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,))))	
Plaintiffs,)	Case No. 2:18-cv-02617-DDC-GEB
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 CARYN SCHECHTMAN IN SUPPORT OF MOTION FOR ATTORNEYS' FEES AND EXPENSES

I, Caryn Schechtman, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of

perjury that the following facts are true and correct to the best of my knowledge and belief:

1. I am a member of the bar of the State of New York and admitted to practice in the

District of Kansas pro hac vice.

2. I am a partner in the international law firm of DLA Piper LLP ("DLA"). On behalf

of DLA, I submit this sworn declaration and corresponding exhibits in support of Plaintiffs'

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

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

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

A. Background and Qualifications

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

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

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

B. Work Performed and Qualifications of DLA Attorneys and Staff

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

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

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

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

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

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

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

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

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

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

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

C. Amounts Requested

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

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

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

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

Name	Title	JD Class Year	Local Rate	Hours Submitted ¹	Fees Submitted (rate multiplied by hours)
David J. Sager	Partner	1991	\$500/hour	42.9	\$16,450.00
Kristin Pacio	Senior Attorney	2005	\$410/hour	74.9	\$30,709.00
Joshua Kane	Senior Associate	2010	\$410/hour	108.8	\$44,608.00
William J. Diggs	Senior Associate	2010	\$410/hour	73.1	\$29,971.00

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

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

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

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

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

DLA PIPER LLP (US) Caryn Schechtman (admitted *pro hac vice*) NY Bar ID No. NY-2910420 1251 Avenue of the Americas New York, New York 10020-1104 (212) 335-4500 Caryn.Schechtman@us.dlapiper.com

CO-COUNSEL FOR PLAINTIFFS

Exhibit A

Date	Name	Title	Hours	Rate	An	nount	Narrative
							Reviewing complaint,
2/5/2019	Diggs, William J.	Associate	1.2	410	\$	492.00	press release.
							Reviewing stipulated
							confidentiality and
							protective order, draft settlement term sheet
2/25/2010	Digge William I	Accediate	0.5	410	ć	205.00	
2/25/2019	Diggs, William J.	Associate	0.5	410	\$	205.00	agreement.
							Call with David Sager,
							Anne Geraghty Helms,
							Natasha Kanerva, Meg
							Fowler concerning matter
2/26/2019	Diggs, William J.	Associate	0.4	410	\$	164.00	background, next steps.
							Prepare for and
							participate in call among
							plaintiffs' counsel re
							staffing, named plaintiffs,
							and case management (1);
							follow up with DLA team
2/27/2019	Sager, David S.	Partner	1.4	500	\$	700.00	(.4).
							Weekly strategy call with
							cocounsel, including
							discussion of staffing,
							named plaintiffs, and case
							management (1); follow-
							up discussion with David
2/27/2019	Diggs, William J.	Associate	1.1	410	\$	451.00	Sager, Meg Fowler (.1).
							Weekly strategy call with
							cocounsel, including
							discussion of: gathering
							named plaintiff files and
2/5/2242		.	0 7			~~~ ~~	litigation
3/6/2019	Diggs, William J.	Associate	0.7	410	\$	287.00	timeline/strategy. Revising pro hac vice
3/11/2019	Diggs, William J.	Associate	0.4	410	\$	164.00	application.
3/11/2019	Diggs, William J.	Associate	0.4	410	Ļ	104.00	Participate in weekly
							conference call, including
							discussion of file
							management and
							prospective additional
3/13/2019	Fowler, Meg	Associate	0.9	240	\$	216.00	named plaintiffs.
							Attend status call re file
							management and
							prospective additional
3/13/2019	Sager, David S.	Partner	0.9	500	\$	450.00	named plaintiffs.

Date	Name	Title	Hours	Rate	A	mount	Narrative
							Weekly strategy call with
							cocounsel, including
							discussion of file
							management and
							prospective additional
							named plaintiffs (.9);
							follow-up discussion with
3/13/2019	Diggs, William J.	Associate	1	410	\$	410.00	David Sager (.1).
5/15/2015		Associate		410	Ļ	410.00	Review and update draft
3/14/2019	Calderon, Judy	Paralegal	1.2	200	\$	240.00	key players list
5/14/2015	Calueron, Judy	Falalegai	1.2	200	ې	240.00	key players list
							Compile and edit a list of
2/11/2010	F . b . M .		0.0	240	~	72.00	the key players involved in
3/14/2019	Fowler, Meg	Associate	0.3	240	\$	72.00	the class action litigation.
2/11/2010	5. 14/11: 1				4	~~~~~	Revising pro hac vice
3/14/2019	Diggs, William J.	Associate	0.2	410	\$	82.00	application.
							Reviewing
							correspondence
							concerning next steps,
							document collection,
3/15/2019	Diggs, William J.	Associate	0.2	410	\$	82.00	Relativity setup.
							Compile and edit a list of
							the key players involved in
3/16/2019	Fowler, Meg	Associate	3.2	240	\$	768.00	the class action litigation.
							Organize and review
							documents and emails in
							preparation for the next
3/19/2019	Fowler, Meg	Associate	0.7	240	\$	168.00	day's all-hands meeting.
							Prepare for and attend
							strategy meeting in NYC
							with national litigation
3/20/2019	Sager, David S.	Partner	5.3	500	\$	2,650.00	team.
							Attend team strategy
							meeting, including
							discussion of claims and
							strategy for complaint
							amendment, class
							certification, and
3/20/2019	Fowler, Meg	Associate	3	240	\$	720.00	discovery.
0,20,2015	i offici) incg	7105001410	5	2.10	Ŷ	, 20.00	Meeting with cocounsel
							concerning claims and
							strategy for complaint
							amendment, class
2/20/2010		Accodicto	n	410	ć	1 220 00	certification, and
3/20/2019	Diggs, William J.	Associate	3	410	\$	1,230.00	discovery.
							Planning concerning tasks
							regarding brief in support
0 /0 - /0	5				1		of motion for class
3/21/2019	Diggs, William J.	Associate	0.3	410	\$	123.00	certification.

Date	Name	Title	Hours	Rate	А	mount	Narrative
							Correspond with DLA
							team members to plan
							next steps and to allocate
3/22/2019	Fowler, Meg	Associate	0.3	240	\$	72.00	
							Coordinating with team
							concerning tasks in
							preparation for brief in
							support of motion for
3/22/2019	Diggs, William J.	Associate	0.1	410	\$	41.00	class certification.
0,, _0 _0	2.880,	1.00001410	0.1		Ŧ		Attend weekly strategy
							meeting, including
							discussion of Defendants'
							proposed stay and client
3/27/2019	Fowler, Meg	Associate	0.9	240	\$	216.00	updates.
5/27/2019	rowier, wieg	Associate	0.9	240	Ş	210.00	Reviewing
							-
							correspondence
							concerning potential stay
0/07/0010	5. 14/11: 1	.				~~~~~	pending settlement
3/27/2019	Diggs, William J.	Associate	0.2	410	\$	82.00	discussions.
							Weekly strategy call with
							cocounsel, including
							discussion of Defendants'
							proposed stay and client
3/27/2019	Diggs, William J.	Associate	0.4	410	\$	164.00	updates.
							Reviewing
							correspondence
							concerning next steps
3/27/2019	Diggs, William J.	Associate	0.1	410	\$	41.00	regarding discovery.
							Reviewing
							correspondence
3/28/2019	Diggs, William J.	Associate	0.1	410	\$	41.00	concerning case strategy.
							Research concerning
							specificity requirement for
3/28/2019	Diggs, William J.	Associate	2.3	410	\$	943.00	Rule 23(b)(2) certification.
							Reviewing
							correspondence
3/29/2019	Diggs, William J.	Associate	0.3	410	\$	123.00	concerning case strategy.
							Research concerning
							specificity requirement for
3/29/2019	Diggs, William J.	Associate	1.9	410	\$	779.00	Rule 23(b)(2) certification.
							Email regarding case
							status, extension of time,
							and related issues (.1);
							review and sign
4/1/2019	Sager, David S.	Partner	0.2	500	\$	100.00	undertaking (.1).
7/ 1/ 2015	54607, 54414 5.	i di tilti	0.2	500	Ŷ	100.00	

Date	Name	Title	Hours	Rate	А	mount	Narrative
							Finalize
							acknowledgements of
							confidentiality and
							protective orders for DLA
4/1/2019	Calderon, Judy	Paralegal	0.3	200	\$	60.00	team;
					1		
							Research concerning
							specificity requirement for
4/1/2019	Diggs, William J.	Associate	0.4	410	\$	164.00	Rule 23(b)(2) certification.
							Attend weekly status call
							re 4/19 meeting with
							defendants, settlement
							strategy, and possible
							amendments to
4/3/2019	Sager, David S.	Partner	1	500	\$	500.00	complaint.
4/3/2013	Suger, David S.	rartici	±	500	,	500.00	complaint.
							Participate in the weekly
							strategy call, including
							discussion re: 4/19
							meeting with defendants,
							settlement strategy, and
4/2/2010		Accesiete	1	240	÷	240.00	possible amendments to
4/3/2019	Fowler, Meg	Associate	1	240	\$	240.00	complaint.
							Weekly strategy call with
							cocounsel, concerning
							-
							4/19 meeting with
							defendants, settlement
							strategy, and possible
							amendments to complaint
							(1); follow-up discussion
4/3/2019	Diggs, William J.	Associate	1.1	410	\$	451.00	with David Sager (.1).
			_				Call with L. Welch
4/4/2019	Sager, David S.	Partner	0.5	500	\$	250.00	regarding strategy.
							Reviewing electronic
			_				correspondence
4/4/2019	Diggs, William J.	Associate	0.1	410	\$	41.00	concerning case strategy.
							Research concerning
							specificity requirement for
4/4/2019	Diggs, William J.	Associate	0.9	410	\$	369.00	Rule 23(b)(2) certification.
							Coordinating with team
							concerning tasks in
							preparation for class
4/4/2019	Diggs, William J.	Associate	0.2	410	\$	82.00	certification briefing.
							Instructions to W. Diggs
							regarding research/class
4/8/2019	Sager, David S.	Partner	0.3	500	\$	150.00	cert motion.

