

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

M.B. and **S.E.** through their next friend)
Katharyn McIntyre, **R.M.** through his next)
friend Allan Hazlett, **C.A.** through his next)
friend Allan Hazlett, **E.B.** through his next)
friend Allan Hazlett, **J.P.** through her next)
friend Allan Hazlett, **Z.Z.** through her next)
friend Ashley Thorne, and **M.A.** through his)
next friend Ashley Thorne, for themselves and)
those similarly situated,)

Case No. 2:18-cv-02617-DDC-GEB

Plaintiffs,

v.

Laura Howard in her official capacity as)
Kansas Department for Children and Families)
Secretary, **Dr. Lee A. Norman** in his official)
capacity as Kansas Department of Health and)
Environment Secretary, and **Laura**)
Howard in her official capacity as Kansas)
Department for Aging and Disability Services)
Secretary,)

Defendants.

DECLARATION OF LORETTA BURNS-BUCKLEW

I, Loretta E. Burns-Bucklew, state the following to be true:

1. I am an attorney in the private practice of law. I represent the Plaintiffs in the above-titled action. I submit this declaration in support of Plaintiffs’ Motion for Attorneys’ Fees and Expenses. I have personal knowledge of the facts stated herein and, if called to testify, could and would testify competently thereto.

2. My work in the child welfare system concentrates on representation of youth and children, as well as the families who care for them. I am also active in systemic advocacy and represent young people in systemic reform actions. My office is in Kansas City, Missouri. I have been licensed to practice law since 1984, and my practice has been devoted almost exclusively to child welfare and family law since 1987. I am a member of the Missouri Bar. I have been admitted to practice in the District Courts for the Western District of Missouri and the District of Kansas.

3. I have been an accredited Child Welfare Law Specialist (CWLS) since 2011. CWLS certification is a professional achievement that signifies an attorney's specialized knowledge, skill, and verified expertise in the field of child welfare law. The specialization area is defined as "the practice of law representing children, parents or the government in all child protection proceedings including emergency, temporary custody, adjudication, disposition, foster care, permanency planning, termination, guardianship, and adoption."¹ The CWLS certification is accredited by the American Bar Association.

4. From 1987 through 1990, I acted as an attorney for the Juvenile Officer of Jackson County, Missouri, prosecuting delinquency, child abuse/neglect and termination of parental rights matters.

5. From 1990 through 2015, I worked for Shook, Hardy and Bacon LLP in the firm's Pro Bono program. I acted as attorney for numerous families in abuse/neglect and delinquency actions, as well as custody, paternity, and domestic violence cases. I served on a subcommittee of the Missouri Supreme Court to study and revise state standards for guardians ad litem. I conducted numerous Continuing Legal Education and training sessions on representation of children and parents and best practices in child welfare matters. I also presented community training sessions

¹ National Association of Counsel for Children, *Promoting Excellence: CWLS Certification*, <https://www.naccchildlaw.org/page/Certification> (last visited Nov. 13, 2020).

on topics related to child welfare and delinquency practice for foster parents, social workers, and other child welfare stakeholders. While working at Shook, Hardy, and Bacon, I served as class counsel for foster children in two federal civil rights cases in the Western District of Missouri, both of which achieved significant systemic reforms of the foster care system:

- a. G.L. v. Stangler, Case No. 77-0242-CV-W-DW (W.D. Mo.): With Children’s Rights, Inc. (“CR”), I represented a class of foster children in Jackson County, Missouri, in the monitoring phase of a federal class action case. I participated in an innovative Problem Solving Forum, which assisted defendants in coming into substantial compliance with the Consent Decree. The main accomplishments of the Consent Decree included: improved medical care for foster children; increased numbers of adoptions and significantly reduced waiting time for kids who cannot return home; significantly reduced incidence of abuse/neglect in foster homes; and required training for social workers and supervisors.
- b. E.C. v. Blunt, Case No. 05-0726-CV-W-SOW (W.D. Mo.): With a coalition of local and national child advocates, I represented a class of all present and future foster children in Missouri in a federal class action suit to protect adoption subsidies. Our legal team secured a permanent injunction prohibiting Missouri from imposing income/means tests upon prospective adoptive parents and prohibiting discrimination in subsidy awards between Title IV-E eligible and non-Title IV-E eligible children.

6. From 2015 to 2018, I was the Director of Legal Services and Chief Advocacy Officer at Foster Adopt Connect (“FAC”) (formerly Midwest Foster Care and Adoption Association). Foster Adopt Connect is a peer-led grassroots advocacy agency for children in foster care and the families

who care for them. In addition to case-specific advocacy, my responsibilities included developing the advocacy and legislative agenda for the agency in both Missouri and Kansas. I also conducted training for shareholders in the child welfare system regarding best practices. I also developed the SUE Program, a program that provided direct legal services to community youth ages 17-25 who were transitioning from foster care into adulthood.

