR	7/20/2020	0.2	104	520	43.51	217.54	Emails and telephone call with N. Rim regarding press contact
SKG	7/20/2020	2.1	661.5	315	456.83	217.54	Review news; process intake from loved ones, including updating chart and responding to voicemails; circulate initial form response and latest updates and Order to new contacts
CJL	7/21/2020	0.8	364	455	174.03	217.54	Correspondence w/ case team; drafted Lompoc class notice; correspondence w/ opposing counsel
KSS	7/21/2020	0.5	227.5	455	108.77	217.54	Review and analyze govt's filings
OXR	7/21/2020	0.8	416	520	174.03	217.54	Attend call with ACLU regarding press; emails with group and P. Eliasberg;
SKG	7/21/2020	2.4	756	315	522.10	217.54	Review news; review BOP list of covered class inmates filed per Court Order and cross reference with key individuals identified as at risk; update intake chart
KSS	7/22/2020	0.5	227.5	455	108.77	217.54	Review latest filings and emails with USAO
OXR	7/22/2020	0.8	416	520	174.03	217.54	Emails with ACLU regarding press
SKG	7/22/2020	0.2	63	315	43.51	217.54	Review news
KSS	7/23/2020	0.5	227.5	455	108.77	217.54	Review new materials and emails
OXR	7/23/2020	0.6	312	520	130.52	217.54	Review background materials on Cohen release

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SEB	7/23/2020	0.5	290	580	108.77	217.54	Draft responses for reporter; review OIG report
SKG	7/23/2020	0.8	252	315	174.03	217.54	Review news; research and retrieve key filings in M Cohen Habeas case;
JST	7/24/2020	0.6	273	455	130.52	217.54	Phone call with government, PLO, ACLU
NXR	7/24/2020	0.6	330	550	130.52	217.54	Emails re site monitor; emails re BOP deadlines; e-mail re [REDACTED]
SKG	7/24/2020	1.5	472.5	315	326.31	217.54	Review and circulate news; review messages from inmates' families; update contact data; communicate with S Norman regarding response to families looking for referrals
JST	7/27/2020	0.7	318.5	455	152.28	217.54	Phone call with S. Grisham; email correspondence with ACLU, PLO, N. Rim, C. Lee
NXR	7/27/2020	2.9	1595	550	630.87	217.54	Email proposing strategy and next steps re site visit and fact collection; emails with [REDACTED] call with J. Threatt re site monitor and fact collection; emails with T. Bird re site visit funds; review government declarations re compliance with court's order
OXR	7/27/2020	0.3	156	520	65.26	217.54	Review press regarding prison
SKG	7/27/2020	2.3	724.5	315	500.34	217.54	Review and circulate news; review messages from inmates' families; update contact data; research and retrieve key dockets; identify and organize Respondent Declarations; conference with attorney in preparation for calls to at risk inmates; review amended BOP list and format as spreadsheet
CJL	7/28/2020	0.8	364	455	174.03	217.54	Call with [REDACTED]
JST	7/28/2020	0.3	136.5	455	65.26	217.54	Email and phone correspondence with Lompoc corrections officers; email correspondence with N. Rim
NXR	7/28/2020	3.4	1870	550	739.64	217.54	Call with [REDACTED] emails with PLO re site visit expert; email analysis of [REDACTED] email to [REDACTED] re documents requested
SKG	7/28/2020	1.2	378	315	261.05	217.54	Review news; confirm consent to representation from key inmate witnesses; review messages from inmates' families; update contact data; return voicemails; circulate updates; provide ACLU with new contact information
JST	7/29/2020	0.8	364	455	174.03	217.54	Phone calls with inmates; email correspondence with PLO, ACLU, N. Rim
SKG	7/29/2020	1.7	535.5	315	369.82	217.54	Review news; prepare and transmit message for families; confirm key inmates on list
NXR	7/30/2020	1.5	825	550	326.31	217.54	Draft meet and confer email to government re class evaluation and home confinement evaluation procedures; call with O. Rocos re reviewing government's filings

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	7/30/2020	0.9	468	520	195.79	217.54	Telephone call and emails with N. Rim regarding next steps; review [REDACTED]
SKG	7/30/2020	0.5	157.5	315	108.77	217.54	Review news; update contact list
NXR	7/31/2020	1.2	660	550	261.05	217.54	Draft case update for prisoners and their representatives; emails selecting expert for site visit; emails re team assignments and next steps; email re topics for cross-examination of Lawrence Cross
SKG	7/31/2020	2.8	882	315	609.11	217.54	Review news; intake messages; return calls from families; update contact list
CJL	8/3/2020	0.1	45.5	455	21.75	217.54	Correspondence with case team
JST	8/3/2020	1.9	864.5	455	413.33	217.54	Phone calls with inmates; memos to file
SKG	8/3/2020	1.2	378	315	261.05	217.54	Review news; assemble list of certified candidates for legal calls
CJL	8/4/2020	0.4	182	455	87.02	217.54	Call with client family; correspondence with case team
OXR	8/4/2020	4	2080	520	870.16	217.54	Review materials regarding requests for information; revise draft email to individuals requesting information; draft meet and confer email regarding compliance with preliminary injunction; emails with P. Eliasberg regarding deadlines; emails regarding contacts with court
SKG	8/4/2020	1.1	346.5	315	239.29	217.54	Review news; review and revise updated form response and confer with attorney regarding same; process intake messages and update chart; return voicemails from families
CJL	8/5/2020	0.5	227.5	455	108.77	217.54	Correspondence with PLO; case team; calls with case team
JST	8/5/2020	2.1	955.5	455	456.83	217.54	Call with [REDACTED] call with inmate; email correspondence with BOP; prepare script for inmate calls; review motion for appointment of Dr. Venters as Rule 706 expert
OXR	8/5/2020	1.1	572	520	239.29	217.54	Emails with the court regarding requests for information; finalize and send meet and confer email; review emails from S. Grisham regarding requests for information
SKG	8/5/2020	1.7	535.5	315	369.82	217.54	Review news; review updated form response; process intake messages and update chart; return voicemails from families; confer with team regarding response to counsel seeing information; prepare and transmit update to relatives; provide ACLU with latest contact data
JST	8/6/2020	0.4	182	455	87.02	217.54	Email correspondence with BOP, S. Grisham, C. Lee
OXR	8/6/2020	0.5	260	520	108.77	217.54	Emails regarding meet and confer

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SEB	8/6/2020	0.2	116	580	43.51	217.54	Review Supreme Court dissent in Barnes v. Ahlman; review email traffic re meet and confer with government
SKG	8/6/2020	3.6	1134	315	783.14	217.54	Review news; place calls to inmates; draft memos of same
CJL	8/7/2020	1.2	546	455	261.05	217.54	Meet & confer call; compile notes of call; review of notes from [REDACTED] call
JST	8/7/2020	3.2	1456	455	696.13	217.54	Email correspondence with PLO, BOP, C. Lee, N. Rim, S. Grisham; phone calls with inmates; memos to file
OXR	8/7/2020	1.2	624	520	261.05	217.54	Prepare for and attend meet and confer regarding compliance with preliminary injunction; emails regarding home confinement reviews
SEB	8/7/2020	0.1	58	580	21.75	217.54	Review emails re meet and confer with government
SKG	8/7/2020	2.6	819	315	565.60	217.54	Review news; place calls to inmates; draft memos of same; process incoming communications from families
JST	8/9/2020	2.7	1228.5	455	587.36	217.54	Legal research; email correspondence with PLO and clients' family members; email correspondence with BOP; revise reply to government's opposition re site expert
JST	8/10/2020	2.1	955.5	455	456.83	217.54	Email correspondence with BOP and SS. Grisham; review documents produced by government and exhibits; discovery spreadsheet; review reply to government's objection to Rule 706 expert
NXR	8/10/2020	0.8	440	550	174.03	217.54	Call with O. Rocos re following up on meet and confer with respondents re class member identification and release criteria; email to D. Spector re revisions to reply in support of selection of Rule 706 expert
OXR	8/10/2020	0.4	208	520	87.02	217.54	Emails and telephone calls regarding matter status
SKG	8/10/2020	1.4	441	315	304.56	217.54	Review news; process incoming communications from families
CJL	8/11/2020	0.3	136.5	455	65.26	217.54	Call with N. Rim
JST	8/11/2020	0.8	364	455	174.03	217.54	Phone call with N. Rim; review discovery
NXR	8/11/2020	1.1	605	550	239.29	217.54	Call with J. Threatt re prisoner declarations and site visit; revise meet and confer email to BOP; email re work streams
OXR	8/11/2020	0.6	312	520	130.52	217.54	Draft and revise email to Respondents; emails with N. Rim regarding matter status

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	8/11/2020	3.1	976.5	315	674.37	217.54	Review news; process incoming communications from families; review letters from inmates; prepare update to new contacts
JST	8/12/2020	2.3	1046.5	455	500.34	217.54	Phone calls with inmates; memos to file
NXR	8/12/2020	1.8	990	550	391.57	217.54	Revise meet and confer email re preliminary injunction compliance; meet and confer emails re Rule 706 expert; call with O. Rocos re modification of preliminary injunction; emails with S. Grisham re identification of missing class members
OXR	8/12/2020	0.4	208	520	87.02	217.54	Emails and telephone call with N. Rim regarding meet and confer with government
SKG	8/12/2020	4.3	1354.5	315	935.42	217.54	Review news; place calls to selected inmates and draft memos recording same; comprehensive comparison of BOP original, incorrect list of class members against corrected list; search for key inmates who have reported illness
JST	8/13/2020	0.1	45.5	455	21.75	217.54	Email correspondence with BOP
NXR	8/13/2020	2.1	1155	550	456.83	217.54	Meet and confer call re site expert; draft meet and confer email re modification of preliminary injunction; analyze class communications for missing class members
OXR	8/13/2020	1.3	676	520	282.80	217.54	Prepare for and attend meet and confer with government; emails with government and N. Rim regarding meet and confer
PKF	8/13/2020	1	120	120	120.00	120	Review phone call protocol with Sharon, reviewing case files
SKG	8/13/2020	6.2	1953	315	1348.75	217.54	Review news; place calls to selected inmates and draft memos recording same; create comprehensive, correct list of class members; communicate clients' class status to key counsel; research inmates with identified health risk factors who are not on the class list; train paralegal clerk in conducting inmate phone interviews and preparation of related memo; direct paralegal clerk in organization of letters
JST	8/14/2020	0.9	409.5	455	195.79	217.54	Meet with N. Rim; memos to file; email with PLO
NXR	8/14/2020	2.1	1155	550	456.83	217.54	Revise ex parte application re site visit conditions; meet and confer emails with prosecutors re site visit; meet and confer call with J. Yang re BOP extension to file; call with O. Rocos re ex parte to modify preliminary injunction
OXR	8/14/2020	0.4	208	520	87.02	217.54	Emails and telephone call with N. Rim regarding meet and confer
PKF	8/14/2020	3.8	456	120	456.00	120	Rename PDFs to prisoner name and number and adding to new folder
SKG	8/14/2020	3.4	1071	315	739.64	217.54	Review news; place calls to selected inmates and draft memos recording same; process incoming messages from relatives; prepare update for relatives
NXR	8/16/2020	0.2	110	550	43.51	217.54	Email re site visit

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
JST	8/17/2020	0.4	182	455	87.02	217.54	Email correspondence with BOP, N. Rim, Sharon Grisham
NXR	8/17/2020	1	550	550	217.54	217.54	Meet and confer emails with prosecutors re extension for declaration; call with O. Rocos re anticipated opposition
OXR	8/17/2020	0.3	156	520	65.26	217.54	Emails with government regarding meet and confer and ex parte application
SKG	8/17/2020	3.1	976.5	315	674.37	217.54	Review news; prepare for calls to selected inmates and former inmates; process incoming messages from relatives; communication with relative of inmate regarding fear of speaking openly on calls; confer with legal team regarding same; revise memos
CJL	8/18/2020	0.2	91	455	43.51	217.54	Correspondence with case team
JST	8/18/2020	1.7	773.5	455	369.82	217.54	Phone calls with clients; memos to file; revise protective order; email correspondence with BOP, N. Rim, PLO
NXR	8/18/2020	2.3	1265	550	500.34	217.54	Meet and confer re preliminary injunction compliance; revise opposition to ex parte application; email to co-counsel re meet and confer issues and [REDACTED]
OXR	8/18/2020	7.3	3796	520	1588.04	217.54	Review ex parte motion; draft opposition to ex parte motion; prepare for and attend meet and confer
PKF	8/18/2020	7.5	900	120	900.00	120	Rename PDFs to prisoner names
SKG	8/18/2020	3.8	1197	315	826.65	217.54	Review news; return voicemails; update tracking chart; conduct interview with recently released inmate and draft memo regarding same; process incoming messages from relatives
JST	8/19/2020	0.6	273	455	130.52	217.54	Email correspondence with N. Rim, PLO; phone call with client; memo to file
OXR	8/19/2020	2	1040	520	435.08	217.54	Revise, finalize and file opposition to ex parte motion; review ruling on ex parte
PKF	8/19/2020	3.8	456	120	456.00	120	Rename PDFs to prisoner names
SKG	8/19/2020	3.5	1102.5	315	761.39	217.54	Review news; circulate memo of inmate interview; complete paperwork to be cleared to conduct interviews in future; review filings; process incoming messages from relatives; communicate with relatives; upload and review medical records; check class list for select names
JST	8/20/2020	2.4	1092	455	522.10	217.54	Phone calls with clients; memos to file
NXR	8/20/2020	0.9	495	550	195.79	217.54	Revise protective order; emails with prosecutors re protective order; analyze [REDACTED] docket

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
JST	8/21/2020	0.8	364	455	174.03	217.54	Phone calls with clients; memos to file; email correspondence with families of clients, N. Rim
NXR	8/21/2020	1.6	880	550	348.06	217.54	Analyze Review Worksheets; emails and call with prosecutor re protective order proposal
OXR	8/21/2020	0.3	156	520	65.26	217.54	Emails with P. Eliasberg regarding matter status
PKF	8/21/2020	3.3	396	120	396.00	120	Rename PDFs to prisoner name and number
JST	8/23/2020	0.2	91	455	43.51	217.54	Email correspondence with BOP
NXR	8/23/2020	2.2	1210	550	478.59	217.54	Call with S. Normal re Review Worksheet protocol; analyze Exhibit B part 1 for Rule Outs"; research PATTERN score and BOP acronyms"
AJH	8/24/2020	0.5	157.5	315	108.77	217.54	Meeting with N. Rim and S. Grisham regarding work sheet review and spreadsheet organization
JST	8/24/2020	0.4	182	455	87.02	217.54	Email correspondence with BOP, S. Grisham, family members of clients, N. Rim, PLO
NXR	8/24/2020	7.1	3905	550	1544.53	217.54	Develop Review Worksheet coding spreadsheet; meeting with S. Grisham and A. Hyon re instructions for Review Worksheet coding; review Exhibit A worksheets and decisions from Lompoc declaration; email instructions to team re Review Worksheet coding; emails with counsel re class list sufficiency problems
SKG	8/24/2020	4.3	1354.5	315	935.42	217.54	Review news; conference with attorney regarding worksheet review; begin conversion and formatting of complete BOP Class List as spreadsheet; review filings; process incoming messages from relatives; communicate with relatives; upload and review medical records; check class list for select names
AJH	8/25/2020	2.4	756	315	522.10	217.54	Review Worksheets and update spreadsheet
JST	8/25/2020	0.5	227.5	455	108.77	217.54	Email correspondence with BOP, S. Grisham, N. Rim
KSS	8/25/2020	3.9	1774.5	455	848.41	217.54	Team training meeting; review home confinement worksheets and related materials; numerous related team emails
NXR	8/25/2020	2.5	1375	550	543.85	217.54	Finish coding Exhibit A worksheets and decisions from Lompoc declaration into Review Worksheet spreadsheet
NXR	8/25/2020	2.1	1155	550	456.83	217.54	Finish dividing Review Worksheets; conduct training on Review Worksheet coding and analysis protocol; emails with outside witnesses re BOP [REDACTED] that show BOP's class identification process is flawed; emails with PLO re initial objections to review process
OXR	8/25/2020	0.3	156	520	65.26	217.54	Attend call regarding reviewing worksheets

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
PKF	8/25/2020	1.75	210	120	210.00	120	Rename PDFs to prisoner name and number
SKG	8/25/2020	6.3	1984.5	315	1370.50	217.54	Review news; begin worksheet review; review filings; process incoming messages from relatives; communicate with relatives; upload and review [REDACTED] check class list for select names
AJH	8/26/2020	2.8	882	315	609.11	217.54	Review Worksheets and update spreadsheet
JST	8/26/2020	0.9	409.5	455	195.79	217.54	Phone calls with clients; memos to file
KSS	8/26/2020	3	1365	455	652.62	217.54	Review and summarize home confinement worksheets
NXR	8/26/2020	4.7	2585	550	1022.44	217.54	Meet and confer email to prosecutors re joint status report; draft joint status report
OXR	8/26/2020	0.5	260	520	108.77	217.54	Review worksheets
SKG	8/26/2020	4.3	1354.5	315	935.42	217.54	Review news; begin worksheet review; review filings; process incoming messages from relatives; communicate with relatives; upload and review [REDACTED]
AJH	8/27/2020	2.7	850.5	315	587.36	217.54	Review inmate home confinement evaluation Worksheets and update spreadsheet
CJL	8/27/2020	2	910	455	435.08	217.54	Correspondence with case team, ACLU; worksheet review
JST	8/27/2020	2.7	1228.5	455	587.36	217.54	Phone calls with clients; memo to file; email correspondence with N. Rim, PLO, S. Grisham
KSS	8/27/2020	0.5	227.5	455	108.77	217.54	Review government filings and declarations
NXR	8/27/2020	6.3	3465	550	1370.50	217.54	Emails to counsel and family re Lompoc matter; analyze newly filed Review Worksheets; create spreadsheet for remaining class members; conduct Review Worksheet training with PLO; call with S. Norman and D. Specter re Lompoc hearing
OXR	8/27/2020	0.6	312	520	130.52	217.54	Review worksheets
SKG	8/27/2020	5.4	1701	315	1174.72	217.54	Review and circulate news; continue worksheet review; review filings; process incoming messages from relatives; communicate with relatives; upload and review medical records
AJH	8/28/2020	2.8	882	315	609.11	217.54	Review inmate home confinement evaluation Worksheets and update spreadsheet

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
JST	8/28/2020	4.4	2002	455	957.18	217.54	Meet with N. Rim; phone calls with clients; memos to file; review letters from clients; prepare for hearing; summaries to N. Rim
NXR	8/28/2020	1.4	770	550	304.56	217.54	Revise joint status report; emails with prosecutor re same; communications re Review Worksheet project; call with J. Threatt about calls to clients and ██████████ and site visit
OXR	8/28/2020	0.4	208	520	87.02	217.54	Review worksheets
PKF	8/28/2020	1	120	120	120.00	120	Move PFDs from wrong folders to correct folders
SKG	8/28/2020	5.6	1764	315	1218.22	217.54	Review and circlate news; complete worksheet review; review filings; process incoming messages from relatives; communicate with relatives; upload and review medical records
JST	8/30/2020	0.7	318.5	455	152.28	217.54	Review letters from clients; prepare for hearing; summaries to N. Rim
NXR	8/30/2020	7	3850	550	1522.78	217.54	Consolidate review worksheet coding; second pass review; analyze data and potential objections; email to team
JST	8/31/2020	4.1	1865.5	455	891.91	217.54	Phone calls with family members; email correspondence with BOP, PLO, N. Rim; meet with N. Rim, PLO, S. Bannett, ACLU; review letters from clients; prepare for hearing; meet with N. Rim
NXR	8/31/2020	7.5	4125	550	1631.55	217.54	Analyze review worksheets for hearing exhibits; prepare for Lompoc hearing and draft hearing outline; call with PLO, S. Bannett, and J. Threatt re Lompoc hearing
OXR	8/31/2020	0.6	312	520	130.52	217.54	Telephone call regarding 9/1/20 hearing
SKG	8/31/2020	5.1	1606.5	315	1109.45	217.54	Review and circulate news; process incoming messages from relatives; communicate with relatives; upload and review medical records; conduct interview with A ██████████ review worksheets to confirm missing reports; develop spreadsheet of named petitioners in preparation for hearing
JST	9/1/2020	3.7	1683.5	455	804.90	217.54	Email correspondence with Don Specter, Sara Norman, N. Rim, S. Grisham; phone calls with family members of clients; attend telephonic court hearing
NXR	9/1/2020	6.8	3740	550	1479.27	217.54	Prepare for Lompoc hearing; argue hearing; call with PLO counsel re Special Master; being meet and confer email to Respondents
OXR	9/1/2020	0.5	260	520	108.77	217.54	Review emails from prisoners regarding ██████████ emails regarding letters from court
PKF	9/1/2020	3.8	456	120	456.00	120	Rename PFDs and relocate to correct folders
SEB	9/1/2020	1	580	580	217.54	217.54	Attend hearing by telephone; review numerous emails