Date	Name	Title	Hours	Rate	Amount	Narrative
						Coordinating with team
						concerning outline for
						brief in support of motion
4/8/2019	Diggs, William J.	Associate	0.1	410	\$ 41.00	
						Drafting template for
						preparation of outline for brief in support of motion
4/8/2019	Diggs, William J.	Associate	0.2	410	\$ 82.00	
					,	Instructions to W. Diggs
						regarding class
						certification and
4/0/2010	Casar David C	Dautaan	0.4	500	¢ 200.00	preparation for upcoming
4/9/2019	Sager, David S.	Partner	0.4	500	\$ 200.00) meetings. Research case law from
						District of Kansas and
						Tenth Circuit concerning
						class certification and
						bifurcation of discovery
		• · ·				between merits and class
4/9/2019	Fowler, Meg	Associate	4.1	240	\$ 984.00	certification issues.
						Coordinating with team
						concerning outline for
						brief in support of motion
4/9/2019	Diggs, William J.	Associate	0.4	410	\$ 164.00	
						Attend weekly status call
						re 4/19/19 meeting with defendants, proposed
						additional substantive due
						process claim, and
4/10/2019	Sager, David S.	Partner	1	500	\$ 500.00	o document management.
						Conference call with team re 4/19/19 meeting with
						defendants, proposed
						additional substantive due
						process claim, and
4/10/2019	Pacio, Kristin A.	Attorney	1	410	\$ 410.00) document management.
						Call with David Sager, Kristin Pacio, Meg Fowler
						regarding outline for brief
						in support of motion for
4/10/2019	Diggs, William J.	Associate	0.4	410	\$ 164.00	

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

Date	Name	Title	Hours	Rate	A	Mount	Narrative
							Drafting outline for brief
							in support of motion for
4/16/2019	Diggs, William J.	Associate	3.5	410	\$	1,435.00	class certification.
							Prepare for and attend
							team status call re
							4/19/19 meeting with
							defendants and early
4/17/2019	Sager, David S.	Partner	0.8	500	\$	400.00	settlement strategy.
							Participate in the weekly
							all-hands conference call,
							including discussion of
							4/19/19 meeting with
							defendants and early
4/17/2019	Fowler, Meg	Associate	0.8	240	\$	192.00	settlement strategy.
	, 0						Prepare for and travel to
							Kansas City for meeting
							with State. (Half Rate for
4/18/2019	Sager, David S.	Partner	6	250	\$	1,500.00	Travel Time)
						,	
							Prepare for and attend
							team meetings and
							meeting with lawyers for
							State; return travel. (Half
4/19/2019	Sager, David S.	Partner	14	250	\$	3,500.00	Rate for Travel Time)
					· ·	,	, Reviewing electronic
							correspondence
							concerning meeting with
4/19/2019	Diggs, William J.	Associate	0.1	410	\$	41.00	Plaintiffs, case strategy.
							Reviewing electronic
							correspondence
							concerning April 19
							meeting with Plaintiffs,
4/22/2019	Diggs, William J.	Associate	0.1	410	\$	41.00	case strategy.
							Prepare for and attend
							weekly status call re
							local/stakeholder updates
							(.6); follow up call
4/24/2019	Sager, David S.	Partner	1.3	500	\$	650.00	regarding strategy (.7).
							Participate in the weekly
							all-hands conference call,
							including discussion of
							local/stakeholder updates
							(.6); confer with DLA team
							members about the
							motion for class
4/24/2019	Fowler, Meg	Associate	1.6	240	\$	384.00	certification (1).
7/27/2015	1000101,10105	7.55001010	1.0	270	7	554.00	

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

Date	Name	Title	Hours	Rate	1	Amount	Narrative
							Correspond with team
							members concerning the
							motion for class
5/7/2019	Fowler, Meg	Associate	0.2	240	\$	48.00	certification.
							Attend the weekly team
							call, including discussion
							of scheduling order,
							complaint amendments,
5/8/2019	Fowler, Meg	Associate	1.8	240	\$	432.00	and terms sheet.
0,0,2020		1.00001410	2.0		+	.02.00	Drafting brief in support
							of motion for class
5/8/2019	Diggs, William J.	Associate	3.6	410	\$	1,476.00	certification.
5/0/2015		Associate	5.0	410	,	1,470.00	Weekly strategy call with
							cocounsel, including
							discussion of scheduling
							•
							order, complaint
- (0 /0010	5. W////	.					amendments, and terms
5/8/2019	Diggs, William J.	Associate	0.9	410	\$	369.00	sheet.
- (0 /0010	D : W (1):	.					Reviewing settlement
5/8/2019	Diggs, William J.	Associate	0.1	410	\$	41.00	term sheet.
							Reviewing memorandum
							concerning research
- /- /							regarding motion to
5/8/2019	Diggs, William J.	Associate	0.2	410	\$	82.00	dismiss governor.
							Drafting brief in support
							of motion for class
5/9/2019	Diggs, William J.	Associate	6.3	410	\$	2,583.00	certification.
							Review and respond to
							email regarding term
							sheet, Rule 16 conference,
5/14/2019	Sager, David S.	Partner	0.6	500	\$	300.00	and related issues.
							Reviewing electronic
							correspondence
							concerning conference
							with magistrate,
5/14/2019	Diggs, William J.	Associate	0.1	410	\$	41.00	discussions with Plaintiffs.
							Prepare for and attend
							status/strategy call re
							scheduling conference,
							term sheet, and complaint
5/15/2019	Sager, David S.	Partner	0.7	500	\$	350.00	amendments.
							Conference call with team
							re: scheduling conference,
							term sheet, and complaint
5/15/2019	Pacio, Kristin A.	Attorney	1	410	\$	410.00	amendments.

Date	Name	Title	Hours	Rate	An	nount	Narrative
							Participate in weekly all-
							hands team call, including
							discussion re: scheduling
							conference, term sheet,
							and complaint
5/15/2019	Fowler, Meg	Associate	0.7	240	\$	168.00	amendments.
							Weekly strategy call with
							cocounsel, concerning
							scheduling conference,
							term sheet, and complaint
5/15/2019	Diggs, William J.	Associate	1	410	\$	410.00	amendments.
							Reviewing draft class
5/16/2019	Pacio, Kristin A.	Attorney	2.3	410	\$	943.00	certification brief.
							Reviewing electronic
							correspondence
							concerning press
5/18/2019	Diggs, William J.	Associate	0.2	410	\$	82.00	coverage, case strategy.
							Email regarding possible
							amendment and related
5/20/2019	Sager, David S.	Partner	0.5	500	\$	250.00	issues.
							Reviewing electronic
							correspondence
5/20/2019	Diggs, William J.	Associate	0.1	410	\$	41.00	concerning case strategy.
							Reviewing
							correspondence regarding
5/21/2019	Pacio, Kristin A.	Attorney	0.3	410	\$	123.00	amendment of complaint.
					-		
							Conference call with team
							including discussion of
							new clients, term sheet,
5/22/2019	Pacio, Kristin A.	Attorney	1	410	\$	410.00	and Medicaid claim.
							Attend team
							status/stategy call re new
							clients, term sheet, and
5/22/2019	Sager, David S.	Partner	1	500	\$	500.00	Medicaid claim.
							Participate in weekly all-
							hands team call, including
							discussion of new clients,
							term sheet, and Medicaid
5/22/2019	Fowler, Meg	Associate	1.1	240	\$	264.00	claim.
	,						Weekly strategy call with
							cocounsel, including
							discussion of new clients,
							term sheet, and Medicaid
5/22/2019	Diggs, William J.	Associate	1	410	\$	410.00	claim.
, ,				-			Conference call with team
							re: response to settlement
							proposal from
5/29/2019	Pacio, Kristin A.	Attorney	0.8	410	\$	328.00	Defendants.
5,25,2015		rationicy	0.0	410	Ŷ	520.00	Berendunts.

Date	Name	Title	Hours	Rate	A	nount	Narrative
							Weekly status call re: term
							sheet, initial disclosures,
							RFPs, and case file
6/5/2019	Sager, David S.	Partner	0.5	500	\$	250.00	reviews.
							Attend the weekly team
							conference call, including
							discussion re: term sheet,
							initial disclosures, RFPs,
6/5/2019	Fowler, Meg	Associate	0.5	240	\$	120.00	and case file reviews.
							Weekly strategy call with
							cocounsel, including
							discussion re: term sheet,
							initial disclosures, RFPs,
6/5/2019	Diggs, William J.	Associate	0.5	410	\$	205.00	and case file reviews.
							Reviewing electronic
							correspondence
6/7/2019	Diggs, William J.	Associate	0.1	410	\$	41.00	8 87
							Conference call re
							possible preliminary
							injunction motion and
6/12/2019	Pacio, Kristin A.	Attorney	0.7	410	\$	287.00	discovery management.
							Reviewing electronic
							correspondence
6/12/2019	Diggs, William J.	Associate	0.1	410	\$	41.00	concerning case strategy.
							Weekly strategy call with
							cocounsel, including
							discussion of possible
							preliminary injunction
							motion and discovery
6/12/2019	Diggs, William J.	Associate	0.7	410	\$	287.00	management.
							Conference call to discuss
6/13/2019	Pacio, Kristin A.	Attorney	0.5	410	\$	205.00	document review.
							Call with NCYL, Kristin
							Pacio, Judy Calderon
							concerning discovery
							(0.3); follow-up discussion
6/13/2019	Diggs, William J.	Associate	0.4	410	\$	164.00	with Judy Calderon (0.1).
6/25/2019	Diggs, William J.	Associate	1.5	410	\$	615.00	Revising ESI protocol.
							Attend weekly team call re
							26(f) conference and
							statement, prospective
6/26/2019	Sager, David S.	Partner	1.3	500	\$	650.00	mediators, and discovery.