7. I became aware of the patterns of placement instability and the resulting trauma to which Kansas foster children have been subjected for many years while working in the FAC Kansas office in 2015. While working with placement providers, relatives and others in the child welfare system, I came to form the opinion that the provision of individual advocacy, training, and supports for families and caregivers, however helpful that might be, would not resolve these conditions. Families were simply unable to handle the placement problems presented by the state agencies and the contractors on their own. I also came to believe that legislative reform would be helpful, but could not correct these harms because legislation alone would not address the administrative practices that had allowed these conditions to become part of the culture of the state service system. I came to the conclusion that these issues needed to be addressed on a systemic basis because other advocacy efforts were failing. Targeted impact litigation seemed necessary to remedy these systemic problems.

8. FAC did not have the resources to initiate this litigation and, as a solo practitioner, neither did I. I reached out to Children's Rights, and specifically the Director of Litigation, Ira Lustbader, for help; I had collaborated with Children's Rights in Missouri and knew of their depth of expertise, their success in similar matters across the country, and their ability to discern the needs of the systems in the different jurisdictions in which they advocate for children. Children's Rights suggested collaborating with the National Center for Youth Law ("NCYL"), with whom

Children's Rights had recently successfully partnered, because of NCYL's deep experience reforming child welfare systems, including mental health systems affecting vulnerable youth. Kansas Appleseed is a strong community organizing force all across the State of Kansas, and had recently successfully helped the state to develop significant and meaningful reform for the juvenile justice system. I was particularly thrilled that Teresa Woody, Martha Hodgesmith, and Larry Rute joined the team, as each is a highly respected lawyer in the Kansas community and shared valuable insight and experience throughout the case. DLA Piper LLP joined the team and provided invaluable resources as a global law firm with expertise in large-scale class action litigation involving complex discovery. The resources and expertise of Kansas Appleseed and of our national partners were required to succeed in this undertaking. Their contributions to this effort were crucial to the success of the excellent resolution of this case in beginning to remedy the harms experienced by the Kansas children who are involved in the child welfare system.

9. I am not aware of any other law office in Kansas that could have led litigation efforts in this case. Several major local law firms who were approached to participate in this matter had conflicts of interest due to prior or current relationships with the State of Kansas or were unable to devote the resources necessary to go forward with us.

10. My co-counsel and I spent over a year investigating the housing instability and mental health care deficiencies I and other practitioners had become aware of. During this time, I attended legislative hearings regarding foster care matters in Topeka. I attended community forums in Topeka, Overland Park, and Garden City to hear concerns from families and service providers around the state. I participated in meetings with a grassroots coalition of advocates for Kansas families who have had involvement with child welfare and poverty programs. I also had many

individual meetings throughout the state with stakeholders, including attorneys, families of children in care, former foster youth, foster parents, and service providers.

11. Throughout this litigation, I provided strategic input on all litigation decisions. I helped drive the overall litigation strategy and analysis to achieve the specific substantive remedies negotiated in the Settlement Agreement. I provided counsel with important information on the workings of Kansas state agencies, the Kansas child welfare and contract agency provider systems, and the tangible impact this case would have on the lives on Kansas children and families, given my deep familiarity with these systems. I was also able to assist throughout the investigative stages by identifying local stakeholders and allies who had on-the-ground information about conditions of care for foster children.

12. I believe that the considerable professional expertise and resources of each of my co-counsel were critical to the success of this case.

13. Through Plaintiffs' investigation and the discovery process, I have gained a thorough understanding of the facts and law in this case. Based on my extensive experience in litigation on behalf of children in the child welfare system and my knowledge of the case at hand, including the strengths and weaknesses of Plaintiffs' claims and the potential defenses and the costs and risks of proceeding to trial, I believe that the Settlement Agreement achieved in this case is an excellent result for Kansas children. Based on my experience, it is my opinion that the Kansas agencies involved in this case would not have begun to remedy the problems of extreme placement instability and lack of mental health services for children in foster care without this Settlement Agreement. Through this agreement, the State is making a commitment to reform significant aspects of the care of foster children, and that commitment will not be bound by partisan political interests, but by an agreement that truly puts the needs of children and families at the forefront.

14. Plaintiffs' counsel, including myself, have dedicated substantial time and resources to identifying, prosecuting, and resolving the claims of the Class. I have devoted significant time to this case. As a result of the time I devoted to this case, I was precluded from working in my full-time position as Director of Legal Services and Chief Advocacy Officer of Foster Adopt Connect due to conflicts of interest. I resigned from that position and lost my employment benefits including health care. Once I became a solo practitioner, I devoted a significant percentage of my time on this case each week.

15. I recorded my activities and efforts in this case throughout my involvement in the litigation and investigative process.

16. From November 15, 2017 to July 27, 2020, I have devoted more than 230 hours on this case. A true and correct itemization of my billable time I submit to the Court for reimbursement is attached as Exhibit A. I have personally reviewed these time entries to ensure their accuracy, validity, and compensability under law.

17. In an exercise of billing judgment, I am not currently seeking compensation for time billed subsequent to when Plaintiffs filed the motion for preliminary approval of the Settlement Agreement on July 27, 2020. I am also not currently seeking to recover the time spent in preparing this motion for fees or in seeking final approval of the Settlement Agreement.

18. On top of these deductions, our co-counsel team has further limited the hours for which we seek compensation. For my time specifically, I exercised billing discretion in declining to submit a significant amount of my time spent on this case. For instance, I did not request fees for attending the deposition, much of my informal discovery efforts on the ground, or many of my day-to-day tasks relating to this case. The limited services for which I have charged fees were reasonable and necessary.