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	9/1/2020	3.3	1039.5	315	717.88	217.54	Review news; process incoming messages from relatives; communicate with relatives; upload and review [REDACTED] prepare [REDACTED] interview memo; review and reply to inmates' counsels; communicate with ACLU regarding update list; incorporate latest updates with Initial Form Response information and circulate to latest contacts; manage paralegal organization of letters
AHM	9/2/2020	0.4	396	990	87.02	217.54	Exchanges with N. Rim re special master
JST	9/2/2020	0.6	273	455	130.52	217.54	Email correspondence with BOP; memos to file; email correspondence with S. Grisham
NXR	9/2/2020	3.7	2035	550	804.90	217.54	Emails with prosecutors re site visit; draft meet and confer email re compliance with preliminary injunction; emails with proposed Special Masters
SKG	9/2/2020	3.4	1071	315	739.64	217.54	Review news; process incoming messages from relatives; communicate with relatives; communicate with ACLU regarding update list; update master worksheet review spreadsheet; telephonic conference with [REDACTED] to schedule interview
JST	9/3/2020	2.7	1228.5	455	587.36	217.54	Phone calls with inmates; memos to file; email correspondence with BOP
NXR	9/3/2020	2	1100	550	435.08	217.54	Interviews with proposed Special Masters S. Segal and P. Walsh; call with D. Spector re Special Masters; revise and send meet and confer email to Respondents re failure to comply with Preliminary Injunction; national strategy meeting with COVID-19 prison litigators in related matters
PKF	9/3/2020	3.8	456	120	456.00	120	Rename PFDs and relocate to correct folders
SKG	9/3/2020	0.3	94.5	315	65.26	217.54	Review news; process incoming messages from relatives
CJL	9/4/2020	0.7	318.5	455	152.28	217.54	Research on special masters
NXR	9/4/2020	0.5	275	550	108.77	217.54	Email to opposing counsel re Review Worksheets
PKF	9/4/2020	3.8	456	120	456.00	120	Rename PFDs and relocate to correct folders
SKG	9/4/2020	5.6	1764	315	1218.22	217.54	Review news; process incoming messages from relatives; communicate with relatives; communicate with ACLU regarding update list; update master worksheet review spreadsheet; interview inmates; begin interview memos; download filing
CJL	9/8/2020	2.7	1228.5	455	587.36	217.54	Meet and confer call; call with case team; drafting and filing of stipulation
JST	9/8/2020	0.1	45.5	455	21.75	217.54	Email correspondence with BOP
NXR	9/8/2020	3.8	2090	550	826.65	217.54	Meet and confer call with prosecutors re compliance with preliminary injunction and special master; call with S. Normal re Special Master filing; emails to team re possible ex parte application for lack of compliance; draft proposed order for ex parte application

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	9/8/2020	2.4	1248	520	522.10	217.54	Attend meet and confer with government and follow up team call
PKF	9/8/2020	3.8	456	120	456.00	120	Rename PFDs and relocate to correct folders
SKG	9/8/2020	3.2	1008	315	696.13	217.54	Review news; process incoming messages from relatives; communicate with relatives; update master worksheet review spreadsheet; process and document discovery; [REDACTED] discussion
CJL	9/9/2020	2.5	1137.5	455	543.85	217.54	Calls with case team; correspondence with case team; draft motion re: special master, declaration
JST	9/9/2020	0.5	227.5	455	108.77	217.54	Email correspondence with BOP, S. Grisham
KSS	9/9/2020	0.2	91	455	43.51	217.54	Emails re inmate inquiries
NXR	9/9/2020	1.5	825	550	326.31	217.54	Draft proposed order for ex parte application
NXR	9/9/2020	4.3	2365	550	935.42	217.54	Draft opposition to ex parte application; calls with S. Norman re special master filing; draft motion for compliance and order to show cause
OXR	9/9/2020	1.2	624	520	261.05	217.54	Draft ex parte motion; emails regarding mail from court
SKG	9/9/2020	5.6	1764	315	1218.22	217.54	Review news; process incoming messages from relatives; communicate with relatives; confirm class members; update master worksheet review spreadsheet; identify [REDACTED]
CJL	9/10/2020	3.3	1501.5	455	717.88	217.54	Draft special master motion; motion to extend time
JST	9/10/2020	3.6	1638	455	783.14	217.54	Phone calls with inmates; memos to file; email correspondence with BOP, family members of clients; FPD
NXR	9/10/2020	7.2	3960	550	1566.29	217.54	Draft motion for enforcement of compliance; revise ex parte application to shorten time; calls with S. Norman; revise Special Master proposal
PKF	9/10/2020	3.8	456	120	456.00	120	Relocate prisoner files into more easily found folders
SKG	9/10/2020	4.8	1512	315	1044.19	217.54	Review news; process incoming messages from relatives; comprehensive cite check of filing; prepare key [REDACTED]
JST	9/11/2020	1.4	637	455	304.56	217.54	Email correspondence with BOP; phone call with inmates; memos to file

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
PKF	9/11/2020	3.8	456	120	456.00	120	Relocate prisoner files into more easily found folders
SKG	9/11/2020	2.1	661.5	315	456.83	217.54	Review news; process incoming messages from relatives; conduct interviews with inmates and draft memos regarding same
JST	9/14/2020	2.2	1001	455	478.59	217.54	Phone calls with clients; memos to file; email correspondence with N. Rim
PKF	9/14/2020	3.8	456	120	456.00	120	Relocate prisoner files into more easily found folders
SKG	9/14/2020	0.3	94.5	315	65.26	217.54	Review news; process incoming messages from relatives; conduct interviews with inmates and draft memos regarding same
CJL	9/15/2020	1	455	455	217.54	217.54	Worksheet data input
JST	9/15/2020	3.7	1683.5	455	804.90	217.54	Conference call with C. Lee, PLO, +nr; meet with +nr; meet with R. Capata; email correspondence with BOP; prepare for hearing; phone calls with family members; email correspondence with S. Grisham
SKG	9/15/2020	4.1	1291.5	315	891.91	217.54	Review news; process incoming messages from relatives; return voicemails and record contact data; confirm [REDACTED]; retrieve and upload Discovery; update Discovery Index; consult with team regarding additional worksheets; confer with team regarding inmate denied RRC at the last moment
JST	9/16/2020	1.7	773.5	455	369.82	217.54	Phone calls with clients; memos to file; email correspondence with S. Grisham
OXR	9/16/2020	0.2	104	520	43.51	217.54	Emails with N. Rim regarding motion to dismiss
SKG	9/16/2020	3.9	1228.5	315	848.41	217.54	Review news; process incoming messages from relatives; return voicemails and record contact data; confirm class members; update Discovery Index; interview inmate and prepare memo; prepare for upcoming inmate interviews
JST	9/17/2020	0.6	273	455	130.52	217.54	Email correspondence with S. Grisham; communications with client family members
SKG	9/17/2020	1.5	472.5	315	326.31	217.54	Review news; interview inmates
CJL	9/18/2020	3.1	1410.5	455	674.37	217.54	Correspondence with case team; drafted reply brief
JST	9/18/2020	1.3	591.5	455	282.80	217.54	Meet with S. Grisham; meet with K. Fisher and K. Lee; email correspondence with BOP and S. Grisham
NXR	9/18/2020	0.6	330	550	130.52	217.54	Revise reply to motion for compliance

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	9/18/2020	4.4	1386	315	957.18	217.54	Review news; prepare memos of inmate interviews; consult with team to train clerk in email and vmail intake; begin construction of spreadsheet to capture key issues
DEF	9/21/2020	0.3	87	290	65.26	217.54	Download files via FTP
JST	9/21/2020	3.2	1456	455	696.13	217.54	Email correspondence with BOP and S. Grisham; review discovery; email correspondence with PLO
SKG	9/21/2020	4.2	1323	315	913.67	217.54	Review news; place calls to recently released individuals; revise spreadsheet capturing key issues; consult with attorney regarding preparation of ██████████ prepare folder for key inmate evidence; prepare for upload of latest batch of letters; download Discovery; revise Discovery tracking log
JST	9/22/2020	1.1	500.5	455	239.29	217.54	Email correspondence with BOP and S. Grisham; phone call with client; draft letter to client; revise intake email; memo to file; review documents
KEL	9/22/2020	1.5	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; return calls to relatives; update index
PKF	9/22/2020	3.8	456	120	456.00	120	Rename PDFs to prisoner names and moving to appropriate folder
SKG	9/22/2020	4.8	1512	315	1044.19	217.54	Review news; revise spreadsheet capturing key issues; consult with attorney regarding ██████████ arrange for provision of ██████████ to plaintiff; direct clerk in organization of latest batch of letters; direct clerk in updating Intake Index and contacting families
JST	9/23/2020	0.7	318.5	455	152.28	217.54	Phone call with client; memo to file; review documents; email correspondence with S. Grisham
PKF	9/23/2020	1.5	180	120	180.00	120	Rename PDFs to prisoner names and moving to appropriate folder
SKG	9/23/2020	1.6	504	315	348.06	217.54	Review news; Prepare scripts for interview; confirm receipt of ██████████ prepare for updates for class tracking log
JST	9/24/2020	0.8	364	455	174.03	217.54	Phone call with client; memo to file; email correspondence with S. Grisham; review documents; revise intake email; email correspondence with N. Rim
PKF	9/24/2020	3.8	456	120	456.00	120	Rename PDFs to prisoner names and moving to appropriate folder
SKG	9/24/2020	3.8	1197	315	826.65	217.54	Review news; conduct inmate interviews; update class tracking log; update special issues log; download and organize document productions and update tracking index; confer with paralegal clerk on various intake matters
JST	9/25/2020	1.5	682.5	455	326.31	217.54	Phone calls with clients; memos to file
PKF	9/25/2020	3.8	456	120	456.00	120	Rename PDFs to prisoner names and moving to appropriate folder

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
JST	9/28/2020	0.9	409.5	455	195.79	217.54	Phone and email correspondence with BOP; email correspondence with N. Rim and S. Grisham; email correspondence with clients' families
PKF	9/28/2020	2	240	120	240.00	120	Rename PDFs to prisoner names and moving to appropriate folder
SKG	9/28/2020	3.7	1165.5	315	804.90	217.54	Review and circulate news; draft inmate interview memos; update class tracking log; update special issues log; download and organize document productions and update tracking index
DEF	9/29/2020	0.3	87	290	65.26	217.54	Create FTP link for file upload; Download files via FTP
JST	9/29/2020	4.1	1865.5	455	891.91	217.54	Phone calls with clients; memos to file; email correspondence with PLO, S. Grisham, N. Rim; meet with N. Rim, S. Grisham, K. Lee
KEL	9/29/2020	0.8	0	0	0.00	0	Transmit current case update to relatives; provide new intake contact data to ACLU
KEL	9/29/2020	0.3	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index
KEL	9/29/2020	1.1	0	0	0.00	0	Consult with team (SKG, NR, JST) regarding general intake, organization, and future projects
NXR	9/29/2020	1	550	550	217.54	217.54	Call with S. Grisham and J. Threatt re strategy for reviewing and responding to communications from class members and potential class members
PKF	9/29/2020	2.8	336	120	336.00	120	Rename PDFs to prisoner names and moving to appropriate folder
SKG	9/29/2020	4.3	1354.5	315	935.42	217.54	Review news; draft inmate interview memos; prepare for more interviews; team meeting to review intake, organization and tracking procedures; update class tracking log; update special issues log; communications with ACLU and paralegal clerk regarding new intake contacts and latest case update
JST	9/30/2020	0.2	91	455	43.51	217.54	Email correspondence with N. Rim, PLO, O. Rocos, C. Lee
NXR	9/30/2020	0.5	275	550	108.77	217.54	Meeting with T. Bird and Mark Drooks re Lompoc hearing; meeting with PLO re same
SKG	9/30/2020	1.6	504	315	348.06	217.54	Review news; conduct inmate interviews
JST	10/1/2020	0.6	273	455	130.52	217.54	Phone call with inmate; memo to file; email correspondence with S. Grisham, N. Rim, K. Lee, family members of inmates
KEL	10/1/2020	0.4	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; return calls to relatives; update index

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	10/1/2020	1.7	535.5	315	369.82	217.54	Review news; draft memos of inmate interviews; confer with paralegal clerk regarding various intake issues; upload and save intake communications
SKG	10/2/2020	2.1	661.5	315	456.83	217.54	Review news; draft memos of inmate interviews
JST	10/5/2020	0.4	182	455	87.02	217.54	Email correspondence with T. Bird, S. Grisham, N. Rim, family members of inmates
SKG	10/5/2020	5.1	1606.5	315	1109.45	217.54	Review news; comprehensive revision of sheet tracking qualified individuals who have been denied class status; revise log of inmates with special issues; update Master Workheet Review sheet to reflect inmates reporting inaccuracies in worksheets or issues with being released as approved
JST	10/6/2020	0.2	91	455	43.51	217.54	Email correspondence with BOP, S. Grisham, N. Rim, T. Bird
KEL	10/6/2020	1	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index
SKG	10/6/2020	0.6	189	315	130.52	217.54	Review news; prepare for inmate interviews
JST	10/7/2020	0.4	182	455	87.02	217.54	Email correspondence with BOP, T. Bird, S. Grisham, N. Rim, family members of inmates
SKG	10/7/2020	5.7	1795.5	315	1239.98	217.54	Review and circulate news; conduct inmate interviews; prepare interview memos; update spreadsheets tracking various issues; communicate with counsel regarding individual inmates
JST	10/8/2020	2.8	1274	455	609.11	217.54	Email correspondence with S. Grisham, N. Rim, T. Bird, PLO; meet with T. Bird; phone calls with inmates; memos to file
KEL	10/8/2020	0.8	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; return calls to relatives; update index
SKG	10/8/2020	2.6	819	315	565.60	217.54	Review news; conduct plaintiff interviews; prepare interview memo; direct paralegal clerk in intake; revise sheet logging individuals for class eligibility
CJL	10/9/2020	0.2	91	455	43.51	217.54	Review of court order; correspondence with case team
JST	10/9/2020	0.4	182	455	87.02	217.54	Email correspondence with T. Bird, N. Rim, S. Grisham, PLO, BOP
OXR	10/9/2020	0.7	364	520	152.28	217.54	Emails with team regarding status update
SKG	10/9/2020	0.3	94.5	315	65.26	217.54	Review news

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	10/12/2020	0.1	31.5	315	21.75	217.54	Review news
DEF	10/13/2020	0.4	116	290	87.02	217.54	Create FTP link file upload to FTP; Download the files and save onto FTP
JST	10/13/2020	0.3	136.5	455	65.26	217.54	Email correspondence with BOP, S. Grisham
KEL	10/13/2020	0.7	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index
OXR	10/13/2020	1.3	676	520	282.80	217.54	Emails regarding team call; prepare for and attend team call; emails with Y. Skipper regarding special master
SKG	10/13/2020	0.8	252	315	174.03	217.54	Review news; consult with attorney to arrange interviews
JST	10/14/2020	5.4	2457	455	1174.72	217.54	Phone calls with inmates; memos to file; mediation brief
SKG	10/14/2020	0.4	126	315	87.02	217.54	Review news; prepare for drafting and transmission of revised update
KEL	10/15/2020	0.8	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; return calls to relatives; update index
OXR	10/15/2020	0.4	208	520	87.02	217.54	Emails regarding document collection
SKG	10/15/2020	6	1890	315	1305.24	217.54	Review news; conduct inmate interviews; draft interview memos
CJL	10/19/2020	0.4	182	455	87.02	217.54	Research on initial disclosures; review of government declarations
JST	10/19/2020	0.4	182	455	87.02	217.54	Email correspondence with S. Grisham and BOP
NXR	10/19/2020	0.6	330	550	130.52	217.54	Analyze [REDACTED] and halfway house submission filed by Government
SKG	10/19/2020	3.3	1039.5	315	717.88	217.54	Review news; draft interview memo; circulate inmate interview memos to team with summaries; update key tracking sheets
CJL	10/20/2020	1.4	637	455	304.56	217.54	Research on sanctions

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
KEL	10/20/2020	0.4	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index
NXR	10/20/2020	0.5	275	550	108.77	217.54	Emails re government submission in preparation for hearing
SKG	10/20/2020	3.7	1165.5	315	804.90	217.54	Review news; review and upload inmate communications; phone interview with relative concerned about retaliation against class member; circulate key issue summaries to team; update tracking sheets
CJL	10/21/2020	0.8	364	455	174.03	217.54	Review and summarize Venters report
JST	10/21/2020	2.7	1228.5	455	587.36	217.54	Email correspondence with N. Rim; attend court hearing; email correspondence with N. Rim, Sara Norman, Don Specter; email correspondence with ACLU COVID team
NXR	10/21/2020	3.2	1760	550	696.13	217.54	Appear for and argue at hearing for Lompoc; meeting with PLO and team re next steps; emails re meet and confer and data to gather
OXR	10/21/2020	0.9	468	520	195.79	217.54	Telephone call with J. Threatt regarding next steps; draft and send meet and confer correspondence
SKG	10/21/2020	1.2	378	315	261.05	217.54	Review news; review and upload inmate and counsel communications; update spreadsheet tracking inmates who should be included in Class
OXR	10/22/2020	0.4	208	520	87.02	217.54	Review emails regarding matter status
SKG	10/22/2020	0.3	94.5	315	65.26	217.54	Review news; review incoming communications
OXR	10/23/2020	0.3	156	520	65.26	217.54	Review emails regarding matter status
SKG	10/23/2020	2.8	882	315	609.11	217.54	Review news; review and upload inmate and counsel communications; update spreadsheet tracking inmates who should be included in Class
JST	10/26/2020	0.2	91	455	43.51	217.54	Email correspondence with BOP
OXR	10/26/2020	0.3	156	520	65.26	217.54	Emails with J., Threatt regarding met and confer
SKG	10/26/2020	1.1	346.5	315	239.29	217.54	Review news; review and upload inmate and counsel communications; respond to relative regarding class member; research plaintiff medical release; update records tracking sheet
KEL	10/27/2020	0.6	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; return calls to relatives; update index

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	10/27/2020	2.4	1248	520	522.10	217.54	Review letters from prisoners sent to court
SKG	10/27/2020	0.5	157.5	315	108.77	217.54	Review news; direct paralegal clerk in responses to family members
CJL	10/28/2020	0.2	91	455	43.51	217.54	Read and respond to correspondence
OXR	10/28/2020	1.9	988	520	413.33	217.54	Review letters from prisoners sent to court; emails regarding re-scheduling meet and confer
SKG	10/28/2020	0.3	94.5	315	65.26	217.54	Review news; consult with attorney regarding [REDACTED]
JST	10/29/2020	0.7	318.5	455	152.28	217.54	Phone call with inmates; memos to file; email correspondence with N. Rim
OXR	10/29/2020	3.1	1612	520	674.37	217.54	Prepare for and attend meet and confer; review correspondence from court
SKG	10/29/2020	1.9	598.5	315	413.33	217.54	Review news; consult with attorney regarding [REDACTED]; review and upload inmate correspondence; confer with counsel regarding [REDACTED]
OXR	10/30/2020	1.8	936	520	391.57	217.54	Prepare summary of meet and confer; review correspondence from court
JST	11/2/2020	1.4	637	455	304.56	217.54	Review inmate letters; email correspondence with BOP and S. Grisham
OXR	11/2/2020	0.7	364	520	152.28	217.54	Emails regarding new class members and class member list
SKG	11/2/2020	0.9	283.5	315	195.79	217.54	Review news; consult with attorney regarding [REDACTED] updated class member sheet; plan for inmate interview
JST	11/3/2020	0.4	182	455	87.02	217.54	Email correspondence with BOP and S. Grisham
SKG	11/3/2020	1.4	441	315	304.56	217.54	Review and circulate news; consult with paralegal clerk regarding correspondence organization; prepare for inmate interview; review and process inmate correspondence
JST	11/4/2020	0.1	45.5	455	21.75	217.54	Email correspondence with BOP
NXR	11/4/2020	0.5	275	550	108.77	217.54	Emails re meet and confer process; review summary of letters forwarded from Court

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	11/4/2020	2	1040	520	435.08	217.54	Prepare summary of correspondence from the Court; emails with Respondents about next steps
PKF	11/4/2020	2	240	120	240.00	120	Organize prisoner files on P drive
JST	11/5/2020	1.1	500.5	455	239.29	217.54	Phone calls with inmates; memos to file
OXR	11/5/2020	0.9	468	520	195.79	217.54	Emails regarding meet and confer and next steps; emails regarding correspondence from the court
SKG	11/5/2020	1.7	535.5	315	369.82	217.54	Review and circulate news; consult with paralegal clerk regarding correspondence organization; conduct inmate interview and draft memo regarding same; review and process inmate correspondence; confer with paralegal clerk regarding calls with families
JST	11/6/2020	0.5	227.5	455	108.77	217.54	Phone call with inmate; memo to file
PKF	11/6/2020	1	120	120	120.00	120	Check prisoner folders
SKG	11/6/2020	1.3	409.5	315	282.80	217.54	Review news; review team discussions regarding case strategy and medical record collection and review; direct paralegal clerk in organization of inmate correspondence
CJL	11/9/2020	1.1	500.5	455	239.29	217.54	Update master spreadsheet
OXR	11/9/2020	0.8	416	520	174.03	217.54	Review emails regarding matter status and situation at Lompoc
SKG	11/9/2020	1.1	346.5	315	239.29	217.54	Review news; upload BOP Pandemic Response modules; upload and organize Affidavits and inspection report
JST	11/10/2020	0.1	45.5	455	21.75	217.54	Email correspondence with Sharon Grisham and N. Rim
SKG	11/10/2020	0.3	94.5	315	65.26	217.54	Review news; review strategy discussions
JST	11/11/2020	0.3	136.5	455	65.26	217.54	Email correspondence with N. Rim, S. Grisham, O. Rocos, J. Matz, F. Wang
OXR	11/11/2020	2.2	1144	520	478.59	217.54	Emails regarding matter status and next steps in Lompoc litigation
SKG	11/11/2020	0.9	283.5	315	195.79	217.54	Review news; review strategy discussions; prepare for organization of inmate correspondence

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	11/12/2020	0.7	364	520	152.28	217.54	Emails regarding matter status and scheduling meet and confers
SKG	11/12/2020	0.3	94.5	315	65.26	217.54	Review news; review strategy discussions
OXR	11/13/2020	2.3	1196	520	500.34	217.54	Prepare for and attend meet and confer; emails regarding meet and confer
SKG	11/13/2020	0.4	126	315	87.02	217.54	Review news; review strategy discussions
JST	11/15/2020	1.8	819	455	391.57	217.54	Draft legal argument for joint status report; legal research
JST	11/16/2020	3.2	1456	455	696.13	217.54	Meeting and email correspondence with O. Rocos; revise disputed section of status report; email correspondence with ACLU
NXR	11/16/2020	1.2	660	550	261.05	217.54	Call with counsel for future class member; call with O. Rocos re meet and confer and joint status report; email re joint status report
OXR	11/16/2020	3.2	1664	520	696.13	217.54	Prepare for and attend call regarding future Lompoc inmate; review and revise draft status report; telephone call with J. Yang regarding status report; telephone call with N. Rim regarding draft proposed order
SKG	11/16/2020	0.6	189	315	130.52	217.54	Review news; review strategy discussions; research class status and home confinement schedule of key inmate and communicate with counsel regarding same
JST	11/17/2020	2.6	1183	455	565.60	217.54	Draft and revise proposed order; prepare notice of lodging; meeting and email correspondence with O. Rocos; revise disputed section of status report; email correspondence with ACLU; meeting with N. Rim
NXR	11/17/2020	0.8	440	550	174.03	217.54	Review and comment on joint status report; revise proposed order; call with J. Threatt
OXR	11/17/2020	7.1	3692	520	1544.53	217.54	Review, revise, and finalize draft status report, list of issues, and proposed order; telephone calls with J. Yang, N. Rim, and J. Threatt regarding status report and proposed order; review additional guidance from BOP on home confinement reviews
SKG	11/17/2020	0.2	63	315	43.51	217.54	Review news; review strategy discussions
JST	11/18/2020	0.8	364	455	174.03	217.54	Meeting with N. Rim, O. Rocos, PLO; email correspondence with N. Rim and O. Rocos; email correspondence with ACLU and S. Grisham; meeting with O. Rocos
NXR	11/18/2020	0.5	275	550	108.77	217.54	Call re proposed order and trial strategy
OXR	11/18/2020	1.1	572	520	239.29	217.54	Telephone call regarding proposed order; finalize and file proposed order