Date	Name	Title	Hours	Rate	A	mount	Narrative
							Conforance call roy 26/f)
							Conference call re: 26(f) conference and
							statement, prospective
6/26/2019	Pacio, Kristin A.	Attorney	1.3	410	\$	533.00	mediators, and discovery.
					- T		
							Attend weekly call to plan
6/26/2019	Fowler, Meg	Associate	1.5	240	\$	360.00	for the 26(f) conference.
							Weekly strategy call with
							cocounsel, including
							discussion re: 26(f)
							conference and
							statement, prospective
							mediators, and discovery (1); follow-up discussion
							with Judy Calderon
							regarding document
6/26/2019	Diggs, William J.	Associate	1.3	410	\$	533.00	production (.3).
							Reviewing electronic
							correspondence
							concerning discovery, case
6/26/2019	Diggs, William J.	Associate	0.2	410	\$	82.00	strategy.
							Call with Judy Calderon,
c /2 c /2 2 4 2	5	.				400.00	NCYL concerning
6/26/2019	Diggs, William J.	Associate	0.3	410	\$	123.00	discovery.
							Attend the 26(f) conference with
6/27/2019	Fowler, Meg	Associate	3.5	240	\$	840.00	Defendants' counsel.
0/2//2015		7.05001010	5.5	240	Ŷ	040.00	Reviewing electronic
							correspondence
							concerning discovery, case
6/27/2019	Diggs, William J.	Associate	0.2	410	\$	82.00	strategy.
6/27/2019	Diggs, William J.	Associate	2.2	410	\$	902.00	Rule 26(f) conference.
							Reviewing material in
							preparation for Rule 26(f)
6/27/2019	Diggs, William J.	Associate	1.1	410	\$	451.00	conference.
6/27/2019	Diggs, William J.	Associate	1	410	\$	410.00	Revising ESI protocol.
							Coordinating with team concerning Rule 26(f)
6/27/2019	Diggs, William J.	Associate	0.6	410	\$	246.00	conference, next steps.
0/2//2015			0.0	710	<u>ب</u>	2-10.00	Reviewing electronic
							correspondence
7/8/2019	Diggs, William J.	Associate	0.2	410	\$	82.00	-
							Email regarding Rule 16
							conference and next
7/9/2019	Sager, David S.	Partner	0.3	500	\$	150.00	steps.

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

Date	Name	Title	Hours	Rate	A	mount	Narrative
							Conference call with team
							re: mediation, experts,
							discovery, and
							information from
7/24/2019	Pacio, Kristin A.	Attorney	0.9	410	\$	369.00	stakeholders.
							Email regarding
							defendants' responses to
7/26/2019	Sager, David S.	Partner	0.5	500	\$	250.00	RFP and related issues.
, -,							Reviewing electronic
							correspondence
							concerning discovery, case
7/26/2019	Diggs, William J.	Associate	0.1	410	\$	41.00	strategy.
, _,			_				Revising chart assessing
							Defendants' response to
7/29/2019	Diggs, William J.	Associate	0.4	410	\$	164.00	settlement proposal.
.,,	88-,				Ŧ		
							Conference call with team
							re: mediation, discovery,
7/31/2019	Pacio, Kristin A.	Attorney	0.7	410	\$	287.00	and Task Force.
, - ,							Attend weekly status call
							re: mediation, discovery,
7/31/2019	Sager, David S.	Partner	0.9	500	\$	450.00	and Task Force.
7,01,2015	ouger) buria or	i ui tiici	0.5	500	Ŷ	130.00	Revising third-party
							subpoena to Defendants'
7/31/2019	Diggs, William J.	Associate	0.2	410	\$	82.00	contractors.
775172015		Associate	0.2	410	7	02.00	contractors.
							Weekly strategy call with
							cocounsel, including
							discussion re: mediation,
7/31/2019	Diggs, William J.	Associate	0.7	410	\$	287.00	discovery, and Task Force.
7/31/2019	Diggs, William J.	Associate	0.7	410	Ş	207.00	Conferring with team
8/7/2019	Dacia Kristin A	Attorney	0.3	410	\$	123.00	regarding matter status.
0/7/2019	Pacio, Kristin A.	Attorney	0.5	410	Ş	125.00	Discussion with David
							Sager, Kristin Pacio, Meg
0/7/2010	Diana Milliana I	A	0.2	410	~	02.00	Fowler concerning draft
8/7/2019	Diggs, William J.	Associate	0.2	410	\$	82.00	work plan.
0/12/2010	Canan David C	Deutureu	0.2	500	~	450.00	Email regarding
8/13/2019	Sager, David S.	Partner	0.3	500	\$	150.00	settlement.
							Attend weekly
							status/strategy call re
0/4 1/2010		.	~ -			250.00	ADR, discovery, and
8/14/2019	Sager, David S.	Partner	0.7	500	\$	350.00	complaint amendment.
							Consideration of issues
0/10/00-0	_				-	400	with respect to amending
8/16/2019	Pacio, Kristin A.	Attorney	0.3	410	\$	123.00	complaint.
							Reviewing electronic
							correspondence
							concerning case strategy,
							potential amendment to
8/16/2019	Diggs, William J.	Associate	0.3	410	\$	123.00	complaint.

Date	Name	Title	Hours	Rate	ļ	Amount	Narrative
							Reviewing electronic
							correspondence
							concerning case strategy,
8/19/2019	Diggs, William J.	Associate	0.2	410	\$	82.00	Relativity database.
							Reviewing complaint and
							other materials in
							connection with
8/21/2019	Pacio, Kristin A.	Attorney	7.5	410	\$	3,075.00	amending complaint.
							Reviewing complaint and
							background materials in
							connection with
8/22/2019	Pacio, Kristin A.	Attorney	3	410	\$	1,230.00	amending complaint.
					1		Analyzing complaint in
							connection with potential
							amendments and
							conferring with co-counsel
8/23/2019	Pacio, Kristin A.	Attorney	4.4	410	\$	1,804.00	regarding same.
0, 20, 2020		,			+	_)0000	Attend weekly status
							conference re ADR,
							amended complaint, local
8/28/2019	Sager, David S.	Partner	0.6	500	\$	300.00	updates.
0,20,2013	Suger, Burla Si	i di tilei	0.0	500	Ŷ	500.00	Reviewing electronic
							correspondence
							concerning motion to
8/30/2019	Diggs, William J.	Associate	0.1	410	\$	41.00	amend complaint.
0/30/2013		Associate	0.1	410	Ļ	41.00	Reviewing draft mediation
9/11/2019	Diggs, William J.	Associate	0.7	410	\$	287.00	statement.
5/11/2015	51555, William 5.	7135001400	0.7	410	7	207.00	Call with Kristin Pacio
10/4/2019	Diggs, William J.	Associate	0.1	410	\$	41.00	concerning ESI protocol.
10/4/2015	51555, William 5.	7135001400	0.1	410	Ŷ	41.00	Draft and revise draft pro
							hac vice admission forms
10/14/2019	Calderon, Judy	Paralegal	1.3	200	\$	260.00	for team review;
10/14/2015		Taracgar	1.5	200	Ļ	200.00	Participating in weekly
							team conference call re:
10/16/2019	Pacio, Kristin A.	Attorney	0.4	410	\$	164.00	ADR and stakeholders.
10/10/2015		Attorney	0.4	410	Ļ	104.00	Abit and stakenolders.
		Pro Bono					Attend weekly team call
10/16/2019	Kinney, Megan E.	Fellow	0.3	240	\$	72.00	-
10/10/2015	Kinicy, Wiegan L.	Tenow	0.5	240	Ļ	72.00	Attend weekly team
	Tourgee, Olivia						phone call re: ADR and
10/16/2019	Morgan	Associate	0.5	240	\$	120.00	stakeholders.
10/10/2019	Iviorgan	Associate	0.5	240	ç	120.00	Review, revise, finalize
							and file motion for pro
							hac vice admission for J.
							Kane; review and update
10/22/2019	Calderon, Judy	Daralogal	1.1	200	\$	220.00	case files for same
10/22/2019		Paralegal	1.1	200	Ş	220.00	Review Defendants'
							responses and objections
10/22/2010	Kana Jaal	A	4.0	440	~	F 2 2 0 0	to Plaintiffs' document
10/23/2019	Kane, Joshua	Associate	1.3	410	\$	533.00	requests.

Date	Name	Title	Hours	Rate	An	nount	Narrative
							Attend the counsel teleconference concerning
							discovery, ADR, meetings
10/23/2019	Fowler, Meg	Associate	0.7	240	\$	168.00	with experts.
	, 8				- T		
							Meet with M. Nardi, I.
							Lustbader, C. Schechtman,
							M. Fowler, and J.
							Rotenberg to discuss case
10/28/2019	Kane, Joshua	Associate	2.1	410	\$	861.00	status and strategy.
							Meet with M. Nardi, I.
							Lustbader, C. Schechtman,
							J. Kane, and J. Rotenberg
			_				to discuss case status and
10/28/2019	Fowler, Meg	Associate	2.1	240	\$	504.00	strategy.
							Attend the counsel
							teleconference concerning
							the status of the case,
							including re: motion to dismiss, discovery, and
10/30/2019	Fowler, Meg	Associate	1.3	240	\$	312.00	ADR.
10/30/2019	FOWIEI, Meg	Associate	1.5	240	Ş	512.00	Attend prep session for
							meet-and-confer with
							opposing counsel (.3);
							attend meet-and-confer
							with opposing counsel
							regarding discovery issues
11/1/2019	Kane, Joshua	Associate	1	410	\$	410.00	(.7).
							Attend weekly team
							conference call, including
							discussion re: ADR, MTD,
11/6/2019	Kane, Joshua	Associate	1	410	\$	410.00	discovery, experts.
							Exchange emails with J.
							Rotenberg and K. Pacio
							regarding upcoming
11/7/2019	Kane, Joshua	Associate	0.1	410	\$	41.00	mediation.
							Consideration of issues
11/7/2019	Pacio, Kristin A.	Attorney	1.2	410	\$	492.00	Consideration of issues with respect to mediation.
11/7/2019	racio, Niistiii A.	Allonney	1.2	410	ې ا	492.00	
							Consideration of issues
11/8/2019	Pacio, Kristin A.	Attorney	0.3	410	\$	123.00	with respect to mediation.
, _,							
							Compose updated task list
		Pro Bono					and matter activity email
11/8/2019	Kinney, Megan E.	Fellow	0.5	240	\$	120.00	to distribute to DLA team.
	Tourgee, Olivia						Attend team call regarding
11/8/2019	Morgan	Associate	0.8	240	\$	192.00	mediation.

