

**IN THE UNITED STATES DISTRICT COURT  
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,

vs.

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.

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

**MEMORANDUM IN OPPOSITION TO  
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND EXPENSES**

Defendants Laura Howard, in her official capacity as Secretary of the Kansas Department for Children and Families, Dr. Lee A. Norman, in his official capacity as Secretary of the Kansas Department of Health and Environment, and Laura Howard,

in her official capacity as Secretary of the Kansas Department for Aging and Disability Services, offer their Memorandum in Opposition to Plaintiffs' Motion for Attorneys' Fees and Expenses. [Doc. 143].

Plaintiffs filed this case as a class action lawsuit, seeking to improve the workings of the Kansas foster care system on behalf of similarly-situated children in DCF Custody in November 2018, right after the election. Because of the shared interests, Defendants immediately expressed a willingness to participate in early mediation. The parties began mediation in November of 2019 and in July of 2020, the parties reached a Settlement Agreement to resolve the Plaintiffs' claims. Defendants are certainly pleased that the parties were able to settle this case and put an end to this litigation, allowing Defendants to focus on their priority of serving Kansas' children. In opposing this request, Defendants are by no means discounting the importance of improving the ways that the Kansas foster care system can address the needs of those that it serves, which now includes Defendants' commitment to the terms agreed to in this Settlement Agreement.

Defendants' assent and support for this Settlement Agreement does not extend to the Plaintiffs' recent Motion for Attorneys' Fees and Expenses. [Doc. 143]. Plaintiffs' attorneys are requesting that they be reimbursed to the tune of nearly \$ 4 million dollars (\$3,753,896.50 in fees and \$128,476.01 in expenses) of costs that they claim to have expended over the course of this litigation. This request is simply unreasonable in every sense of the word.

Plaintiffs filed this lawsuit under the guise of seeking improvements for children in Kansas foster care. Plaintiffs filed this case at a time after State agencies had endured years of massive budgetary cuts, which stretched the resources of these agencies, including the Defendants. Plaintiffs' lawsuit complained in great detail about a lack of adequate resources being dedicated to these agencies serving Kansas children. It seems incongruous that Plaintiffs' counsel is now asking Kansas taxpayers to foot the bill for their exorbitant fees. Plaintiffs' attorneys are asking for nearly four million dollars in fees, to be paid from the same State coffers that fund the programs that they seek to improve. Defendants question whether Plaintiffs' lawyers are attempting to benefit from this settlement even more so than Kansas' children given that Defendants believe they can achieve the performance improvements and outcomes detailed in the Settlement Agreement without requesting additional monies.

The request for fees might not have been so objectionable were it not for the sheer excess that this request entails. As Defendants have attempted to highlight in this response and with the attached summaries from Plaintiffs' billing records, Plaintiffs billed anything, and everything, to this case. Plaintiffs engaged five separate firms/law offices, utilizing 25 attorneys, billing over 10,000 hours to this case. Plaintiffs' motion contends that counsel exercised great restraint in making their ask for this award. Their accompanying statements, however, demonstrate otherwise. The moderation that Plaintiffs have exercised in this fee request mirrors that of a group of teenage boys who have been invited to a free pizza buffet.

Defendants also zealously defended the claims in this case and performed work that parallels the work by Plaintiffs' counsel. Defendants engaged two different outside law firms to defend the named Defendants, one following the other. Ex. A [Depew Decl.] ¶¶ 5,6. Defendant's current team at Lathrop GPM is made up of just five attorneys and two paralegals. To date, Defendants have spent \$1,028,472.68 in fees and expenses in the defense of this case, roughly a quarter of the amounts that Plaintiff is currently seeking.<sup>1</sup> Ex. A, ¶ 7.

There are many reasons to reject Plaintiffs' request for fees, and Defendants would urge the Court to do so, either by cutting the request significantly, or denying it altogether. Plaintiffs bear the burden of establishing both that they are entitled to this fee award and that the proposed award is reasonable. Plaintiffs have not met either burden here.

**I. FEDERAL LAW DOES NOT SUPPORT PLAINTIFFS' CLAIM FOR FEES**

Before we can tackle the mountain that is Plaintiffs' fee request, we must first address the foothills. In order for Plaintiffs to recovery *any* fee in this litigation, Plaintiffs must demonstrate that they are entitled to fees under applicable law. *See Robinson v. City of Edmond*, 160 F.3d 1275, 1280 (10<sup>th</sup> Cir. 1998).

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<sup>1</sup> This amount includes some duplication that was unavoidable when current counsel for Defendants replaced previous counsel.

### A. Plaintiffs' Legal Basis for Fees

Plaintiffs claim entitlement to reasonable attorneys' fees as an award for their section 1983 claims under 42 U.S.C. § 1988. [Doc. 143] at 13; [Doc. 63] Count I.<sup>2</sup> Plaintiffs (more specifically, Plaintiffs' attorneys), claim that they are entitled to be awarded almost \$4 million dollars in fees and expenses, as they have "obtained a favorable, court-enforceable settlement requiring substantial changes on the part of Defendants that will significantly benefit the Class." *Id.*

42 U.S.C. § 1988 provides that a prevailing party on a claim brought under § 1983 may be entitled to an award of reasonable attorney's fees as part of the costs. A party may be a prevailing party within the meaning of this section either by obtaining a judgment or by obtaining comparable relief through a consent decree or a settlement. *Ellis v. University of Kansas Med. Ctr.*, 163 F.3d 1186, 1193 (10<sup>th</sup> Cir. 1998). When the case is terminated by way of settlement, a party may be considered a prevailing party only if the agreement "materially alters the legal relationship between the parties." *Id.*; *Bell v. Bd. of C'ty Comm'rs of Jefferson County*, 451 F.3d 1097, 1102 (10<sup>th</sup> Cir.2006)(citing *Buckhannon Bd. & Care Home, Inc. v. West Virginia*, 532 U.S. 598, 602–04, 121 S.Ct. 1835, 149 L.Ed.2d 855 (2001)). The award of attorneys' fees under § 1988 is discretionary. *Robinson v. Kansas*, 506 F. Supp. 2d 488, 495 (D. Kan. 2007).

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<sup>2</sup> The Amended Complaint also sets forth three claims under the Medicaid Act. [Doc. 63], Counts II, III, and IV. These Medicaid Act claims were abandoned in the Settlement Agreement.

Plaintiffs cite *Foremaster v. City of St. George*, 882 F.2d 1485, 1488 (10th Cir. 1989), which discussed the “catalyst” test for fee recovery in § 1983 actions. To be entitled to fees under this test, a plaintiff must show: “(1) that [the] lawsuit is causally linked to securing the relief obtained, and (2) that the defendant's conduct in response to the lawsuit was required by law.” *Id.* (citations omitted). The Tenth Circuit later explained the purposes of this inquiry is

. . . to ensure, in cases where a concession of defeat might be inferred from defendant's conduct, that the conduct was actually brought about by the lawsuit. Attorney's fees should be awarded only when the suit brought about such conduct, and not when the defendant acted supererogatorily.

*Dahlem v. Board of Educ. of Denver Public Schools*, 901 F.2d 1508, 1512, n. 3 (10th Cir.1990), *see also Robinson*, 506 F. Supp. 2d at 502. More recent United States Supreme Court case law rejects this “catalyst” theory as being too lenient and suggests instead that a private settlement agreement must bear the marks of a consent decree to confer prevailing party status before fees can be ordered. *See Sanchez v. Bd. of E. N.M.*, 361 F. App'x 980, 983 (10th Cir. 2010)(discussing the requirement that a settlement must maintain a level of “judicial imprimatur” established in *Buckhannon Bd. & Care Home, Inc. v. W. Virginia Dep't of Health & Human Res.*, 532 U.S. 598, 600, 121 S. Ct. 1835, 149 L. Ed. 2d 855 (2001)).

Plaintiffs bear the burden to establish that they are entitled to an award of fees under § 1988. *Robinson*, 506 F. Supp. 2d at 504. While Plaintiffs’ motion pays lip service to the existence of these tests, Plaintiffs wholly fail to address how, under *any* inquiry, they qualify for a fee award under prevailing Tenth Circuit law. [Doc. 143] at 14.

**1. Plaintiffs have not demonstrated that this lawsuit is causally linked to securing the relief obtained.**

Plaintiffs cannot show that their lawsuit prompted the results that they now herald because the lawsuit was not the catalyst for the changes demanded. Defendants entered into the Settlement Agreement to put an end to litigation only after Plaintiffs focused and limited their demands to the goals that Defendants had already established and had already put in place. In bringing this suit, Plaintiffs knew they were suing a favorable administration that campaigned on the issue of reforming the Kansas foster care system. Plaintiffs should not be rewarded almost four million dollars in attorneys' fees for policies that Defendants would have implemented, and, in fact, did implement, on their own.

Former defendant, Governor Laura Kelly won the 2018 Kansas gubernatorial election on November 6, 2018. As Plaintiffs acknowledged in their briefing on the Governor's Motion to Dismiss, the Governor had been a vocal proponent of reform to the foster care system, dating back to her days in the Kansas Senate. [Doc. 96] at 1 and extensive exhibits. Governor Kelly's campaign had identified improving the Kansas foster care program as one of her top priorities. Ex. B, (Howard Decl.) ¶ 4. Although the billing records attached to the instant motion indicate Plaintiffs' attorneys had been working on their lawsuit for a year, they waited until *after* the election to file suit. Plaintiffs sued ten days later, on November 16, 2018, naming the outgoing Governor and his administration 50 days before Governor Kelly was sworn in and able to appoint new agency heads to implement these reforms. [Doc. 1]. None of the representative groups, who purport to advocate on behalf of Kansas children,

attempted to reach out to the Governor's office or to any of her representatives regarding her plans for improvement to the Kansas foster care system before they filed this suit. Ex. B, ¶¶ 6,7.

Before being sworn in, Governor-Elect Kelly named Defendant Howard to head both the DCF and KDADS agencies. Ex. B, ¶ 2. Secretary Howard shared in the Governor's commitment to improving the Kansas foster care system. Ex. B, ¶ 4. Immediately following her appointment, Secretary Howard and her staff began plans to improve the performance of DCF, KDADS and their providers. Ex. B, ¶ 5. These improvements serve as the seeds of the reform upon which the Settlement Agreement is based.