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
JST	11/19/2020	0.7	318.5	455	152.28	217.54	Phone call with client; email correspondence with ACLU and BOP
OXR	11/19/2020	1.2	624	520	261.05	217.54	Emails with N. Rim regarding status conference; emails with J. Yang regarding scheduling Rule 26f conference; emails regarding protective order dispute
SKG	11/19/2020	0.6	189	315	130.52	217.54	Review news; review strategy discussions; upload and organize retainer agreement and medical records releases
JST	11/20/2020	1.4	637	455	304.56	217.54	Meet and confer with government; meeting with O. Rocos, PLO; email correspondence with BOP
NXR	11/20/2020	0.8	440	550	174.03	217.54	Meet and confer call re trial and status conference
OXR	11/20/2020	2.1	1092	520	456.83	217.54	Prepare for and attend Rule 26f conference; follow up phone calls and emails regarding discovery and trial dates; review report of Asma Tekbali
SKG	11/20/2020	0.1	31.5	315	21.75	217.54	Review news
JST	11/23/2020	2.5	1137.5	455	543.85	217.54	Meeting with N. Rim, PLO, O. Rocos; meet with N. Rim; prepare for court hearing
NXR	11/23/2020	1	550	550	217.54	217.54	Call with co-counsel re hearing tomorrow; draft hearing outline; call with J. Threatt re same
OXR	11/23/2020	2.5	1300	520	543.85	217.54	Revise, finalize, and file Rule 26f report; telephone calls regarding hearing
SKG	11/23/2020	0.3	94.5	315	65.26	217.54	Review news; review strategy discussions; upload filings
NXR	11/24/2020	2.5	1375	550	543.85	217.54	Preparation for hearing; attend and argue hearing; call with S. Norman and O. Rocos re hearing and trial schedule
OXR	11/24/2020	5.3	2756	520	1152.96	217.54	Prepare for and attend status conference; emails regarding magistrate judge and next steps
SKG	11/24/2020	0.1	31.5	315	21.75	217.54	Review news; review strategy discussions
SKG	11/25/2020	0.1	31.5	315	21.75	217.54	Review news
NXR	11/30/2020	0.2	110	550	43.51	217.54	Emails with O. Rocos re magistrate judge consent form

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	11/30/2020	0.5	260	520	108.77	217.54	Emails regarding assignment to magistrate judge
SKG	11/30/2020	0.1	31.5	315	21.75	217.54	Review news
JST	12/1/2020	0.1	45.5	455	21.75	217.54	Email correspondence with BOP
OXR	12/1/2020	0.4	208	520	87.02	217.54	Emails regarding magistrate judge
SKG	12/1/2020	0.5	157.5	315	108.77	217.54	Review news; communicate with relatives regarding submission of information on current conditions
JST	12/2/2020	0.1	45.5	455	21.75	217.54	Email correspondence with ACLU
OXR	12/2/2020	0.6	312	520	130.52	217.54	Emails regarding magistrate judge
SKG	12/2/2020	0.2	63	315	43.51	217.54	Review news
JST	12/3/2020	0.4	182	455	87.02	217.54	Phone call with inmate; email correspondence with O. Rocos
OXR	12/3/2020	0.8	416	520	174.03	217.54	Emails regarding notice to prisoners and medical records; emails regarding magistrate
SKG	12/3/2020	0.9	283.5	315	195.79	217.54	Review news; direct paralegal clerk in intake coordination with ACLU; communicate with inmate's counsel regarding ██████████ upload Zepeda Order
OXR	12/4/2020	0.8	416	520	174.03	217.54	Emails regarding notice to prisoners, medical records, magistrate
SKG	12/4/2020	5.1	1606.5	315	1109.45	217.54	Review and circulate news; pull and circulate Engleman Declaration filed under seal; begin review and analysis of filings; begin review and processing of communications from inmates families; determine member status of key correspondents, upload messages, ensure collection of contact data; respond to correspondence; upload key documents as requested by team
TWB	12/4/2020	0.3	297	990	65.26	217.54	Emails and telephone calls with ██████████ re Lompoc suit
NXR	12/7/2020	0.7	385	550	152.28	217.54	Call re litigation strategy
OXR	12/7/2020	2.1	1092	520	456.83	217.54	Prepare for and attend call with intervenor; emails regarding medical records; emails regarding magistrate judge

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	12/7/2020	4.7	1480.5	315	1022.44	217.54	Review news; review communications from inmates families; determine member status of key correspondents, upload messages, respond to correspondence; direct paralegal clerk regarding intake; comprehensive review of all inmate interviews, identify and assemble all reports of retaliation and prepare for team analysis
TWB	12/7/2020	0.5	495	990	108.77	217.54	Telephone call with [REDACTED] re case work in Lompoc
KEL	12/8/2020	0.7	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index
NXR	12/8/2020	0.7	385	550	152.28	217.54	Emails re motion for intervention; revise non-opposition to motion for intervention
OXR	12/8/2020	6.1	3172	520	1326.99	217.54	Draft non-opposition to motion to intervene and draft proposed order; draft initial disclosures; emails with D. Hurwitz and M. Masters regarding class action; emails regarding scheduling hearing before magistrate judge
OXR	12/8/2020	0.7	364	520	152.28	217.54	Finalize and serve initial disclosures; review respondents' initial disclosures
SKG	12/8/2020	2.6	819	315	565.60	217.54	Review news; review and upload correspondence and statements; direct paralegal clerk in intake coordination with ACLU; check status on class list; manage CorrLinks account; upload settlement data; communicate with relatives; circulate inquiry regarding status of inmates transferred out of Lompoc
NXR	12/9/2020	0.4	220	550	87.02	217.54	Revise status report
OXR	12/9/2020	0.4	208	520	87.02	217.54	Revise magistrate judge status update
SKG	12/9/2020	3.4	1071	315	739.64	217.54	Review news; review notice regarding class member previously approved for HC, now being denied; research application status; update notes in tracking sheet and report to team regarding same; continue review of correspondence and filings
OXR	12/10/2020	2.3	1196	520	500.34	217.54	Finalize and file magistrate judge status update; draft proposed stipulation and order; emails regarding filings
SKG	12/10/2020	3.6	1134	315	783.14	217.54	Review news; direct paralegal clerk in intake coordination with ACLU; confer with team regarding [REDACTED] upload records; review and reply to relatives
JST	12/11/2020	0.5	227.5	455	108.77	217.54	Phone call with inmate; notes to file
OXR	12/11/2020	0.8	416	520	174.03	217.54	Emails and telephone calls regarding [REDACTED]
SKG	12/11/2020	4.3	1354.5	315	935.42	217.54	Review and circulate news; Begin review of key filings; Reply to relatives; Review, upload and reply to CorrLinks messages; Upload filings
OXR	12/14/2020	1.1	572	520	239.29	217.54	Emails and telephone calls with Respondents regarding [REDACTED] and proposed stipulation

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	12/14/2020	4.4	1386	315	957.18	217.54	Review and circulate news; review correspondence from attorneys and relatives and confer with legal team regarding same; complete review of CorrLinks messages and summarization of key points for attorneys; upload filings; continue review and analysis of key filings
KEL	12/15/2020	0.3	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; Update index
OXR	12/15/2020	0.6	312	520	130.52	217.54	Emails regarding [REDACTED] emails regarding meet and confer
SKG	12/15/2020	1.3	409.5	315	282.80	217.54	Review news; communicate with paralegal clerk regarding intake; draft correspondence to Ms. Hanson regarding her husband's HC denial, consult with team regarding same; provide counsel with Venters report in response to request for information
OXR	12/16/2020	0.8	416	520	174.03	217.54	Emails regarding ADR form and meet and confer; call with Respondents regarding [REDACTED]
SKG	12/16/2020	2.8	882	315	609.11	217.54	Review and circulate news; complete review and summary of class update filings and prepare memos regarding same
OXR	12/17/2020	1.8	936	520	391.57	217.54	Emails regarding discovery requests, meet and confer status, USPO
SKG	12/17/2020	2.2	693	315	478.59	217.54	Review and circulate news; communicate with outside counsel regarding [REDACTED] confer with staff regarding intake communications; compile summaries of key issues for attorney consultation
OXR	12/18/2020	1.4	728	520	304.56	217.54	Emails regarding discovery requests, magistrate judge, mediation
SKG	12/18/2020	1.2	378	315	261.05	217.54	Review and circulate news; review/reply to communications from relatives; pull Under Seal Javernick Declaration with updated class list
JST	12/21/2020	1.8	819	455	391.57	217.54	Phone call with government and O. Rocos; meeting with O. Rocos; meeting with N. Rim
NXR	12/21/2020	0.8	440	550	174.03	217.54	Participate in portion of meet and confer call with Respondents; call with O. Rocos re litigation strategy
OXR	12/21/2020	2.9	1508	520	630.87	217.54	Prepare for and attend meet and confer regarding [REDACTED] reviews and delays, follow up calls with J. Threatt and N. Rim; telephone call with S. Norman regarding discovery requests; draft outline for potential ex parte motion
PKF	12/21/2020	7.5	900	120	900.00	120	Rename and relocate prisoner PDFs
SKG	12/21/2020	1.6	504	315	348.06	217.54	Review and circulate news; review and upload inmate communications; compile summaries of key issues for attorney consultation; direct clerks in intake
JST	12/22/2020	0.7	318.5	455	152.28	217.54	Phone call with O. Rocos; meetings with N. Rim

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
NXR	12/22/2020	0.8	440	550	174.03	217.54	Call with joint defense counsel; revise outline for motion; emails with O. Rocos and J. Threatt
OXR	12/22/2020	0.7	364	520	152.28	217.54	Meet and confer emails with government; follow up with N. Rim and J. Threatt regarding ex parte
PKF	12/22/2020	7.5	900	120	900.00	120	Rename and relocate prisoner PDFs
SKG	12/22/2020	1.2	378	315	261.05	217.54	Review and circulate news; review and upload inmate communications; compile summaries of key issues for attorney consultation; direct clerks in intake; upload declaration filed under seal and circulate to team
JST	12/23/2020	4.7	2138.5	455	1022.44	217.54	Draft motion to enforce compliance with PI; email correspondence with O. Rocos
OXR	12/23/2020	1.1	572	520	239.29	217.54	Telephone calls and emails regarding ADR proposal; prepare ADR proposal
PKF	12/23/2020	2.5	300	120	300.00	120	Rename and relocate prisoner PDFs
OXR	12/25/2020	0.4	208	520	87.02	217.54	Email government regarding meet and confer
OXR	12/27/2020	3.8	1976	520	826.65	217.54	Revise opposition to motion to dismiss and motion to strike
JST	12/29/2020	0.2	91	455	43.51	217.54	Meet with N. Rim
OXR	12/29/2020	0.4	208	520	87.02	217.54	Emails regarding assignment of magistrate judge
JST	12/30/2020	0.5	227.5	455	108.77	217.54	Meet with or; email correspondence with N. Rim, O. Rocos, PLO
NXR	12/30/2020	0.4	220	550	87.02	217.54	Emails with counsel for [REDACTED]
OXR	12/30/2020	0.5	260	520	108.77	217.54	Emails and telephone calls with J. Threatt regarding next steps
JST	1/4/2021	0.1	45.5	455	21.75	217.54	Email correspondence with family members
NXR	1/4/2021	0.8	440	550	174.03	217.54	Strategy meeting re mediation; emails re hearing before Judge Castillo

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	1/4/2021	1.1	572	520	239.29	217.54	Emails regarding magistrate judge hearing; prepare for and attend strategy discussion
SKG	1/4/2021	0.3	94.5	315	65.26	217.54	Review and circulate news
KEL	1/5/2021	0.4	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; return calls to relatives; update index
SKG	1/5/2021	1.7	535.5	315	369.82	217.54	Review news; review and upload inmate communications; direct clerk in intake; reply to correspondence from relatives
SKG	1/6/2021	0.8	252	315	174.03	217.54	Review news; review and upload inmate communications; direct clerk in intake; reply to correspondence from relatives
KEL	1/7/2021	0.2	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; return calls to relatives; update index
SKG	1/7/2021	0.8	252	315	174.03	217.54	Review news; review and upload inmate communications; confer with legal staff regarding access and download of sealed filings
NXR	1/8/2021	1	550	550	217.54	217.54	Call with mediator; email to team re notes of call with mediator
SKG	1/8/2021	3.5	1102.5	315	761.39	217.54	Review and circulate news; review and upload inmate communications; confer with opposing counsel regarding access and download of sealed filings; prepare summary of key issues from inmate correspondence for attorney analysis
JST	1/11/2021	1.2	546	455	261.05	217.54	Prepare for hearing on intervenor motion; email correspondence with ACLU
SKG	1/11/2021	1.5	472.5	315	326.31	217.54	Review news; consult with opposing counsel regarding expanded team access to documents filed under seal; review communications
JST	1/12/2021	4.2	1911	455	913.67	217.54	Prepare for hearing on intervenor motion; attend hearing on intervenor motion; meet with N. Rim
NXR	1/12/2021	2.8	1540	550	609.11	217.54	Attend and argue at hearing for motion for intervention
SKG	1/12/2021	0.7	220.5	315	152.28	217.54	Review news; review and upload inmate communications; identify inmate concerns regarding [REDACTED]
SKG	1/13/2021	0.5	157.5	315	108.77	217.54	Review and circulate news; review and upload inmate communications
SKG	1/14/2021	0.4	126	315	87.02	217.54	Review and upload inmate communications

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
NXR	1/15/2021	0.3	165	550	65.26	217.54	Strategy meeting re discovery and mediation; emails with co-counsel re same
OXR	1/15/2021	2.1	1092	520	456.83	217.54	Emails and telephone call regarding next steps in Lompoc; review discovery requests; draft discovery requests
SKG	1/15/2021	1.7	535.5	315	369.82	217.54	Review and circulate news; review and upload inmate communications; reply to family communications; confer with paralegal clerk regarding intake; upload material to brief bank
OXR	1/18/2021	1.2	624	520	261.05	217.54	Draft status update report; draft responses to requests for production
KEL	1/19/2021	0.4	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index
NXR	1/19/2021	1.7	935	550	369.82	217.54	Revise status report; draft introduction section of status report; emails with O. Rocos re revisions and discovery requests
OXR	1/19/2021	5.1	2652	520	1109.45	217.54	Draft status update report; draft, finalize, and serve requests for production; draft responses to requests for production; telephone call with [REDACTED] regarding class member; emails with J. Yang regarding matter status; telephone call and emails with S. Grisham regarding class updates; revise class update email
SKG	1/19/2021	4.3	1354.5	315	935.42	217.54	Review and circulate news; download video of oversight hearing; Prepare for upload of and organization of USPS letters received from inmates; review and upload inmate communications; reply to family communications; confer with paralegal clerk regarding intake; upload material to brief bank; consult with attorney regarding comprehensive update to class tracking sheet
NXR	1/20/2021	0.3	165	550	65.26	217.54	Meeting re mediation
OXR	1/20/2021	2.4	1248	520	522.10	217.54	Telephone call regarding hearing before Castillo; draft responses to requests for production
KEL	1/21/2021	0.3	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index
NXR	1/21/2021	1.5	825	550	326.31	217.54	Prepare for status hearing; call with O. Rocos re status hearing; appear at and argue status hearing; meeting with co-counsel re mediation and litigation strategy
OXR	1/21/2021	3.8	1976	520	826.65	217.54	Prepare for and attend hearing before Castillo; team call; draft responses to interrogatories
SKG	1/21/2021	1.5	472.5	315	326.31	217.54	Review news; confirm material available on USAfx platform and confer with opposing counsel to secure expanded access for team; upload transcripts; develop spreadsheet to record BOP COVID stats over the last 60 days
JST	1/22/2021	0.3	136.5	455	65.26	217.54	Email correspondence with PLO, N. Rim, O. Rocos; deadline schedule

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	1/22/2021	0.4	208	520	87.02	217.54	Emails regarding ██████████
SKG	1/22/2021	6.9	2173.5	315	1501.03	217.54	Review and circulate news; upload TRO and Supporting Declaration to Brief Bank; begin comprehensive analysis of BOP filings to identify updated data on class members and ██████████ status for each inmate
JST	1/25/2021	0.1	45.5	455	21.75	217.54	Email correspondence with ██████████
NXR	1/25/2021	0.7	385	550	152.28	217.54	Emails with team re upcoming motions and mediation
OXR	1/25/2021	3.2	1664	520	696.13	217.54	Revise, finalize, and serve responses to discovery requests; emails regarding outstanding discovery
SKG	1/25/2021	7.1	2236.5	315	1544.53	217.54	Review news; prepare and circulate summary of data provided by BOP in Declarations; begin comprehensive integration of updated class member data
JST	1/26/2021	0.6	273	455	130.52	217.54	Meeting with O. Rocos
KEL	1/26/2021	2	0	0	0.00	0	Research and retrieve Lompoc historical COVID statistics
OXR	1/26/2021	9.2	4784	520	2001.37	217.54	Research and draft brief regarding enforcement; emails and telephone calls with S. Grisham regarding class and review worksheets; review review worksheets; emails and telephone calls regarding ██████████
SKG	1/26/2021	6.9	2173.5	315	1501.03	217.54	Review news; direct paralegal clerk in research of historic COVID statistics; continue integration of updated class member data; confer with attorney regarding fact investigation and analysis; research specific details regarding conditions and release administration; review correspondence from inmate
OXR	1/27/2021	5.6	2912	520	1218.22	217.54	Research and draft brief regarding enforcement
SKG	1/27/2021	7.4	2331	315	1609.80	217.54	Review news; continue integration of updated class member data; begin extensive update of individual inmates' release statuses
NXR	1/28/2021	3.7	2035	550	804.90	217.54	Revise motion for enforcement
OXR	1/28/2021	3.2	1664	520	696.13	217.54	Revise brief and draft declaration and proposed order regarding enforcement; telephone call with S. Grisham regarding class list and review worksheets
SKG	1/28/2021	5.4	1701	315	1174.72	217.54	Review news; complete extensive update of individual inmates' release statuses; consult with attorney regarding ██
NXR	1/29/2021	1.2	660	550	261.05	217.54	Revise motion re injunction enforcement

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	1/29/2021	3.6	1872	520	783.14	217.54	Revise, finalize, and file brief, declaration, and proposed order regarding enforcement
SKG	1/29/2021	6.4	2016	315	1392.26	217.54	Review and circulate news; research data for brief, prepare citations and revise data as needed; prepare exhibit to attorney declaration in support of brief; continue reconciliation of voluminous class lists
SKG	2/1/2021	3.7	1165.5	315	804.90	217.54	Review news; continue reconciliation of voluminous class lists
CJL	2/2/2021	0.2	91	455	43.51	217.54	Call with O. Roccas
JST	2/2/2021	0.6	273	455	130.52	217.54	Mediation brief; email correspondence with N. Rim
KEL	2/2/2021	1.2	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; return calls to relatives; update index
OXR	2/2/2021	1.3	676	520	282.80	217.54	Emails and telephone call with C. Lee regarding matter status; telephone call with S. Grisham regarding worksheet review; emails with inmate's relatives
SKG	2/2/2021	5.2	1638	315	1131.21	217.54	Review news; review and upload incoming messages; research class member denied home confinement and communicate with relative regarding status; process incoming voicemails and return calls to loved ones; confer regarding comprehensive update of integrated class list with specific data from worksheets
CJL	2/3/2021	0.1	45.5	455	21.75	217.54	Correspondence with case team
JST	2/3/2021	0.5	227.5	455	108.77	217.54	Email correspondence with PLO and N. Rim; phone call with client; memo to file
SKG	2/3/2021	6.8	2142	315	1479.27	217.54	Review news; review and upload incoming messages; prepare 574 class member worksheets for processing begin review and processing of class member worksheets
JST	2/4/2021	0.1	45.5	455	21.75	217.54	Email correspondence with BOP
KEL	2/4/2021	0.7	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; return calls to relatives; update index
SKG	2/4/2021	7.4	2331	315	1609.80	217.54	Review news; review and upload incoming messages; begin review and processing of class member worksheets
CJL	2/5/2021	2	910	455	435.08	217.54	Data input for spreadsheet; call with PLO
JST	2/5/2021	0.6	273	455	130.52	217.54	Lompoc mediation brief

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	2/5/2021	0.9	468	520	195.79	217.54	Emails regarding inmate's ██████ requests
SKG	2/5/2021	5.1	1606.5	315	1109.45	217.54	Review and circulate news; review and upload incoming messages; prepare for processing of incoming letters; begin review and processing of class member worksheets
JST	2/7/2021	2.7	1228.5	455	587.36	217.54	Lompoc mediation brief
SKG	2/7/2021	6.1	1921.5	315	1326.99	217.54	Continue review and processing of class member worksheets
CJL	2/8/2021	5.8	2639	455	1261.73	217.54	Class member data input
JST	2/8/2021	4.7	2138.5	455	1022.44	217.54	Phone call with client; memo to file; draft Lompoc mediation brief
OXR	2/8/2021	7.3	3796	520	1588.04	217.54	Review review worksheets; emails with prisoner's family regarding ██████ draft reply brief
PKF	2/8/2021	7.5	900	120	900.00	120	Rename prisoner PDFs
SKG	2/8/2021	6.7	2110.5	315	1457.52	217.54	Review news; complete review and processing of class member worksheets and confer with team regarding same
CJL	2/9/2021	2.1	955.5	455	456.83	217.54	Class member data input; correspondence with case team
JST	2/9/2021	4.9	2229.5	455	1065.95	217.54	Meeting with N. Rim; draft Lompoc mediation brief; email correspondence with N. Rim and PLO
OXR	2/9/2021	6.9	3588	520	1501.03	217.54	Review review worksheets; draft reply brief
JST	2/10/2021	3.2	1456	455	696.13	217.54	Meeting with N. Rim; phone call with PLO; email correspondence with PLO, N. Rim, O. Rocos; revise mediation brief
NXR	2/10/2021	1.6	880	550	348.06	217.54	Revise mediation brief; call with O. Rocos re Lompoc reply
OXR	2/10/2021	5.3	2756	520	1152.96	217.54	Draft reply brief; call with N. Rim regarding matter status; review draft mediation brief