Date	Name	Title	Hours	Rate	A	mount	Narrative
							Preparing for mediation
							and consideration of
							issues with respect to
11/11/2019	Pacio, Kristin A.	Attorney	7	410	\$	2,870.00	same.
							Preparing for and
11/12/2019	Pacio, Kristin A.	Attorney	13	410	\$	5 330 00	participating in mediation.
11/12/2015		Attorney	15	410	Ŷ	3,330.00	Consideration of issues
							with respect to post
11/13/2019	Pacio, Kristin A.	Attorney	0.6	410	\$	246.00	mediation matters.
		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	0.0		+		Consideration of issues
							with respect to mediation
11/15/2019	Pacio, Kristin A.	Attorney	0.6	410	\$	246.00	and discovery.
		,			7		Attend weekly counsel
							call, including re:
							mediation, experts, and
11/15/2019	Fowler, Meg	Associate	0.9	240	\$	216.00	media.
							Attend Kansas team call
		Pro Bono					re: mediation, experts,
11/15/2019	Kinney, Megan E.	Fellow	0.9	240	\$	216.00	and media.
							Conference call re:
							mediation, document
							production issues, and
11/20/2019	Pacio, Kristin A.	Attorney	0.7	410	\$	287.00	experts.
							Attend weekly team call
							re: mediation, document
		Pro Bono					production issues, and
11/20/2019	Kinney, Megan E.	Fellow	0.7	240	\$	168.00	experts.
							Participate and take notes
							on weekly team phone
							call re: mediation,
	Tourgee, Olivia						document production
11/20/2019	Morgan	Associate	0.6	240	\$	144.00	issues, and experts.
							Consideration of issues
							with respect to reviewing
11/21/2019	Pacio, Kristin A.	Attorney	0.5	410	\$	205.00	documents for mediation.
							Review Defendants'
							document production to
							identify documents
		Pro Bono			1		relevant to upcoming
11/21/2019	Kinney, Megan E.	Fellow	5.9	240	\$	1,416.00	mediation.
							Review Defendants'
							document production to
		D					identify documents
		Pro Bono			1		relevant to upcoming
11/22/2019	Kinney, Megan E.	Fellow	5.5	240	\$	1,320.00	mediation.
		D					Attend weekly team call re
44/25/2040	-	Pro Bono	4	2.0	~	242.02	discussion of settlement
11/25/2019	Kinney, Megan E.	Fellow	1	240	\$	240.00	draft edits.

Date	Name	Title	Hours	Rate	Amount	Narrative
						Review documents on
						Relativity database in
						preparation for mediation (2.6); review mediation
	Tourgoo Olivio					drafts, comments, and
11/25/2010	Tourgee, Olivia	Associate	3.7	240	\$ 888.	
11/25/2019	Morgan	Associate	5.7	240	ې ۵۵۵.	Review final set of
	Tourgee, Olivia					documents for mediation
11/27/2019	Morgan	Associate	0.5	240	\$ 120.	
11/2//2019	Worgan	Associate	0.5	240	Ş 120.	Attend team call to
		Pro Bono				discuss final editing of
12/2/2019	Kinney, Megan E.	Fellow	1.2	240	\$ 288.	-
12/2/2015	Kinicy, Wiegan L.	Tenow	1.2	240	Ş 200.	Attend the counsel
						teleconference concerning
						the status of the case,
						including discussion re:
12/4/2019	Fowler, Meg	Associate	0.9	240	\$ 216.	_
12/4/2015		Associate	0.5	240	Ş 210.	
						Participate and take notes
	Tourgee, Olivia					on the team's weekly
12/4/2019	Morgan	Associate	0.9	240	\$ 216.	•
12/4/2015	Worgan	Associate	0.5	240	Ş 210.	Reviewing
						correspondence and
						materials regarding
12/6/2019	Pacio, Kristin A.	Attorney	0.8	410	\$ 328.	
12,0,2013		raconney	0.0	410	<i>Ş</i> <u>520</u> .	Consideration of issues
						with respect to status of
12/9/2019	Pacio, Kristin A.	Attorney	0.4	410	\$ 164.	•
		,				Review Defendants'
						document production to
						identify documents
		Pro Bono				relevant to upcoming
12/9/2019	Kinney, Megan E.	Fellow	4.5	240	\$ 1,080.	
1-1	-77 -0-				, ,	Review and analyze
	Tourgee, Olivia					documents produced by
12/9/2019	Morgan	Associate	2.7	240	\$ 648.	
						Review documents
						produced by defendants
						to identify documents
						relevant to upcoming
12/10/2019	Kane, Joshua	Associate	0.3	410	\$ 123.	
						Review documents
						produced by Defendants
						to identify key documents
						for mediation preparation
		Pro Bono				(2.7); Attend settlement
12/10/2019	Kinney, Megan E.	Fellow	3.6	240	\$ 864.	00 drafting team call (.9).

Date	Name	Title	Hours	Rate	ļ	Amount	Narrative
							Review documents
							produced by defendants
							to identify documents
							relevant to upcoming
12/11/2019	Kane, Joshua	Associate	2.1	410	\$	861.00	mediation.
							Review documents
							produced by Defendants
							for expedited mediation
							preparation; summarize
							key documents;
							disseminate key
		Pro Bono					documents to the rest of
12/11/2019	Kinney, Megan E.	Fellow	4.1	240	\$	984.00	the team.
					Ŧ		
							Complete the mediation
	Tourgee, Olivia						document review batches
12/11/2019	Morgan	Associate	0.8	240	\$	192.00	per review protocol.
12/11/2015	Worgan	Associate	0.0	240	7	152.00	Exchange emails with M.
							Nardi, K. Pacio, and C.
							Schechtman regarding
							mediation (.3); review
							background documents to
12/14/2019	Kana Joshua	Associate	1.6	410	\$	656.00	mediation (1.3).
12/14/2019	Kane, Joshua	Associate	1.0	410	Ş	050.00	Review draft settlement
							proposals (1.9); attend
12/15/2010	Kana Jaahua	A	2 7	44.0	~	1 5 4 7 00	mediation via telephone
12/15/2019	Kane, Joshua	Associate	3.7	410	\$	1,517.00	(1.8).
12/10/2010			2.4	44.0		064.00	Attend mediation via
12/16/2019	Kane, Joshua	Associate	2.1	410	\$	861.00	telephone.
							Reviewing updated
							settlement agreement and
			_				notes regarding
12/16/2019	Pacio, Kristin A.	Attorney	1	410	\$	410.00	mediation.
							Reviewing
							correspondence regarding
12/17/2019	Pacio, Kristin A.	Attorney	0.4	410	\$	164.00	settlement.
							Conference call with team
							re: mediation, discovery,
12/18/2019	Pacio, Kristin A.	Attorney	0.8	410	\$	328.00	and motion to stay.
							Attend weekly team
							phone call re: mediation,
	Tourgee, Olivia						discovery, and motion to
12/18/2019	Morgan	Associate	0.8	240	\$	192.00	stay, and take notes.
							Review draft settlement
12/31/2019	Kane, Joshua	Associate	3.8	410	\$	1,558.00	documents.
							Attend team call to
		Pro Bono					discuss edits to settlement
1/6/2020	Kinney, Megan E.	Fellow	1.4	240	\$	336.00	draft.

Date	Name	Title	Hours	Rate	A	mount	Narrative
							Review Plaintiffs'
							Integrated Draft
							Settlement (.9); attend
							team phone call to
							strategize draft for
	Tourgee, Olivia						Plaintiffs' Integrated Draft
1/6/2020	Morgan	Associate	2.4	240	\$	576.00	Settlement (1.5).
							Reviewing
							correspondence regarding
							settlement negotiations
1/7/2020	Pacio, Kristin A.	Attorney	0.6	410	\$	246.00	and mediation.
							Review the 12(b)(1)
							Discovery Letter drafts
	Tourgee, Olivia						and team
1/10/2020	Morgan	Associate	0.4	240	\$	96.00	correspondence.
_, ,					Ŧ		Reviewing
							correspondence regarding
1/14/2020	Pacio, Kristin A.	Attorney	0.3	410	\$	123.00	settlement.
	,	,					
							Review team
							correspondence regarding
							strategizing mediation
							plans and responses to
							opposing counsel's emails
							and review related articles
							to the case (.4); attend
							weekly team phone call
							discussing mediation,
							discovery requests,
							discovery plan, class
	Tourgee, Olivia						certification motion plan,
1/15/2020	Morgan	Associate	1.4	240	\$	336.00	and local updates (1).
1/13/2020	WOIgan	Associate	1.4	240	Ş	550.00	and local updates (1).
							Confer via teleconference
							with Ms. Juneja, Ms. Pitts,
							and the DLA team
1/10/2020	Fourier Mar-	Accesit	1	240	4	240.00	members regarding
1/16/2020	Fowler, Meg	Associate	1	240	\$	240.00	discovery tasks.
							Attend phone call to
							discuss discovery
	Tauran Olt						preparation with M.
1/10/2020	Tourgee, Olivia	A	0.5	240	4	120.00	Fowler, M. Kinney, P.
1/16/2020	Morgan	Associate	0.5	240	\$	120.00	Juneja, and F. Pitts.
							Deviewir -
							Reviewing
							correspondence and
1/21/2020		A ++	0.4	440	~	464.00	consideration of issues
1/21/2020	Pacio, Kristin A.	Attorney	0.4	410	\$	164.00	with respect to discovery.