Because Defendants were committed to these changes in the system, reaching a settlement was achievable as the terms were consistent with the goals that Defendants had already identified and were already implementing prior to reaching the agreement with Plaintiffs. Ex. B, ¶ 8. The items listed in the Practice Improvements and the Outcomes of the Settlement Agreement were already part of the improvement that Defendants had identified and undertaken steps to achieve. Ex. B, ¶ 9. Notably, Defendants were able to agree quickly to the terms of the Settlement Agreement and sought approval from the State Finance Counsel without the need to request any additional appropriations for the Defendant agencies because the improvements had already been implemented by the new administration. Ex. B, ¶ 10.



Plaintiffs are not entitled to recover fees for hooking their cart to a train that had already left the station. While § 1988 law does not require that the Plaintiffs' lawsuit be the only reason that Defendants undertook the reforms to the foster care system, the lawsuit must have, at a minimum, been a "substantial factor or a significant catalyst" for these changes in order to meet the Tenth Circuit's standard for awarding fees. *Foremaster*, 882 F.2d at 1488.

Here, the catalyst to change was not litigation, but Kansas voters' election of a new administration that prioritized the children in DCF custody. Defendants' voluntary adoption of new policies and priorities, although accomplishing some of the same goals that Plaintiffs sought to achieve in this lawsuit, lacks the necessary judicial imprimatur that can be said to have forced the change. *Buckhannon*, 532 U.S. at 605; *see Robinson*, 506 F. Supp. 2d at 502 (finding that federal 1983 action surrounding state court funding did not merit fee award where matter resolved through concurrent state court law suit and by action of the Kansas Legislature, stating "Here, there is absolutely no evidence that this federal case was a significant catalyst in prompting defendants to do anything.")

Defendants are pleased with the Settlement Agreement and the efforts that were made to reach an agreement that aligned with the goals that Defendants had established for the Kansas foster care system. Defendants do not believe, however, that reaching this point of consensus reasonably translates to a payment of nearly four million dollars of taxpayer funds to Plaintiffs, or specifically Plaintiffs' attorneys.

**2. Plaintiffs have not demonstrated that the conduct in response to the suit was required by law.**

A plaintiff seeking an award of fees under § 1988 must also demonstrate that the defendant's conduct compelled by the settlement was required by law. This essentially requires that Plaintiffs demonstrate they would have prevailed on the merits of their constitutional claims. *Foremaster*, 882 F.2d at 1488. There has been no adjudication on the merits of Plaintiffs' case. Some courts have rejected prevailing party status in cases, such as this one, where there has been no adjudication on the merits by the federal court prior to resolution. *See Robinson*, 506 F. Supp. 2d at 503 (citations omitted); *see also Buckhannon*, 532 U.S. 598 at 608 (questioning expansive application of the "catalyst" theory to justify fees where there has been no judicial determination of interests) (quoting *Hanrahan v. Hampton*, 446 U.S. 754, 758, 100 S. Ct. 1987, 64 L. Ed. 2d 670 (1980)) ("[O]nly when a party has prevailed on the merits of at least some of his claims ... has there been a determination of the 'substantial rights of the parties,' which Congress determined was a necessary foundation for departing from the usual rule in this country that each party is to bear the expense of his own attorney").

While Plaintiffs and Defendants may have had a shared desire to effect changes in the Kansas foster care system, both the allegations that Plaintiffs made in this lawsuit, and the question of whether Plaintiffs were entitled to obtain injunctive relief under their substantive due process theory, were very much in dispute.

Plaintiffs' lawsuit requested that a federal court enter prospective injunctive relief that would dictate how State government agencies operate and administer the State-sponsored Kansas foster care programs. Plaintiffs sought to accomplish this through a claim for deprivation of substantive due process under the Fourteenth Amendment. Plaintiffs had very high hurdles to clear to prove a viable claim under this theory and obtain such extraordinary relief against sovereign state agencies.

To prevail on their claim, Plaintiffs must have been able to prove that the members of the class were 1) deprived of a cognizable constitutional right (*Teigen v. Renfrow*, 511 F.3d 1072, 1079 (10th Cir. 2007)); 2) that the Defendants acted with "deliberate indifference" to the protected right in a manner that "shocks the conscience" (*Green v. Post*, 574 F.3d 1294, 1300 (10th Cir. 2009); *Uhlrig v. Harder*, 64 F.3d 567, 571 (10th Cir. 1995)); and 3) and that the policies or practices complained of were the direct cause of the constitutional deprivation. *See M.D. by Stukenberg v. Abbott*, 907 F.3d 237, 248 (5th Cir. 2018) (litigation surrounding Texas foster care system).

To prove their claims here, Plaintiffs would be required to demonstrate that the policies and practices of Defendants in administering the foster care system created a risk substantial enough to amount to the deprivation of the class's substantive due process rights. While Defendants may have inherited a system that was ripe for reform, Defendants maintain that the problems did not rise to the level of constitutional deprivation. Federal case law supports this position. As the Fifth Circuit explained in 2018 in *M.D. by Stukenberg*, "[t]here is no "responsibility to [ ]

maximize[ ] [foster children's] personal psychological development,” and children have no “right to a stable environment” or a right “not to be moved from home to home,” despite the “significant literature which indicates a traumatic effect of such moves on young children.” 907 F.3d at 268 (citing *Griffith v. Johnston*, 899 F.2d 1427, 1439 (5th Cir. 1990); *Drummond v. Fulton Cnty. Dept. of Family and Children's Servs.*, 563 F.2d 1200, 1208 (5th Cir. 1977)). There is a “significant amount of daylight” between the minimum, constitutionally protected standard of care, and optimal treatment or the most appropriate care. *Id.* Further, while a primary focus of this litigation, placement stability, is an admirable goal for improvement (and one that Defendants, indeed share), it is questionable whether this focus supports a *constitutionally cognizable* harm. *M.D. by Stukenburg*, 907 F.3d at 268; *Griffith*, 899 F.2d at 1429 (no “responsibility to [ ] maximize[ ] [foster children's] personal psychological development); *Drummond*, 563 F.2d at 1208 (children have no “right to a stable environment” or a right “not to be moved from home to home,” despite the “significant literature which indicates a traumatic effect of such moves on young children.”).

Federal courts may issue injunctive relief<sup>3</sup> only in a manner that is “narrowly tailor[ed]” to address constitutional infirmities, and nothing more. *See Milliken v. Bradley*, 433 U.S. 267, 282, 97 S.Ct. 2749, 53 L.Ed.2d 745 (1977). The federal courts

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<sup>3</sup> Because injunctive relief is prospective only, Plaintiffs would also be tasked with proving that these constitutional violations were occurring in the current landscape and in the current administration. Again, on taking office, Defendants began to institute global reforms in the Kansas foster care system. Ex. A, ¶ 8.

are not in the business, nor should they be, of dictating how a state government should govern. Defendants are only required to protect a constitutionally minimal standard. A settlement outlining improvements to the system that were not constitutionally required cannot form the basis for fees under § 1988.

## **II. PLAINTIFFS BEAR THE BURDEN OF ESTABLISHING THE REASONABLENESS OF THEIR FEE REQUEST**

A prevailing party submitting a request for reasonable attorney's fees under 42 U.S.C. § 1988 bears the "burden to prove and establish the reasonableness of each dollar, each hour, above zero." *Mares v. Credit Bureau of Raton*, 801 F.2d 1197, 1210 (10th Cir. 1986). The District Court must first determine "the number of hours reasonably expended on the litigation" and also "a reasonable hourly rate." *Hensly v. Eckhart*, 461 F.2d 424, 433 (10th Cir. 1983). The Court should exclude any hours that were not "reasonably expended." *Id.* at 434 (citations omitted). At this stage, the Court must assess whether the case was overstaffed and should exclude any "hours that are excessive, redundant, or otherwise unnecessary." *Id.*

The lodestar method involves "the number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate." *Ellis v. University of Kansas Med. Ctr.*, 163 F.3d 1186, 1202 (10th Cir. 1998). Defendants agree with Plaintiffs that the lodestar method is an appropriate method for the Court to determine what fees, expenses and costs are reasonable, if any, while acknowledging "the Court has discretion to fashion a fee award under any method which is reasonable." *In re: Motor Fuel Temperature Sales Practices Litig.*, No. 07-MD-1840-KHV, 2016 WL 4445438, at \*12 (D. Kan. Aug. 24, 2016).

“In determining which hours reported were reasonably expended and hence are billable to the adversary, the court should examine the total number of hours reported by each lawyer.” *Ramos v. Lamm*, 713 F.2d 546, 553 (10th Cir. 1983), *disapproved of on other grounds*, *disapproved of on other grounds*, *Pennsylvania v. Delaware Valley Citizens' Council for Clean Air*, 483 U.S. 711, n. 4 (1987). “In examining the reasonableness of the hours reported, the district court should also examine hours allotted to specific tasks. First, the court should determine whether the tasks sought to be charged to the adverse party would normally be billed to a paying client.” *Id.* at 554.

“If the court has concluded that each specific task is properly chargeable to the client and, therefore, properly presented in a fee application, the court ‘should look at the hours expended on each task to determine whether they are reasonable.’” *Wirtz v. Kansas Farm Bureau Servs., Inc.*, 355 F. Supp. 2d 1190, 1197 (D. Kan. 2005) (quoting *Case v. Unified School Dist. No. 233*, 157 F.3d 1243, 1250 (10th Cir.1998)).

### **III. PLAINTIFFS’ REQUEST FOR FEES IS MANIFESTLY UNREASONABLE**

Before delving too deep into the discussion on this fee request, defense counsel wants to be clear that, due to time constraints, this Memorandum in Opposition response is only hitting the high points for the Court to consider in evaluating almost a \$ 4 million request for fees and expenses.

The parties notified the Court of a settlement in this matter on July 8, 2020. [Doc. 133]. Plaintiffs’ attorneys had from July until November 30<sup>th</sup> to prepare their motion for fees and expenses and to supply the documents to support their claim.