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	2/10/2021	4.3	1354.5	315	935.42	217.54	Review news; review individual status updates in latest Declaration and revise spreadsheet accordingly; integrate hundreds of entries updated with Worksheet data; analyze data to identify [REDACTED] direct staff in upload of correspondence
JST	2/11/2021	1.6	728	455	348.06	217.54	Finalize mediation brief; email correspondence with N. Rim and R. Flores; email correspondence with Judge Ramirez
NXR	2/11/2021	1	550	550	217.54	217.54	Revise reply to motion for enforcement
OXR	2/11/2021	3.1	1612	520	674.37	217.54	Draft and revise reply brief
SKG	2/11/2021	0.1	31.5	315	21.75	217.54	Review news
OXR	2/12/2021	1.5	780	520	326.31	217.54	Finalize and file reply brief
SKG	2/12/2021	0.1	31.5	315	21.75	217.54	Review news
JST	2/16/2021	1.4	637	455	304.56	217.54	Prepare for mediation; draft term /summary sheet for mediator; email correspondence with N. Rim, PLO
OXR	2/16/2021	0.4	208	520	87.02	217.54	Emails regarding discovery
SKG	2/16/2021	0.4	126	315	87.02	217.54	Review news; direct paralegal clerk in intake
JST	2/17/2021	0.9	409.5	455	195.79	217.54	Meeting with O. Rocos, PLO; prepare for mediation and revise summary sheet for mediator; email correspondence with N. Rim, O. Rocos, PLO
OXR	2/17/2021	0.5	260	520	108.77	217.54	Emails and telephone call regarding mediation
SKG	2/17/2021	0.5	157.5	315	108.77	217.54	Review news; review incoming correspondence
JST	2/18/2021	6.9	3139.5	455	1501.03	217.54	Prepare for and attend mediation session; email correspondence with PLO, N. Rim, O. Rocos; meeting with N. Rim; draft settlement proposal
KEL	2/18/2021	1	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; return calls to relatives; update index

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
NXR	2/18/2021	6.5	3575	550	1414.01	217.54	Participate in and attend mediation; emails with co-counsel re mediation terms
OXR	2/18/2021	3.8	1976	520	826.65	217.54	Prepare for and attend mediation
SKG	2/18/2021	1.7	535.5	315	369.82	217.54	Review news; direct paralegal clerk in intake; review/reply to incoming correspondence; begin review of worksheets and status updates
JST	2/19/2021	1.2	546	455	261.05	217.54	Meet with N. Rim; revise settlement proposal; email correspondence with N. Rim, O. Rocos, PLO
NXR	2/19/2021	2.6	1430	550	565.60	217.54	Draft high level settlement terms; call with opposing counsel; emails with co-counsel re settlement terms and monitoring
SKG	2/19/2021	3.8	1197	315	826.65	217.54	Review news; review/reply to and upload incoming correspondence from inmates and loved ones; clean up Master spreadsheet
SKG	2/20/2021	7.6	2394	315	1653.30	217.54	Careful review of latest BOP Declarations; update individual inmates' statuses regarding HC applications; review progress chart and update master spreadsheet; process 174 individual Worksheets and prepare for entry of same
OXR	2/22/2021	1.7	884	520	369.82	217.54	Review home confinement review worksheets
SKG	2/22/2021	6.1	1921.5	315	1326.99	217.54	Review and circulate news; manage integration of 1000s of class member records and prepare for updates to same
OXR	2/23/2021	5.3	2756	520	1152.96	217.54	Review home confinement review worksheets
SKG	2/23/2021	8.1	2551.5	315	1762.07	217.54	Begin review and processing of individual inmate HC review worksheets
OXR	2/24/2021	0.5	260	520	108.77	217.54	Emails regarding review worksheets
SKG	2/24/2021	6.6	2079	315	1435.76	217.54	Review and circulate news; complete analysis and processing of HC review worksheets
SKG	2/25/2021	5.5	1732.5	315	1196.47	217.54	Review and circulate news; integrate updated entries and begin spreadsheet review and cleanup for team analysis
SKG	2/26/2021	5.7	1795.5	315	1239.98	217.54	Review news; continue review and clean up of voluminous comprehensive class member spreadsheet
JST	3/1/2021	0.1	45.5	455	21.75	217.54	Email correspondence with N. Van Dyk, O. Rocos, PLO

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	3/1/2021	0.6	189	315	130.52	217.54	Review news; upload and process incoming communications
JST	3/2/2021	0.1	45.5	455	21.75	217.54	Email correspondence with N. Van Dyk, O. Rocos, PLO, opposing counsel
NXR	3/2/2021	0.8	440	550	174.03	217.54	Call with J. Yang re settlement; email to co-counsel re settlement
SKG	3/2/2021	0.2	63	315	43.51	217.54	Review news
SKG	3/3/2021	0.4	126	315	87.02	217.54	Review news; review and process incoming communications
JST	3/4/2021	1.2	546	455	261.05	217.54	Phone calls with client and Lompoc Valley Medical Center; meeting with O. Rocos, PLO; email correspondence with same
KEL	3/4/2021	1	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; return calls to relatives; update index
NXR	3/4/2021	0.4	220	550	87.02	217.54	Call with co-counsel re mediation
SKG	3/4/2021	0.9	283.5	315	195.79	217.54	Review news; review and process incoming communications; confirm status of class member; direct paralegal clerk in response to family member
SKG	3/5/2021	0.4	126	315	87.02	217.54	Review news; review and process incoming communications
JST	3/8/2021	0.4	182	455	87.02	217.54	Meeting with N. Rim, O. Rocos, PLO; email with same
NXR	3/8/2021	1.3	715	550	282.80	217.54	Review respondent's counterproposal; redline counter proposal; calls with co-counsel re settlement strategy; call with J. Yang re potential for settlement
OXR	3/8/2021	0.4	208	520	87.02	217.54	Emails and telephone calls with ACLU regarding [REDACTED]
OXR	3/8/2021	0.4	208	520	87.02	217.54	Telephone call regarding next steps
SKG	3/8/2021	0.7	220.5	315	152.28	217.54	Review news; review and process incoming communications
JST	3/9/2021	0.2	91	455	43.51	217.54	Review BOP updates filing in Elkton case; email correspondence with N. Rim

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
KEL	3/9/2021	0.2	0	0	0.00	0	Return calls to relatives
NXR	3/9/2021	0.2	110	550	43.51	217.54	Email with Court re settlement; emails with co-counsel re failure to settle
OXR	3/9/2021	0.4	208	520	87.02	217.54	Emails regarding next steps
SKG	3/9/2021	0.6	189	315	130.52	217.54	Review news; review and CorrLinks communications
SKG	3/10/2021	0.5	157.5	315	108.77	217.54	Review news; review and process incoming communications
NXR	3/11/2021	0.3	165	550	65.26	217.54	Email to team re Lompoc hearing strategy
OXR	3/11/2021	0.3	156	520	65.26	217.54	Emails regarding hearing on motion to enforce
SKG	3/11/2021	3.4	1071	315	739.64	217.54	Review news; review correspondence from families; direct staff in responses to relatives; filter class members to isolate [REDACTED]
OXR	3/15/2021	0.9	468	520	195.79	217.54	Emails and telephone calls regarding next steps
JST	3/16/2021	1	455	455	217.54	217.54	Meeting with PLO, O. Rocos; meet and confer call with government; phone call with Sara Norman; email correspondence with PLO and O. Rocos; draft litigation schedule; meeting with O. Rocos; prep for meet and confer call
OXR	3/16/2021	2.7	1404	520	587.36	217.54	Emails and telephone calls regarding summary judgment and modifying case schedule
SKG	3/16/2021	6.7	2110.5	315	1457.52	217.54	Review news; review and upload CorrLinks communications; review voluminous [REDACTED] and cross reference against class list; manage incoming communications and direct staff regarding same
JST	3/17/2021	3.4	1547	455	739.64	217.54	Phone call with Sara Norman; review docket and communications with government; legal research; outline and draft motion to re-open discovery
OXR	3/17/2021	2.4	1248	520	522.10	217.54	Emails and telephone calls with S. Grisham regarding [REDACTED] and hearing prep; prepare for hearing
SKG	3/17/2021	2.1	661.5	315	456.83	217.54	Review news; complete cross check of key [REDACTED] against class members list and consult with attorney regarding same; review/respond to communications from relatives; confer with attorney regarding [REDACTED] and hearing preparation
JST	3/18/2021	3.6	1638	455	783.14	217.54	Email correspondence with clerk and ACLU; legal research; meetings with O. Rocos; revise motion to re-open discovery; phone calls with Sara Norman

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	3/18/2021	4.1	2132	520	891.91	217.54	Draft ex parte to modify case schedule; telephone calls and emails with J. Threatt and S. Norman regarding ex parte
SKG	3/18/2021	0.5	157.5	315	108.77	217.54	Review news; consult with staff regarding incoming communications
JST	3/19/2021	8.3	3776.5	455	1805.58	217.54	Meetings with O. Rocos; email correspondence with N. Rim, O. Rocos, PLO; revise and finalize motion to re-open discovery; legal research; draft and finalize declaration in support of motion and exhibits; draft and finalize proposed order; email correspondence with opposing counsel
OXR	3/19/2021	6.2	3224	520	1348.75	217.54	Prepare for and attend hearing; revise ex parte to modify case schedule
PKF	3/19/2021	3	360	120	360.00	120	Rename and relocate prisoner letters
SKG	3/19/2021	6.1	1921.5	315	1326.99	217.54	Review news; prepare for upload and organization of incoming letters; review and process incoming CorrLinks correspondence; develop chart for [REDACTED]
JST	3/21/2021	0.2	91	455	43.51	217.54	Review government's opposition papers; email correspondence with O. Rocos and PLO
OXR	3/21/2021	2.1	1092	520	456.83	217.54	Revise spreadsheet of inmates
JST	3/22/2021	1.1	500.5	455	239.29	217.54	Meeting with O. Rocos; phone call with Sara Norman; review court's ruling
OXR	3/22/2021	2.1	1092	520	456.83	217.54	Review opposition to ex parte; review ruling on ex parte; emails regarding next steps
PKF	3/22/2021	4	480	120	480.00	120	Rename and move prisoner letters
SKG	3/22/2021	4.8	1512	315	1044.19	217.54	Review and circulate news; review key Worksheets and document reasons for denial; review and process incoming CorrLinks correspondence
JST	3/23/2021	0.6	273	455	130.52	217.54	Phone call with client; email correspondence with N. Rim, O. Rocos, PLO
KEL	3/23/2021	1	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; return calls to relatives; update index
OXR	3/23/2021	4.5	2340	520	978.93	217.54	Telephone call with [REDACTED] regarding matter status; emails regarding next steps; draft supplemental submission; review draft RFP; review request for clarification
SKG	3/23/2021	2.7	850.5	315	587.36	217.54	Review news; research class member and reply to inquiry from his counsel; advise and direct staff in response to family member; process intake communications; review detailed analysis of inmates identified as [REDACTED] denials in preparation for development of data sheets for provision to Court

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
JST	3/24/2021	0.8	364	455	174.03	217.54	Phone call with Sara Norman; email correspondence with N. Rim, O. Rocos, PLO; notice of non-opposition; email correspondence with N. Rim, O. Rocos, S. Grisham
OXR	3/24/2021	3.6	1872	520	783.14	217.54	Draft and file notice of non-opposition; draft supplemental submission; emails regarding matter status
SKG	3/24/2021	5.7	1795.5	315	1239.98	217.54	Review news; process intake communications; review CorrLinks messages; telephonic conference with recently released inmate and revise tracking sheet accordingly; confirm statements made in recent hearing; return call to released class member to address questions; review/reply to relatives; revise spreadsheet of [REDACTED] create subchart exhibits identifying [REDACTED] confer with attorney regarding same; arrange for ACLU interview
JST	3/25/2021	1.2	546	455	261.05	217.54	Meeting with O. Rocos and PLO; revise requests for production; email correspondence with Sara Norman; email correspondence with O. Rocos; review filing
OXR	3/25/2021	6.6	3432	520	1435.76	217.54	Draft supplemental submission; meeting with S. Norman and PLO regarding next steps
SKG	3/25/2021	5.5	1732.5	315	1196.47	217.54	Review news; interview with [REDACTED] [REDACTED] direct staff in intake; review and process communications from relatives; further revision to spreadsheet exhibits to be submitted with Supplemental Data; review Supplemental Data Submission; create PDFs of multiple exhibits and prepare for filing with Court
OXR	3/26/2021	6.8	3536	520	1479.27	217.54	Revise, finalize, and file supplemental submission
SKG	3/26/2021	6.6	2079	315	1435.76	217.54	Review news; confer with staff regarding family inquiries; review and process communications; develop new exhibits for submission to Court; complete revision and preparation of spreadsheet exhibits to be submitted with Supplemental Data; review Supplemental Data Submission and edit as needed; create PDFs of multiple exhibits and prepare for filing with Court; research key inmates who have been released
OXR	3/29/2021	2.1	1092	520	456.83	217.54	emails regarding discovery and current conditions at Lompoc; call with [REDACTED]
SKG	3/29/2021	1.8	567	315	391.57	217.54	Review and circulate news; consult with legal team regarding inquiry about class member; research member's status and history and update spreadsheet accordingly; conference with relative regarding [REDACTED] review and process inmate communications; communicate latest internal updates to team; communicate with family member regarding case status
JST	3/30/2021	0.6	273	455	130.52	217.54	Revise requests for production; email correspondence with PLO; phone calls with PLO; email correspondence with BOP
OXR	3/30/2021	1.1	572	520	239.29	217.54	Emails regarding draft deposition notices and RFPs
SKG	3/30/2021	0.5	157.5	315	108.77	217.54	Review news; review and process incoming communications from inmates; manage correspondence from relatives

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
JST	3/31/2021	4.7	2138.5	455	1022.44	217.54	Revise requests for production
OXR	3/31/2021	1.1	572	520	239.29	217.54	emails regarding depositions and medical record review
SKG	3/31/2021	0.4	126	315	87.02	217.54	Review news; review and process incoming communications
OXR	4/1/2021	0.3	156	520	65.26	217.54	emails regarding depositions
SKG	4/1/2021	4.6	1449	315	1000.68	217.54	Review and circulate news; review and process incoming communications; organize sets of medical records for physician review; complete initial data documentation for records review; review and process communications
OXR	4/5/2021	1.6	832	520	348.06	217.54	Review government's response on Castillo motion; emails regarding government's requested stipulation and protective order
SKG	4/5/2021	1.1	346.5	315	239.29	217.54	Review and circulate news; review and process incoming communications; research Minute Order and circulate to advocate
JST	4/6/2021	1.7	773.5	455	369.82	217.54	Meet and confer call with government; email correspondence with Sara Norman; phone call with Sara Norman; draft status report filing
OXR	4/6/2021	0.4	208	520	87.02	217.54	Emails regarding government's requested stipulation; emails regarding review of medical records
SKG	4/6/2021	0.8	252	315	174.03	217.54	Review news; review and process incoming communications; retrieve and review latest filings
OXR	4/7/2021	1.1	572	520	239.29	217.54	Prepare for and attend meet and confer on discovery
SKG	4/7/2021	0.4	126	315	87.02	217.54	Review news; review and process incoming communications
KEL	4/8/2021	0.5	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index
OXR	4/8/2021	1.9	988	520	413.33	217.54	Prepare for and give presentation regarding depositions
SKG	4/8/2021	3.7	1165.5	315	804.90	217.54	Review news; review and process incoming communications; confer with paralegal assistant regarding relatives' inquiries; begin organization of voluminous [REDACTED] for analysis
OXR	4/9/2021	1.3	676	520	282.80	217.54	Emails regarding scheduling, discovery, and depositions

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	4/9/2021	1.8	567	315	391.57	217.54	Review news; review and process inmate correspondence; telephonic conference with [REDACTED]
SKG	4/12/2021	0.6	189	315	130.52	217.54	Review news; review and process inmate correspondence
OXR	4/13/2021	0.4	208	520	87.02	217.54	Emails regarding depositions and scheduling; emails regarding review of medical records
SKG	4/13/2021	1.2	378	315	261.05	217.54	Review news; review and process incoming communications; additional organization of medical records
OXR	4/14/2021	0.7	364	520	152.28	217.54	Review and revise stipulation; emails regarding matter status, next steps, and depositions; emails with D. Beck regarding protective order
SKG	4/14/2021	3.6	1134	315	783.14	217.54	Review news; review and process inmate correspondence; review physician analysis of medical records; prepare additional medical records for secure transmission and physician review; research class status of inmates to be reviewed; revise medical record review spreadsheet
OXR	4/15/2021	0.5	260	520	108.77	217.54	Emails regarding matter status
SKG	4/15/2021	1.6	504	315	348.06	217.54	Review news; review correspondence; follow up on retrieval and maintenance of filings and confer with staff regarding same
OXR	4/16/2021	2.2	1144	520	478.59	217.54	Emails regarding matter status; review and finalize protective order
SKG	4/16/2021	3.6	1134	315	783.14	217.54	Review news; process inmate correspondence; review communications from family; organize class member status data from various filings; analyze latest numbers on home confinement, compassionate release, transfer and general release and revise tracking chart; review figures on class members with each qualifying condition and create spreadsheet to track data
OXR	4/19/2021	0.7	364	520	152.28	217.54	Emails regarding deposition scheduling
SKG	4/19/2021	0.4	126	315	87.02	217.54	Review news; review and process inmate correspondence
OXR	4/20/2021	0.3	156	520	65.26	217.54	Emails regarding deposition scheduling
SKG	4/20/2021	4.8	1512	315	1044.19	217.54	Review news; upload medical release; review communications and schedule; begin conversion and integration of current class lists and data updates
OXR	4/21/2021	1.2	624	520	261.05	217.54	Review 30b6 deposition outline
SKG	4/21/2021	6.2	1953	315	1348.75	217.54	Review news; review updates on individual class members' home confinement statuses and revise tracking sheet accordingly

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
KEL	4/22/2021	1	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index; return calls to relatives
OXR	4/22/2021	0.8	416	520	174.03	217.54	Emails regarding status of appeal; emails regarding setting up database to review government's documents
SKG	4/22/2021	5.1	1606.5	315	1109.45	217.54	Review news; process incoming messages; review and process correspondence from inmates; review and organize documents from class members to [REDACTED] continue updates to class member spreadsheet
OXR	4/23/2021	2.1	1092	520	456.83	217.54	Emails and telephone calls regarding review of government's produced documents
PKF	4/23/2021	7.5	900	120	900.00	120	Organize prisoner files
SKG	4/23/2021	5.3	1669.5	315	1152.96	217.54	Review news; download voluminous production from Respondents; arrange for management and review of document production on shared database; team meeting to prepare for document review; instruct staff in responses to family members; direct staff in consolidation of key correspondence; further updates to class tracking sheet
SVA	4/23/2021	2	640	320	435.08	217.54	Setup secure database and prepare documents for review
OXR	4/26/2021	0.5	260	520	108.77	217.54	Emails regarding depositions; review documents
SKG	4/26/2021	5.9	1858.5	315	1283.49	217.54	Review news; summarize key issues regarding inmates' [REDACTED]; complete addition of full data for newest class members; download, review, and organize voluminous document production from BOP in response to expert requests
PKF	4/27/2021	1	120	120	120.00	120	Reorganize prisoner files
SKG	4/27/2021	3.8	1197	315	826.65	217.54	Review news; continue revision and updating of integrated class spreadsheet; review and respond to correspondence; direct staff in review of voluminous correspondence and extraction of key medical releases and [REDACTED]
OXR	4/28/2021	1	520	520	217.54	217.54	Telephone call regarding depositions and next steps
PKF	4/28/2021	7.5	900	120	900.00	120	Reorganize prisoner files
SKG	4/28/2021	4.1	1291.5	315	891.91	217.54	Review news; update Discovery tracking index; review/reply to correspondence from relatives; upload documentation regarding expert deposition
KEL	4/29/2021	1.5	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index; return calls to relatives
NXR	4/29/2021	0.3	165	550	65.26	217.54	Call with PLO and M. Drooks re case strategy

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
PKF	4/29/2021	7.5	900	120	900.00	120	Reorganize prisoner files
SKG	4/29/2021	2.2	693	315	478.59	217.54	Review news; review/reply to inquiries regarding class status; upload notices; review discovery correspondence; review and process inmate correspondence; manage upload of document production
DEF	4/30/2021	1	290	290	217.54	217.54	Download files via FTP; Import production files into Relativity; Creat batches for reveiw.
OXR	4/30/2021	1.9	988	520	413.33	217.54	Meet and confer regarding dispute over H. Venters' counsel; emails with inmates; emails regarding Castillo ruling
PKF	4/30/2021	7.5	900	120	900.00	120	Reorganize prisoner files
OXR	5/3/2021	1.9	988	520	413.33	217.54	Review Castillo ruling; emails regarding correspondence from prisoners; emails regarding medical records; emails regarding settlement; review RFP responses
PKF	5/3/2021	7.5	900	120	900.00	120	Reorganize prisoner folders
SKG	5/3/2021	5.9	1858.5	315	1283.49	217.54	Review news; review recommendation from Judge; consult with relative regarding acquisition of email discussing remarks on home confinement; confer with inmate advocate about direct communication with Carvajal; prepare sheets identifying men eligible for re-review per Court's recommendation; prepare medical records for outside physician review
OXR	5/4/2021	0.6	312	520	130.52	217.54	Emails regarding correspondence from prisoners
PKF	5/4/2021	7.5	900	120	900.00	120	Reorganize prisoner folders
SKG	5/4/2021	3.6	1134	315	783.14	217.54	Review news; correspondence with relative regarding basis for denial; research and review worksheet and confer with attorney regarding same; communications with relative regarding recent death at facility; upload and organize medical records for review
NXR	5/5/2021	0.5	275	550	108.77	217.54	Call with O. Rocos re settlement
OXR	5/5/2021	2.4	1248	520	522.10	217.54	Emails regarding fees; call with N. Rim regarding settlement; call with J. Yang regarding settlement; review ex parte motion regarding Venters' counsel; review and revise opposition to ex parte
PKF	5/5/2021	7.5	900	120	900.00	120	Reorganize prisoner files
SKG	5/5/2021	0.6	189	315	130.52	217.54	Review news; review and upload communications; confer with staff regarding message intake
KEL	5/6/2021	0.5	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index; return calls to relatives