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

Date	Name	Title	Hours	Rate	Am	ount	Narrative
							Finalize and edit notes
							from yesterday's team call
							and summarize running
							task list for team (.3); send
							call notes and summary to
							K. Pacio for review and
							then circulate to M.
							Kinney, K. Pacio, C,
							Schechtman, J. Rotenberg,
	Tourgee, Olivia						M. Fowler, J. Calderon, J.
1/24/2020	Morgan	Associate	0.6	240	\$	144.00	Kane, and A. Helms (.3)
1/24/2020	Worgan	Associate	0.0	240	ې ا	144.00	Reviewing brief in
							opposition to motion to
1/28/2020	Pacio, Kristin A.	Attorney	1	410	\$	410.00	dismiss.
1/20/2020		Attorney	Ŧ	410	ب ب	410.00	Attend weekly team call
							re: mediation and
							opposition to motion to
		Pro Bono					dismiss (.8); Attend call
1/29/2020	Kinney, Megan E.	Fellow	1.7	240	\$	408.00	with mediator (.9).
1/25/2020	Kinicy, Wegan E.	Tenow	1.7	240	ب ب	400.00	Teleconference call with
							P. Juneja regarding edits
							and second level review in
1/30/2020	Calderon, Judy	Paralegal	0.5	200	\$	100.00	relativity
1/30/2020	calderoll, Judy	Taracgai	0.5	200	ب ب	100.00	Correspond with Ms.
							Juneja, Ms. Pacio, Ms.
							Tourgee, Ms. Kinney, and
							Ms. Pitts regarding
							upcoming discovery-
1/31/2020	Fowler, Meg	Associate	0.2	240	\$	48.00	related tasks.
1,51,2020	i owier, wieg	7.55001010	0.2	210	Ŷ	40.00	Correspond with Ms.
							Pacio and Ms. Tourgee
							regarding scheduled
							coverage for the week's
							counsel call; correspond
							with Ms. Juneja to
							schedule a call to discuss
2/4/2020	Fowler, Meg	Associate	0.1	240	\$	24.00	discovery.
2/ 1/2020	1000101,0005	7.05001010	0.1	2.10	Ŷ	2 1.00	Conference call with team
							re: mediation, discovery,
							and oppositon to motion
2/5/2020	Pacio, Kristin A.	Attorney	0.7	410	\$	287.00	to dismiss.
, , , ,	,	1	-	-			
		Pro Bono					Review documents
2/5/2020	Kinney, Megan E.	Fellow	2.2	240	\$	528.00	produced by Defendants.
	,, - <u>0</u>	-		-			Attend discovery team call
							discussing document
	Tourgee, Olivia						review protocol on
2/5/2020	Morgan	Associate	1	240	\$	240.00	Relativity.

Date	Name	Title	Hours	Rate	1	Amount	Narrative
		Pro Bono					Review documents
2/6/2020	Kinney, Megan E.	Fellow	2.1	240	\$	504.00	produced by Defendants.
		Pro Bono					Review documents
2/7/2020	Kinney, Megan E.	Fellow	5	240	\$	1,200.00	, ,
		Pro Bono					Conduct document
2/11/2020	Kinney, Megan E.	Fellow	2.2	240	\$	528.00	review.
							Review draft motion to
							dismiss and mediation
							documents (1.5); attend
							status call with plaintiff
							team re opposition to
							Governor's MTD,
							medation updates and
2/12/2020	Kane, Joshua	Associate	2.5	410	\$	1,025.00	next steps (1).
							Attend weekly team call re
							opposition to Governor's
							motion to dismiss,
		Pro Bono					medation updates and
2/12/2020	Kinney, Megan E.	Fellow	1	240	\$	240.00	next steps.
							Review notes from team
							call regarding discovery
2/19/2020	Kane, Joshua	Associate	0.3	410	\$	123.00	and mediation.
							Attend Kansas Discovery
							Team call and discuss
							document review (.3);
	Tourgee, Olivia						attend Kansas Team call
2/19/2020	Morgan	Associate	1.3	240	\$	312.00	and take notes (1).
	Tourgee, Olivia						Review documents
2/20/2020	Morgan	Associate	2.6	240	\$	624.00	produced by Defendants.
							Review and analyze
							documents from the file
							of the original named
							plaintiff, M.J., produced to
							Plaintiffs by the
2/24/2020	Fowler, Meg	Associate	2.5	240	\$	600.00	Defendants.
							Review and analyze
							documents produced to
							Plaintiffs by the
							Defendants; review and
							analyze documents from
							the file of the original
							named plaintiff, M.J.,
- 11 - 1-				_			produced to Plaintiffs by
2/26/2020	Fowler, Meg	Associate	6.3	240	\$	1,512.00	the Defendants.
0 /0 - /		Pro Bono	-		4		Review documents
2/27/2020	Kinney, Megan E.	Fellow	6	240	\$	1,440.00	produced by Defendants.

Date	Name	Title	Hours	Rate	А	mount	Narrative
2/27/2020	Tourgee, Olivia Morgan	Associate	0.2	240	\$	48.00	Confer with M. Fowler about the document review status and progress moving forward.
2/2//2020		Associate	0.2	210	Ŷ	-10.00	
2/28/2020	Kinney, Megan E.	Pro Bono Fellow	7.5	240	\$	1,800.00	Review documents produced by Defendants.
3/1/2020	Fowler, Meg	Associate	0.1	240	\$	24.00	Review emails and documents concerning Plaintiffs' responses to Defendants' responses and objections to Plaintiffs' first set of RFPs.
3/4/2020	Kane, Joshua	Associate	0.8	410	\$	328.00	Attend co-counsel status call re mediation, ESI, third party discovery, stakeholder/local updates.
3/4/2020	Tourgee, Olivia Morgan	Associate	0.7	240	\$	168.00	Attend weekly team phone call to discuss mediation, upcoming discovery priorities, and stakeholder/local outreach.
3/10/2020	Pacio, Kristin A.	Attorney	0.5	410	\$	205.00	Reviewing correspondence and consideration of issues with respect to discovery.
3/11/2020	Pacio, Kristin A.	Attorney	1	410	\$	410.00	Conference call with team re experts, settlement negotiations, discovery.
3/13/2020	Pacio, Kristin A.	Attorney	0.5	410	\$	205.00	Consideration of issues with respect to ESI.
3/13/2020	Kinney, Megan E.	Pro Bono Fellow	0.5	240	\$	120.00	Attend weekly Kansas foster care discovery strategy call.
3/13/2020	Tourgee, Olivia Morgan	Associate	0.5	240	\$	120.00	Attend weekly discovery call with P. Juneja, M. Kinney, D. Adamek, K. Pacio, F. Pitts, M. Fowler, M. Nardi, E. Gretter, K. Setren, J. King, C. Glasspiegel, N. Taykhman, and C. Connaughton.

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

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

Date	Name	Title	Hours	Rate	Am	ount	Narrative
							Attend weekly discovery
							check-in with P. Juneja, M.
							Kinney, D. Adamek, K.
							Pacio, F. Pitts, M. Fowler,
							M. Nardi, E. Gretter, K.
							Setren, J. King, C.
							Glasspiegel, N. Taykhman,
							and C. Connaughton (.3);
							attend team call to discuss
							discovery strategy and
							moving forward after the
							passing of one of the Next
							Friends (1); reach out to
							docketing to find process
							servers and begin the
	Tourgee, Olivia						process of preparing for
4/3/2020	Morgan	Associate	2	240	\$	480.00	service (.7).
							Review emails from co-
4/4/2020	Kana Jaahua	A	0.1	44.0	ć	44.00	counsel regarding
4/4/2020	Kane, Joshua	Associate	0.1	410	\$	41.00	potential experts.
							Review email from Ms.
							Juneja regarding the
							various scenarios for
							extensions in the case and
					4		discovery due to the
4/7/2020	Fowler, Meg	Associate	0.1	240	\$	24.00	coronavirus.
							Exchange emails with co-
							counsel team and DLA
							team regarding upcoming
. 10 / 2020							meet-and-confer with
4/8/2020	Kane, Joshua	Associate	0.4	410	\$	164.00	defendants.
							Participate in weekly all-
							counsel call re meet and
							confer with Defendants,
							discovery issues, next
4/0/2020		A	0.0	240	ć	246.00	friend/client updates,
4/8/2020	Fowler, Meg	Associate	0.9	240	\$	216.00	experts, local updates.
							Attend and take notes on
							Kansas weekly team call
							discussing meet and
							confer with defendants,
							discovery issues, Next
							Friends developments,
4/0/2020	Tourgee, Olivia	Accesit	0.0	240	~	210.00	experts, and
4/8/2020	Morgan	Associate	0.9	240	\$	216.00	local/stakeholder updates.