Rather than provide Defendants and the Court with a comprehensive spreadsheet or list of time entries in chronological order incorporating all timekeepers, Plaintiffs submitted five separate declarations, one for each billing organization, most of which are separated by timekeeper rather than provided in chronological order. Plaintiffs' fee application consists of 10,332 separate time entries consisting of 10,064.1 hours expended by thirty-two timekeepers across five organizations.

Plaintiffs' attorneys are well aware that Defendants and this Court face a monumental task to review, evaluate, and cross-check thousands of time entries and hours expended for deficiencies related to unreasonable billing practices that include duplicative billing, excessive staffing, and belaboring every aspect of this matter. Defendants, utilizing a team of five attorneys and two paralegals, have had only sixteen days to untangle the web of unreasonable billing practices presented by Plaintiffs. There is no way that Defendants can adequately address every single excess and deficiency in Plaintiffs' application for fees and expenses in this timeframe. Defendants caution the Court that, similar to cockroaches, when you find one instance there are inevitably more.

**A. Plaintiffs have Overstaffed this Matter**

The problem that begets all other problems in this fee request (which likely extends to other corners of this world) is that there are simply Too. Many. Lawyers. *See Ramos v. Lamm*, 713 F.2d 546, 554 (10th Cir. 1983) (“The more lawyers representing a side of the litigation, the greater the likelihood will be for duplication of services.”), *disapproved of on other grounds, Pennsylvania v. Del. Valley Citizens' Council for Clean Air*, 483 U.S. 711 (1987). Plaintiffs are certainly free to hire as

many lawyers as they please to act on their behalf. This does not mean that Defendants should be required to pay for them all. *Gay Officers Action League v. Puerto Rico*, 247 F.3d 288, 297 (1st Cir. 2001) (“ a court should not hesitate to discount hours if it sees signs that a prevailing party has overstaffed a case”).

While purporting otherwise, Plaintiffs’ submissions fail in every manner to exercise billing judgment.

“Once the district court has adequate time records before it, it must then ensure that the winning attorneys have exercised “billing judgment.” *Ramos*, 713 F.2d at 553 (quoting *Copeland v. Marshall*, 641 F.2d at 891). Billing judgment consists of winnowing the hours actually expended down to the hours reasonably expended. *See id.* Hours that an attorney would not properly bill to his or her client cannot reasonably be billed to the adverse party, making certain time presumptively unreasonable.”

*Case v. Unified Sch. Dist. No. 233, Johnson Cnty., Kan.*, 157 F.3d 1243, 1250 (citing *Ramos*, 713 F.2d at 553-4).

The problem starts at the top. There are four separate organizations and an additional local attorney representing Plaintiffs’ interest in this lawsuit and they are all billing for their time. Both Children’s Rights and National Center for Youth Law are highly-regarded organizations with, as they explain, extensive experience representing the interests of children in these types of litigation. These entities have each handled many of these complex lawsuits, although normally they handle them separately.<sup>4</sup> Plaintiffs have not articulated any rationale as to why the expertise of

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<sup>4</sup> Children’s Rights separately handled the following cases: *B.K v. McKay*, Case No. 2:15-cv-00185-PHX-ROS, (D. Az) (filed 2015); *Juan F., et al. v. John g. Rowland*, Case No. H-89-859 (AHN) (D. Conn.) (filed 1989); *LaShawn A. v. Gray*, Case No. 89-cv-1754 (D. D.C.) (filed 1989); *H.G. v. Carroll*, Case No. 4:18-cv-0100-WS-CAS (N.D. Fla.) (filed 2018); *T.H. v. DeKalb County School District*, Case No. 1:19-cv-03268-TWT



both of these entities was required here, when either of them could have competently pursued these claims on their own, particularly with the involvement of experienced local counsel that Kansas Applesseed hired as the lead for this lawsuit.

Plaintiffs have also have not explained why five separate “firms” were needed in this litigation, when one or two would suffice. The use of attorneys from the New York City office of DLA Piper, a firm which has no particular expertise in the subject matter, no particular experience in the jurisdiction, and with a higher billable rate than many qualified local firms is particularly puzzling.<sup>5</sup> Again, choice of counsel is a personal matter, but when those choices lead to higher rates and duplicative efforts, it is appropriate for this Court to exclude hours related to “overstaffing, duplication, and excessiveness, or that are otherwise unnecessary.” *Rogers v. Bank of Am., N.A.*, No. CIV.A. 13-1333-CM, 2014 WL 6632944, at \*3 (D. Kan. Nov. 21, 2014).

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(N.D. Ga.) (filed 2019); *C.P.X. v. Garcia*, Case No. 4:17-cv-00417-SMR-HCA (S.D. Iowa) (filed 2017); *Connor B. v. Patrick*, 3:10-cv-30073 (D. Mass.) (filed 2010); *Dwayne B. v. Snyder*; Case No. Case No. 2:06-cv-13548-NGE-DAS (E.D. Mich.) (filed 2006); *E.C. v. Sherman*, Case No. 2:05-cv-00726-SOW (W.D. Mo.) (filed 2005); *Andrew C. v. Raimondo (Carcieri)*, Case No. 1:07-cv-00241-L-LDA (D. R.I.) (filed 2007); *Michelle H. v. McMaster*, Case No. 2:15-cv-00134-RMG (D. S.C.) (filed 2015); *Brian A. v. Haslam*, Case No. 3:00-0445 (M.D. Tn.) (originally filed 2000). See <https://www.childrensrights.org/our-campaigns/class-actions/>.

NCYL separately handled the following cases: *Clark K. v. Wilden (Guinn)*, Case No. 2:06-CV-01068 (D. Nev.) (filed 2006); *David C. v. Huntsman*, Case No. 2:93-cv-00206-TC (D. Utah) (filed 1993); *Braam v. Washington*, Case No. 98-2-01570-1-DAN, (Wash. Sup. Ct., Whatcom County) (filed 1998). See [https://youthlaw.org/strategies/litigation-strategies/?sft\\_issues=foster-care](https://youthlaw.org/strategies/litigation-strategies/?sft_issues=foster-care).

<sup>5</sup> Plaintiffs make no indication that they sought but could not obtain the services of a local law firm in Kansas, or even Missouri, to assist in this matter.

**B. Plaintiffs' Fees Are Also Disproportional to the Amount of Work Actually Performed**

Plaintiffs seek fees for thirty-two timekeepers for more than 10,000 hours of work in this matter. This is a case in which no trial occurred, and no class certification motion was filed (although Plaintiffs have billed for that).<sup>6</sup> Plaintiffs answered no discovery (but billed for that too), and took a single half-day deposition focused only on DCF's storage of electronically-stored information rather than the substance of the case. Plaintiffs responded to one dispositive motion (which they lost, but billed for, *see infra* at 38) and mediated the case.

Plaintiffs spend a great deal of effort in their memorandum detailing the alleged discovery failures and Plaintiffs' repeated threats to seek court intervention for countless egregious deficiencies. It suffices to say that these claims are disputed in every regard by Defendants. Further, it is noteworthy and most telling that Plaintiffs filed exactly zero discovery motions in this case. Likewise, Plaintiffs' time entries reflect no discussion, research, or drafting of any motion to compel or order for discovery from this Court. The reason it is not reflected in the time entries is because these Defendants were very responsive to Plaintiffs' discovery requests and even voluntarily provided additional data and documents during the mediation to expedite reaching a settlement.

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<sup>6</sup> According to this Court's Scheduling Order, Plaintiffs' Motion for Class Certification was due to be filed June 30, 2020. [Doc. 53] at 14. Nonetheless, DLA Piper associates spent an impressive amount of time during the Spring of 2019 amassing over \$30,000 in fees researching, discussing, outlining, reviewing outlines for, and drafting the Motion, over a year before the filing date on this motion. Ex. M.

The truth is, besides the mediation process (prolonged by disagreements among the Plaintiffs' counsel), and the production of documents, not a lot went on in case. This matter surely did not represent the type of workload to justify a fee of nearly \$4 million dollars.

**C. Plaintiffs Are Requesting to be Reimbursed at Unreasonable Hourly Rates**

In addition to grossly overstaffing this matter, Plaintiffs request hourly rates for twenty-five timekeepers that are unreasonable in this community. To determine reasonable hourly rates, “the district court should base its hourly rate award on what the evidence shows the market commands for civil rights or analogous litigation. *Case*, 157 F.3d at 1255 (citing *Beard v. Teska*, 31 F.3d 942, 955–57 (10th Cir.1994)).<sup>7</sup>

Defendants do not challenge all of the rates charged by Plaintiffs' counsel. For instance, Defendants do not challenge the rates charged by Ira Lustbader of Children's Rights or the attorneys of the Kansas Appleseed organization. Plaintiffs, however, request fees for an additional twenty-five timekeepers that are out of proportion with those typically charged.

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<sup>7</sup> The Court may also properly consider the hourly rates of opposing counsel in determining the reasonableness of hourly rates. *See Fox v. Pittsburgh State Univ.*, 258 F. Supp. 3d 1243, 1267 (D. Kan. June 26, 2017). Here, the rates by timekeepers at the Barber Emerson, the firm that initially represented Defendants, and the rates of timekeepers at the Lathrop Gage/Lathrop GPM firm range from \$80 to \$155 for paralegals, \$200 to \$260 for associates, \$350 for counsel, and \$260 to \$430 for partners. Ex. A, ¶ 8.

**1. Plaintiffs' Evidence as to Their Rates is Inconsistent and Confusing**

As an initial matter, the submission of Children's Rights has created confusion and made this Court's work and the work of Defendants to assess the fees the organization seeks a more difficult process. Although the Lustbader Declaration purports to set hourly rates for attorneys in his organization per the summary provided therein, Exhibit C to this Declaration does not reflect these rates for attorneys other than Lustbader himself. *Compare* [Doc. 144] at 19 *with* [Doc. 144-3] (listing different hourly rates for attorneys at Children's Rights except Mr. Lustbader). Instead, as discussed below, Children's Rights appears to have used a form and rates submitted from a separate case in the Western District of Missouri rather than the rates it is requesting in this case. *M.B. v. Tidball*, No. 2:17-CV-4102-NKL, 2020 WL 1666159, at \*6 (W.D. Mo. Apr. 3, 2020).