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	5/6/2021	0.4	208	520	87.02	217.54	Review ruling on ex parte
PKF	5/6/2021	7.5	900	120	900.00	120	Reorganize prisoner files
SKG	5/6/2021	0.5	157.5	315	108.77	217.54	Review news; upload incoming messages
OXR	5/7/2021	0.6	312	520	130.52	217.54	Emails regarding correspondence from prisoners and medical records
PKF	5/7/2021	7.5	900	120	900.00	120	Reorganize prisoner files
SKG	5/7/2021	1.1	346.5	315	239.29	217.54	Review news; review recently released individual's request for interview; review messages; clean up data
OXR	5/10/2021	0.5	260	520	108.77	217.54	Emails regarding settlement and prisoner correspondence
PKF	5/10/2021	7.5	900	120	900.00	120	Reorganize prisoner files
SKG	5/10/2021	6.5	2047.5	315	1414.01	217.54	Review news; process incoming messages; upload and initial review of voluminous medical records provided by class member; begin determination of people released on home confinement specifically and conduct research to confirm status
OXR	5/11/2021	0.5	260	520	108.77	217.54	Call with S. Grisham regarding matter status
PKF	5/11/2021	7.5	900	120	900.00	120	Reorganize prisoner files
SKG	5/11/2021	3.3	1039.5	315	717.88	217.54	Review news; complete identification and assembly of all individuals released to home confinement; conference with attorney regarding case strategy and task
PKF	5/12/2021	7.5	900	120	900.00	120	Reorganize prisoner files for easier searching
SKG	5/12/2021	1.9	598.5	315	413.33	217.54	Review news; upload expert reports; review discovery correspondence; review and process inmate correspondence; initial conference with recently released class member; consult with staff regarding identification of medical records and releases
OXR	5/13/2021	1.9	988	520	413.33	217.54	Emails regarding case schedule, document productions; review documents
PKF	5/13/2021	7.5	900	120	900.00	120	Reorganize prisoner files

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	5/13/2021	0.8	252	315	174.03	217.54	Review news; review correspondence from relatives; identify key Declarations
OXR	5/14/2021	1.5	780	520	326.31	217.54	Emails regarding document production for deposition; emails regarding inmate interviews
PKF	5/14/2021	7.5	900	120	900.00	120	Reorganize prisoner files for easier searching by medical records and medical information release authorizations
SKG	5/14/2021	2.7	850.5	315	587.36	217.54	Review news; review inmate correspondence; communications with relative regarding home confinement status and message alleging freeze of releases; upload document production; update discovery index; prepare interview script for recently released class member; consult with attorney regarding key discussion points
OXR	5/17/2021	1.5	780	520	326.31	217.54	Emails regarding status of actions; review objection to Castillo ruling; telephone call regarding O. Souvresrafil
PKF	5/17/2021	7.5	900	120	900.00	120	Create spreadsheet for all prisoner medical release authorizations and medical records
SKG	5/17/2021	2.8	882	315	609.11	217.54	Review news; review inmate correspondence; review/reply to communications with relatives regarding home confinement status; conduct interview with recently released class member
OXR	5/18/2021	0.3	156	520	65.26	217.54	Emails regarding case schedule
PKF	5/18/2021	1.5	180	120	180.00	120	Finish spreadsheet for all Lompoc prisoner medical release authorizations and medical records
SKG	5/18/2021	5.6	1764	315	1218.22	217.54	Review news; review inmate correspondence; review/reply to communications with relatives and counsel regarding home confinement status; prepare and circulate report on interview with recently released class member; consult with staff regarding organization of inmate correspondence; track upload of filings; confirm new class list has been filed and review attendant Declarations
PKF	5/19/2021	5	600	120	600.00	120	Ad bates number ranges to prisoner files for Lompoc
SKG	5/19/2021	7.4	2331	315	1609.80	217.54	Review news; review/reply to correspondence from counsel; review/reply to correspondence from relatives; begin preparation of document productions for database upload; direct staff in preparation of additional document production for processing; review latest Class List filed with the Court; review home confinement updates and initial preparation of same for processing; convert and integrate Class Lists into voluminous master spreadsheet; confer with PLO regarding discovery
SVA	5/19/2021	1.5	480	320	326.31	217.54	Prepare documents for review
OXR	5/20/2021	2.2	1144	520	478.59	217.54	Call regarding upcoming depositions; review and revise outline for deposition of A. Tekbali
SKG	5/20/2021	0.7	220.5	315	152.28	217.54	Review news; review inmate correspondence; process incoming notices from relatives

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	5/21/2021	1.2	624	520	261.05	217.54	Emails regarding A. Tekbali deposition; review and revise settlement proposal
SKG	5/21/2021	1.3	409.5	315	282.80	217.54	Review, upload, and circulate news; review incoming messages
OXR	5/23/2021	0.7	364	520	152.28	217.54	Review and revise outline for J. Beard deposition
OXR	5/24/2021	0.7	364	520	152.28	217.54	Call regarding depositions and next steps
SKG	5/24/2021	0.7	220.5	315	152.28	217.54	Review news; review messages and correspondence
OXR	5/25/2021	2.3	1196	520	500.34	217.54	Emails regarding case status, settlement, next steps
SKG	5/25/2021	0.8	252	315	174.03	217.54	Review news; draft case project update for attorney
SVA	5/25/2021	1.5	480	320	326.31	217.54	Prepare documents for review
OXR	5/26/2021	8.5	4420	520	1849.09	217.54	research and draft opposition to objection to report and recommendation; telephone call regarding opposition to motion for summary judgment
SKG	5/26/2021	3.2	1008	315	696.13	217.54	Review news; review/reply to messages from class members and relatives regarding [REDACTED] [REDACTED] [REDACTED] circulate key messages to attorney; communicate with PLO regarding named plaintiff's [REDACTED] follow up on retrieval and organization of all MSJ filings; listen to voicemail and transmit to clerk for processing
OXR	5/27/2021	7.2	3744	520	1566.29	217.54	Research and draft opposition to objection to report and recommendation; emails and telephone calls regarding summary judgment, settlement, opposition to motion to lift the injunction
SKG	5/27/2021	3.3	1039.5	315	717.88	217.54	Review news; review notices regarding conditions and consult with attorney; confer with PLO regarding BOP plans/policies; direct clerk in response to voicemails; conduct document review training session; coordinate issue tag revision; review inmate correspondence
DEF	5/28/2021	1	290	290	217.54	217.54	Email with team; Modified layout changes to the Relativity database;
OXR	5/28/2021	2.5	1300	520	543.85	217.54	Finalize and file opposition to objection to report and recommendation; emails with government regarding opposition to motion to lift preliminary injunction
SKG	5/28/2021	0.5	157.5	315	108.77	217.54	Review news; confer with legal team regarding issue tags on document review

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	5/29/2021	3.5	1102.5	315	761.39	217.54	Review BOP document production and code for key issues
SKG	5/30/2021	3.6	1134	315	783.14	217.54	Review BOP document production and code for key issues; report to team regarding same
CJL	6/1/2021	0.3	136.5	455	65.26	217.54	Call
OXR	6/1/2021	1.9	988	520	413.33	217.54	Draft, finalize, and file stipulation regarding opposition to motion to lift preliminary injunction; telephone calls regarding opposition to motion for summary judgment
SKG	6/1/2021	1.6	504	315	348.06	217.54	Review, upload, and circulate news; review, reply to, and download inmate messages; circulate select messages to team
CJL	6/2/2021	4.5	2047.5	455	978.93	217.54	Research for opposition
OXR	6/2/2021	1.9	988	520	413.33	217.54	Review materials for opposition to motions for summary judgment and to dissolve preliminary injunction
SKG	6/2/2021	3.1	976.5	315	674.37	217.54	Review news; review incoming correspondence; review Corrlinks messages and [REDACTED] to potentially give Declarations; prepare select messages and transmit to PLO attorneys with background and summaries regarding each Class Members, their concerns, and possible abilities as witnesses; conference with attorney regarding filing preparation
CJL	6/3/2021	4.5	2047.5	455	978.93	217.54	Research for opposition
KEL	6/3/2021	0.3	0	0	0.00	0	Process incoming messages re incarcerated individuals; update index
OXR	6/3/2021	2.1	1092	520	456.83	217.54	Prepare for and attend calls regarding pre-trial deadlines and settlement; emails regarding opposition to motion for summary judgment
SKG	6/3/2021	3.2	1008	315	696.13	217.54	Review news and correspondence; confer with attorneys regarding [REDACTED] vaccine education, and vaccine refusal; consult with attorneys regarding arranging phone calls with Class Members
OXR	6/4/2021	4.8	2496	520	1044.19	217.54	Review draft sections of opposition to motion for summary judgment; draft outline for opposition
OXR	6/5/2021	1.8	936	520	391.57	217.54	Research opposition to motion for summary judgment; emails with S. Norman regarding opposition
CJL	6/7/2021	3.1	1410.5	455	674.37	217.54	Correspondence; draft opposition
OXR	6/7/2021	13.2	6864	520	2871.53	217.54	Draft and revise opposition to motion for summary judgment and supporting papers, emails and telephone calls regarding the same

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	6/7/2021	4.9	1543.5	315	1065.95	217.54	Review news and incoming messages; review and upload Corrlinks communications; review Plaintiff Declaration; identify and circulate news from Class Members regarding ██████████ ██████████ clean up tracking worksheet
CJL	6/8/2021	3	1365	455	652.62	217.54	Draft statement of uncontroverted facts
OXR	6/8/2021	14.8	7696	520	3219.59	217.54	Draft, revise, finalize and file opposition to motion for summary judgment, opposition to motion to lift the preliminary injunction, declarations, and supporting papers, emails regarding the same
SKG	6/8/2021	8.6	2709	315	1870.84	217.54	Review news; review Opposition to MSJ, review Statement and Additional Statement of Facts; review revised Statements; identify cites in Beard, Venters, Tekbali, and PMK depositions and prepare Exhibits; revise citations in Brief and Statements; confer with legal team regarding same; review attorney Declaration and revise as needed
OXR	6/9/2021	1.2	624	520	261.05	217.54	Emails with co-counsel regarding ██████████
SKG	6/9/2021	0.6	189	315	130.52	217.54	Review news; review, reply to, and download inmate messages
OXR	6/10/2021	0.3	156	520	65.26	217.54	Emails with co-counsel regarding ██████████
SKG	6/10/2021	3.1	976.5	315	674.37	217.54	Review news; review and process incoming messages; review all material on network and DMS and consult with Tech Support regarding transmittal of same; prepare for upload of latest letters
OXR	6/11/2021	0.9	468	520	195.79	217.54	Telephone calls with class members
OXR	6/14/2021	1.3	676	520	282.80	217.54	Emails and telephone calls regarding matter status
DEF	6/15/2021	0.5	145	290	108.77	217.54	Download files via FPT site.
OXR	6/15/2021	0.3	156	520	65.26	217.54	Emails regarding matter status
SKG	6/15/2021	3.5	1102.5	315	761.39	217.54	Review news; review, reply to, and download incoming communications; download, circulate, and review Declarations filed under seal; review and upload inmate messages; circulate key emails to legal team; coordinate upload and processing of document production
OXR	6/16/2021	3.3	1716	520	717.88	217.54	Review replies in support of motions; prepare for and attend call regarding next steps; draft stipulation
PKF	6/16/2021	6	720	120	720.00	120	Rename and relocate prisoner files

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	6/16/2021	2.2	693	315	478.59	217.54	Review news; process incoming communications; direct clerk in letter organization; draft case update for families
SVA	6/16/2021	0.5	160	320	108.77	217.54	Prepare documents for batch review
OXR	6/17/2021	0.4	208	520	87.02	217.54	Finalize and file stipulation
SKG	6/17/2021	0.3	94.5	315	65.26	217.54	Review news; review incoming correspondence
OXR	6/21/2021	0.3	156	520	65.26	217.54	Emails regarding stipulation
SKG	6/21/2021	4.1	1291.5	315	891.91	217.54	Review news; process incoming correspondence and voicemails; begin updating statuses of class members
DEF	6/22/2021	0.2	58	290	43.51	217.54	Create Relativity issue tag
OXR	6/22/2021	1.1	572	520	239.29	217.54	Emails regarding stipulation ruling
PKF	6/22/2021	1	120	120	120.00	120	Rename and relocate prisoner files
SKG	6/22/2021	3.9	1228.5	315	848.41	217.54	Review news; review messages; prepare for management of incoming letters and direct clerk in organization of same; continue revision of class tracking sheet
SKG	6/23/2021	6.4	2016	315	1392.26	217.54	Review news; review and enter class member home confinement worksheets; review and upload CorrLinks messages; circulate key correspondence to team and discuss relevant, recurring issues; confer with staff regarding organization and consolidation of letters
CJL	6/24/2021	1.7	773.5	455	369.82	217.54	Correspondence; draft discovery response
OXR	6/24/2021	0.5	260	520	108.77	217.54	Review discovery requests; emails regarding response to discovery requests
PKF	6/24/2021	1	120	120	120.00	120	Relocate PDF prisoner files.
SKG	6/24/2021	4.3	1354.5	315	935.42	217.54	Review news; manage incoming correspondence; process messages; begin review and organization of hundreds of hard copy letters
CJL	6/25/2021	0.4	182	455	87.02	217.54	Revise discovery responses, correspondence

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
DEF	6/25/2021	0.8	232	290	174.03	217.54	Import production files into Relativity
OXR	6/25/2021	2.5	1300	520	543.85	217.54	Revise discovery responses
PKF	6/25/2021	3	360	120	360.00	120	Rename prisoner PDFs to bates numbers
SKG	6/25/2021	2.2	693	315	478.59	217.54	Review news; review incoming correspondence; clean up records on home confinement status
SKG	6/28/2021	4.4	1386	315	957.18	217.54	Review news; review incoming correspondence; continue revision of home confinement tracking chart to remove duplicative and outdated entries
KEL	6/29/2021	0.6	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index
PKF	6/29/2021	6	720	120	720.00	120	Rename and relocate prisoner files, create PDFs from word doc
SKG	6/29/2021	1.2	378	315	261.05	217.54	Review news; process incoming correspondence and confer with staff regarding same; prepare for updates to chart
SKG	6/30/2021	7.2	2268	315	1566.29	217.54	Review news; review incoming correspondence; continue extensive clean up and revise class member tracking sheet
PKF	7/1/2021	1	120	120	120.00	120	Rename PDFs by bates numbers
SKG	7/1/2021	2.8	882	315	609.11	217.54	Review news; review incoming correspondence; continue extensive clean up and revise class member tracking sheet; confer with staff regarding secure maintenance of voluminous correspondence; direct staff in reply to class member
OXR	7/2/2021	0.4	208	520	87.02	217.54	Review report and recommendation
PKF	7/2/2021	7.5	900	120	900.00	120	Rename and relocating prisoner files
SKG	7/2/2021	7.4	2331	315	1609.80	217.54	Review news; review and reply to incoming correspondence; circulate key messages to legal team; continue extensive clean up and revise class member tracking sheet; review and summarize Court's revised Recommendation; manage electronic and hard copy security of voluminous records and correspondence; instruct staff in organization of incoming individual letters
SKG	7/6/2021	3.4	1071	315	739.64	217.54	Review news; review correspondence from various class members and circulate select messages to legal team; telephonic conference with recently released class member
DEF	7/7/2021	1	290	290	217.54	217.54	Import/process production files; Create Images/OCR

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	7/7/2021	2.6	819	315	565.60	217.54	Review news; review incoming messages; direct clerk in maintenance of correspondence; continue clean up of tracking sheet
SKG	7/8/2021	0.5	157.5	315	108.77	217.54	Review news; review messages; coordinate upload of mail
OXR	7/9/2021	0.4	208	520	87.02	217.54	Emails regarding matter status
SKG	7/9/2021	2.2	693	315	478.59	217.54	Review news; review and reply to correspondence and messages
OXR	7/12/2021	0.6	312	520	130.52	217.54	Call regarding matter status and next steps
SKG	7/12/2021	2.4	756	315	522.10	217.54	Review news; review incoming correspondence; team meeting regarding strategy and scheduling, including MSJ schedule, interviews, depositions and survey review; draft summary of conference call; research location information for plaintiffs and legal call procedures
SKG	7/13/2021	3.6	1134	315	783.14	217.54	Review news; review and respond to incoming correspondence; research relative and/or counsel data for plaintiffs; circulate template outline for phone and in person interviews; identify upload, and circulate Declarations containing new Class Lists, new Worksheets and latest individual home confinement application updates; prepare to review material and prepare for extensive updates to comprehensive Class Member tracking sheet; prepare for secure maintenance of
PKF	7/14/2021	0.5	60	120	60.00	120	Create folder and save letters from prisoners
SKG	7/14/2021	0.4	126	315	87.02	217.54	Review news; review and respond to incoming correspondence
OXR	7/19/2021	0.5	260	520	108.77	217.54	Emails regarding deadlines for motion for summary judgment
PKF	7/19/2021	1	120	120	120.00	120	File prisoner letters
SKG	7/19/2021	7.8	2457	315	1696.81	217.54	Review news; review/respond to incoming correspondence; circulate letters for filing; conference with legal team regarding ██████████ ██████████ manage revision, extensive formatting, and full integration of most recent Class Lists into comprehensive, universal tracking spreadsheet; organize expert reports and related documents; review proposed case update
SKG	7/20/2021	2.1	661.5	315	456.83	217.54	Review news; review/respond to incoming correspondence; circulate letters for filing
OXR	7/21/2021	0.5	260	520	108.77	217.54	Emails regarding deadlines for motion for summary judgment; emails and telephone call regarding new retainer agreement
SKG	7/21/2021	0.6	189	315	130.52	217.54	Review news; review/respond to incoming correspondence; follow up on message from class member's wife
OXR	7/22/2021	0.3	156	520	65.26	217.54	Emails regarding deadlines for motion for summary judgment

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
PKF	7/22/2021	0.5	60	120	60.00	120	Rename and refile prisoner letters
SKG	7/22/2021	3.1	976.5	315	674.37	217.54	Review news; review/respond to incoming correspondence; circulate letters for filing; review and revise case update and confer with attorneys regarding same
SKG	7/23/2021	0.5	157.5	315	108.77	217.54	Review news; review/respond to incoming correspondence; circulate letters for filing
OXR	7/26/2021	2.1	1092	520	456.83	217.54	Draft opposition to objection to amended report and recommendation
SKG	7/26/2021	1.7	535.5	315	369.82	217.54	Review news; review/respond to incoming correspondence; circulate key messages to legal team
OXR	7/27/2021	4.3	2236	520	935.42	217.54	Draft opposition to objection to amended report and recommendation; review motion for summary judgement; telephone call with N. Rim and S. Norman regarding opposition to motion for summary judgment
SKG	7/27/2021	0.8	252	315	174.03	217.54	Review news; review/respond to incoming correspondence; finalize case status summary for intake contacts
DEF	7/28/2021	0.4	116	290	87.02	217.54	Export document via Relativity
PKF	7/28/2021	0.5	60	120	60.00	120	Move prisoner letters into folders to be reviewed
SKG	7/28/2021	1.1	346.5	315	239.29	217.54	Review news; review/respond to incoming correspondence
OXR	7/29/2021	0.5	260	520	108.77	217.54	Revise opposition to objection to amended report and recommendation
SKG	7/29/2021	0.9	283.5	315	195.79	217.54	Review news; review/respond to incoming correspondence
OXR	7/30/2021	0.7	364	520	152.28	217.54	Revise, finalize, and file opposition to objection to amended report and recommendation
SKG	7/30/2021	1.5	472.5	315	326.31	217.54	Review news; review/respond to incoming correspondence
SKG	8/2/2021	1.8	567	315	391.57	217.54	Review news; review/respond to incoming correspondence; organize message files; forward voicemails
SKG	8/3/2021	0.6	189	315	130.52	217.54	Review news; review/respond to incoming correspondence

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	8/4/2021	4.9	1543.5	315	1065.95	217.54	Review news; forward incoming correspondence; review multiple Declarations and perform comprehensive updates to tracking sheets to capture updated class member data
KEL	8/5/2021	1	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index
SKG	8/5/2021	1.2	378	315	261.05	217.54	Review news; review/respond to incoming correspondence; provide current population and release counts for update; forward communications for intake
SKG	8/6/2021	0.4	126	315	87.02	217.54	Review news; forward incoming correspondence for filing
KEL	8/9/2021	0.2	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index
PKF	8/9/2021	1	120	120	120.00	120	File prisoner letters
SKG	8/9/2021	0.2	63	315	43.51	217.54	Review news; forward incoming correspondence for filing
SKG	8/10/2021	0.1	31.5	315	21.75	217.54	Review news
SKG	8/11/2021	1.2	378	315	261.05	217.54	Review news; review correspondence; prepare for additional updates to class sheet
KEL	8/12/2021	0.2	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index
SKG	8/12/2021	2.1	661.5	315	456.83	217.54	Review news; review and reply to correspondence; review class list to determine status of various individuals
KEL	8/13/2021	0.5	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index
SKG	8/13/2021	0.1	31.5	315	21.75	217.54	Review news
PKF	8/16/2021	0.25	30	120	30.00	120	Move prisoner letter to correct folder
SKG	8/16/2021	0.2	63	315	43.51	217.54	Review news; review incoming messages
SKG	8/17/2021	1.6	504	315	348.06	217.54	Review news; review and circulate incoming messages