Date	Name	Title	Hours	Rate	Α	mount	Narrative
							Evelopeo emeile with O
							Exchange emails with O. Tourgee regarding service
4/9/2020	Kane, Joshua	Associate	0.6	410	\$	246.00	of third-party subpoenas.
4/9/2020	Kane, Joshua	Associate	0.0	410	Ş	240.00	or third-party subpoends.
							Coordinate with P. Juneja,
							J. Kane, and K. Owens
							regarding service of
							subpoenas on Amerigroup
	Tourgee, Olivia						Kansas, Aetna, Sunflower,
4/9/2020	Morgan	Associate	0.9	240	\$	216.00	and United.
							Correspond with Ms.
							Tourgee regarding the
							review of the named
4/10/2020	Fowler, Meg	Associate	0.3	240	\$	72.00	plaintiff file.
							Coordinate with K. Owens
							regarding service of
							subpoenas on Amerigroup
							Kansas, Aetna, Sunflower,
							and Unitedand circulate
	Tourgee, Olivia						the certified receipts to T. Woody, P. Juneja, M.
4/10/2020	Morgan	Associate	1.4	240	\$	336.00	Nardi, F. Pitts, and J. Kane.
4/10/2020	Worgan	Associate	1.4	240	,	550.00	Narai, F. Fitts, and J. Raile.
							Review previous discovery-
							related correspondence in
							preparation for meet and
							confer with opposing
4/14/2020	Kane, Joshua	Associate	0.4	410	\$	164.00	counsel.
							Review correspondence
							with defendants in
							preparation for meet and
							confer regarding discovery
4/15/2020	Kane, Joshua	Associate	1.3	410	\$	533.00	issues.
							Conferring with team
							regarding discovery meet
							and confer, Named
	_	• • •			1		Plaintiffs, Next Friends,
4/15/2020	Pacio, Kristin A.	Attorney	1.2	410	\$	492.00	and potential experts
							Poviow ompile planning
4/16/2020	Fowler, Meg	Associate	0.2	240	\$	48.00	Review emails planning Friday's meet and confer.
4/ 10/ 2020	רטאוכו, ועופצ	Associate	0.2	240	ې	40.00	Legal research regarding
							scheduling order and
							preparing summary of
4/16/2020	Pacio, Kristin A.	Attorney	3.4	410	\$	1,394.00	research.
1, 10, 2020		, acomey	017	.10	Ŷ	_,004.00	rescaron

Date	Name	Title	Hours	Rate	ļ	Amount	Narrative
							Participate in meet and
							confer with Defendants
4/17/2020	Kane, Joshua	Associate	1.2	410	\$	492.00	regarding discovery.
							Attend meet and confer
							with Defendants to
		Pro Bono	2	2.42			discuss outstanding
4/17/2020	Kinney, Megan E.	Fellow	2	240	\$	480.00	discovery issues.
							Summarize key documents from DLA's
							general document review;
							circulate summaries to the
4/19/2020	Fowler, Meg	Associate	5	240	\$	1,200.00	group.
4/15/2020	i owier, weg	7.55061410		240	Ŷ	1,200.00	Exchange emails with co-
							counsel regarding 4/17
4/20/2020	Kane, Joshua	Associate	0.2	410	\$	82.00	meet-and-confer.
							Reviewing memorandum
							regarding key documents
4/20/2020	Pacio, Kristin A.	Attorney	0.5	410	\$	205.00	from discovery.
							Discuss third party
	Tourgee, Olivia						subpoenas with P. Juneja
4/20/2020	Morgan	Associate	0.3	240	\$	72.00	and K. Owens.
							Discuss case schedule and
							discovery with co-counsel
							(.5); exchange emails with
							Sunflower Health Plan
							regarding third-party
							subpoena (.4); attend
							meet-and-confer with
							opposing counsel regarding discovery and
4/21/2020	Kane, Joshua	Associate	3.3	410	\$	1,353.00	case schedule (2.4).
4/21/2020	Kane, Joshua	Associate	5.5	410	Ļ	1,555.00	Attend meet and confer
							with Defendants to
		Pro Bono					discuss outstanding
4/21/2020	Kinney, Megan E.	Fellow	1.5	240	\$	360.00	discovery issues.
, ,	- // -0-						Attend meet and confer
							call to discuss discovery
	Tourgee, Olivia						follow-up items and
4/21/2020	Morgan	Associate	0.7	240	\$	168.00	schedule.
							Review privilege log,
							redaction log, and
							litigation hold letters
							provided by Defendants
							(.9); attend status call with
4/22/2020	Kane, Joshua	Associate	1.9	410	\$	779.00	co-counsel (1.0).

Date	Name	Title	Hours	Rate	/	Amount	Narrative
							Attend the weekly counsel
							call, including discussion
							re discovery, experts, next
							friends and take notes on
							the call for circulation to
4/22/2020	Fowler, Meg	Associate	0.9	240	\$	216.00	the DLA group.
							Review subpoena to
							Sunflower Health (.8);
							review list of proposed
							search terms in
							preparation for meet and
							confer (2.1); exchange
							emails with opposing
							counsel and co-counsel
							regarding meet and
4/23/2020	Kane, Joshua	Associate	3.1	410	\$	1,271.00	confer (.2).
							Review discovery requests
							to Defendants in
							preparation for meet and
							confer regarding ESI
4/25/2020	Kane, Joshua	Associate	0.3	410	\$	123.00	search terms.
							Review discovery requests
							and correspondence in
							preparation for meet and
4/26/2020	Kane, Joshua	Associate	1.1	410	\$	451.00	confer regarding ESI.
472072020	Rune, Joshuu	Associate	1.1	410	,	451.00	conter regulating ESI.
							Review document
							requests, correspondence
							between parties, and ESI
							search terms to prepare
							for meet and confer
							regarding ESI (2.6);
							participate in meet and
							confer (1.1); exchange
							emails with Amerigroup
							Kansas regarding
4/27/2020	Kane, Joshua	Associate	4.1	410	\$	1,681.00	subpoena (.4).
, ,	,				ŕ	,	Prepare for and attend
							meet and confer with
							Amerigroup regarding
4/28/2020	Kane, Joshua	Associate	0.8	410	\$	328.00	third-party subpoena.

Date	Name	Title	Hours	Rate	ļ	Amount	Narrative
							Participate in meet and
							confer regarding ESI terms
							(2.5); participate in case
							status call with co-counsel
							re: Defendants'
							productions, third party
							subpoenas, experts, and
4/29/2020	Kane, Joshua	Associate	4	410	\$	1,640.00	Next Friends (1.5).
							Attend and take notes on
							Kansas weekly call (1.4);
							draft email summarizing
							notes from call to
	Tourgee, Olivia						circulate to DLA Piper's
4/29/2020	Morgan	Associate	2.2	240	\$	528.00	internal Kansas team (.8).
							Attend co-counsel
							strategy call in advance of
							meet and confer on
							discovery issues (1.3);
							review draft amended
							case schedule (.2); draft
							email to defendants
							regarding production
							deficiencies (1.6); review
							Defendants' initial
							interrogatories and
							requests for production
5/1/2000	Kane, Joshua	Associate	3.2	410	\$	1,312.00	(.1).
							Correspond with Mr. Kane
							regarding the production
							issues with the file of
							former named plaintiff,
4/30/2020	Fowler, Meg	Associate	0.2	240	\$	48.00	M.J.
							Correspond with Mr. Kana
							Correspond with Mr. Kane
							regarding production
							issues with the file of
							former named plaintiff,
F /4 /2020		•		240	~	246.00	M.J.; review the file for
5/1/2020	Fowler, Meg	Associate	0.9	240	\$	216.00	specific production issues.
							Analyze documents
							previously reviewed in
							connection with
							production defiencies
							being identified to
							Defendants for discussion
							(.6); attend KS Foster Care
, .	Tourgee, Olivia						Discovery Follow-up call
5/1/2020	Morgan	Associate	1.4	240	\$	336.00	(.8).

Date	Name	Title	Hours	Rate	1	Amount	Narrative
							Review Defendants'
							response to settlement
5/4/2020	Kane, Joshua	Associate	1.5	410	\$	615.00	proposal.
							Exchange emails with co-
							counsel and opposing
							counsel regarding meet
5/5/2020	Kane, Joshua	Associate	0.9	410	\$	369.00	and confer on ESI.
							Coordinate review of the
							file of the former named
5/5/2020	Fowler, Meg	Associate	0.5	240	\$	120.00	plaintiff, M.J.
	, 0						Revise draft ESI terms
							(1.8); attend case status
							call with co-counsel re:
							case schedule, meet and
							confer with Defendants,
							and settlement strategy
F / C / 2020	Kasalah		2 5	44.0	~	4 005 00	(1.2); attend internal DLA
5/6/2020	Kane, Joshua	Associate	2.5	410	\$	1,025.00	case status call (.5).
							Conferring with team re:
							case schedule, meet and
			_				confer with Defendants,
5/6/2020	Pacio, Kristin A.	Attorney	0.5	410	\$	205.00	and settlement strategy.
							Attend call with C.
							Schechtman, K. Pacio, A.
							Helms, J. Kane, M. Fowler,
							J. Rotenberg, J. Calderon,
							and M. Kinney to discuss
							status of Kansas case and
							strategy moving forward
	Tourgee, Olivia						(.5); attend weekly Kansas
5/6/2020	Morgan	Associate	1.6	240	\$	384.00	call (1.1).
							Revise and supplement list
5/7/2020	Kane, Joshua	Associate	2.5	410	\$	1,025.00	of draft ESI search terms.
							Revise draft ESI search
							terms (2.5); exchange
							emails with co-counsel
							regarding search terms
5/8/2020	Kane, Joshua	Associate	3.4	410	\$	1,394.00	(.9).
							Confer with Ms. Juneja,
							Ms. Nardi, and team
							regarding discovery
5/8/2020	Fowler, Meg	Associate	0.5	240	\$	120.00	issues.
	Tourgee, Olivia						Attend Meet and Confer
5/8/2020	Morgan	Associate	0.5	240	\$	120.00	with opposing counsel.
, , , ,	- 0			-			Review co-counsel's edits
5/10/2020	Kane, Joshua	Associate	0.2	410	\$	82.00	to draft ESI search terms.
5, 10, 2020	Rancy Joshuu	, 100001010	0.2	710	Ý	02.00	to arare Eor Search terms.

Date	Name	Title	Hours	Rate	Amount	Narrative
						Discuss ESI search terms
						with NCYL (.6); revise draft
						list of search terms (2.5);
						exchange emails with
						opposing counsel
						regarding search terms
						(.3); exchange emails with
						Aetna regarding subpoena
5/11/2020	Kane, Joshua	Associate	3.6	410	\$ 1,476.00	(.2).
	,					Discuss third-party
						subpoena with Aetna (.1);
						exchange emails with M.
						Fowler regarding
						document review (.1);
						exchange emails with co-
						counsel regarding
5/12/2020	Kane, Joshua	Associate	0.4	410	\$ 164.00	discovery (.2).
5/12/2020	Kalle, Joshua	Associate	0.4	410	5 104.00	
						Prepare for deposition of
						Jason Koehn (.1); attend
						case status call with co-
						counsel re: settlement,
						depositions, and
						responding to Defendants'
5/13/2020	Kana Jashua	Associate	1.4	410	\$ 574.00	
5/15/2020	Kane, Joshua	Associate	1.4	410	\$ 574.00	discovery requests (1.3).
						Attend weekly counsel
						, call, including discussion
						re: settlement,
						depositions, and
						responding to Defendants'
5/13/2020	Fowler, Meg	Associate	1.1	240	\$ 264.00	discovery requests.
3/13/2020		7.55001010	1.1	240	<i>Ş</i> 204.00	Attend weekly call to
						discuss the settlement
						draft; case schedule;
						discovery updates
						regarding upcoming
						deposition, redaction log
						-
						issue, responding to
						defendants' discovery
						requests, and third party
	T					discovery; potential
	Tourgee, Olivia					experts; and local
5/13/2020	Morgan	Associate	1.2	240	\$ 288.00	updates.
						Exchange emails with
- 14 - 1- 4					.	Aetna regarding third-
5/14/2020	Kane, Joshua	Associate	0.2	410	\$ 82.00	party subpoena.