**2. Plaintiffs Seek Hourly Rates that are Unreasonable for Levels of Experience and Similar Recent Awards**

In many instances, Plaintiffs are requesting hourly rates for attorneys that that are not commensurate with reasonable community rates for attorneys with corresponding levels of experience. Further, the rates that Plaintiffs are requesting in this litigation are unreasonable and inconsistent with rates that these same organizations requested just months earlier in similar litigation before Judge Laughrey in the Western District of Missouri. *See M.B. v. Tidball*, No. 2:17-cv-4102-NKL, 2020 WL 1666159 (W.D. Mo. Apr. 3, 2020).

Plaintiffs are asking to be reimbursed premium rates for junior level attorneys. Even where specialized knowledge and experience may justify rates “on the high end of the Kansas City market with respect to [] partners,” no such presumption is given to less experienced attorneys. *Fish v. Kobach*, 2018 WL 3647132, at \*7 (D. Kan. Aug. 1, 2018). Even those whose “credentials are all impressive” are subject to particular scrutiny in this District for those with less than ten years’ experience. *Id.* at \*8. These rates must reflect the hourly rates of attorneys in the Kansas City market with similar skill and experience. *Id.*

Here, Plaintiffs request hourly rates for several attorneys whose skill and experience does not command the requested rates in the Kansas City market. For instance, Plaintiffs seek fees for eight timekeepers from the law firm of DLA Piper, six of which are associates or comparable level with no particular experience or specialized knowledge in the children’s rights litigation field. [Doc. 148] ¶¶ 11 (describing William J. Diggs as a “senior litigation associate” with five years’ private practice experience); 12 (describing Meg Fowler as a “former DLA litigation associate” with no experience during time on matter); 13 (describing Joshua Kane as a “senior litigation associate” with ten years’ private practice experience); 14 (describing Megan Kinney as a “Krantz Fellow” and first-year associate); 15 (describing Kristin Pacio as a “senior attorney” with approximately ten years’ private practice experience); 17 (describing Olivia Tourgee as a “junior litigation associate” and 2019 law graduate).

Plaintiffs request hourly rates of \$240 for each inexperienced DLA Piper associate that worked on this matter, an excessive rate for the Kansas City market with little to no experience. *See Fish v. Kobach*, 2018 WL 3647132, at \*7 (D. Kan. Aug. 1, 2018)(finding \$195 rate reasonable given experience and skill in Kansas City market for attorney “that had been in practice a little over one year”); *Ross v. Jenkins*, 325 F. Supp. 3d 1141, 1181 (D. Kan. 2018)(finding \$225 hourly rate reasonable for attorneys with “four years (or fewer) experience”). Defendants propose an hourly rate of \$200 for each of these attorneys that reflects hourly rates approved by Courts in this District for inexperienced associates in the Kansas City market.

Plaintiffs request hourly rates of \$410 for DLA Piper associates with ten and five years private practice experience, respectively, and a “senior attorney” with approximately ten years’ private practice experience. This rate is excessive in the Kansas City market for attorneys with similar skill and experience. *See Fish*, 2018 WL 3647132, at \*7 (finding \$250 rate reasonable given experience and skill in Kansas City market for attorneys with six to nine years’ experience, and \$240 for an attorney with five years’ experience); *Ross*, 325 F. Supp. 3d at 1181 (finding \$300 hourly rate reasonable for attorney with approximately ten years’ experience, and \$250 for attorney with five years’ experience).

Amazingly, the \$410 rate requested for each of these New York associates, who have *no particular experience in this field or in this jurisdiction*, is greater than all other attorneys at the National Center for Youth Law and Children’s Rights except Litigation Director Ira Lustbader and Senior Director Leccia Welch. Furthermore,

the \$410 rate sought for each DLA senior non-partner is equivalent to the rate requested by Stephen Dixon of Children's Rights, who graduated law school more than two decades before Mr. Diggs and Mr. Kane.

The Court must reduce these attorneys' hourly rates to a reasonable level. *See Ross*, 325 F. Supp. at 1181. For instance, a \$300 hourly rate reflects reasonable rates set by this Court for the Kansas City market for litigation attorneys with similar experience. *Id.*

The rates Plaintiffs are seeking for attorneys at Children's Rights and the National Center for Youth Law also exceed the rates charged in the Kansas City market for their respective experience levels as reflected in this Court's recent decisions. Again, the Court can and should draw upon hourly rates awarded in analogous litigation to establish a reasonable hourly rate for these attorneys. *Id.* In a footnote, Plaintiffs cite Judge Laughrey's April 2020 decision in the Western District of Missouri to demonstrate the reasonableness of their requested hourly rates for "senior attorney rates of \$500" in a "neighboring market." [Doc. 143] at p. 20 n.16, citing *M.B. v. Tidball*, No. 2:17-cv-4102-NKL, 2020 WL 1666159 (W.D. Mo. Apr. 3, 2020)). Plaintiffs fail to disclose to this Court that the rates they are asking to be reimbursed in this case *exceed* those that they proposed to Judge Laughrey for similar work just a few months ago. *Tidball*, 2020 WL 1666159, at \*6. Plaintiffs also do not mention that the rates they are requesting for junior attorney greatly exceeds the rates that Judge Laughrey actually awarded. *Id.* at \*10-13. As detailed in the chart below, Plaintiffs have sought increases in hourly rates awarded in the "neighboring

market” that represent an increase of \$50-70 per hour from hourly rates awarded in similar litigation just months earlier.

Attorney	Experience	D. Kan. Requested Rate	Tidball Requested Rate	Tidball Awarded Rate	Proposed Rate
L. Welch	24 years	\$500	\$450	\$450	\$450
M. Nardi	8 years	\$380	N/A	N/A	\$300
E. McGuinness	8 years	\$240	\$225	\$225	\$225
J. King	8 years	\$345	\$325	\$300	\$300
C. Glasspiegel	5 years	\$310	N/A	N/A	\$250
N. Taykhman	4 years	\$290	N/A	N/A	\$225
F. Pitts	7 years	\$365	\$300	\$300	\$300
J. Strout	6 years	\$325	N/A	N/A	\$250
A. Grill	3 years	\$270	\$225	\$200	\$200
J. Stolzenberg	2 years	\$250	\$225	\$200	\$200

To the extent that the Court deems fees should be awarded, Defendants propose the Court adopt hourly rates that reflect the reasonable hourly rates reflected in the above chart that are consistent with rates set by this Court in *Fish v. Kobach* and *Ross v. Jenkins* for attorneys of similar levels of experience, and that are further reflected as reasonable for the Kansas City market as reflected in the recent award in the Western District of Missouri. Plaintiffs have provided the Court no basis to



award fees at hourly rates that are significantly greater than those recently awarded in analogous litigation.

**3. Plaintiffs' Seek Excessive Hourly Rates for Paralegal and Law Student Work**

Plaintiffs seek fees for the work of six paralegals and one law student, each at an hourly rate of \$200. [Doc. 144] ¶ 19; [Doc. 146] ¶ 10; [Doc. 148] ¶ 10; [Doc. 145] ¶¶ 12-13). Plaintiffs cite to page three of the 2019 Missouri Lawyers Media Billing Rates survey as evidence that paralegal rates in the Kansas City area charge a median rate of \$225 per hour or \$305 per hour at the highest rates, but the cited page includes no explicit information or rates for paralegals. [Doc. 143] at p. 18; [Doc. 144-5] at 3. Plaintiffs also cite rates from the law firm of Shook, Hardy, & Bacon as comparable for attorneys, but the cited report indicates a rate of \$125 per hour for a “Legal Analyst” was awarded to the firm, not the rate requested here. [Doc. 144-5] at 6. Similarly, Plaintiffs cite the 2017 Economics of Law Practice Survey, but the survey reveals the \$200 per hour rate for “Legal Assistants” is in the 95th percentile for those with more than a decade of experience. [Doc. 144-6] at 19. The same report further reveals the median hourly rate for a legal assistant with more than a decade of experience is \$107 in the Kansas City, MO area. *Id.* at 20. The declaration of Nick Badgerow’s purports to establish these rates are reasonable applying the community standard for “other professionals who provided services to plaintiffs,” but does so in conclusory fashion without explanation on how he based this assertion. [Doc. 149] ¶ 36. Finally, Plaintiffs have submitted no evidence regarding the reasonableness of a \$200 hourly rate for a law student.

The Court applies the same scrutiny to paralegal and other assistant rates as it does to attorney rates. *Ross*, 325 F. Supp. 3d at 1181. A \$200 hourly rate for paralegal and law student work is not supported by Plaintiffs' declarations and is unreasonable in this District and Division. *See Animal Legal Defense Fund v. Kelly*, No. 18-2657-KHV, 2020 WL 4000905, at \*9 (D. Kan. July 15, 2020)(finding requested hourly rate of \$125 for paralegal and law student work reasonable); *Fish*, 2018 WL 3647132 at \*8 (finding requested hourly rate of \$110 for paralegal work reasonable); *Ross*, 325 F. Supp. 3d at 1182 (finding reasonable paralegal hourly rate of \$130 in Kansas market); *Mathiason v. Aquinas Home Health Care, Inc.*, 187 F. Supp. 3d 1269, 1281 (D. Kan. 2016)(finding requested hourly rate of \$125 for paralegal work reasonable). Plaintiffs point the Court to *Animal Legal Defense Fund v. Kelly* and *Fish v. Kobach* in their memorandum of support, but ignore that these cases award paralegal and law student rates at a far lower rate than what Plaintiffs are now seeking. [Doc. 143] at 19. Defendants propose a \$125 per hour rate for paralegal work that is consistent with this Court's recent decisions.