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	8/18/2021	0.7	364	520	152.28	217.54	Review filings in Lompoc
SKG	8/18/2021	1.7	535.5	315	369.82	217.54	Review news; review and circulate incoming messages; research and download Declarations
SKG	8/19/2021	3.8	1197	315	826.65	217.54	Review news; begin review and processing up updated class lists and current home confinement review updates; notify team of Plaintiff's [REDACTED]
OXR	8/20/2021	2.3	1196	520	500.34	217.54	Finalize engagement letters; emails regarding matter status; draft response to audit letter request
SKG	8/20/2021	3.2	1008	315	696.13	217.54	Review news; review correspondence; integrate updated class lists and repair all formatting as needed
OXR	8/23/2021	0.4	208	520	87.02	217.54	Revise response to audit letter request
SKG	8/23/2021	0.4	126	315	87.02	217.54	Review news; review correspondence
KEL	8/24/2021	0.2	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index
KEL	8/24/2021	0.2	0	0	0.00	0	Transmit current case update to relatives
SKG	8/24/2021	1.7	535.5	315	369.82	217.54	Review news; review correspondence; manage voicemails; prepare for comprehensive class updates
SKG	8/25/2021	1.4	441	315	304.56	217.54	Review news; review correspondence; manage voicemails; begin processing of status updates
OXR	8/26/2021	0.5	260	520	108.77	217.54	Finalize and send response to audit letter request
SKG	8/26/2021	0.4	126	315	87.02	217.54	Review news; review incoming communications
KEL	8/27/2021	1	0	0	0.00	0	Transmit current case update to relatives; provide new intake contact data to ACLU
OXR	8/27/2021	0.3	156	520	65.26	217.54	Review ruling in Lompoc, emails regarding the same
SKG	8/27/2021	6.8	2142	315	1479.27	217.54	Review and circulate news; review and respond to correspondence from families and advocates; review and reply to messages from incarcerated persons; research vaccine information and provide to Class Member; circulate messages raising key issues to team; review Order; draft update for circulation

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	8/29/2021	3.7	1165.5	315	804.90	217.54	Perform extensive updates to master status tracking sheet, including all individual Class Member updates and current counts of total dispositions over the last 13 months
SKG	8/30/2021	0.6	189	315	130.52	217.54	Review news; review and circulate key correspondence regarding Class Members
SKG	8/31/2021	0.3	94.5	315	65.26	217.54	Review news; review messages
OXR	9/1/2021	0.5	260	520	108.77	217.54	Team call regarding matter status and next steps
SKG	9/1/2021	4.3	1354.5	315	935.42	217.54	Review news; review and reply to messages; telephonic conference with counsel for Class Member; upload correspondence and circulate key communications; review Worksheets
SKG	9/2/2021	2.3	724.5	315	500.34	217.54	Review news; review and reply to messages; telephonic conferences with attorneys for Class Members; upload correspondence; initial conference with released Class Member; prepare materials for in-depth interview; research key individuals for inclusion in Class
SKG	9/3/2021	1.2	378	315	261.05	217.54	Review news; review and reply to messages; upload correspondence; review filings; confer with team regarding class member interview
PKF	9/7/2021	0.5	60	120	60.00	120	File prisoner letters in appropriate folder
SKG	9/7/2021	2.2	693	315	478.59	217.54	Review news; review and reply to messages; upload correspondence; research and transmit requested plaintiff data
SKG	9/8/2021	3.3	1039.5	315	717.88	217.54	Review news; review and reply to messages; interview class member recently released to home confinement
SKG	9/9/2021	3.2	1008	315	696.13	217.54	Review news; review messages; continue interview with class member recently released to home confinement; prepare interview memo documenting conference with class member and circulate to team with notes and observations
KEL	9/10/2021	1	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; return calls to relatives; update index
SKG	9/10/2021	3.8	1197	315	826.65	217.54	Review news; review and reply to messages; coordinate attorney conference with class member recently released to home confinement
SKG	9/13/2021	1.4	441	315	304.56	217.54	Review and download news; review messages; provide Class Member [REDACTED] coordinate maintenance of letters; provide attorney with material in preparation for Class Member interview
OXR	9/14/2021	1.1	572	520	239.29	217.54	Telephone call with [REDACTED] [REDACTED]
SKG	9/14/2021	1.1	346.5	315	239.29	217.54	Review news; review correspondence from relatives; forward letters for maintenance

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	9/15/2021	0.6	189	315	130.52	217.54	Review news; review correspondence from relatives; forward letters for maintenance
OXR	9/16/2021	0.4	208	520	87.02	217.54	Emails regarding disclosing home confinement review worksheets
PKF	9/16/2021	0.5	60	120	60.00	120	File prisoner letter
SKG	9/16/2021	2.6	819	315	565.60	217.54	Review news; review and reply to correspondence from class members, counsel, and relatives; telephonic conference with family member
SKG	9/22/2021	6.4	2016	315	1392.26	217.54	Review news; review correspondence; communications with attorneys regarding Order; research latest filed Declarations with update class member data; download and organize new class lists, worksheets, and member updates; begin review and updates based on latest data
PKF	9/23/2021	1	120	120	120.00	120	Put prisoner letters in appropriate folders
SKG	9/23/2021	4.9	1543.5	315	1065.95	217.54	Review news; review and respond to correspondence from class members, counsel, and relatives; conferences with family members; convert and format new class lists in preparation for integration
PKF	9/24/2021	3.5	420	120	420.00	120	Filing prisoner letters and creating video
SKG	9/24/2021	4.2	1323	315	913.67	217.54	Review news; read and reply to family and class member communications; identify key issues of concern, assemble supporting worksheets and messages and transmit to attorneys; direct staff in management of class member mail
PKF	9/27/2021	0.5	60	120	60.00	120	File prisoner letters
SKG	9/27/2021	4.4	1386	315	957.18	217.54	Review news; review mail and prepare for maintenance; process messages from family; research [REDACTED] and provide full details to legal team
SKG	9/28/2021	2.4	756	315	522.10	217.54	Review news; research total number of people released to Home Confinement to date; confer with clerk regarding relative inquiry; review communications
SKG	9/29/2021	6.1	1921.5	315	1326.99	217.54	Review news; review and circulate relative inquiry regarding class member transferred out of facility; incorporate all updates from latest filings
OXR	9/30/2021	0.8	416	520	174.03	217.54	Emails regarding matter status and prisoner correspondence
PKF	9/30/2021	0.5	60	120	60.00	120	Relocate prisoner letters
SKG	9/30/2021	4.7	1480.5	315	1022.44	217.54	Review news; read and reply to family and class member communications; identify class members eligible for re-evaluation per Order; transmit key communications to attorneys

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	10/1/2021	1.8	936	520	391.57	217.54	Emails regarding matter status and prisoner questions
SKG	10/1/2021	5.7	1795.5	315	1239.98	217.54	Review news; research key [REDACTED] as needed; communicate with relatives and legal team regarding [REDACTED] begin review and entry of voluminous member worksheets
SKG	10/3/2021	6.8	2142	315	1479.27	217.54	Review all worksheets to identify class members eligible for re-evaluation per Order; Additionally, identify all members [REDACTED] document evaluation and denial details; Coordinate tracking of all members by key denial criteria
OXR	10/4/2021	0.4	208	520	87.02	217.54	Emails and telephone calls regarding matter status and prisoner questions
SKG	10/4/2021	8.7	2740.5	315	1892.60	217.54	Review news; provide update on [REDACTED] and outstanding Order, per attorney's request; continue review and documentation of class member evaluations and denials
SKG	10/5/2021	6.4	2016	315	1392.26	217.54	Review news; complete comprehensive identification and flagging of all members eligible for reevaluation; run counts of each reevaluation group; analyze denials which include [REDACTED] [REDACTED] review strategy communication; draft summary of [REDACTED]
OXR	10/6/2021	1.5	780	520	326.31	217.54	Prepare for and attend team meeting regarding next steps; emails regarding supplemental motion
OXR	10/6/2021	0.4	208	520	87.02	217.54	Emails and telephone calls regarding matter status and prisoner questions
SKG	10/6/2021	3.3	1039.5	315	717.88	217.54	Review news; team meeting to discuss reevaluations and strategize next steps; Review BOP Declaration regarding re-evaluations Ordered by court; review communications
SKG	10/7/2021	0.7	220.5	315	152.28	217.54	Review news; Manage correspondence and voicemails
PKF	10/8/2021	7.5	900	120	900.00	120	Relocate prisoner review worksheets
SKG	10/8/2021	7.8	2457	315	1696.81	217.54	Review news; Integrate all reevaluation worksheets from latest Declaration
OXR	10/11/2021	0.4	208	520	87.02	217.54	emails regarding matter status
PKF	10/11/2021	7.5	900	120	900.00	120	Relocate prisoner review worksheets
SKG	10/11/2021	0.6	189	315	130.52	217.54	Review news; prepare for attorney analysis of all worksheets for re-evaluated class members
OXR	10/12/2021	0.4	208	520	87.02	217.54	Emails regarding matter status

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
PKF	10/12/2021	6.5	780	120	780.00	120	Add docket documents to prisoner files
SKG	10/12/2021	0.5	157.5	315	108.77	217.54	Review news; direct clerk in identification and assembly of all worksheets for re-evaluated class members
PKF	10/13/2021	7.5	900	120	900.00	120	Add docket documents to prisoner files
SKG	10/13/2021	0.1	31.5	315	21.75	217.54	Review news
PKF	10/14/2021	0.5	60	120	60.00	120	Add prisoner letters into appropriate folders
SKG	10/14/2021	0.1	31.5	315	21.75	217.54	Review news
SKG	10/15/2021	0.1	31.5	315	21.75	217.54	Review news
SKG	10/17/2021	7.8	2457	315	1696.81	217.54	Process and enter latest worksheets for class members
PKF	10/18/2021	4	480	120	480.00	120	File prisoner emails into correct folders
SKG	10/18/2021	5.6	1764	315	1218.22	217.54	Review news; confirm status of all re-evaluated class members; prepare spreadsheet of same for review by legal team; direct clerks in processing voluminous correspondence
PKF	10/19/2021	4	480	120	480.00	120	Downloading prisoner emails from CorrLinks
SKG	10/19/2021	1.4	441	315	304.56	217.54	Review news; direct clerk in maintenance of correspondence and response to messages
SKG	10/20/2021	0.8	252	315	174.03	217.54	Review news; Research status of former client who is newly incarcerated and confer with attorney regarding class status Provide recent Order and overview of case status
SKG	10/21/2021	0.7	220.5	315	152.28	217.54	Review news; confer with clerk regarding handling of incoming voicemails and correspondence; reply to family members
OXR	10/22/2021	0.7	364	520	152.28	217.54	Prepare for and attend call regarding motion to enforce
SKG	10/25/2021	1.5	472.5	315	326.31	217.54	Review news; review and reply to messages; communicate with clerks regarding voicemails

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	10/26/2021	0.8	252	315	174.03	217.54	Review news; review and reply to messages; forward key information to attorneys
SKG	10/27/2021	3.5	1102.5	315	761.39	217.54	Review news; review and reply to messages; forward letters for processing; consult with clerks regarding incoming messages; reply to correspondence; retrieve Class Member updates; prepare updated Class Lists and updated ██████████ for review and processing
SKG	10/28/2021	4.3	1354.5	315	935.42	217.54	Review news; review and reply to messages; direct clerk in communications with relatives; begin updates to class member data
SKG	10/29/2021	6.6	2079	315	1435.76	217.54	Review news; review and reply to messages; perform comprehensive updates to various Class tracking spreadsheets; convert, format, and integrate voluminous revised Class Lists with existing tracking sheet
OXR	11/1/2021	0.8	416	520	174.03	217.54	emails regarding ██████████ procedure
SKG	11/1/2021	5.6	1764	315	1218.22	217.54	Review news; research Class Members' statuses and communicate with attorneys regarding same; review Worksheets and update tracking spreadsheet with individual evaluations
SKG	11/2/2021	1.4	441	315	304.56	217.54	Review news; review and reply to messages; continue updates
SKG	11/3/2021	2.4	756	315	522.10	217.54	Review news; review and reply to messages; continue to process updates
PKF	11/9/2021	3	360	120	360.00	120	Prisoner letters
PKF	11/10/2021	2	240	120	240.00	120	Filing prisoner letters in correct folders
KEL	11/12/2021	0.5	0	0	0.00	0	Process incoming messages regarding incarcerated individuals; update index
SKG	11/15/2021	6	1890	315	1305.24	217.54	Review news; review and reply to messages; continue to process updates; review discussions regarding continuance of hearing; provide attorney clarification on class membership and evaluation process; provide key case filings; research ██████████
SKG	11/16/2021	2.3	724.5	315	500.34	217.54	Review news; review and reply to messages; draft summary of key ongoing issues for legal team; additional status updates to class member tracking spreadsheet
PKF	11/17/2021	0.5	60	120	60.00	120	Relocate prisoner letters in proper folders
SKG	11/17/2021	5.6	1764	315	1218.22	217.54	Review news; review messages; respond to relatives and class members; circulate pertinent information to attorneys regarding ██████████ ██████████ ██████████ add evaluation data to tracking spreadsheet; review and edit transcript of ██████████ research evaluation history of ██████████ and confer with legal team regarding same
SKG	11/18/2021	5.5	1732.5	315	1196.47	217.54	Review news; review and reply to messages; continue to process updates; confirm release of named plaintiff Wilson to RRC

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
PKF	11/19/2021	1	120	120	120.00	120	Organize prisoner letters
SKG	11/19/2021	6.7	2110.5	315	1457.52	217.54	Review news; review and reply to messages; forward key correspondence to attorneys; forward letter for processing; review and enter evaluations of new class members
PKF	11/22/2021	0.5	60	120	60.00	120	prisoner letters
SKG	11/22/2021	5.7	1795.5	315	1239.98	217.54	Review news; review correspondence and prepare for processing; review messages from relatives and Class Members; respond to messages; provide updates and relevant filings per request; summarize current [REDACTED] for legal team, including [REDACTED]
PKF	11/23/2021	1	120	120	120.00	120	Organize prisoner letters
SKG	11/23/2021	6.3	1984.5	315	1370.50	217.54	Review news; review and revise proposed communication to BOP; download and review new Class List; review and prepare latest evaluation status updates for processing; continue review and revision of Class Member spreadsheet to capture evaluation data
PKF	11/24/2021	1	120	120	120.00	120	Organize prisoner letters
SKG	11/24/2021	6.5	2047.5	315	1414.01	217.54	Review news; review and reply to messages; forward letters for processing; review and enter evaluations of new class members
PKF	11/29/2021	1	120	120	120.00	120	Organize prisoner letters
SKG	11/29/2021	7.1	2236.5	315	1544.53	217.54	Review news; review and reply to messages; forward letter for processing; process evaluation data
PKF	11/30/2021	0.5	60	120	60.00	120	Organize prisoner letters
SKG	11/30/2021	6.4	2016	315	1392.26	217.54	Review news; forward correspondence for processing; complete revisions to Class member spreadsheet; [REDACTED]
PKF	12/1/2021	0.5	60	120	60.00	120	Organize prisoner letters
SKG	12/1/2021	6.5	2047.5	315	1414.01	217.54	Review news; forward correspondence for processing; review and respond to updates and inquiries from relatives and counsel; circulate material regarding [REDACTED] to legal team; clean up master class member tracking sheet
SKG	12/2/2021	5.7	1795.5	315	1239.98	217.54	Review news; review and reply to correspondence from family members and attorneys; direct clerk in processing of incoming mail; update and revise comprehensive Class List
PKF	12/3/2021	6.5	780	120	780.00	120	Organized prisoner letters

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	12/3/2021	6.2	1953	315	1348.75	217.54	Review news; forward letters for maintenance; manage updates on Class Members; eliminate duplicative data for spreadsheet
PKF	12/6/2021	0.5	60	120	60.00	120	Organize prisoner letters
SKG	12/6/2021	3.2	1008	315	696.13	217.54	Review news; review and reply to correspondence from family members and attorneys; direct clerk in processing of incoming mail; update and revise comprehensive Class List
PKF	12/7/2021	0.5	60	120	60.00	120	Organize prisoner letters
SKG	12/7/2021	5.4	1701	315	1174.72	217.54	Review news; manage maintenance of incoming mail; review, process and reply to messages from class members; review and reply to correspondence from relatives; continue update and revision of comprehensive spreadsheet
SKG	12/8/2021	5.9	1858.5	315	1283.49	217.54	Review news; forward correspondence for processing; forward voicemails; continue cleanup and revision of class member tracking sheet
SKG	12/9/2021	1.6	504	315	348.06	217.54	Review news; forward scanned letters for processing; review all class member messages
SKG	12/10/2021	2.3	724.5	315	500.34	217.54	Review news; forward correspondence for processing; review and process incoming messages; revise comprehensive tracking sheet
PKF	12/13/2021	0.5	60	120	60.00	120	Organize prisoner letters
SKG	12/13/2021	6.1	1921.5	315	1326.99	217.54	Review news; prepare for organization and maintenance of voluminous hard copy correspondence; forward scanned mail; review class member messages; research all class members for whom the Government provided updates in conference, determine accuracy of data provided to legal team and flag issues for further discussion
SKG	12/14/2021	5.6	1764	315	1218.22	217.54	Review and circulate news; forward letters for processing; review and process class member messages; extensive updates to class member status entries; research compassionate release process; [REDACTED] correspondence regarding [REDACTED] for review by legal team
PKF	12/15/2021	0.5	60	120	60.00	120	Organize prisoner letters
SKG	12/15/2021	6.2	1953	315	1348.75	217.54	Review news; research and retrieve key piece of [REDACTED] review and respond to incoming messages; manage organization of 18 months of hard copy records and correspondence; clean up tracking sheet
PKF	12/16/2021	0.5	60	120	60.00	120	Organize prisoner letters
SKG	12/16/2021	6.3	1984.5	315	1370.50	217.54	Review news; research Class Members and confirm data; review and reply to Class Member messages; forward letters and voicemails for processing; manage updates to class member evaluation spreadsheet

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	12/17/2021	6.5	2047.5	315	1414.01	217.54	Review news; review and reply to family members; investigate [REDACTED] and summarize issues for legal team; continue revisions to spreadsheet
PKF	12/27/2021	0.5	60	120	60.00	120	Organize prisoner letters
SKG	12/27/2021	6	1890	315	1305.24	217.54	Review and circulate news; forward letters and voicemails for processing; document latest class member evaluations; review and respond to class member communications
PKF	12/28/2021	0.25	30	120	30.00	120	Organize prisoner letters
SKG	12/28/2021	5.8	1827	315	1261.73	217.54	Review news; team meeting to prepare for 1/4/22 hearing on MSJ and Injunction; research data; summarize hearing preparations and circulate same; forward voicemails and letters
SKG	12/29/2021	6.2	1953	315	1348.75	217.54	Review news; review and reply to Class Member messages; continue review and processing of evaluations
SKG	12/30/2021	4.3	1354.5	315	935.42	217.54	Review news; review and reply to Class Member messages; forward letters and voicemails for processing; complete update to class member tracking sheet; prepare for hearing
OXR	1/3/2022	4.7	2444	520	1022.44	217.54	Review materials and prepare for hearing on motion for summary judgment and motion to dissolve injunction; emails regarding inmates' requests for information
PKF	1/3/2022	2	240	120	240.00	120	Relocating prisoner letters
SKG	1/3/2022	6.3	1984.5	315	1370.50	217.54	Review news; review and reply to Class Member messages; forward letters and voicemails for processing; additional circulation of hearing attendance information; assemble summary of current conditions and recurring issues with supporting documentation for hearing preparation; consult with attorney regarding hearing; research updated DOJ guidelines; confer with class member's outside counsel regarding [REDACTED]
OXR	1/4/2022	4.3	2236	520	935.42	217.54	Prepare for and attend hearing on motion for summary judgment and motion to dissolve injunction
PKF	1/4/2022	1	120	120	120.00	120	Rename PDFs
SKG	1/4/2022	3.6	1134	315	783.14	217.54	Review news; telephonically attend hearing; research issues and class members as needed; communicate with families regarding hearing observation; process incoming correspondence; confer with relative regarding class member; upload deposition transcript
OXR	1/5/2022	0.7	364	520	152.28	217.54	Telephone call and emails regarding next steps
SKG	1/5/2022	1.8	567	315	391.57	217.54	Review and circulate news; review and reply to incoming messages; forward letters and voicemails for processing; review transcripts and identify key Court assertion regarding Venters; upload latest BOP class member lists, updates, and evaluations

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	1/6/2022	0.9	283.5	315	195.79	217.54	Review news; review and reply to Class Member messages; forward letters and voicemails for processing
OXR	1/7/2022	0.5	260	520	108.77	217.54	Telephone call regarding supplemental filings and motions
SKG	1/7/2022	1.6	504	315	348.06	217.54	Review news; review incoming messages; provide co-counsel with key Court transcripts
OXR	1/10/2022	1.4	728	520	304.56	217.54	Review and revise brief regarding admissibility of Venters reports; emails and telephone calls with inmate families
SKG	1/10/2022	4.2	1323	315	913.67	217.54	Review news; review and reply to incoming messages; process correspondence; analyze updated data in filings
OXR	1/11/2022	0.5	260	520	108.77	217.54	Emails regarding next steps
SKG	1/11/2022	4.7	1480.5	315	1022.44	217.54	Review and circulate news; review incoming messages; research class member mentioned by Judge during hearing and prepare worksheet for attorney review; forward correspondence for processing; begin careful analysis of recent communications to [REDACTED]
OXR	1/12/2022	0.8	416	520	174.03	217.54	Emails regarding next steps; review filings
PKF	1/12/2022	0.5	60	120	60.00	120	Organizing prisoner letters
SKG	1/12/2022	3.7	1165.5	315	804.90	217.54	Review and circulate news; review incoming messages; complete summary of recent communications to [REDACTED]
OXR	1/13/2022	0.5	260	520	108.77	217.54	Emails regarding next steps
SKG	1/13/2022	3.1	976.5	315	674.37	217.54	Review and circulate news; review incoming messages; review updates
SKG	1/14/2022	2.2	693	315	478.59	217.54	Review news; review incoming messages; review BOP data regarding [REDACTED]; upload all Court transcripts for team review
OXR	1/16/2022	0.5	260	520	108.77	217.54	Emails regarding Lompoc supplemental briefing
SKG	1/17/2022	0.5	157.5	315	108.77	217.54	Review and record BOP data regarding [REDACTED]
OXR	1/18/2022	2.6	1352	520	565.60	217.54	Review briefs regarding class certification and Dr. Venters visit; emails regarding ruling and next steps