Date	Name	Title	Hours	Rate	Amount	Narrative
						Discuss ESI issues with
						opposing counsel (.5);
						exchange emails with P.
						Juneja and M. Nardi
						regarding deposition
						preparation (.4); review
						emails with Sunflower's
						counsel regarding
						subpoena (.1); exchange
						emails with opposing
						counsel regarding
E /4 E /2020			1.2	44.0	¢ 533.00	subpoena to United
5/15/2020	Kane, Joshua	Associate	1.3	410	\$ 533.00	
- / - /	Tourgee, Olivia					Attend weekly discovery
5/15/2020	Morgan	Associate	0.1	240	\$ 24.00	
						Discuss deposition of
						Jason Koehn with P.
5/18/2020	Kane, Joshua	Associate	1	410	\$ 410.00	,
						Discuss logistics of
						deposition of Jason Koehn
						with co-counsel and
						deposition services
5/19/2020	Kane, Joshua	Associate	1.1	410	\$ 451.00	provider.
						Exchange emails with co-
						counsel, opposing
						counsel, and deposition
						vendor regarding
						deposition of Jason
5/20/2020	Kane, Joshua	Associate	0.8	410	\$ 328.00	Koehn.
						Create DLA weekly call
						schedule for June and July
						and circulate to DLA team
						(.3); attend and take notes
						on weekly team call re:
						discovery, mediation, and
						experts (1.1); draft notes
	Tourgee, Olivia					of weekly call and
5/20/2020	Morgan	Associate	2.1	240	\$ 504.00	-
-, -,	- 0				,	
						Draft deposition outline
						for Jason Koehn (.8);
						exchange emails with co-
						counsel and vendor
5/21/2020	Kane, Joshua	Associate	1.9	410	\$ 779.00	regarding deposition (1.1).
51 2 11 2020	Kunc, Joshua	Associate	1.7	710	۶ <i>۲۱۶</i> .00	

	ate in ESI meet-
and-coi	nfer (.8); discuss
depositio	on of Jason Koehn
with N	1. Nardi and P.
June	eja, including
particip	ating in remote
5/22/2020 Kane, Joshua Associate 3.7 410 \$ 1,517.00 depos	ition trial (2.9).
Drat	ft outline for
depos	sition of Jason
5/23/2020 Kane, Joshua Associate 2.8 410 \$ 1,148.00	Koehn.
Drat	ft outline for
depositio	on of Jason Koehn
(6.3); e	xchange emails
	Juneja and M.
	egarding outline
5/24/2020 Kane, Joshua Associate 6.4 410 \$ 2,624.00	(.1).
	se outline for
depo	sition of Jason
5/25/2020 Kane, Joshua Associate 5.7 410 \$ 2,337.00	Koehn.
	position of Jason
5/26/2020 Kane, Joshua Associate 7.2 410 \$ 2,952.00	Koehn.
	named plaintiff
	le review.
	ate in case status
	th co-counsel.
Attend t	eam call re: case
schedu	le, depositions,
third p	arty discovery,
respondi	ng to Defendants'
Pro Bono discove	ry requests, and
5/27/2020 Kinney, Megan E. Fellow 1 240 \$ 240.00	experts.
Attend	weekly Kansas
tean	n call re: case
schedu	le, depositions,
third p	arty discovery,
respondi	ng to Defendants'
Tourgee, Olivia discove	ry requests, and
5/27/2020 Morgan Associate 1 240 \$ 240.00	experts.
	named plaintiff
	ment review.
	w and analyze
	ned plaintiff
	ocuments.
	and coordinate
with Ms	. Kinney and Ms.
	, e regarding the
	d plaintiff files.
	named plaintiff
	ment review.

Date	Name	Title	Hours	Rate	ļ	Amount	Narrative
							Review and analyze
							named plaintiff
							documents (4.1); attend
							internal settlement
							discussion to discuss
							settlement strategy,
							Defendants' proposals,
							and various terms and
							approaches used in the
							settlement (1.5); attend
							Kansas updates call with
							M. Fowler and M. Kinney
	Tourgee, Olivia						to discuss status of
5/29/2020	Morgan	Associate	7.1	240	\$	1,704.00	discovery (.5).
	<u>U</u>						Discuss third-party
							subpoena to Sunflower
							with Sunflower counsel
							(.1); exchange emails
							regarding third-party
							subpoenas with P. Juneja
6/1/2020	Kane, Joshua	Associate	0.2	410	\$	82.00	(.1).
							Review and analyze
							named plaintiff
							documents as per the
	Tourgee, Olivia						Named Plaintiff Document
6/2/2020	Morgan	Associate	1.4	240	\$	336.00	Review Protocol.
							Review correspondence
							regarding settlement
							negotiations (.1);
							correspond with counsel
							for Amerigroup Kansas
							regarding third-party
6/3/2020	Kane, Joshua	Associate	0.2	410	\$	82.00	subpoena (.1).
							Attend the weekly counsel
							call, including discussion
							re: MTD order, settlement
6/3/2020	Fowler, Meg	Associate	1	240	\$	240.00	prep, and discovery.
							Review and analyze
							named plaintiff
							documents (3.9); attend
	Tourgee, Olivia						and take notes on weekly
6/3/2020	Morgan	Associate	4.9	240	\$	1,176.00	team call (1).
							Discuss third-party
			• -		4		subpoena with counsel for
6/4/2020	Kane, Joshua	Associate	0.3	410	\$	123.00	Amerigroup Kansas.
C 1 1 2 2 2 2			<u> </u>			005 05	Reviewing order on
6/4/2020	Pacio, Kristin A.	Attorney	0.5	410	\$	205.00	motion to dismiss.

Date	Name	Title	Hours	Rate	ļ	Amount	Narrative
		Pro Bono					Review named plaintiff
6/4/2020	Kinney, Megan E.	Fellow	6.1	240	\$	1,464.00	files.
							Attend meet and confer
							with opposing counsel
6/5/2020	Kane, Joshua	Associate	1	410	\$	410.00	regarding ESI.
							Review and analyze
	Tourgee, Olivia						named plaintiff
6/5/2020	Morgan	Associate	1.6	240	\$	384.00	documents.
							Review revised ESI search
							terms (.2); exchange
							emails with P. Juneja and
							M. Nardi regarding search
6/8/2020	Kane, Joshua	Associate	0.3	410	\$	123.00	terms (.1).
							Review and analyze
	Tourgee, Olivia						named plaintiff
6/8/2020	Morgan	Associate	3.1	240	\$	744.00	documents.
0,0,2020		1.000014.00	0.1		+		
							Review correspondence
6/12/2020	Kane, Joshua	Associate	0.1	410	\$	41.00	regarding case settlement.
0,, _00		1.000014.00	0.1		Ŧ		Correspond with Ms.
							Tourgee and Ms. Kinney
							regarding the status of the
							file review for former
6/14/2020	Fowler, Meg	Associate	0.2	240	\$	48.00	named plaintiff M.J.
0/14/2020		7.55001400	0.2	240	Ŷ	40.00	Correspond with Ms.
							Tourgee and Ms. Kinney
							regarding the review of
							the file of former named
6/15/2020	Fowler, Meg	Associate	0.1	240	\$	24.00	plaintiff M.J.
0/13/2020		Associate	0.1	240	Ļ	24.00	Send M. Fowler updated
							excel sheet with the
							coding and comments for
	Tourgee, Olivia						the Named Plaintiff
6/15/2020	Morgan	Associate	0.2	240	\$	48.00	Document Review.
0/13/2020	Worgan	Associate	0.2	240	ڔ	48.00	Review correspondence
							relating to third-party
6/16/2020	Kane, Joshua	Associate	0.5	410	\$	205.00	subpoenas.
0/ 10/ 2020	Nane, Jushud	ASSOCIALE	0.5	410	Ş	205.00	Reviewing
							-
6/16/2020	Dacio Kristia A	Attornay		410	ć	205.00	correspondence regarding settlement.
6/16/2020	Pacio, Kristin A.	Attorney	0.5	410	\$	205.00	Review correspondence
							•
							with third parties
							regarding third-party
							subpoenas (.5); attend
C /17 /2020	Kons Issle	A	4.0	440	~	720.00	internal team status call
6/17/2020	Kane, Joshua	Associate	1.8	410	\$	738.00	(1.3).