19. I have calculated my lodestar based on the hours reasonably expended and a reasonable rate for an attorney of my level of experience in the Kansas City and Kansas legal market. My rate of \$500 is well within the prevailing market for billing rates in this area. I spoke with other local practitioners and reviewed materials on rates typically applied by Kansas federal courts in determining to apply this rate. I believe the hourly rates sought by my colleagues from the other law offices are reasonable, as they are comparable with the rates charged by similarly experienced attorneys in Kansas.

20. Based on this rate and the reasonable hours incurred, the total lodestar for which I seek compensation is \$115,500.00.

21. Although I incurred expenses in the form of gas mileage and meals during my work on this case, I have elected not to submit any expenses for reimbursement. I elected not to submit these expenses despite the fact that I incurred them frequently, especially during the investigation phase of the case.

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

Executed this 16th day of November, 2020, in Kansas City, Jackson County, Missouri.

A handwritten signature in cursive script that reads "Loretta Burns-Bucklew". The signature is written in black ink and is positioned above a horizontal line.

Loretta E. Burns-Bucklew

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EXHIBIT A

*M.B. v. Howard***Lori Burns-Bucklew's Itemized Time Entries Requested for Reimbursement**

Attorney	Date	Description of Time Entry	Hours	Rate	Payment
Lori Burns-Bucklew	1/25/2018	phone call with PJ re collecting factual data NCYL needs for investigation	0.50	\$ 500.00	\$ 250.00
Lori Burns-Bucklew	2/24/2018	phone call with cocounsel PJ re investigation strategy, including connecting with foster parents and local Kansas child advocates	0.60	\$ 500.00	\$ 300.00
Lori Burns-Bucklew	2/28/2018	Meeting with co-counsel re investigation and upcoming interviews - LW, SD, and PJ	1.00	\$ 500.00	\$ 500.00
Lori Burns-Bucklew	3/7/2018	Call with LW re local partnership, including on the ground investigation routes	0.70	\$ 500.00	\$ 350.00
Lori Burns-Bucklew	3/7/2018	Team call with full CR team and NCYL team regarding investing strategy and next steps	0.67	\$ 500.00	\$ 333.33
Lori Burns-Bucklew	3/19/2018	Meeting with SD, LW (NCYL) and EM to discuss best practices in child welfare that KS child welfare system violates	3.07	\$ 500.00	\$ 1,533.33
Lori Burns-Bucklew	3/21/2018	Meeting with SD, LW, and EM and foster care advocate to discuss case workers' workload.	1.00	\$ 500.00	\$ 500.00
Lori Burns-Bucklew	3/28/2018	Team strategy call with co counsel, including discussion of investigation strategy and pot. claims	1.07	\$ 500.00	\$ 533.33
Lori Burns-Bucklew	4/11/2018	Telephone call with co-counsel team regarding investigation strategy and next steps	1.00	\$ 500.00	\$ 500.00
Lori Burns-Bucklew	5/9/2018	Conference call with counsel team regarding investigation strategy	1.08	\$ 500.00	\$ 541.67
Lori Burns-Bucklew	5/17/2018	phone call with PJ re investigation updates	0.20	\$ 500.00	\$ 100.00
Lori Burns-Bucklew	5/21/2018	Telephone call with co-counsel (CR and NCYL) regarding investigation strategy and claims	1.00	\$ 500.00	\$ 500.00

*M.B. v. Howard***Lori Burns-Bucklew's Itemized Time Entries Requested for Reimbursement**

Lori Burns-Bucklew	5/23/2018	Team meeting regarding strategy for investigation and claims	0.58	\$	500.00	\$	291.67
Lori Burns-Bucklew	5/30/2018	Team counsel call regarding strategy for claims	0.75	\$	500.00	\$	375.00
Lori Burns-Bucklew	6/6/2018	Team meeting regarding strategy for claims as well as investigation tasks	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	6/13/2018	Phone call with team re investigation, including re: fact development, stakeholder updates, local counsel, and legal research	1.10	\$	500.00	\$	550.00
Lori Burns-Bucklew	6/25/2018	Telephone call with team and co-counsel re: investigative strategy and findings of fact ("FOF")	1.42	\$	500.00	\$	708.33
Lori Burns-Bucklew	7/11/2018	Team call re investigation, FOF, local counsel, etc	0.80	\$	500.00	\$	400.00
Lori Burns-Bucklew	7/11/2018	Team Call with consulting expert re EPSDT	0.70	\$	500.00	\$	350.00
Lori Burns-Bucklew	7/18/2018	Strategy conference call with co counsel team on investigations status	0.92	\$	500.00	\$	458.33
Lori Burns-Bucklew	7/31/2018	Investigation status meeting with NCYL and CR counsel team	0.33	\$	500.00	\$	166.67
Lori Burns-Bucklew	8/8/2018	Strategy conference call with co-counsel team (NCYL and CR) to discuss investigation, including complaint drafting	1.33	\$	500.00	\$	666.67
Lori Burns-Bucklew	8/15/2018	Weekly team meeting to discuss updates on stakeholder outreach, complaint drafting, and upcoming trip with co-counsel (NCYL & CR).	0.98	\$	500.00	\$	491.67