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
PKF	1/18/2022	0.5	60	120	60.00	120	Organize prisoner letters
SKG	1/18/2022	4.7	1480.5	315	1022.44	217.54	Review and circulate news; review incoming messages; multiple updates to ██████████ review motion; confer with legal team and begin development of comprehensive update; forward incoming mail
OXR	1/19/2022	1.6	832	520	348.06	217.54	Emails regarding prison litigation update
SKG	1/19/2022	3.9	1228.5	315	848.41	217.54	Review and circulate news; review incoming messages; research data and prepare daily updates to ██████████ confer with legal team and draft additions to comprehensive update; additional consultation with attorney regarding ██████████
SKG	1/20/2022	6.7	2110.5	315	1457.52	217.54	Review and circulate news; review and respond to incoming messages; multiple updates to ██████████ prepare and circulate comprehensive case update to relatives; clean up contact list as needed; confer with select family members; integrate current class member data to comprehensive class member tracking spreadsheet
SKG	1/21/2022	5.1	1606.5	315	1109.45	217.54	Review and circulate news; review incoming messages; multiple updates to ██████████ process updates
OXR	1/24/2022	0.4	208	520	87.02	217.54	Emails regarding Lompoc trial
PKF	1/24/2022	0.5	60	120	60.00	120	Relocate prisoner letters
SKG	1/24/2022	2.4	756	315	522.10	217.54	Review and circulate news; forward correspondence from class members; review incoming messages; multiple updates to ██████████ provide hearing transcript to co-counsel; consult with clerk regarding family member inquiry
SKG	1/25/2022	4.8	1512	315	1044.19	217.54	Review and circulate news; review and reply to incoming messages; identify key data from ██████████ multiple updates to ██████████ confer with legal team regarding discovery; coordinate counsel access to database; confer with outside counsel and family member regarding ██████████; research ██████████ ██████████
SKG	1/26/2022	6.8	2142	315	1479.27	217.54	Review news; review incoming messages; multiple updates to ██████████ extensive updates to ██████████ tracking sheet and processing of ██████████ data
SKG	1/27/2022	5.9	1858.5	315	1283.49	217.54	Review news; review and respond to incoming messages; multiple updates to ██████████ continue revisions to ██████████ r tracking sheet; confer with attorney regarding trial preparation planning
PKF	1/28/2022	0.25	30	120	30.00	120	Relocate prisoner letters

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	1/28/2022	6.1	1921.5	315	1326.99	217.54	Review news; review and reply to incoming messages; multiple updates to [REDACTED] prepare screenshots of BOP website; revise organization of [REDACTED] process [REDACTED] review data
PKF	1/31/2022	0.5	60	120	60.00	120	Relocate prisoner letters
SKG	1/31/2022	5.7	1795.5	315	1239.98	217.54	Review and circulate news; review incoming messages; multiple updates to [REDACTED] revise organization of screenshots from BOP website; review and enter evaluation data; review draft filing
PKF	2/1/2022	0.5	60	120	60.00	120	Relocate prisoner letters
SKG	2/1/2022	4.9	1543.5	315	1065.95	217.54	Review news; review and respond to incoming messages; multiple updates to [REDACTED] review and enter evaluation data; forward correspondence for processing
SKG	2/2/2022	5.3	1669.5	315	1152.96	217.54	Review news; review and reply to incoming messages; multiple updates to [REDACTED] revise tracking sheet to integrate class member reviews
OXR	2/3/2022	0.3	156	520	65.26	217.54	Emails regarding Venters site visit
SKG	2/3/2022	5.8	1827	315	1261.73	217.54	Review news; review incoming messages; multiple updates to [REDACTED] review and enter evaluation data; respond to attorney's incoming message updates; confer with clerk regarding publically available information on class members
SKG	2/4/2022	5.7	1795.5	315	1239.98	217.54	Review and circulate news; review incoming messages; multiple updates to [REDACTED] review and enter evaluation data; identify [REDACTED]
SKG	2/7/2022	8.9	2803.5	315	1936.11	217.54	Review news; review incoming messages; multiple updates to [REDACTED] extensive updates to tracking sheet to record [REDACTED] evaluation data; upload latest class member lists, status updates and worksheets for review and processing
SKG	2/8/2022	5.2	1638	315	1131.21	217.54	Review news; review incoming messages; multiple updates to [REDACTED] review and enter evaluation data; prepare spreadsheet tracking [REDACTED]
SKG	2/9/2022	3.6	1134	315	783.14	217.54	Review news; review and reply to incoming messages; multiple updates to [REDACTED]
SKG	2/10/2022	5.9	1858.5	315	1283.49	217.54	Review news; review incoming messages; identify data for potential use in future declarations; multiple updates to [REDACTED] upload updates from [REDACTED] update [REDACTED] tracking sheet
SKG	2/11/2022	5.6	1764	315	1218.22	217.54	Review news; review and reply to incoming messages; multiple updates to [REDACTED] [REDACTED] and circulate updates; research material submitted by [REDACTED]; prepare and circulate notification regarding upcoming hearing and link to access audio attendance; clean up class list tracker

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	2/14/2022	0.4	208	520	87.02	217.54	Emails regarding interview with former inmate
SKG	2/14/2022	4.8	1512	315	1044.19	217.54	Review news; review and respond to incoming messages; circulate reports regarding expert visit; research class status; update spreadsheet tracking qualified inmates not included in Class List; multiple updates to ██████████ consultation with attorney regarding management of daily ██████████ and statistics tracking; research and circulate data on specific class member; prepare and circulate update regarding access to audio attendance at hearing; consult with family member to clarify scope of class action and class qualification; direct clerk in update to intake chart; review report and reply regarding limits on communication with expert
OXR	2/15/2022	3	1560	520	652.62	217.54	Prepare for and attend hearing on motion for non-provisional class certification
PKF	2/15/2022	2.75	330	120	330.00	120	Retrieve corlinks email, collect daily covid data
SKG	2/15/2022	5.1	1606.5	315	1109.45	217.54	Review news; direct clerk in procedures for reviewing, maintaining, and evaluating incoming messages; direct clerk in daily capture and documentation of vaccine implementation, cases, and testing; clean up and revisions to class member tracking sheet
PKF	2/16/2022	1	120	120	120.00	120	Multiple updates to ██████████
SKG	2/16/2022	6.1	1921.5	315	1326.99	217.54	Review news; work on formatting and modifying filed updated Class Lists to allow for Excel conversion and integration into ██████████ tracking spreadsheet; manage specific updates regarding qualified inmates, individuals' ██████████ process statuses and evaluation outcomes
PKF	2/17/2022	2	240	120	240.00	120	Multiple updates to ██████████
SKG	2/17/2022	5.5	1732.5	315	1196.47	217.54	Review news; review ██████████ evaluations and document same; follow up on hearing
PKF	2/18/2022	1	120	120	120.00	120	Multiple updates to ██████████
SKG	2/18/2022	4.3	1354.5	315	935.42	217.54	Review news; continue review of class members' home confinement evaluations and documentation of same
PKF	2/22/2022	1	120	120	120.00	120	Multiple updates to ██████████
SKG	2/22/2022	1.2	378	315	261.05	217.54	Review news; forward messages for processing; continue review of class members' home confinement evaluations and documentation of same
PKF	2/23/2022	1	120	120	120.00	120	Multiple updates to ██████████
PKF	2/24/2022	1	120	120	120.00	120	Multiple updates to ██████████

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
PKF	2/25/2022	1	120	120	120.00	120	Multiple updates to [REDACTED]
SKG	2/25/2022	0.6	189	315	130.52	217.54	Review news; forward messages for review and processing; research initial correspondence providing settlement proposal to government
PKF	2/28/2022	1	120	120	120.00	120	Multiple updates to [REDACTED]
SKG	2/28/2022	0.3	94.5	315	65.26	217.54	Review news; forward messages for review and processing
PKF	3/1/2022	1	120	120	120.00	120	Multiple updates to [REDACTED]
SKG	3/1/2022	0.5	157.5	315	108.77	217.54	Review news; forward voicemails and messages for review and processing; confirm vaccination numbers provided to Court expert against data reported by BOP on website
PKF	3/2/2022	1	120	120	120.00	120	Multiple updates to [REDACTED]
SKG	3/2/2022	0.4	126	315	87.02	217.54	Review news; forward voicemails and messages for review and processing
PKF	3/3/2022	1	120	120	120.00	120	Multiple updates to [REDACTED]
SKG	3/3/2022	0.4	126	315	87.02	217.54	Review news; forward voicemails and messages for review and processing
OXR	3/4/2022	1.9	988	520	413.33	217.54	Emails regarding transcripts of hearings; prepare for and attend telephone call [REDACTED] and next steps; review third Venters report; review emails regarding prevailing parties
PKF	3/4/2022	1	120	120	120.00	120	Multiple updates to [REDACTED]
SKG	3/4/2022	6.1	1921.5	315	1326.99	217.54	Review news; forward messages for review and processing; continue analysis and processing of Class Member evaluations
PKF	3/7/2022	1	120	120	120.00	120	Multiple updates to [REDACTED]
SKG	3/7/2022	0.8	252	315	174.03	217.54	Review news; forward voicemails and messages for review and processing
PKF	3/8/2022	1	120	120	120.00	120	Multiple updates to [REDACTED]

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
SKG	3/8/2022	1.2	378	315	261.05	217.54	Review news; forward voicemails and messages for review and processing; review and process updated data
OXR	3/9/2022	1.2	624	520	261.05	217.54	Review declarations regarding preliminary injunction; review research regarding prevailing parties
PKF	3/9/2022	1	120	120	120.00	120	Multiple updates to [REDACTED]
SKG	3/9/2022	1.4	441	315	304.56	217.54	Review news; forward voicemails and messages for review and processing; updates class member tracking sheet
OXR	3/10/2022	1.4	728	520	304.56	217.54	Review order regarding emergency application; review home confinement worksheet for [REDACTED]; review and revise offer to settle; review draft additional correspondence to Respondents
PKF	3/10/2022	1	120	120	120.00	120	Multiple updates to [REDACTED]
SKG	3/10/2022	5.1	1606.5	315	1109.45	217.54	Review and circulate news; research [REDACTED] review drafts and discussions regarding settlement; research and retrieve latest filings containing class member updates, worksheet evaluations, and updated Class lists; prepare for analysis and processing of all data; format spreadsheets for review
PKF	3/11/2022	1	120	120	120.00	120	Multiple updates to [REDACTED]
SKG	3/11/2022	3.4	1071	315	739.64	217.54	Review news; forward voicemails and messages for review and processing; integrate and format class member spreadsheets
OXR	3/14/2022	0.5	260	520	108.77	217.54	Emails regarding [REDACTED]
PKF	3/14/2022	1	120	120	120.00	120	Multiple updates to [REDACTED]
OXR	3/15/2022	1.4	728	520	304.56	217.54	Emails regarding settlement, next steps, and status report; draft, finalize, and file status report
PKF	3/15/2022	1	120	120	120.00	120	Multiple updates to [REDACTED]
PKF	3/16/2022	1	120	120	120.00	120	Multiple updates to spreadsheet tracking current vaccines, cases and testi
OXR	3/17/2022	0.5	260	520	108.77	217.54	Emails regarding upcoming hearing; review additional research regarding prevailing party

[illegible]

Bil Emp	Trans Date	Billable Hours	Actual Billable Dollars	Actual Bill Rate	Billable Dollars EAJA RATES	Bill Rate EAJA RATES	Transaction description
OXR	3/24/2022	0.3	156	520	65.26	217.54	Emails regarding potential settlement
PKF	3/24/2022	1	120	120	120.00	120	Multiple updates to [REDACTED]
SKG	3/24/2022	1.1	346.5	315	239.29	217.54	Review news; forward voicemails and messages for review and processing; confer with clerk regarding synch of contact lists; telephonic conferences with relatives
OXR	3/25/2022	0.3	156	520	65.26	217.54	emails scheduling call with Respondents
PKF	3/25/2022	0.5	60	120	60.00	120	Multiple updates to [REDACTED]
SKG	3/25/2022	1.4	441	315	304.56	217.54	Review news; forward voicemails and messages for review and processing; review settlement discussions
PKF	3/28/2022	0.5	60	120	60.00	120	Multiple updates to [REDACTED]
SKG	3/28/2022	1.1	346.5	315	239.29	217.54	Review news; forward voicemails and messages for review and processing; consult with team regarding Orders issued on individual Class Member Motions; further discussion with staff regarding contact list synch
PKF	3/29/2022	0.5	60	120	60.00	120	Multiple updates to [REDACTED]
SKG	3/29/2022	0.5	157.5	315	108.77	217.54	Review news; forward voicemails and messages for review and processing; review discussions regarding settlement
PKF	3/30/2022	0.5	60	120	60.00	120	Multiple updates to [REDACTED]
SKG	3/30/2022	0.3	94.5	315	65.26	217.54	Review news; forward voicemails and messages for review and processing
OXR	3/31/2022	0.4	208	520	87.02	217.54	Emails with co-counsel regarding recoverable fees
PKF	3/31/2022	0.5	60	120	60.00	120	Multiple updates to [REDACTED]
SKG	3/31/2022	0.6	189	315	130.52	217.54	Review news; forward voicemails and messages for review and processing; process correspondence requests
		2,948.20	\$ 1,111,708.00		\$ 599,573.37		

Timekeeper	Hours Billed	Actual Billable Dollars	EAJA Rate Billable Dollars
Howard A. Matz (AHM)	10.20	\$10,098.00	\$2,218.91
Alison Hyon (AJH)	11.20	\$3,528.00	\$2,436.45
Christopher J. Lee (CJL)	68.10	\$30,985.50	\$14,814.47
DeHaviland Findley (DEF)	5.90	\$1,711.00	\$1,283.49
Dorothy Wolpert (DW)	10.60	\$8,692.00	\$2,305.92
Jimmy S. Threat (JST)	215.90	\$98,234.50	\$46,966.89
Kiana Lee (KEL)	27.00	0	\$0.00
Kate S. Shin (KSS)	60.30	\$27,436.50	\$13,117.66
Naeun Rim (NXR)	268.60	\$147,730.00	\$58,431.24
Oliver Rocos (OXR)	492.40	\$256,048.00	\$107,116.70
Kevin P. Fisher (PKF)	368.10	\$44,172.00	\$44,172.00
Shoshana Barnett (SEB)	117.60	\$68,208.00	\$25,582.70
Sharon Grisham (SKG)	1275.30	\$401,719.50	\$277,428.76
Stacey V. Allen (SVA)	5.50	\$1,760.00	\$1,196.47
Terry Bird (TWB)	11.50	\$11,385.00	\$2,501.71
	2,948.20	\$1,111,708.00	\$599,573.37

Grouping code description	Trans Date	Billable Doll	Transaction description							
Computerized legal research	5/31/2020	177.47								
	6/30/2020	195.83	Rush service of process, PDF chrg-L.Milusnic c/oUSAO //First Legal Netw FI180 First Legal Networ//							
	6/30/2020	195.83	Rush service of process, PDF chrg-M.Carvajal c/oUSAO //First Legal Netw FI180 First Legal Networ//							
	6/30/2020	181.56	Service/process,PDFchrg, adv.ck&ck chrg AttyGen-USA //First Legal Netw FI180 First Legal Networ//							
	6/30/2020	918	Transcript fee for 7/7 hrg on ex parte //Maria Bustillos, BB000 Maria Bustillos, C//							
	6/30/2020	400	Court fees //First Bankcard (MC747 First Bankcard (SE//							
Computerized legal research	6/30/2020	230.55								
Computerized legal research	6/30/2020	103.52								
Computerized legal research	6/30/2020	5.04								
Computerized legal research	6/30/2020	70.2								
	7/31/2020	78.5	Special messenger //USA Legal Networ US105 USA Legal Network//							
	7/31/2020	11	Service of process - FCC Lompoc Satelite Camp //First Legal Netw FI180 First Legal Networ//							
Computerized legal research	7/31/2020	381.72								
FedEx	7/31/2020	22.31	//706235919// //FedEx FX100 FedEx//							
FedEx	7/31/2020	11.28	//707472688// //FedEx FX100 FedEx//							
Summitt Reprographics>.Litig	7/31/2020	251.62	9999.183 //Summitt Reprogra SU050 Summitt Reprograph//							
	8/31/2020	327.58	Courtesy copy to judge, PDF chrgs //First Legal Netw FI180 First Legal Networ//							
	8/31/2020	55.58	Scan documents/letters //Summitt Reprogra SU050 Summitt Reprograph//							
	8/31/2020	50	Credential verification - ANNC //First Bankcard (MC740 First Bankcard (SK//							
Computerized legal research	8/31/2020	162.59								
Computerized legal research	8/31/2020	113.47								
FedEx	8/31/2020	11.98	//709367651// //FedEx FX100 FedEx//							
FedEx	8/31/2020	11.17	//710794668// //FedEx FX100 FedEx//							
Summitt Reprographics>.Litig	8/31/2020	140.27	9999.183 //Summitt Reprogra SU050 Summitt Reprograph//							
	9/30/2020	702	Transcript of hearing 9/1 //Maria Bustillos BB000 Maria Bustillos//							
Computerized legal research	9/30/2020	86.17								
Computerized legal research	9/30/2020	40.5								
FedEx	9/30/2020	11.98	//712009837// //FedEx FX100 FedEx//							
FedEx	9/30/2020	11.34	//712720353// //FedEx FX100 FedEx//							
FedEx	9/30/2020	10.14	//713363266// //FedEx FX100 FedEx//							
	10/31/2020	11	Service of process - Yonnedil Carror-Torres //First Legal Netw FI180 First Legal Networ//							
Computerized legal research	10/31/2020	128.81								
FedEx	10/31/2020	9.59	//715319288// //FedEx FX100 FedEx//							
Summitt Reprographics>.Litig	10/31/2020	28.67	9999.183 //Summitt Reprogra SU050 Summitt Reprograph//							

Summitt Reprographics>.Litig	10/31/2020	22.38	9999.183	//Summitt Reprogra SU050 Summitt Reprograph//							
	12/31/2020	369.6	Transcript fee for 11/24 hrg		//Maria Bustillos, BB000 Maria Bustillos, C//						
Computerized legal research	12/31/2020	36.49									
FedEx	12/31/2020	9.32	//718783804// //FedEx FX100 FedEx//								
	1/31/2021	78	9999.183 Transcript 10-21-2020		//Myra Ponce PP000 Myra Ponce//						
Computerized legal research	1/31/2021	15.9									
Computerized legal research	1/31/2021	33.07									
Summitt Reprographics>.Litig	1/31/2021	54.27	Litigation copies		//Summitt Reprogra SU050 Summitt Reprograph//						
First Legal>.Court Services	2/15/2021	384.6	Confidential mediation brief // BSDMESS 10375523 //								
	2/28/2021	28.8	9999.183 Transcript 1-12-21		//Miranda Algorri, AA000 Miranda Algorri, C//						
	2/28/2021	12.71	Fedex #772840212069, 02/08/2021//FedEx FX100 FedEx//								
Computerized legal research	2/28/2021	16.49									
	3/31/2021	9.95	Fedex 772582866442 //FedEx FX100 FedEx//								
Computerized legal research	3/31/2021	211.51									
First Legal>.Court Services	3/31/2021	58.25	Courtesy copy to judge //PDFDELR 10386228//								
	4/30/2021	17.16	Fedex 772824973512 //FedEx FX100 FedEx//								
	4/30/2021	12.85	Fedex 773174162456 //FedEx FX100 FedEx//								
	4/30/2021	48.14	Litigation copies, Prison letters		//Summitt Reprogra SU050 Summitt Reprograph//						
Computerized legal research	5/31/2021	36.58									
Computerized legal research	6/21/2021	31	Pacer, 5/7 //MC510 First Bankcard//								
Reproduction Costs	6/22/2021	280.8									
Postage	6/29/2021	221.52									
	6/30/2021	52.8	Exceptional Reporting,04/30		//First Bankcard (MC747 First Bankcard (SE//						
Computerized legal research	6/30/2021	252.43									
First Legal>.Court Services	1/15/2022	477.68	Advance payment // PDFDELR 10462193 //								
	2/28/2022	132.6	Transcript Fee		//MM000 02252022 MM000 Judy K. Moore//						
First Legal>.Court Services	3/31/2022	356.84	Deliver check for transcript request // SPECIAL 10487134 //								
		\$ 8,409.01									