Attend weekly tphone call to disproposed settlerrevisions; dismisecertain Named Placlient approval ansteps; preliminapproval motionnotice; contactchambers aboutpreferred scheduleparty discovery; caDefendants tomocalls with Judy andon Monday; motiaattorney's fees; ar6/17/2020MorganAssociate1.2240\$ 288.00press release	cuss nent sal of intiffs; d next ary and ing the s; third II with rrow; Karen
Tourgee, Olivia	nent sal of intiffs; d next ary and ing the e; third II with rrow; Karen
Tourgee, Olivia	al of intiffs; d next ary and ing the c; third II with rrow; Karen
Tourgee, Olivia Tourgee, Olivia certain Named Plaction Approval and steps; prelimin approval and steps; prelimin approval motion notice; contact chambers about preferred schedule party discovery; calls with Judy and on Monday; motion attorney's fees; and attorney's fees;	intiffs; d next ary and ing the e; third II with rrow; Karen
Tourgee, Olivia Image: Client approval and steps; prelimin approval motion notice; contact chambers about preferred schedule party discovery; call on Monday; motion on Monday; motion attorney's fees; and the set of the	d next ary and ing the e; third II with rrow; Karen
Tourgee, Olivia	ary and ing the ; third II with rrow; Karen
Tourgee, Olivia	and ing the ; third II with rrow; Karen
Tourgee, Olivia	ing the e; third II with rrow; Karen
Tourgee, Olivia Chambers about Chambers about Chambers about Chambers about Chambers about Chambers about Chambers about Chambers about <td>the ; third II with rrow; Karen</td>	the ; third II with rrow; Karen
Tourgee, Olivia	e; third ll with rrow; Karen
Tourgee, Olivia	ll with rrow; Karen
Tourgee, Olivia Defendants tomo Tourgee, Olivia Defendants tomo	rrow; Karen
Tourgee, Olivia calls with Judy and on Monday; motive attorney's fees; and the set of the s	Karen
Tourgee, Olivia on Monday; motionation	
Tourgee, Olivia on Monday; motionation	
	on for
Reviewing	
correspondence re	garding
6/18/2020 Pacio, Kristin A. Attorney 0.5 410 \$ 205.00 settlement.	
Attend Settlement	rocess
Tourgee, Olivia Discussion with	:h
6/18/2020 Morgan Associate 1 240 \$ 240.00 Defendants' cou	nsel.
Attend the weekly	counsel
call, including disc	
re: Attorney Gen	
proposed settler	
revisions and m	edia
6/24/2020 Fowler, Meg Associate 1.6 240 \$ 384.00 strategy.	
Attend weekly t	eam
phone call to discu	ss our
response to the At	torney
General's propo	sed
settlement changes	
approvals; timelir	
preliminary appr	
motion, notice,	
approval motion, a	
Tourgee, Olivia motion; press relea	
6/24/2020 Morgan Associate 0.8 240 \$ 192.00 local updates	
Conference call wit	
re: next steps	
settlement appro	
dismissal of cer	
Named Plaintii	
preliminary appr	
motion, and pr	
7/1/2020 Pacio, Kristin A. Attorney 1 410 \$ 410.00 strategy.	

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

Date	Name	Title	Hours	Rate	Amount	Narrative
						Confer with J. Kane about
						drafting the supporting
						declarations (.3); email
						DLA team to discuss
						drafting the supporting
						declarations (.2); draft
						supporting declaration of
7/46/2020	Tourgee, Olivia		4.0	2.42		DLA Piper and send to J.
7/16/2020	Morgan	Associate	1.2	240	\$ 288.00	
						Revise declaration in
						support of motion to
						approve settlement (.7);
						exchange emails with O.
7/47/2020	Kara tasha a		0.0	44.0	¢ 220.00	Tourgee regarding
7/17/2020	Kane, Joshua	Associate	0.8	410	\$ 328.00	
						Circulate draft of
7/17/2020	Tourgee, Olivia	Assasiata	0.2	240	ć 10.00	supporting declaration to
7/17/2020	Morgan	Associate	0.2	240	\$ 48.00	DLA team. Revise declaration in
7/20/2020	Kana Jashua	Associate	1	410	\$ 410.00	support of appointment of class counsel.
7/20/2020	Kane, Joshua	Associate	1	410	\$ 410.00	Class counsel.
						Confer with J. Kane about
						supporting declaration
	Tourgee, Olivia					(.2); revise and send draft
7/20/2020	Morgan	Associate	0.6	240	\$ 144.00	
772072020	Worgan	Associate	0.0	240	Ş 144.00	
						Revise declaration in
						support of appointment of
						class counsel (.2);
						exchange emails with O.
						Tourgee and B. Yang
7/21/2020	Kane, Joshua	Associate	0.5	410	\$ 205.00	
, ,	,					Confer with J. Kane, B.
						Yang, and C. Schechtman
						regarding draft of
						declaration in support of
	Tourgee, Olivia					approval motion and pro
7/21/2020	Morgan	Associate	1.1	240	\$ 264.00	
						Exchange emails with O.
						Tourgee regarding pro hac
						vice papers and
						declaration in support of
						appointment of class
						counsel (.5); attend team
7/22/2020	Kane, Joshua	Associate	1	410	\$ 410.00) status call (.5).

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

Exhibit B

4/29/2019 Sager, David S. Partner Parking/Mileage 04/20/19 - TRAVEL FROM NEWARK TO KANSAS CIT FOR MEETING WITH ATTORNEYS AND ENTIRE TEAM NEWARK AIRPOR 4/29/2019 Sager, David S. Partner Reimbursement \$ 78.00 PARKING. 4/29/2019 Sager, David S. Partner Hotel \$ 04/18/19 - TRAVEL FROM NEWARK TO KANSAS CIT FOR MEETING WITH ATTORNEYS AND ENTIRE TEAM ONE NIGHT STAN ATTORNEYS AND ENTIRE TEAM UBER FROM NEWARK TO KANSAS CIT FOR MEETING WITH ATTORNEYS AND ENTIRE TEAM UBER FROM NEWARK TO KANSAS CIT FOR MEETING WITH ATTORNEYS AND ENTIRE TEAM UBER FROM NEWARK TO KANSAS CIT FOR MEETING WITH ATTORNEYS AND ENTIRE TEAM UBER FROM NEWARK TO KANSAS CIT FOR MEETING WITH ATTORNEYS AND ENTIRE TEAM UBER FROM NEWARK TO KANSAS CIT FOR MEETING WITH ATTORNEYS AND ENTIRE TEAM UBER FROM NEWARK TO KANSAS CIT FOR MEETING WITH ATTORNEYS AND ENTIRE TEAM UBER FROM NEWARK TO KANSAS CIT FOR MEETING WITH ATTORNEY SAND ENTIRE TEAM UBER FROM NEWARK TO KANSAS CIT FOR MEETING WITH ATTORNEY SAND ENTIRE TEAM UBER FROM NEWARK TO KANSAS CIT FOR MEETING WITH ATTORNEY AND ENTIRE TEAM UBER FROM NEWARK TO KANSAS CIT FOR MEETING WITH ATTORNEY SAND ENTIRE TEAM UBER FROM NEWARK TO KANSAS CIT FOR MEETING WITH ATTORNEY DAVID S. SAGER TO ADPEAD PRO SAGER TO ADPEAD PRO ADTORNEY DAVID S. SAGER TO ADPEAD PRO ADTORNEY DAVID S. SAGE	Date	Name	Title	Description	A	mount	Narrative
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ATTORNEY DAVID S.	4/23/2013	Sager, Davia S.	rartici		Ŷ	55.50	
		Griffin, Marcus	Docketing	Filing/Recording			SAGER TO APPEAR PRO
5/14/2019 Lee Mgr. Fees \$ 50.00 HAC VICE.	5/14/2019		-		\$	50.00	
	3/11/2013			1005	Ŷ	50.00	FILING THE MOTION FOR
ATTORNEY WILLIAM J.							
Griffin, Marcus Docketing Filing/Recording DIGGS TO APPEAR PRO		Griffin Marcus	Docketing	Filing/Recording			
5/14/2019LeeMgr.Fees\$50.00HAC VICE.	5/14/2019		-	•	Ś	50.00	
MEETING TRAVEL TO:	0,, 2010				-	20.00	
NEW YORK -							
							NEWARK/HOUSTON/CORP
							US CHRISTI/KANSAS CITY,
Out-of-Town MO 08-APR-19 TICKET				Out-of-Town			
5/31/2019 Sager, David S. Partner Travel \$ 35.00 #0765228971	5/31/2019	Sager, David S	Partner		Ś	35.00	

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

Date	Name	Title	Description		Amount	Narrative
						CAR SERVICE/TAXI -
						VENDOR: KRISTIN PACIO -
						11/12/19 - TRAVEL TO
						KANSAS CITY FOR
						MEDIATION - CAR SERVICE
11/22/2019	Pacio, Kristin A.	Attorney	Car Service/Taxi	\$	155.49	FROM AIRPORT TO HOME
						CAR SERVICE/TAXI -
						VENDOR: KRISTIN PACIO -
						11/11/19 - TRAVEL TO
						KANSAS CITY FOR MEDIATION - UBER FROM
11/22/2010	Decie Kristin A		Con Comiso /Toui	~	24 50	
11/22/2019	Pacio, Kristin A.	Attorney	Car Service/Taxi	\$	34.58	AIRPORT TO HOTEL
						CAR SERVICE/TAXI -
						VENDOR: KRISTIN PACIO -
						11/12/19 - TRAVEL TO
						KANSAS CITY FOR
						MEDIATION - UBER FROM
11/22/2019	Pacio, Kristin A.	Attorney	Car Service/Taxi	\$	30.97	HOTEL TO AIRPORT
		· · · ·				TRAVEL TO: NEW YORK -
						NEWARK/KANSAS CITY,
	Schechtman,		Out-of-Town			MO 11-NOV-19 TICKET
12/20/2019	Caryn G.	Partner	Travel	\$	35.00	#0790841197
						TRAVEL TO: NEW YORK -
						NEWARK/KANSAS CITY,
	Schechtman,					MO 11-NOV-19 TICKET
12/20/2019	Caryn G.	Partner	Air Fare	\$	529.00	#7471491457
						TRAVEL TO: NEW YORK -
						NEWARK/KANSAS CITY,
			Out-of-Town			MO 11-NOV-19 TICKET
12/20/2019	Pacio, Kristin A.	Attorney	Travel	\$	35.00	#0791235231
						TRAVEL TO: NEW YORK -
						NEWARK/KANSAS CITY,
						MO 11-NOV-19 TICKET
12/20/2019	Pacio, Kristin A.	Attorney	Air Fare	\$	734.75	#7473745886
						VENDOR: PUBLIC
						CATALYST GROUP
						CORPORATION PAYMENT
						FOR DOCUMENT REVIEW,
2/14/2020	Helms, Anne			~		TRAVEL, CONFERENCES
2/14/2020	Geraghty	Of Counsel	Miscellaneous	\$	9,263.54	WITH COURT

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