*M.B. v. Howard***Lori Burns-Bucklew's Itemized Time Entries Requested for Reimbursement**

Lori Burns-Bucklew	8/22/2018	Co-counsel team meeting re: investigation and complaint drafting	1.10	\$	500.00	\$	550.00
Lori Burns-Bucklew	8/28/2018	Team call with cocounsel re: complaint drafting	0.40	\$	500.00	\$	200.00
Lori Burns-Bucklew	9/5/2018	Telephone conference with co-counsel team regarding investigation and compl strategy	1.50	\$	500.00	\$	750.00
Lori Burns-Bucklew	9/6/2018	Prepare written analysis of potential legal claims for co-counsel consideration	1.08	\$	500.00	\$	541.67
Lori Burns-Bucklew	9/12/2018	Telephone call with team co-counsel regarding next steps and strategy for compl and plttfs	0.58	\$	500.00	\$	291.67
Lori Burns-Bucklew	9/19/2018	Team call with cocounsel re: complaint, local stakeholders, potential Plaintiffs and Next Friends, call with Kansas Appleseed, and upcoming visit	0.80	\$	500.00	\$	400.00
Lori Burns-Bucklew	9/26/2018	Telephone call with co-counsel team regarding the timing and strategy for filing	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	10/2/2018	Telephone call with co-counsel IL regarding compl strategy	0.92	\$	500.00	\$	458.33
Lori Burns-Bucklew	10/3/2018	Team call, including re: complaint, named plaintiffs, and co-counsel	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	10/9/2018	Meeting with co-counsel regarding stakeholder and plaintiff debrief	2.17	\$	500.00	\$	1,083.33
Lori Burns-Bucklew	10/10/2018	participate in co-counsel in-depth strategy session re complaint (including which potential clients to name, which Defs to name etc., which arguments to include, etc.) with co-counsel IL, MN, LW, FP, and LR	3.67	\$	500.00	\$	1,833.33

*M.B. v. Howard***Lori Burns-Bucklew's Itemized Time Entries Requested for Reimbursement**

Lori Burns-Bucklew	10/17/2018	Telephone call with co-counsel regarding status of investigation and filing strategy	0.92	\$	500.00	\$	458.33
Lori Burns-Bucklew	10/24/2018	Team call, including re: plaintiffs and filing planning and logistics	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	10/31/2018	Telephone call with co-counsel regarding plaintiffs and investigation strategy for complaint	0.77	\$	500.00	\$	383.33
Lori Burns-Bucklew	11/5/2018	Team call re: complaint draft	2.00	\$	500.00	\$	1,000.00
Lori Burns-Bucklew	11/9/2018	Telephone call with co counsel team re: named plaintiff investigation and filing timing and strategy	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	11/10/2018	Call with EM re current / potential NPs and NFs	0.58	\$	500.00	\$	291.67
Lori Burns-Bucklew	11/12/2018	Call with JK, SD, and EM to prepare and strategize for upcoming stakeholder meetings	0.58	\$	500.00	\$	291.67
Lori Burns-Bucklew	11/12/2018	Team call re: complaint draft	1.10	\$	500.00	\$	550.00
Lori Burns-Bucklew	11/14/2018	Meeting with EM & JK re: new fact info learned from mtgs with potential next friend and child advocate to share with co-counsel team, and discuss strategy for upcoming meetings with advocates	2.00	\$	500.00	\$	1,000.00
Lori Burns-Bucklew	11/15/2018	Telephone call with team co counsel on final edits to complaint and strategy	0.83	\$	500.00	\$	416.67
Lori Burns-Bucklew	11/21/2018	Team call regarding initial post filing outreach and litigation strategies	0.83	\$	500.00	\$	416.67
Lori Burns-Bucklew	11/27/2018	Telephone call with co-counsel IL regarding expert strategy	0.58	\$	500.00	\$	291.67
Lori Burns-Bucklew	11/28/2018	Meeting with LW re case investigation issues	1.50	\$	500.00	\$	750.00
Lori Burns-Bucklew	11/28/2018	Team conf call regarding litigation strategy stakeholder/witness engagement	1.08	\$	500.00	\$	541.67

*M.B. v. Howard***Lori Burns-Bucklew's Itemized Time Entries Requested for Reimbursement**