Further, Defendants suggest that for Joshua Nomkin, a law student that clerked for the National Center on Youth Law<sup>8</sup> during his "1L" summer and whose work was solely limited to document review, a far lower rate is consistent with Mr. Nomkin's experience level and hourly activities. *See Lawson v. Spirit AeroSystems*,

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<sup>8</sup> Defendants also point out that Plaintiffs are requesting that the taxpayers of the State of Kansas reimburse these firms an hourly rate for law student work when the summer clerk program at the National Center for Youth Law is advertised as a volunteer program and students who participate are unpaid, other than receiving a small stipend for living expenses. <https://youthlaw.org/about/jobs/>.

*Inc.*, No. 18-1100-EFM-ADM, 2020 WL 6343292, at \*5 (D. Kan. Oct. 29, 2020)(finding rates ranging from \$55-85 for contract attorneys reviewing documents). Accordingly, Defendants propose a \$100 per hour rate for Mr. Nomkin.

**D. Plaintiffs' Submissions and Their Fee Requests Do Not Match**

None of us attended law school because we are good at math, but this still does not explain why Plaintiffs are requesting more fees than they actually billed in this case. Ira Lustbader provided a lengthy Affidavit supporting the fees the Children's Rights staff and establishing their rates based on his alleged extensive market analysis. However, the itemized statement supplied with this supports fees in an amount less than those identified in his Affidavit and included supporting summary. [Doc. 144]. The difference between the amount requested, and the amount supported in the itemized statement submitted by Children's Rights is \$143,072.21 Ex. C. Based on Children's Rights own materials, a reduction of these hours is automatic.

The sum of \$143,072.21 may be a drop in the bucket compared to the nearly four million dollars of fees and expenses that Plaintiffs are requesting that this Court award to them, but it is not an insubstantial number. Like several other irregularities discussed in this Memorandum, the phantom appearance of an extra six figures of fees is significant because it brings into question the credibility of the billing practices in this case and this request as a whole. Where certain entries "throw[] into substantial question the propriety of all the other" charges, the court may find all of the charges to be disallowed. *Wirtz v. Kansas Farm Bureau Services, Inc.*, 355 F. Supp. 2d 1190, 1209 (D. Kan. 2005)(disallowing all of a party's requested

travel expenses when obviously erroneous entries brought into question all of the charges).

**E. Plaintiffs' Submission Contains Numerous Categories of Fee and Expense Requests That Are Patently Unreasonable**

Plaintiffs have the burden to “prove and establish the reasonableness of each dollar, each hour, above zero.” *Mares v. Credit Bureau of Raton*, 801 F.2d 1197, 1210 (10th Cir. 1986). “If the court has concluded that each specific task is properly chargeable to the client and, therefore, properly presented in a fee application, the court “should look at the hours expended on each task to determine whether they are reasonable.” *Wirtz v. Kansas Farm Bureau Services, Inc.*, 355 F.Supp.2d 1190, 1197 (D. Kan. 2005) (quoting *Case v. Unified School Dist. No. 233*, 157 F.3d 1243, 1250 (10th Cir.1998)). Where certain entries “throw[] into substantial question the propriety of all the other” charges, the court may find all of the charges to be disallowed. *Wirtz v. Kansas Farm Bureau Services, Inc.*, 355 F.Supp.2d 1190, 1209 (D. Kan. 2005) (discussing travel expenses).

**1. Plaintiffs' Request for Pre-Suit Fees and Expenses Should be Summarily Denied**

Plaintiffs also request that this Court award them a significant sum of attorneys' fees and \$33,775.19 in expenses for travel and meetings dating back a year prior to filing the lawsuit. Exs. D-1, D-2, E. These include fees to meet amongst themselves, travel to the state, and recruit potential representatives to bring this lawsuit. These activities are not properly chargeable to Defendants.

“[P]re-suit fees may be awarded under 42 U.S.C. § 1988 only for ‘discrete’ work ‘that was both useful and of a type ordinarily necessary to advance the civil rights litigation to the stage it reached.’” *Schneider v. Colegio de Abogados de Puerto Rico*, 187 F.3d 30, 33 (1st Cir. 1999) (quoting *Webb v. Bd. of Educ.*, 471 U.S. 234, 243 (1985)).

A significant portion of the pre-suit fees have been expended to research and analyze various constitutional issues and claims, all of the type that one might normally anticipate in cases of this type and that is familiar to the attorneys at Children’s Rights and the National Center for Youth Law. “[T]ime spent reading background material designed to familiarize the attorney with the area of the law would normally be absorbed into a firm’s overhead and that, therefore, attempting to charge an adversary with time spent conducting background research is presumptively unreasonable. *Case v. Unified Sch. Dist. No. 233, Johnson Cnty., Kan.*, 157 F.3d 1243, 1253 (10th Cir. 1998).

Plaintiffs’ Counsel hold themselves out as having specialized expertise in these matters. [Doc. 143] at 20; [Doc. 144] ¶¶ 4, 7, 14-16, 21, 24; [Doc. 145] ¶¶ 2-3, 5, 7-12, 21 (DKT. 145); [Doc. 146] ¶¶ 3, 4, 7, 10-15. Counsel should be familiar with the constitutional questions raised, potential standing, and other issues relating to the appropriateness of class representatives that they spent time researching in the year prior to suit. *See Kansas Judicial Watch v. Stout*, No. 06-4056-JAR, 2012 WL 1033634, at \*8 (D. Kan. Mar. 27, 2012)(finding time spent on background research

for firm that holds themselves out as Constitutional law specialists and who had participated in other similar lawsuits was not compensable.)

Plaintiffs' counsel claim to have used the year leading up to filing to engage in extensive investigation, which included dozens of "stakeholder" contacts in-person or by phone, "usually in confidence," with lawyers for children and parents; foster parents; former foster youth; providers of mental health and treatment services; and others with direct knowledge of the child welfare system in Kansas. [Doc. 144] ¶ 23. Fees incurred prior to *recruitment* of the Named Plaintiffs "are not appropriately charged to the opposing party" should be disallowed, unless special circumstances warrant time spent to resolve difficult questions (such as standing, mootness, or ripeness, none of which have been articulated here). *Case*, 157 F.3d at 1251.

Plaintiffs do not provide any specific information as to whom they were meeting, or how these parties may relate to the Named Plaintiffs or how the time that they expended advanced the litigation. Indeed, many time entries simply refer to travel to or from, and interactions or meetings with "stakeholders" in Kansas. *See, e.g.*, [Doc. 144-3] at 65 (February 7, 2018 billing entry for Attorney Ira Lustbader, concerning "[t]elephone call with local KS advocate stakeholder on potential plaintiff access,"); [Doc. 145-3] (March 1, 2018 billing entries for Attorney Leecia Welch, concerning meetings with stakeholders). Plaintiffs do not articulate the significance of these meetings, or provide any basis for determining the meetings form the basis for an attorney-client relationship. *See Dowdell v. City of Apopka, Fla.*, 698 F.2d 1181, 1188 (11th Cir. 1983)(cited favorably by *Case*, 157 F.3d 1251). There is no basis

to determine these interviews were with “a representative of the class.” *Case*, 157 F.3d at 1251. Plaintiffs have not established that any of this work was “discrete” or how it advanced this civil rights litigation. Absent such a showing, none of these fees should be recoverable.

“Reasonable expenses incurred in representing a client in a civil rights case should be included in the attorney's fee award if such expenses are usually billed in addition to the attorney's hourly rate. The attorneys requesting fees bear the burden of establishing the amount of compensable expenses to which they are entitled.” *Case v. Unified Sch. Dist. No. 233, Johnson Cty., Kan.*, 157 F.3d 1243, 1257 (10th Cir. 1998) (internal citations omitted).

There are two separate sources of authority courts use to award out-of-pocket expenses to a prevailing party. Some expenses, such as travel, may be included in the concept of attorney's fees as “incidental and necessary expenses incurred in furnishing effective and competent representation.” 122 Cong. Rec. H12160 (daily ed. Oct. 1, 1976) (statement of Rep. Drinan). These expenses are thus authorized by section 1988 . . . . Other costs, such as interpreters' fees and stenographic fees, are incurred by third parties who are not attorneys for the case. These costs cannot reasonably be considered attorney's fees, and are instead governed by 28 U.S.C. § 1920, the general costs statute.

*Brown v. Gray*, 227 F.3d 1278, 1297 (10th Cir. 2000).

Plaintiffs are requesting \$33,775.19 in pre-litigation expenses, *i.e.* expenses incurred prior and up to the filing of the original Complaint. Ex. E These costs are wholly comprised of travel-related expenses, and relate to multiple trips by Class Counsel to Kansas to, for example, “meet with local individuals connected to foster care system [sic].” [Doc. 145-2] at 2.

As with fee requests, Plaintiffs have the obligation to show their expense requests are reasonable and recoverable. It follows that where fees are inappropriate for recovery, related expenses will likewise be unrecoverable. As discussed above, fees incurred prior to recruitment of the Named Plaintiffs “are not appropriately charged to the opposing party”, *Case*, 157 F.3d at 1251, and should generally be disallowed where such fees are not “for ‘discrete’ work ‘that was both useful and of a type ordinarily necessary to advance the civil rights litigation to the stage it reached.’” *Schneider v. Colegio de Abogados de Puerto Rico*, 187 F.3d 30, 33 (1st Cir. 1999) (quoting *Webb v. Board of Education*, 471 U.S. 234, 243 (1985)).

Because Plaintiffs’ billing entries lack detail sufficient to explain the significance of these nine different attorneys’ trips to Kansas and meetings with the “stakeholders,” including with whom they met and the nature of these third parties’ interests and discrete connections to the matter at issue, the Court lacks the necessary information to award these fees. As a result, the expenses associated with these trips are also infirm. The request for these expenses should be denied.