User	Description	Start date	Hours (to 1/10th)	Billed	EAJA rates		Market rates	
					Rate	Amt.	Rate	Amt.
Ckasher	Track and respond to email intakes	6/3/2020	2.0	Yes	207.78	415.56	275	550.00
Ckasher	Track and respond to email intakes	6/4/2020	2.0	Yes	207.78	415.56	275	550.00
Ckasher	Track and respond to email intakes	6/8/2020	1.0	Yes	207.78	207.78	275	275.00
Ckasher	Track and respond to email intakes	6/10/2020	1.4	Yes	207.78	290.89	275	385.00
Ckasher	Track and respond to email intakes	6/11/2020	1.0	Yes	207.78	207.78	275	275.00
Ckasher	Track web form intakes	6/15/2020	0.8	Yes	207.78	166.22	275	220.00
Ckasher	Track email and web form intakes	7/8/2020	1.0	Yes	207.78	207.78	275	275.00
Ckasher	Track email and web form intakes	7/9/2020	0.5	Yes	207.78	103.89	275	137.50
Ckasher	Track email and web form intakes	7/13/2020	1.5	Yes	207.78	311.67	275	412.50
Ckasher	Track email intakes and send case update	7/15/2020	1.5	Yes	207.78	311.67	275	412.50
Ckasher	Track email and web form intakes	7/29/2020	0.4	Yes	207.78	83.11	275	110.00
Ckasher	Track web form intakes	8/3/2020	1.5	Yes	207.78	311.67	275	412.50
Pbibring	review cocounsel & e-mail re same (.3); emails re case filing (.4)	5/9/2020	0.7	Yes	207.78	145.45	790	553.00
Pbibring	call w DC re comms (.3)	5/9/2020	0.3	Yes	207.78	62.33	790	237.00
Pbibring	e-mail with team re subclasses (.2), email with potential class member families (1.0)	5/10/2020	1.2	Yes	207.78	249.34	790	948.00
Pbibring	emails to family members	5/11/2020	4.3	Yes	207.78	893.45	790	3397.00
Pbibring	call w team (.5); call w family members (.5, .2); email team re outreach plan (.3); emails re clas	5/11/2020	2.0	Yes	207.78	415.56	790	1580.00
Pbibring	emailing w/ families, attorneys of prospective plaintiffs	5/13/2020	1.2	Yes	207.78	249.34	790	948.00
Pbibring	research and emailing re theory of case, experts, plaintiff search, filing	5/13/2020	3.0	Yes	207.78	623.34	790	2370.00
Pbibring	call w counsel for national ACLU re support for case	5/13/2020	0.5	No	207.78	0.00	790	0.00
Pbibring	review and edit Lumpoc complaint	5/15/2020	2.5	Yes	207.78	519.45	790	1975.00
Pbibring	draft 30b6 subjects and incorporate PJE edits to ex parte for discovery; additional revisions to reflect 30b6	5/18/2020	1.8	Yes	207.78	374.00	790	1422.00
Pbibring	Team call re hotline, ex parte, TRO	5/18/2020	0.7	Yes	207.78	145.45	790	553.00
Pbibring	call w team re TRO, intake process, discovery requests	5/19/2020	1.0	Yes	207.78	207.78	790	790.00
Pbibring	revise discovery and ex parte	5/20/2020	2.3	Yes	207.78	477.89	790	1817.00
Pbibring	Further legal rx re costs (.3); call w NR re Lumpoc next steps (.4)	2/26/2022	0.7	Yes	217.54	152.28	845	591.50
Pbibring	Review Venters report and email team re next steps	3/3/2022	0.6	Yes	217.54	130.52	845	507.00
Pbibring	Call w team re Lumpoc report; next steps; possible PI	3/4/2022	0.6	Yes	217.54	130.52	845	507.00
Pbibring	Lumpoc - call re strategy	3/18/2022	0.6	Yes	217.54	130.52	845	507.00
Pbibring	Lumpoc hearing (1.9); travel time (.6)	3/21/2022	2.6	Yes	217.54	565.60	845	2197.00
Peliasberg	e-mail to family member of potential declarant Richard Lumpkin	5/18/2020	0.1	Yes	207.78	20.78	860	86.00
Peliasberg	e-mail Richard Lumpkin about being declarant and to set up interview	5/19/2020	0.2	Yes	207.78	41.56	860	172.00
Peliasberg	Interview Richard Lumpkin for draft declaration 2.0 follow up phone calls re same .4	5/20/2020	2.4	Yes	207.78	498.67	860	2064.00
Peliasberg	Draft Lumpkin declaration 2.5; t/c with declarant to check facts 0.3	5/21/2020	2.8	Yes	207.78	581.78	860	2408.00
Peliasberg	T/c with team re strategy, fact gathering	5/11/2020	0.5	Yes	207.78	103.89	860	430.00
Peliasberg	Review and edit ex parte re 30(b)(6) and expedited discovery	5/18/2020	0.5	Yes	207.78	103.89	860	430.00
Peliasberg	t/c with Richard Lumpkin to finalize draft 0.3; make final edits to declaration 0.4	5/22/2020	0.7	Yes	207.78	145.45	860	602.00
Peliasberg	Review and edit draft declaration of Dr. Marc Stern 0.6; e-mail with Jimmie Threatt re same	5/13/2020	0.8	Yes	207.78	166.22	860	688.00
Peliasberg	t/c with Jimmie Threatt about experts	5/12/2020	0.2	Yes	207.78	41.56	860	172.00
TOTAL					EAJA:	10,210.22	Market:	31,966.50

	A	B	C	D	E	F
1	Date	TKPR Name	Bs Hrs	Base Amt	EAJA Rate	Narrative
2	6/8/2021	Rim, Naeun	3.5	\$3,150.00	\$217.54	Revise opposition to summary judgment; revise opposition to motion to vacate; emails with co-counsel re same
3	6/10/2021	Rim, Naeun	0.4	\$360.00	\$217.54	Review settlement proposal; email to team re settlement proposal and dismissal date
4	6/14/2021	Rim, Naeun	0.8	\$720.00	\$217.54	Emails with I. Nsien re summary judgment motion; emails with co-counsel re summary judgment motion; emails with prosecutors re document service
5	6/15/2021	Rim, Naeun	0.4	\$360.00	\$217.54	Call with S. Norman re settlement
6	6/16/2021	Rim, Naeun	1.5	\$1,350.00	\$217.54	Meeting with I. Nsien re trial strategy; meeting with co-counsel re reply to MSJ and strategy and timeline for trial preparation
7	6/16/2021	Nsien, Ima, E.	0.2	\$150.00	\$217.54	Review and execute USDC Admission form.
8	6/16/2021	Nsien, Ima, E.	0.1	\$75.00	\$217.54	Register with USA file exchange to access documents.
9	6/16/2021	Nsien, Ima, E.	1.4	\$1,050.00	\$217.54	Review opposition and confer with Naeun and prison law litigation team re case status and next steps.
10	7/9/2021	Rim, Naeun	0.8	\$720.00	\$217.54	Emails with co-counsel, meeting with Ima Nsien re upcoming survey response review and searching for witnesses
11	9/7/2021	Rim, Naeun	0.3	\$270.00	\$217.54	Email to prosecutors re settlement and trial dates.
12	9/8/2021	Rim, Naeun	0.8	\$720.00	\$217.54	Call with Jacque Wilson; review [REDACTED]
13	9/27/2021	Rim, Naeun	0.5	\$450.00	\$217.54	Call with outside counsel for class member [REDACTED]; emails with co-counsel re same.
14	9/29/2021	Rim, Naeun	0.4	\$360.00	\$217.54	Call with D. Boyadzhyan re motion for enforcement and compliance with August 2021 order.
15	9/29/2021	Boyadzhyan, David	1.1	\$825.00	\$217.54	Discuss with N. Rim regarding gov't compliance with reevaluation order; review materials.
16	10/4/2021	Rim, Naeun	1.3	\$1,170.00	\$217.54	Revise meet and confer email to government re motion for compliance; review prior declarations filed by government re home confinement updates.
17	10/5/2021	Rim, Naeun	0.8	\$720.00	\$217.54	Revise meet and confer email to government on compliance with court order; emails with co-counsel re motion for compliance.
18	10/5/2021	Boyadzhyan, David	1.5	\$1,125.00	\$217.54	Revise draft email per N. Rim comments; send to co-counsel for review.
19	10/6/2021	Rim, Naeun	1	\$900.00	\$217.54	Meeting with co-counsel re motion for compliance; review declaration and review worksheets; emails with attorney for class member.
20	10/6/2021	Boyadzhyan, David	1.5	\$1,125.00	\$217.54	Review declaration from gov't; call with team regarding motion.
21	10/7/2021	Boyadzhyan, David	1.1	\$825.00	\$217.54	Review worksheets; call with N. Rim to discuss meet and confer and motion.
22	10/7/2021	Rim, Naeun	0.8	\$720.00	\$217.54	Meeting with D. Boyadzhyan re meet and confer email and bail/sanctions motion; emails with co-counsel re procedural history.
23	10/8/2021	Boyadzhyan, David	0.5	\$375.00	\$217.54	Review for meet-and-confer; draft email to [REDACTED]
24	10/10/2021	Boyadzhyan, David	0.8	\$600.00	\$217.54	Review to draft revised email to government to meet and confer.
25	10/14/2021	Boyadzhyan, David	0.5	\$375.00	\$217.54	Review [REDACTED]
26	10/15/2021	Boyadzhyan, David	2.8	\$2,100.00	\$217.54	Review [REDACTED] and BOP declaration and data; draft revised meet-and-confer email to BOP counsel.
27	10/18/2021	Boyadzhyan, David	1	\$750.00	\$217.54	Revise draft meet-and-confer email and send to team for review; review spreadsheet from S. Grisham.
28	10/18/2021	Rim, Naeun	0.5	\$450.00	\$217.54	Revise meet and confer email with government; emails with D. Boyadzhyan re same.
29	10/20/2021	Boyadzhyan, David	0.4	\$300.00	\$217.54	Review declarations filed by BOP.
30	10/21/2021	Rim, Naeun	0.3	\$270.00	\$217.54	Emails with R. Fisher re research for motion; emails with D. Boyadzhyan re meet and confer call.
31	10/22/2021	Rim, Naeun	0.8	\$720.00	\$217.54	Call with D. Boyadzhyan and O. Rocos re meet and confer call re motion for compliance; emails with R. Fisher re relevant research.
32	10/22/2021	Boyadzhyan, David	1	\$750.00	\$217.54	Review declarations; call with N. Rim and O. Rocos re meet and confer.
33	10/25/2021	Fisher, C. Ryan	4.1	\$2,829.00	\$217.54	Review case materials and Fraihat opinion and draft summary regarding same.
34	10/25/2021	Boyadzhyan, David	0.1	\$75.00	\$217.54	Review analysis regarding Ninth Circuit cases.
35	10/26/2021	Boyadzhyan, David	1.4	\$1,050.00	\$217.54	Review and prepare for meet-and-confer call with government.
36	10/26/2021	Boyadzhyan, David	1.1	\$825.00	\$217.54	Meet-and-confer call with BOP.
37	10/26/2021	Fisher, C. Ryan	1.3	\$897.00	\$217.54	Prepare for, attend, and draft memorandum to file reflecting meet and confer call with Government.
38	10/27/2021	Boyadzhyan, David	0.1	\$75.00	\$217.54	Call with N. Rim to discuss meet-and-confer call.
39	10/27/2021	Boyadzhyan, David	0.3	\$225.00	\$217.54	Discuss [REDACTED]
40	10/27/2021	Fisher, C. Ryan	0.2	\$138.00	\$217.54	Confer with D. Boyadzhyan and T. Almeida.
41	11/9/2021	Boyadzhyan, David	0.6	\$450.00	\$217.54	Review court order; call regarding hearing; email gov't regarding same.
42	11/9/2021	Rim, Naeun	0.3	\$270.00	\$217.54	Call with co-counsel re summary judgment hearing.
43	11/10/2021	Boyadzhyan, David	0.5	\$375.00	\$217.54	Correspond re changing hearing date.
44	11/10/2021	Boyadzhyan, David	0.5	\$375.00	\$217.54	Prepare draft stip to continue hearing date.
45	11/11/2021	Boyadzhyan, David	0.5	\$375.00	\$217.54	Review charts from TA on meet-and-confer inquiries.
46	11/12/2021	Gasik, Barbara	0.5	\$180.00	\$217.54	E-File Stipulation to Change Hearing Date and Proposed Order United States District Court Central District California as requested by Erica
47	11/16/2021	Boyadzhyan, David	1.4	\$1,050.00	\$217.54	Review TA prepared information from meet-and-confer; review new declarations.

	A	B	C	D	E	F
1	Date	TKPR Name	Bs Hrs	Base Amt	EAJA Rate	Narrative
48	11/16/2021	Nsien, Ima, E.	1.5	\$1,125.00	\$217.54	Review sealed declarations of Charles Hubbard and Melissa Arnold and determine [REDACTED].
49	11/17/2021	Boyadzhyan, David	2.1	\$1,575.00	\$217.54	Review updated declarations and revise draft analysis for meet-and-confer. Emails with [REDACTED]; emails with I. Nsien re correspondence with government; emails with D. Boyadzhyan re status of motion to enforce.
50	11/17/2021	Rim, Naeun	0.4	\$360.00	\$217.54	Review [REDACTED] and draft email to government regarding Mr. Lance's transfer to home confinement.
51	11/17/2021	Nsien, Ima, E.	0.5	\$375.00	\$217.54	Confer with N. Rim [REDACTED] and draft and send email to BOP regarding status of Mr. Wilsons'
52	11/19/2021	Nsien, Ima, E.	0.3	\$225.00	\$217.54	Review and prepare draft further meet and confer email to gov't.
53	11/22/2021	Boyadzhyan, David	2.8	\$2,100.00	\$217.54	Review and revise draft proposed email to gov't per changes from team.
54	11/23/2021	Boyadzhyan, David	1.2	\$900.00	\$217.54	Prepare and attend meet-and-confer call with gov't; draft analysis after.
55	12/9/2021	Boyadzhyan, David	0.9	\$675.00	\$217.54	Analysis regarding info from meet-and-confer call.
56	12/10/2021	Boyadzhyan, David	0.6	\$450.00	\$217.54	Discuss with N. Rim regarding next steps [REDACTED].
57	12/21/2021	Boyadzhyan, David	0.1	\$75.00	\$217.54	Review supplemental authority.
58	12/27/2021	Boyadzhyan, David	0.3	\$225.00	\$217.54	Conference call with N. Rim and prison law team regarding strategy for oral argument and witnesses for trial.
59	12/28/2021	Nsien, Ima, E.	0.7	\$525.00	\$217.54	Conference call.
60	12/28/2021	Boyadzhyan, David	0.8	\$600.00	\$217.54	Call with team re upcoming hearing on summary judgment and preliminary injunction.
61	12/28/2021	Rim, Naeun	0.7	\$630.00	\$217.54	Meeting with O. Rocos and S. Norman re hearing on MSJ and motion to dissolve Preliminary injunction; analyze briefs in preparation for
62	1/3/2022	Rim, Naeun	1.2	\$1,194.00	\$217.54	Review correspondence concerning research project.
63	1/4/2022	Fisher, C. Ryan	0.1	\$82 50	\$217.54	Review updated declarations from gov't.
64	1/4/2022	Boyadzhyan, David	0.5	\$422 50	\$217.54	Prepare for summary judgment hearing; appear at and argue summary judgment hearing; emails with co-counsel re strategy; draft outline for brief to Court and research topics.
65	1/4/2022	Rim, Naeun	6.4	\$6,368.00	\$217.54	Emails with opposing counsel re Venters visit; strategy call with S. Norman and O. Rocos re application for additional inspector visit, supplemental brief in response to evidentiary objection, and class certification motion.
66	1/5/2022	Rim, Naeun	1.5	\$1,492 50	\$217.54	Research case law supporting [REDACTED].
67	1/5/2022	Nsien, Ima, E.	3.7	\$3,126 50	\$217.54	Review government declarations; draft meet and confer correspondence for government.
68	1/5/2022	Boyadzhyan, David	1	\$845.00	\$217.54	Prepare and file notice of appearance.
69	1/6/2022	Boyadzhyan, David	0.4	\$338.00	\$217.54	Review correspondence and draft notice of appearance.
70	1/6/2022	Fisher, C. Ryan	0.4	\$330.00	\$217.54	Draft notice of appearance.
71	1/6/2022	Nsien, Ima, E.	0.3	\$253 50	\$217.54	Prepare for and hold call with N. Rim and D. Boyadzhyan; conduct research regarding brief.
72	1/6/2022	Fisher, C. Ryan	2.8	\$2,310.00	\$217.54	Draft brief regarding admissibility of expert reports.
73	1/6/2022	Boyadzhyan, David	4.4	\$3,718.00	\$217.54	Draft outline for brief re Venters' reports; meeting with D. Boyadzhyan and R. Fisher re same.
74	1/6/2022	Rim, Naeun	1.8	\$1,791.00	\$217.54	Review brief and conduct supplemental research.
75	1/7/2022	Fisher, C. Ryan	1.6	\$1,320.00	\$217.54	Revise brief; draft declaration.
76	1/7/2022	Boyadzhyan, David	0.6	\$507.00	\$217.54	Meet and confer call with gov't.
77	1/7/2022	Boyadzhyan, David	0.4	\$338.00	\$217.54	Revise draft brief.
78	1/7/2022	Boyadzhyan, David	0.8	\$676.00	\$217.54	Draft application for site visit and to set dates; meet and confer call with government.
79	1/7/2022	Rim, Naeun	1.4	\$1,393.00	\$217.54	Research for and revise draft brief.
80	1/10/2022	Boyadzhyan, David	2.9	\$2,450.50	\$217.54	Revise brief re evidentiary objection to the expert report of Dr. Homer Venters; emails with co-counsel re motions for site visit and class certification; emails with Manatt team re various revisions.
81	1/10/2022	Rim, Naeun	6.2	\$6,169.00	\$217.54	Revise and finalize draft brief.
82	1/11/2022	Boyadzhyan, David	1.7	\$1,436 50	\$217.54	Revise declaration in support of brief re Dr. Venters reports; meet and confer email to respondents re site visit and motion for class certification; draft declaration re class member requested by Court.
83	1/11/2022	Rim, Naeun	1.8	\$1,791.00	\$217.54	Review application and rules regarding sealing.
84	1/12/2022	Boyadzhyan, David	0.5	\$422 50	\$217.54	Review procedure for filing N. Rim Decl. under seal; draft materials for filing; oversee filing.
85	1/12/2022	Fisher, C. Ryan	3.9	\$3,217 50	\$217.54	Revise application to file declaration under seal and supervise filing.
86	1/12/2022	Rim, Naeun	0.7	\$696 50	\$217.54	Confer with E. Embray re filing under seal; update declaration regarding same.
87	1/13/2022	Fisher, C. Ryan	0.5	\$412 50	\$217.54	Draft motion for order authorizing Venters visit.
88	1/13/2022	Boyadzhyan, David	1	\$845.00	\$217.54	

	A	B	C	D	E	F
1	Date	TKPR Name	Bs Hrs	Base Amt	EAJA Rate	Narrative
89	1/13/2022	Rim, Naeun	1.1	\$1,094.50	\$217.54	Draft outline of motion re site visit for Dr. Homer Venters; email to Manatt team re same; call with J. Hutt re class action motion.
90	1/14/2022	Boyadzhyan, David	4.8	\$4,056.00	\$217.54	Draft motion for order for Dr. Venters' visit.
91	1/16/2022	Rim, Naeun	1.2	\$1,194.00	\$217.54	Revise motion for site visit and order setting trial dates.
92	1/17/2022	Boyadzhyan, David	0.5	\$422.50	\$217.54	Research re motion for site visit.
93	1/17/2022	Rim, Naeun	7.4	\$7,363.00	\$217.54	Draft motion for site visit; draft declaration of Naeun Rim; revise motion for class certification.
94	1/18/2022	Rim, Naeun	3.7	\$3,681.50	\$217.54	Draft motion for site visit; revise declaration; revise motion for site visit; emails with team; emails with co-counsel re motions.
95	1/18/2022	Boyadzhyan, David	1.6	\$1,352.00	\$217.54	Draft declaration; finalize motion.
96	1/25/2022	Boyadzhyan, David	0.2	\$169.00	\$217.54	Review [REDACTED].
97	1/25/2022	Rim, Naeun	1	\$995.00	\$217.54	Call with S. Castillo re case strategy; call with ACLU's P. Bibring re trial tasks.
98	1/26/2022	Rim, Naeun	0.6	\$597.00	\$217.54	Send reply outline to PLO re reply in support of class certification.
99	1/27/2022	Rim, Naeun	0.3	\$298.50	\$217.54	Emails with Court expert and with respondents re joint filing.
100	1/29/2022	Rim, Naeun	0.6	\$597.00	\$217.54	Revise reply in support of motion for class certification.
101	1/31/2022	Fisher, C. Ryan	0.1	\$82.50	\$217.54	Review tentative order.
102	2/23/2022	Rim, Naeun	3.3	\$3,283.50	\$217.54	Meeting re settlement; emails re potential settlement. Call with co-counsel re Venters Report and [REDACTED]; legal research related to motions; call with [REDACTED].
103	3/4/2022	Rim, Naeun	1.9	\$1,890.50	\$217.54	[REDACTED].
104	3/7/2022	Rim, Naeun	1.2	\$1,194.00	\$217.54	Call with S. Norman re settlement strategy; email to Manatt team re research [REDACTED].
105	3/8/2022	Boyadzhyan, David	2	\$1,690.00	\$217.54	Research [REDACTED].
106	3/9/2022	Boyadzhyan, David	6.1	\$5,154.50	\$217.54	Research and draft analysis regarding [REDACTED] issues.
107	3/10/2022	Rim, Naeun	1.6	\$1,592.00	\$217.54	Draft [REDACTED].
108	3/14/2022	Fisher, C. Ryan	0.3	\$247.50	\$217.54	Begin researching [REDACTED]. Email to co-counsel re status of settlement offer, motion for preliminary injunction, status report, upcoming hearing, and potential for adding class members.
109	3/14/2022	Rim, Naeun	0.6	\$597.00	\$217.54	Call with Y. Carror Torres re [REDACTED]; call with O. Rocos re March 21 hearing; calls and emails with S. Norman re settlement.
110	3/15/2022	Rim, Naeun	1.8	\$1,791.00	\$217.54	Call with V. Reed [REDACTED].
111	3/16/2022	Rim, Naeun	0.8	\$796.00	\$217.54	Research [REDACTED].
112	3/16/2022	Fisher, C. Ryan	4.5	\$3,712.50	\$217.54	Research [REDACTED].
113	3/17/2022	Fisher, C. Ryan	3.6	\$2,970.00	\$217.54	Research [REDACTED].
114	3/17/2022	Rim, Naeun	0.8	\$796.00	\$217.54	Draft letter to [REDACTED].
115	3/18/2022	Rim, Naeun	2.8	\$2,786.00	\$217.54	Meeting with co-counsel re March 21 hearing; draft [REDACTED].
116	3/21/2022	Rim, Naeun	3.6	\$3,582.00	\$217.54	Prepare for further hearing on MSJ and motion to dissolve PI; appear for and argue at hearing.
117	3/23/2022	Rim, Naeun	0.9	\$895.50	\$217.54	Emails with co-counsel re response to Respondent's question re settlement; research [REDACTED].
118	3/24/2022	Fisher, C. Ryan	0.1	\$82.50	\$217.54	Review settlement offer and related correspondence.
119	TOTAL		162.1	\$141,773.50	\$35,363.23	