Lori Burns-Bucklew	12/5/2018	Co-counsel team meeting call regarding next steps post filing regarding fact and plaintiff amendment, initial response, witnesses	1.42	\$	500.00	\$	708.33
Lori Burns-Bucklew	12/6/2018	Call with team re: AG's request for extension	0.40	\$	500.00	\$	200.00
Lori Burns-Bucklew	12/12/2018	Team strategy call with co-counsel re post filing litigation strategy including class cert	0.50	\$	500.00	\$	250.00
Lori Burns-Bucklew	12/19/2018	Team call, including re: Defendants' request for extension, local updates, and experts	0.80	\$	500.00	\$	400.00
Lori Burns-Bucklew	12/21/2018	Telephone call with co-counsel LW/NCYL and LRS/Appleaseed regarding initial deadlines, extension request and discovery strategy	0.75	\$	500.00	\$	375.00
Lori Burns-Bucklew	1/2/2019	Team conference call regarding status of litigation and strategy on next steps regarding amendments, experts	0.93	\$	500.00	\$	466.67
Lori Burns-Bucklew	1/9/2019	Team call, including discussion of status conference, experts, and co-counsel	0.80	\$	500.00	\$	400.00
Lori Burns-Bucklew	1/11/2019	Team call re: telephonic hearing re: motion for extension and next steps	0.30	\$	500.00	\$	150.00
Lori Burns-Bucklew	1/16/2019	Team call, including discussion of litigation strategy, protective order, and motion for leave to use pseudonyms	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	1/22/2019	Conference call with Def counsel (and co-counsel LR, LW) regarding meet and confer on protective order	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	1/23/2019	Team call, including re: protective order, potential co-counsel, experts, and stakeholder updates	0.70	\$	500.00	\$	350.00
Lori Burns-Bucklew	1/29/2019	Telephone call with team regarding expert strategy - vetting and engagement	2.17	\$	500.00	\$	1,083.33
Lori Burns-Bucklew	1/30/2019	Team call, including discussion of protective order and co-counsel	0.40	\$	500.00	\$	200.00
Lori Burns-Bucklew	2/13/2019	Team co-counsel call, including re: named plaintiffs, experts, co-counsel, and new witnesses	1.40	\$	500.00	\$	700.00
Lori Burns-Bucklew	2/27/2019	Team meeting with full counsel team, next steps regarding discovery, strategy regarding settlement potential	1.00	\$	500.00	\$	500.00

*M.B. v. Howard***Lori Burns-Bucklew's Itemized Time Entries Requested for Reimbursement**

Lori Burns-Bucklew	2/28/2019	Conference call with with co counsel team re Named Plaintiff disclosures and production of documents	0.33	\$	500.00	\$	166.67
Lori Burns-Bucklew	3/6/2019	Team call regarding settlement and litigation strategy	0.75	\$	500.00	\$	375.00
Lori Burns-Bucklew	3/13/2019	Team strategy call with co-counsel re: initial disclosures, settlement, NP files	0.83	\$	500.00	\$	416.67
Lori Burns-Bucklew	3/19/2019	Telephone call with co-counsel re: strategy on experts for MH and discovery	0.50	\$	500.00	\$	250.00
Lori Burns-Bucklew	3/20/2019	Meeting with entire co-counsel team regarding strategy on discovery, class cert, and litigation for next 90 days	3.00	\$	500.00	\$	1,500.00
Lori Burns-Bucklew	3/27/2019	Call with co-counsel on strategy, early settlement, and potential stay	0.90	\$	500.00	\$	450.00
Lori Burns-Bucklew	3/29/2019	Telephone call with Def counsel and co-counsel regarding MTD, answer, and discovery	0.50	\$	500.00	\$	250.00
Lori Burns-Bucklew	4/3/2019	Team counsel call regarding strategy on discovery, experts, settlement	0.98	\$	500.00	\$	491.67
Lori Burns-Bucklew	4/10/2019	Full plttf team litigation strategy call re settlement, disc	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	4/17/2019	Team strategy call regarding settlement meeting	0.82	\$	500.00	\$	408.33
Lori Burns-Bucklew	4/19/2019	Meeting with team in advance of settlement discussion with Defendants	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	4/19/2019	Settlement discussion with Defendants	2.00	\$	500.00	\$	1,000.00
Lori Burns-Bucklew	4/19/2019	Debrief meeting with team re next steps	1.50	\$	500.00	\$	750.00

*M.B. v. Howard***Lori Burns-Bucklew's Itemized Time Entries Requested for Reimbursement**

Lori Burns-Bucklew	4/24/2019	Team meeting including discussion of stakeholder updates	0.60	\$	500.00	\$	300.00
Lori Burns-Bucklew	5/2/2019	Telephone call with co-counsel team regarding Answer, settlement strategy and amending complaint	0.93	\$	500.00	\$	466.67
Lori Burns-Bucklew	5/8/2019	Co-counsel meeting regarding strategy on next 3 weeks litigation	0.92	\$	500.00	\$	458.33
Lori Burns-Bucklew	5/8/2019	confer with B.M. and TW re analysis initial settlement terms ;	0.50	\$	500.00	\$	250.00
Lori Burns-Bucklew	5/14/2019	Meet with LR, MH, and TW re Plaintiffs' Rule 26 Disclosures	1.50	\$	500.00	\$	750.00
Lori Burns-Bucklew	5/15/2019	Telephone call with team co counsel re: amendment and discovery strategy, terms sheet for settlement	0.93	\$	500.00	\$	466.67
Lori Burns-Bucklew	5/20/2019	Call with Medicaid expert and MN, JK, EM, NCYL, and Appleseed to discuss Medicaid claims here	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	5/22/2019	Co-counsel team strategy call re: discussion of new clients, term sheet, and Medicaid claim	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	5/29/2019	Team strategy meeting regarding initial discovery and 26f documents	0.72	\$	500.00	\$	358.33
Lori Burns-Bucklew	6/5/2019	Team strategy call re: term sheet, initial disclosures, RFPs, and case file reviews	0.50	\$	500.00	\$	250.00
Lori Burns-Bucklew	6/12/2019	Team strategy meeting, including discovery and settlement strategy	0.67	\$	500.00	\$	333.33
Lori Burns-Bucklew	6/15/2019	Call with JK, NCYL, Appleseed, EM, and MH KS stakeholders re: Kansas Medicaid delivery	1.50	\$	500.00	\$	750.00
Lori Burns-Bucklew	6/19/2019	Team co counsel strategy call on initial discovery and settlement follow up	0.67	\$	500.00	\$	333.33
Lori Burns-Bucklew	6/25/2019	Call with TW re fact-gathering mtg with local foster care advocate with knowledge relevant to case	0.40	\$	500.00	\$	200.00