**F. Plaintiffs Have Charged Excessive Amounts of Time for Numerous Tasks**

**1. Plaintiffs Expended an Unreasonable Amount of Time Drafting the Complaint and the Amended Complaint**

Plaintiffs’ counsel reports an outrageous 896.64 hours between their various firms attributed to the drafting the initial Complaint in this case. The vast majority of this time was reported by the experts in this field, Children’s Rights (608.76 hours) and the National Center for Youth Law (243.5 hours). Ex. F. In touting its expertise



to this Court, Children’s Rights asserts that it “regularly represents plaintiffs in complex class action lawsuits to ensure child welfare systems adequately serve the needs of children and adolescents in their care and that children’s legal rights are protected” and that its attorneys “have among the most experience in the country prosecuting child welfare institutional reform cases such as this one.” [Doc. 144] ¶ 4. Similarly, the National Center for Youth Law asserts that it “regularly represents plaintiffs in complex class action lawsuits intended to benefit large numbers of children and adolescents,” and that its attorneys “are experts in the various areas of law that affect low-income children and are among the most experienced, knowledgeable, and respected children’s lawyers in the country.” [Doc. 145] ¶ 2. Neither of these entities offers any plausible reason why national experts should spend almost 900 hours drafting a Complaint in litigation that is of the type they normally handle.

In *Ramos v. Lamm*, the Tenth Circuit stated that a court entertaining a motion for fees should evaluate the hours spent on each task to determine their reasonableness. 713 F.2d 546, 554 (10<sup>th</sup> Cir. 1983). In that case, the Court observed that, “more than 100 hours were spent drafting the complaint. While this expenditure of time may have been reasonable, it demands explanation.” *Id.* Plaintiffs have spent *nine times* that many hours here with no explanation that could possibly support that fee.

The Court in *Animal Legal Defense Fund v. Kelly*, held that time spent drafting the initial complaint (75 hours between five attorneys) was an excessive amount of

time and that the billing practices “belies plaintiffs’ assertion that “the attorneys were assigned to allotted roles to maximize efficiency,” and that each attorney ‘played a discrete, non-duplicative role in the litigation.” No. CV 18-2657-KHV, 2020 WL 4000905, at \*5 (D. Kan. July 15, 2020).

It is unreasonable and excessive that after more than a year of research, interviews and investigations, two preeminent firms that are “regularly” involved in “complex class actions” involving children and child welfare needed over 850 hours to prepare the original Complaint in this action.<sup>9</sup> Plaintiffs’ counsel even billed for review of the “draft” Complaint after the November 16, 2018 filing of the Complaint. [Doc. 144-3] at 99 (November 19, 2018 entry to “[r]eview final draft Kansas Complaint materials” by Jonathan King); [Doc. 146-2] at 6 (November 20, 2018 entry to “[r]eview closely drafts of all documents to be filed with complaint besides complaint” by Larry Rute).

The explanation, or at least a reasonable explanation, cannot be the intricacies of the Kansas system. Plaintiffs had the expertise of Kansas Appleseed, an entity with “deep familiarity with Kansas government and its child welfare and Medicaid delivery systems,” at their disposal. [Doc. 143] at 21. Yet, Kansas Appleseed, despite joining the Plaintiffs’ Class Counsel team in May of 2018, contributed only 30 of the nearly 900 hours spent on the Complaint. [Doc. 143] p. 21; [Doc. 146] ¶ 18. If the Kansas system was so different from those that the national experts regularly

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<sup>9</sup> A similar argument can be made about Plaintiffs’ significant billing for discovery-related work, given much of the discovery requests are repurposed from those used in prior litigations, tweaked for the instant matter.

encountered, why were the experts in Kansas' child welfare and Medicaid delivery systems not more involved in the drafting of the Complaint? These hours are presumably duplicative and excessive given Plaintiffs' stated expertise. Any award of fees for the drafting of the Complaint should be greatly reduced, if not outright denied.

Plaintiffs engaged in even more inefficient staffing and duplication of effort across five organizations, spending nearly 170 hours to prepare the Amended Complaint. Plaintiffs' counsel spent approximately 71 hours on substantive activities towards the preparation of the Amended Complaint, including the exchange of emails about the Complaint, and also expended another 99 hours in attorney conferences, where Amended Complaint was reportedly discussed. Exs. G-1, G-2.

The specific, substantive changes made from the original Complaint to the Amended Complaint were not complex and largely amounted to the removal of two Named Plaintiffs, J.M and M.L., who had aged out of the system and the addition of four new Named Plaintiffs: R.R., E.B., J.P., and M.A. repurposing much of the prior allegations for the new plaintiffs. *See, generally*, [Doc. 1, Doc. 63]. The Plaintiffs have not satisfactorily justified why they required 71 hours spread out across eleven attorneys and two paralegals to make these relatively small changes. Ex. G-1.

The 99 "Other" hours relating to the Amended Complaint all lack sufficient detail to identify the nature of these activities, whether they represent unique and reasonably useful contributions to the Amended Complaint, or whether they represent "unreasonable or inefficient duplication of services." Ex. G-2. It appears

from the billing records that Plaintiffs' counsel spent more time discussing the Amended Complaint than they committed to actually drafting the document.

**2. The Fees and Expenses Associated with the Mediation are Excessive.**

Plaintiffs seek almost half a million dollars in fees relating to their efforts to mediate this case. Specifically, Plaintiffs incurred \$527,026.60 in fees for 1276.95 hours of fees for time entries containing "mediation" related fees. Ex. H. A summary for "mediation" time entries exceeds 94 pages and includes time billed from what appears to be twenty-seven different timekeepers. Ex. H. The entries follow Plaintiffs' trend of unnecessary, duplicative billing practices.

More pointedly, Plaintiffs sent an unnecessary and excessive army of attorneys to each of the mediation sessions without any explanation as to why this was justified or necessary. November 12, 2019 is a microcosm demonstrating Plaintiffs' excessive fees throughout this case. Plaintiffs seek \$28,672.00 in fees for their attendance at the mediation that day alone. *Id.* at 30-31. Plaintiffs also seek fees and reimbursement for the attendance of nine attorneys' participation in the December 15, 2019 session,<sup>10</sup> totaling \$35,762 in fees and expenses, *id.* at 50-52; nine attorneys' participation in the February 7, 2020 session, totaling \$30,541.07 in fees and expenses, *id.* at 66-68; ten for the February 25-26, 2020 sessions, totaling \$62,171.84 in fees and expenses, *id.* at 75-80; eight for the June 4, 2020 session, totaling

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<sup>10</sup> Ms. Woody has double billed for her participation in the December 15, 2019 session. Her billing entries show a 7.5-hour entry for "attend mediation" and a 7-hour entry for "Mediation and revised drating [sic] w co-counsel", both on December 15, 2019. [Doc. 146-2].

\$17,562.30 in fees and expenses, *id.* at 85-88; and eight for the June 10-11, 2020 sessions totaling \$19, 235.50 in fees and expenses, *id.* at 87-88. Prior to the pandemic, these mediation sessions occurred in person, in Kansas City, and much of Plaintiffs' squadron of attorneys also billed their time to travel here.

Plaintiffs have not demonstrated any significant need for such overrepresentation at the mediation sessions and does not adhere to this District's practice for fees awarded simply for attending a mediation. *Tripp v. Berman & Rabin P.A.*, No. 14-CV-2646-DDC-GEB, 2017 WL 2289500, at \*5 (D. Kan. May 25, 2017)(disallowing fees requested for two attorneys to attend mediation on behalf of plaintiff class). Conversely, the Defendants were represented at most of the mediation sessions by a single outside attorney, Mr. Bradshaw. Ms. Josserand also attended the June sessions to assist in the preparations of the final Settlement Agreement.

Plaintiffs are also seeking to "double dip" on the mediation expenses.<sup>11</sup> DLA submits three entries for mediation expenses to be reimbursed. On November 19, 2019, Anne Geraghty Helms incurred an expense of \$9,394.05 [Doc. 148-2] at 2. On February 14, 2020 Anne Geraghty Helms incurred an expense of \$9,263.54 [Doc. 148-2] at 3. On March 11, 2020, Anne Geraghty Helms incurred an expense of \$17,378.57 [Doc. 148-2] at 4. In total, DLA Piper alone seeks \$36,036.16 for its mediation expenses, which constitutes half of all mediation expenses incurred in this case. Children's Rights and the National Center for Youth also seek reimbursement for

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<sup>11</sup> Defendant has already paid its agreed half of the mediator fees, totaling \$36,036.16.

these same mediation expenses. Children’s Rights seeks reimbursement of the following entries: “Payment to DLA Piper for 25% of mediation fee due for Kevin Ryan – August 20 through Nov. 13, 2019” in the amount of \$2,348.51, *id.* at 41; “Payment to DLA Piper for 25% of mediation fee due for Kevin Ryan – Nov. 14 through Dec. 28, 2019” in the amount of \$2,315.88, *id.* at 57; and “Payment to DLA Piper for 25% of mediation fee due for Kevin Ryan – Jan 03 through Feb. 13, 2020” in the amount of \$4,344.64, *id.* at National Center for Youth Law also seeks payments made to DLA Piper, “Payment to DLA Piper for 25% of mediation fee due for Kevin Ryan” in the amount of \$4,664.39. *Id.* at 71. It appears that while Children’s Rights and National Center for Youth Law reimbursed DLA Piper for some of these expenses (and are asking Defendants to pay), DLA Piper is still seeking the full amount (and asking Defendants to pay).

**3. The 530 Hours that Plaintiffs Billed to Respond to the Motion to Dismiss Are Not Recoverable, And They Are Excessive.**

Plaintiffs request fees for time expended by at least thirteen attorneys related to their work to research, review, analyze, research again, discuss and meet among themselves, draft and revise, and finalize their opposition to Governor Kelly’s successful motion to dismiss. This Court did dismiss the Governor. [Doc. 118]. The Governor is no longer a party to this lawsuit and is not a party to the Settlement Agreement. [Docs. 118, 133]. Plaintiffs are not “prevailing parties” with respect to the Governor and should not be allowed to recover any of their fees associated with pursuing their claims against her.

What is more, Plaintiffs' billing on a single motion response is excessive to the point of egregiousness. The work represents over 530 hours of time billed by Plaintiffs' counsel totaling (by Defendants' best guess given the issues with Plaintiffs' billing entries) \$191,830.00 in fees related to the motion to dismiss. Ex. I. Plaintiffs argue this time was "reasonably expended" to "vigorously" oppose Governor Kelly's motion. [Doc. 143] at 24.