M.B. v. Howard

Lori Burns-Bucklew's Itemized Time Entries Requested for Reimbursement

Lori Burns-Bucklew	6/26/2019	Telephone call with team co-counsel regarding strategy for meet and conference.	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	6/27/2019	strategy session with co-counsel MN & TW in preparation for 26f	2.00	\$	500.00	\$	1,000.00
Lori Burns-Bucklew	6/28/2019	meeting with local foster Foster Adopt Connect, TW, and team members to discuss Defs' harmful placement practices and new info	3.30	\$	500.00	\$	1,650.00
Lori Burns-Bucklew	7/7/2019	Meet with TW and MN re strategy for CMC	1.50	\$	500.00	\$	750.00
Lori Burns-Bucklew	7/12/2019	Team co-counsel strategy meeting re: discovery next steps.	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	7/17/2019	Team call, including re: mediation, 30(b)(6) notice, and stakeholder conversations	0.90	\$	500.00	\$	450.00
Lori Burns-Bucklew	7/24/2019	Team call, including re: mediation, experts, discovery, and information from stakeholders	0.90	\$	500.00	\$	450.00
Lori Burns-Bucklew	7/29/2019	confer with MH and TW re KS Child Welfare Task Force Progress Report;	0.60	\$	500.00	\$	300.00
Lori Burns-Bucklew	7/31/2019	Team call, including re: mediation, discovery, and Task Force	0.70	\$	500.00	\$	350.00
Lori Burns-Bucklew	8/7/2019	Team co-counsel meeting re discovery strategy--amending compl, Settlement.	0.63	\$	500.00	\$	316.67
Lori Burns-Bucklew	8/7/2019	Meeting with MH and TW to prepare strategy and talking points for meeting with local foster care stakeholder, KA	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	8/9/2019	Telephone call with co-counsel IL re potential placement array expert	0.58	\$	500.00	\$	291.67
Lori Burns-Bucklew	8/9/2019	prepare written analysis of eCAP placement matching	0.20	\$	500.00	\$	100.00
Lori Burns-Bucklew	8/12/2019	Telephone call with potential mediator re litigation	1.08	\$	500.00	\$	541.67
Lori Burns-Bucklew	8/14/2019	Co-counsel team strategy call re: settlement, amended complaint	0.75	\$	500.00	\$	375.00

*M.B. v. Howard***Lori Burns-Bucklew's Itemized Time Entries Requested for Reimbursement**

Lori Burns-Bucklew	8/15/2019	Meet with TW, SD, LW, MH re strategy re mediation and continued discovery	1.20	\$	500.00	\$	600.00
Lori Burns-Bucklew	8/16/2019	Meeting with MH, PJ, and child welfare policy stakeholder for informal discovery	2.00	\$	500.00	\$	1,000.00
Lori Burns-Bucklew	8/21/2019	Team strategy call re: complaint amendment, potential settlement, and discovery	0.90	\$	500.00	\$	450.00
Lori Burns-Bucklew	8/28/2019	Weekly team strategy call re: discovery, mediation	0.83	\$	500.00	\$	416.67
Lori Burns-Bucklew	9/4/2019	Strategy conference call with co-counsel re discovery status, next steps, and mediation	0.92	\$	500.00	\$	458.33
Lori Burns-Bucklew	9/5/2019	Telephone call with co-counsel IL and potential expert re placement array	2.00	\$	500.00	\$	1,000.00
Lori Burns-Bucklew	9/11/2019	Team conference call with co-counsel re settlement and discovery strategy.	0.80	\$	500.00	\$	400.00
Lori Burns-Bucklew	9/11/2019	Telephone call with Medicaid expert and co-counsel re Medicaid claims strategy	0.83	\$	500.00	\$	416.67
Lori Burns-Bucklew	9/25/2019	Strategy call with co-counsel re discovery, expert and mediation strategy	0.92	\$	500.00	\$	458.33
Lori Burns-Bucklew	10/1/2019	Co-counsel strategy call primarily to prepare for mtg with new counsel of record for Defs	0.25	\$	500.00	\$	125.00
Lori Burns-Bucklew	10/1/2019	Telephone call with new Def counsel regarding discovery and mediation	0.75	\$	500.00	\$	375.00
Lori Burns-Bucklew	10/2/2019	Co-counsel strategy call re: discovery letter, mediation, amended 30(b)(6), and potential experts	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	10/8/2019	Mediation telephone call with Kevin Ryan and plttf team	1.33	\$	500.00	\$	666.67

*M.B. v. Howard***Lori Burns-Bucklew's Itemized Time Entries Requested for Reimbursement**

Lori Burns-Bucklew	10/16/2019	Team strategy call regarding ESI and RFP deficiency strategy	0.58	\$	500.00	\$	291.67
Lori Burns-Bucklew	10/23/2019	Confer with MN and TW in preparation for meeting with potential experts	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	10/23/2019	Meeting with MN, LW, TW, and LR with two potential expert witnesses	5.80	\$	500.00	\$	2,900.00
Lori Burns-Bucklew	11/1/2019	Team strategy discussion re meet and confer	0.25	\$	500.00	\$	125.00
Lori Burns-Bucklew	11/6/2019	Co-counsel team call re mediation strategy	0.50	\$	500.00	\$	250.00
Lori Burns-Bucklew	11/6/2019	Telephone call with mediator regarding mediation	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	11/8/2019	Co-counsel strategy call re: discovery, mediation	0.90	\$	500.00	\$	450.00
Lori Burns-Bucklew	11/11/2019	Prepare written analysis of key interview with stakeholder service provider	0.40	\$	500.00	\$	200.00
Lori Burns-Bucklew	11/12/2019	Meeting with co-counsel regarding mediation strategy and presentation	2.50	\$	500.00	\$	1,250.00
Lori Burns-Bucklew	11/13/2019	Mediation in KS	7.25	\$	500.00	\$	3,625.00
Lori Burns-Bucklew	11/15/2019	Team co counsel meeting re mediation strategy	0.83	\$	500.00	\$	416.67
Lori Burns-Bucklew	11/18/2019	Meeting with TW to craft prohibitions in draft settlement	4.80	\$	500.00	\$	2,400.00
Lori Burns-Bucklew	11/20/2019	Team strategy call re: mediation, discovery, and stakeholder interviews	0.50	\$	500.00	\$	250.00
Lori Burns-Bucklew	11/25/2019	Team strategy call re: settlement draft	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	12/3/2019	Provide written commentary to current settlement draft	0.20	\$	500.00	\$	100.00

*M.B. v. Howard***Lori Burns-Bucklew's Itemized Time Entries Requested for Reimbursement**

Lori Burns-Bucklew	12/4/2019	Co-counsel strategy call re: current settlement draft	0.90	\$	500.00	\$	450.00
Lori Burns-Bucklew	12/9/2019	Email team re: analysis of remedies	0.10	\$	500.00	\$	50.00
Lori Burns-Bucklew	12/10/2019	Co-counsel team strategy call re: mediation proposal	0.92	\$	500.00	\$	458.33
Lori Burns-Bucklew	12/13/2019	Email with PJ and MN re mediation plan	0.10	\$	500.00	\$	50.00
Lori Burns-Bucklew	12/15/2019	Draft pieces of proposed settlement with co-counsel	2.00	\$	500.00	\$	1,000.00
Lori Burns-Bucklew	12/15/2019	Mediation session with parties and mediator	5.00	\$	500.00	\$	2,500.00
Lori Burns-Bucklew	12/16/2019	Mediation session with parties and mediator	6.50	\$	500.00	\$	3,250.00
Lori Burns-Bucklew	12/18/2019	Co-counsel team strategy call re: discovery and mediation strategy	0.92	\$	500.00	\$	458.33
Lori Burns-Bucklew	1/6/2020	Team strategy call re: settlement draft depositions	1.50	\$	500.00	\$	750.00
Lori Burns-Bucklew	1/7/2020	Conference call with team regarding strategy on Gov. discovery and MTD opp	1.50	\$	500.00	\$	750.00
Lori Burns-Bucklew	1/15/2020	Team co counsel call regarding mediation strategy and discovery	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	1/23/2020	Team co-counsel strategy call regarding mediation and discovery strategy	1.00	\$	500.00	\$	500.00

*M.B. v. Howard***Lori Burns-Bucklew's Itemized Time Entries Requested for Reimbursement**

Lori Burns-Bucklew	1/29/2020	Telephone call with co counsel team regarding mediation strategy	0.50	\$	500.00	\$	250.00
Lori Burns-Bucklew	2/5/2020	Team call re: mediation, discovery, and opposition to motion to dismiss	0.70	\$	500.00	\$	350.00
Lori Burns-Bucklew	2/7/2020	Mediation, KC (phone dial in remote)	7.17	\$	500.00	\$	3,583.33
Lori Burns-Bucklew	2/8/2020	Draft email re stakeholder communication from parent	0.20	\$	500.00	\$	100.00
Lori Burns-Bucklew	2/12/2020	Telephone call with team regarding finalizing MTD opp and mediation strategy, issue for single mediation draft, possible alternatives for next mediation sessions	0.92	\$	500.00	\$	458.33
Lori Burns-Bucklew	2/19/2020	Team call re: mediation, discovery, budget process, and potential witnesses	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	2/21/2020	Team co-counsel strategy call re: mediation analysis and next steps	0.92	\$	500.00	\$	458.33
Lori Burns-Bucklew	2/25/2020	Co-counsel full strategy meeting re mediation	1.25	\$	500.00	\$	625.00
Lori Burns-Bucklew	2/25/2020	Co-counsel discussion re: stability alt strategy	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	2/25/2020	Participate in mediation	8.00	\$	500.00	\$	4,000.00
Lori Burns-Bucklew	2/26/2020	Mediation discussion with co counsel regarding dual track discovery	1.50	\$	500.00	\$	750.00
Lori Burns-Bucklew	2/26/2020	Meeting with co counsel re: offer from Defendants and draft counter proposal package	2.50	\$	500.00	\$	1,250.00
Lori Burns-Bucklew	2/26/2020	Participate in mediation	3.00	\$	500.00	\$	1,500.00
Lori Burns-Bucklew	3/10/2020	Meeting with LW and PJ re case strategy concerns	1.20	\$	500.00	\$	600.00