In October 2019, Governor Kelly moved to dismiss Plaintiffs' claims against her because sovereign immunity precluded the claims against her in this suit. [Doc. 79, 80]. The Governor's motion totaled nine pages in length, and relied on a handful of cases to assert, as a legal matter, that Plaintiffs' could not identify a specific duty to enforce any of the challenged statutes and conduct.

The issue of Eleventh Amendment sovereign immunity is not unique or unfamiliar to Plaintiffs' counsel, either as a general principle of law or specifically within the children's rights litigation field in which both the National Center for Youth Law and Children's Rights organizations specialize. *See e.g., E.C. v. Blunt*, No. 05-0726-CV-W-SOW, 2006 WL 44318 (W.D. Mo. Jan. 9, 2006)(granting former Missouri Governor Matt Blunt's motion to dismiss in litigation involving Children's Rights' Ira Lustbader and Kansas attorney Loretta Burns-Bucklew); *Clark K. v. Guinn*, 2007 WL 1435428, at \*21-23 (D. Nev. May 14, 2007)(granting Governor's motion to dismiss in litigation involving National Center for Youth Law's Leccia Welch).

Plaintiffs' billing entries referencing or relating to work on the motion to dismiss demonstrate (again) extensive duplication of research, drafting, and discussion of the subject. Notably, Plaintiffs' counsel at Kansas Appleseed, National Center for Youth Law, and Children's Rights spent considerable time *months before any motion was filed* to research and correspond among themselves about potential motion to dismiss substantive and procedural issues. Ex. I. Attorneys Jonathan King, Larry Rute, and Teresa Woody all spent time researching the possible motion to dismiss. Attorney Poonam Junjea later reviewed and circulated past motion to dismiss briefing involving the National Center for Youth Law, which several attorneys, including a DLA Piper attorney, recorded time to review. *Id.*, 3 (May 2019 time entries of P. Junjea and W. Diggs). Despite Marissa Nardi preparing a memo summarizing recent motion to dismiss caselaw, at least five more attorneys recorded time to review and discuss the Governor's motion, cases cited therein, and to research again (despite having done so previously and having prior motion to dismiss briefing from other cases) the issues. *Id.*, at 4-8 (October 2019 time entries). And although he had previously recorded 3.67 hours on March 27, 2019 to "research Tenth Circuit case law regarding Younger abstention for potential motion to dismiss," attorney Jonathan King recorded over thirty-five additional hours to research case law regarding Plaintiffs' opposition to the Governor's motion. *Id.*, at 8-19 (time entries in November and December 2019, January 2020).

After requesting and obtaining multiple, generous extensions of time to respond [Docs. 81, 86], Plaintiffs ultimately submitted a response in opposition to the



Governor's 9-page motion that totaled 22 pages in length with seventy-two footnotes, and attached an affidavit from Teresa Woody purporting to show the various ways the Governor was directly involved in the state's foster care system. The hours expended among the more than a dozen timekeepers seeking time for work on the motion to dismiss are mind-boggling. Attorney Jonathan King recorded more than 98 hours to draft and revise the response. Attorney Marissa Nardi recorded *over 170 hours* to draft and revise the response, including at least seven days with more than eight hours recorded for this task. Ira Lustbader recorded almost 18 hours of time to edit and revise multiple versions of the draft response. In addition to the almost 300 hours of time expended by Mr. King, Ms. Nardi, and Mr. Lustbader, billing records reflect additional substantial time spent to review and revise Plaintiffs' response in opposition by National Youth Law Center's Leccia Welch (6.9 hours), Poonam Juneja (7.9 hours), Freya Pitts (9.4 hours), and Kansas Appleseed's Teresa Woody (3 hours). Children's Rights further utilized two paralegals to complete the filing of Plaintiffs' response. Paralegal Clare Connaughton recorded an additional 7.15 hours, while paralegal Daniel Adamek recorded 53.73 hours supporting the preparation and filing of Plaintiffs' response. Ex. I, at 8-33 (entries from November 2019-February 2020).

These are just the highlights. Additional attorneys also participated in the drafting and revising of the motion, or spent time pursuing discovery from the Governor despite the state of Kansas law providing no basis for the Court's exercise of jurisdiction over Governor Kelly. There were dozens of group specific meetings on the topic, weekly counsel meetings where the topic was discussed, emails, or other

calls engaged in by over a dozen timekeepers regarding a constant churn of work on the motion to dismiss by attorneys from all four organizations representing Plaintiffs. Ex. I. This time is excessive, duplicative, and an inefficient allocation of resources to oppose a one-issue dispositive motion that cited no evidence beyond Plaintiffs' pleadings.

Ultimately, Plaintiffs admit the "dismissal of the Governor from this case did not reduce the scope of any claims, or the substance of any of the relief in the Settlement." [Doc. 143] at 24 n.18. Despite now acknowledging the Governor was not a necessary litigant (which was precisely the point of the motion), Plaintiffs' counsel continues to assert this time was "required." [Doc. 144] ¶ 40 n.4. Plaintiffs' counsel "vigorously" opposed the motion to dismiss to the tune of almost \$200,000 in billable time that they now seek reimbursement of from the State of Kansas. The Court should deny the recovery Plaintiffs' seek for this work.

**4. "Meetings are indispensable when you don't want to do anything."<sup>12</sup>**

Plaintiffs' attorneys seek fees for time they collectively expended related to meeting after meeting, including "meet and confer" sessions (called by Plaintiffs) with Defendants' counsel, and regular or weekly meetings to talk amongst their collective, or individual teams. Plaintiffs assert they have reduced their billing for these meetings, by proactively limiting the number of billing attorneys for meet and confers with Defendants' counsel to no more than four attorneys total from CR, NCYL, Kansas Appleseed, and Mr. Burn-Bucklew, and reducing the number of billing

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<sup>12</sup> John Kenneth Galbraith, writer and economist.

attorneys to no more than two attorneys apiece from CR, NCYL, and Kansas Appleseed for regularly scheduled weekly meetings. For other conference calls that are not regularly scheduled, Plaintiffs attest that they reduced the number of billing attorney to no more than one attorney from each firm. [Doc. 143] at 26; [Doc. 144] ¶ 68. Even with these claimed reductions, the amount of people and the amount of time spent in these meetings is staggering and should not be assessed to the Defendants. *See Animal Legal Def. Fund v. Kelly*, No. CV 18-2657-KHV, 2020 WL 4000905, at \*6 (D. Kan. July 15, 2020)(court can reduce hours for duplicated conferences and inter-office and intra-office meetings); *Kansas Judicial Watch v. Stout*, No. 06-4056-JAR, 2012 WL 1033634, at \*8 (D. Kan. Mar. 27, 2012)(“Defendants should not be required to compensate Plaintiffs more than once for time spent by multiple associate attorneys in the same meeting.”); *Sinajini v. Board of Educ. Of San Juan County School Dist.*, 2002 WL 31781131 at \* 2 (10th Cir. 2002)(finding Court may properly reduce hours for excessive, duplicative, or unnecessary time spent in meetings).

Moreover, Plaintiffs have made no similar assurances that the number of billing attorneys from DLA Piper has also been limited, even though DLA Piper attorneys regularly participated in Plaintiffs’ counsel’s meetings. A glance over DLA’s billing submissions reveals that they, too, conducted regular team meetings, both amongst themselves and with their co-counsel. Ex. J.

It is impossible within the time constraints of this response to highlight all of the unreasonable and excessive fees fueled by Plaintiffs’ counsel’s penchant for meetings, calls, team emails and conferences, but their exhibits do reveal their

unreasonable nature. For instance, searching the entries for the word “call” lands on 157 unique time entries, many of them being internal, duplicative entries. One team call on July 17, 2019 between eight timekeepers resulted in fees of \$2,398. *See* Ex. H, at 2-3. These types of calls occurred every week, throughout the course of the lawsuit. *See, e.g.*, Ex. H, at 5 (DLA Piper Timekeeper William J. Diggs refers to “Weekly strategy call”).

Counsel’s records of their meetings are often inconsistent as detailed in Exhibit J. On at least one occasion, Plaintiffs seek time for three DLA Piper attorneys to attend a meet and confer with Defendants’ counsel on April 21, 2020.<sup>13</sup> While Olivia Tourgee recorded .7 hours for the meet and confer, Megan Kinney recorded 1.5 hours for the same meet and confer, while senior associate Joshua Kane recorded 2.4 hours to attend the same call. This happens again on April 17, 2020, where Megan Kinney (2 hours) and Joshua Kane (1.2 hours) bill entirely different blocks of time to attend a meet and confer call. On April 29, 2020, Mr. Kane recorded 2.5 hours for a meet and confer with Defendants regarding ESI issues for which co-counsel Marissa Nardi of NCYL billed only 1 hour. On May 22, 2020, Mr. Kane billed 2.9 hours for a meeting to discuss the deposition of Defendants’ IT employee, but time entries for Marissa Nardi (1 hour) and Poonam Junjea (.7 hours) reflect a much shorter period of time. On July 1, 2020, DLA Piper attorneys Olivia Tourgee, Kristin Pacio, and Megan Kinney recorded time to attend the same call with the Plaintiffs’ counsel team.

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<sup>13</sup> The DLA Piper attorneys did not actively participate in these meet and confer calls with all counsel.

Plaintiffs' time entries are also filled with entries reflecting time spent to prepare for these meetings, or to circulate notes from the meetings. On April 16, 2020, members of Plaintiffs' team held an almost 2-hour call to prepare for a meet and confer with Defendants the next day, and time entries reflect Marissa Nardi recorded more than 4 additional hours on April 16 and 17 to simply prepare for the meet and confer. On May 7, 2020, Clare Glasspiegel recorded 3.5 hours to draft talking points regarding COVID, and then recorded an additional 1 hour on May 8, 2020 to review her notes prior to advising Marissa Nardi about those same talking points. On May 8, 2020, a Children's Rights paralegal billed 1.22 hours to draft action items from a meet and confer with Defendants' counsel.