*M.B. v. Howard***Lori Burns-Bucklew's Itemized Time Entries Requested for Reimbursement**

Lori Burns-Bucklew	3/25/2020	Co-counsel team strategy call re discovery issues	0.75	\$	500.00	\$	375.00
Lori Burns-Bucklew	4/1/2020	Team strategy call re: discovery, experts, NPs, and COVID-19 placement & MH concerns	0.80	\$	500.00	\$	400.00
Lori Burns-Bucklew	4/3/2020	Co-counsel strategy call re: M&C, COVID discovery plan, next steps	0.83	\$	500.00	\$	416.67
Lori Burns-Bucklew	4/8/2020	Telephone call with co-counsel re: M&C talking points and discovery	0.67	\$	500.00	\$	333.33
Lori Burns-Bucklew	4/15/2020	Telephone call with co-counsel team re: discovery strategy, enforcement	0.92	\$	500.00	\$	458.33
Lori Burns-Bucklew	4/15/2020	Strategy call re potential experts on trauma and placements	0.50	\$	500.00	\$	250.00
Lori Burns-Bucklew	4/22/2020	Telephone strategy call with co-counsel re: discovery, experts	0.83	\$	500.00	\$	416.67
Lori Burns-Bucklew	4/29/2020	Co-counsel team strategy call re: discovery issues and experts	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	5/1/2020	Team strategy call, including re: discovery issues to discuss with Defs during M&C	1.30	\$	500.00	\$	650.00
Lori Burns-Bucklew	5/6/2020	Co-counsel strategy call re: discovery and settlement	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	5/11/2020	Co counsel discussion on proposed draft settlement and edits	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	5/13/2020	Co-counsel strategy call re: settlement and discovery	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	5/20/2020	Team call re: discovery, mediation, and experts	1.10	\$	500.00	\$	550.00

*M.B. v. Howard***Lori Burns-Bucklew's Itemized Time Entries Requested for Reimbursement**

Lori Burns-Bucklew	5/21/2020	Email with MN & TW re fact issues for upcoming Koehn dep	0.22	\$	500.00	\$	108.33
Lori Burns-Bucklew	5/27/2020	Co-counsel strategy meeting re: discovery and dep	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	5/29/2020	Team call re: response to settlement proposal from Defendants	1.50	\$	500.00	\$	750.00
Lori Burns-Bucklew	6/3/2020	Co-counsel strategy call re: settlement positions and next steps	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	6/4/2020	Settlement talks with Defendants	3.75	\$	500.00	\$	1,875.00
Lori Burns-Bucklew	6/10/2020	Settlement session with Defendants	3.00	\$	500.00	\$	1,500.00
Lori Burns-Bucklew	6/11/2020	Settlement session	2.80	\$	500.00	\$	1,400.00
Lori Burns-Bucklew	6/17/2020	Team strategy call re: settlement and discovery stay	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	6/18/2020	Call with parties re: remaining settlement issues	1.00	\$	500.00	\$	500.00
Lori Burns-Bucklew	6/22/2020	Mtg with neutral re settlement agreement	0.58	\$	500.00	\$	291.67
Lori Burns-Bucklew	6/23/2020	Call with Judge Crabtree re settlement	0.33	\$	500.00	\$	166.67
Lori Burns-Bucklew	6/24/2020	Strategy mtg with co-counsel re: senate finance committee ("SFC") request from opposing counsel	1.17	\$	500.00	\$	583.33
Lori Burns-Bucklew	6/29/2020	Call with PJ TW FP and MH re third party discovery with contractors	0.50	\$	500.00	\$	250.00

*M.B. v. Howard***Lori Burns-Bucklew's Itemized Time Entries Requested for Reimbursement**

Lori Burns-Bucklew	6/30/2020	Team co-counsel call re strategy and concerns re SFC	0.58	\$	500.00	\$	291.67
Lori Burns-Bucklew	7/1/2020	Co-counsel team strategy call on SFC approval of settlement and discovery	0.58	\$	500.00	\$	291.67
Lori Burns-Bucklew	7/9/2020	Strategize with TW, MN, and MH re settlement and SFC	0.50	\$	500.00	\$	250.00
Lori Burns-Bucklew	7/13/2020	Email with PJ and MH re edits to proposed order	0.30	\$	500.00	\$	150.00
Lori Burns-Bucklew	7/22/2020	Discuss preliminary settlement approval strategy with co-counsel	0.58	\$	500.00	\$	291.67
		TOTAL	231.10			\$	115,550.00