There are many dubious or questionable billing entries stemming from these meetings that reflect either billing errors or duplicative time entries by Plaintiffs' counsel. On November 1, 2019, Marissa Nardi recorded 1.5 hours to meet and confer with Defendants' counsel, a meeting for which Poonam Junjea, Teresa Woody, and Olivia Tourgee recorded .5 hours. On April 3, 2020, DLA Piper attorney Megan Kinney recorded .5 hours to attend counsels' weekly team call, and recorded an additional 1 hour to "attend team call to discuss meet and confer with Defendants." Members from Plaintiffs' counsel team seek time for an April 1, 2020 weekly call or strategy call, and seek time for an additional call on April 3, 2020 to discuss the same issues.

According to their time entries, counsel often spent hours among themselves preparing for weekly team meetings, or discussions to recap team meetings or meet

and confer sessions. Defendants' counsel has prepared the attached exhibit in an effort to compile time. Ex. J. Due to time constraints and Plaintiffs' failure to submit a comprehensive sortable file of time entries for which they seek reimbursement, it is impossible to accurately convey the full scope of discrepancies and errors in Plaintiffs' time entries. Defendants estimate Plaintiffs' seek, at minimum, fees for over 570 hours of attorney and paralegal time related to their constant churn of overstaffed weekly team meetings and excessive preparation and discussion via text, email, and phone on these meetings.

**5. The Fees and Expenses for Thirteen *Pro Hac Vice* Applications are Unnecessary and Excessive**

Plaintiffs filed thirteen *pro hac vice* applications during the course of this litigation, two of which were filed after the parties reached a settlement in this matter. [Docs. 3, 4, 5, 6, 7, 8, 16, 38, 39, 40, 77, 135, 136]. Plaintiffs' time entries reflect a staggering 44.5 hours billed at a variety of hourly rates for excessive discussions, correspondence, meetings, filing, and serving of these affidavits. Plaintiffs now seek more than \$12,000 in fees associated with the filing of these *pro hac vice* applications. Ex. K. This number is in addition to the \$525.08 in expenses that Plaintiffs ask the Court to award them for filing these thirteen applications. *See id.*

While one would reasonably expect paralegals to handle these routine motions (see *Animal Legal Def. Fund v. Kelly*, No. CV 18-2657-KHV, 2020 WL 4000905, at \*5 (D. Kan. July 15, 2020) holding that paralegal rates should apply for time preparing *pro hac* applications), several time entries reflect Plaintiffs' use of excessive attorney

time related to *pro hac vice* applications. For example, Marissa Nardi recorded 1.38 hours on November 20, 2018 to “advise” a paralegal on the preparation of these forms. Ex. K. A team of at least three attorneys and a paralegal then met for an additional hour the following day to discuss these applications and their use of pseudonyms for the Named Plaintiffs. *Id.* In July 2020, after the Court was alerted to the settlement, DLA Piper attorneys Olivia Tourgee and Joshua Kane billed more than 5 hours to discuss and prepare *additional pro hac vice* applications (why?). There is no indication these attorneys consulted with or used the expertise of paralegals, or local counsel, for this work.

Even where Plaintiffs had paralegals complete paralegal work, the billing entries are still mind-boggling. For example, when Children’s Rights attorneys submitted a total of four applications, paralegal Daniel Adamek billed 4.5 hours to “draft” these applications. Similarly, National Center for Youth Law paralegal Kira Setren recorded 3.1 hours to “prepare[] PHV motion and exhibits.” This is excessive under any standard. After filing the applications, paralegal Kira Setren recorded 2.2 hours to serve (presumably via postal mail as stated in the Welch and Pitts applications) two *pro hac vice* applications. Mr. Adamek later recorded 2.15 hours to edit Kansas Appleseed attorney Benet Magnuson’s *pro hac vice* application, for which Mr. Magnuson recorded an hour to draft.

Plaintiffs’ have failed to demonstrate any need for such excessive billing practices, particularly as to many attorneys that have no apparent involvement in this litigation except in the background to manage younger associates. These fees

and costs should be eliminated from any recovery awarded to Plaintiffs' attorneys. *Kansas Teachers Credit Union v. Mut. Guar. Corp.*, 982 F. Supp. 1445, 1448 (D. Kan. 1997)(disallowing additional *pro hac vice* fees that were unnecessary).

**6. Billing Entries Referencing COVID-19 or "COVID" Should be Stricken.**

During the course of this litigation, we entered a global pandemic. Plaintiffs' counsel took this opportunity to take a detour from the merits of their claims to send demands to and to serve discovery (with expedited response times) requesting detailed accounts of Defendants' response to the pandemic. There are no claims in Plaintiffs' Amended Complaint about COVID-19. [Doc. 63]. The Settlement Agreement does not mention COVID-19. [Doc. 134-1].

Still, Plaintiffs are seeking to be reimbursed \$35,301.50 for 94.15 hours of fees with COVID-related time entries. Ex. L, at 14. Neither the descriptions supplied to support these fees, nor the Motion for fees explain how COVID-19 discovery was necessary or how these fees advanced the claims actually litigated and the relief that they actually received.<sup>14</sup> Plaintiffs should not be rewarded for engaging in fishing expeditions and harassment.

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<sup>14</sup> In addition to not advancing the causes of action in this case, the fees sought are duplicative. For example, on March 25 and April 1, 2020, two different attorneys billed 2.3 total hours to attend calls discussing "COVID-19," without describing at all how such discussion advanced the claims regarding Kansas' child welfare system. [Doc. 148-1]



## **CONCLUSION**

Plaintiffs have not demonstrated that the Settlement Agreement entitles them to an award of fees and expenses under federal law. This, alone, justifies denial of Plaintiffs' request.

Plaintiffs assert they are entitled to \$3,753,896.50 in fees and \$128,476.01 in expenses, but fail to provide the necessary justification for such an excessive award to the Court. The Court should deny Plaintiffs' request outright.

Should the Court determine an award is warranted, any award should be reduced due to Plaintiffs' failure to demonstrate the reasonableness of their fees and expenses request. The rates proposed by Plaintiffs are unreasonable in light of Plaintiffs' own failure to apply them uniformly, and the premium rates sought for junior level attorneys, paralegals and a law student are unjustified. Likewise, Plaintiffs' billing records exhibit an excessive abundance of over-staffed and duplicative work, in addition to other troubling billing practices that demonstrate a lack of billing judgment. The end result is a request that is disproportional to the work actually performed and success achieved in this matter. For these reasons, Defendants respectfully request the Court deny Plaintiffs' Motion.

Respectfully Submitted,

**LATHROP GPM LLP**

By: /s/ Jean Paul Bradshaw

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ATTORNEYS FOR ALL DEFENDANTS

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on December 16, 2020, a copy of the foregoing was filed electronically with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to counsel of record.

*/s/ Jean Paul Bradshaw*

\_\_\_\_\_  
JEAN PAUL BRADSHAW, AN ATTORNEY FOR ALL  
DEFENDANTS

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
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,

vs.

LAURA HOWARD in her official capacity  
as Kansas Department for Children and  
Families Secretary, *et al*,

Defendants.

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

**DECLARATION OF DENNIS D. DEPEW**

I, Dennis D. Depew, declare under penalty of perjury that the foregoing is true and correct.

1. I have personal knowledge of the information contained in this Declaration.
2. I am a Deputy Attorney General for Civil Litigation of the Office of the Attorney General for the State of Kansas.
3. The Office of the Attorney General is responsible for defending State actors and agencies in civil litigation. In cases such as this one, where the State retains outside counsel to represent State parties, the Office of the Attorney General coordinates the engagement of such

counsel and the payment of fees for legal services rendered. I prepare the engagement contracts and review/approve all billing statements from outside counsel.

4. I am familiar with the Office of Attorney General's engagement of defense counsel to represent the named State Defendants in the above-referenced litigation and have approved the payment of fees for costs and services associated with this defense.

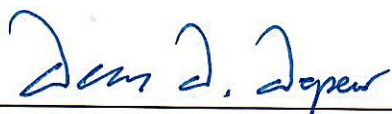
5. The State initially engaged the Law Offices of Barber Emerson, L.C. to act as defense counsel for the Governor and three State agencies sued in this lawsuit.

6. During the course of this lawsuit, the law firm of Lathrop Gage LLP took over as defense counsel for the lawsuit. This firm became known as Lathrop GPM LLP in January of 2020.

7. Since the onset of this litigation, the State of Kansas has paid a total of \$1,028,472.68 in attorneys' fees and expenses associated with the defense of the case. This includes \$208,793.14 paid to the Barber Emerson firm and \$819,679.54 paid to the firm of Lathrop Gage/Lathrop GPM.

8. The hourly rates charged by attorneys at Barber Emerson and Lathrop Gage/Lathrop GPM ranged from \$80 to \$155 for paralegals and \$200 to \$260 for associate attorneys, \$350 for counsel and \$260 to \$430 for partners.

Executed on December 15, 2020.

  
\_\_\_\_\_  
Dennis D. Depew

# **EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
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,

vs.

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.

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

**DECLARATION OF LAURA HOWARD**

I, Laura Howard, declare under penalty of perjury that the foregoing is true and correct:

1. I have personal knowledge of the information contained in this Declaration.
2. I am currently the Secretary of Kansas Department for Children and Families (“DCF”) and the Kansas Department for Aging and Disability Services (“KDADS”). I was named by then Governor-Elect Laura Kelly as the Interim Secretary of each agency on January 3, 2019. I began my service immediately following Governor Kelly’s inauguration on January



14, 2019 and was confirmed by the Kansas State Senate as the permanent Secretary for each agency on April 1, 2019.

3. I am familiar with this litigation and personally participated in the negotiations that culminated with the parties entering into the Settlement Agreement.

4. Prior to Governor Kelly's election on November 6, 2018, her campaign had identified improving the Kansas foster care program as one of her top priorities. I shared that commitment when I was appointed by her to head DCF and KDADS.

5. Immediately following my appointment and before being added as a party to this lawsuit, I and my staff began developing plans to improve the performance of DCF, KDADS and their providers.

6. Advocates for children in the foster care program, including Kansas Appleseed, were very aware of my commitment and that of Governor Kelly to these improvements.

7. Unfortunately, neither Kansas Appleseed, nor any of the other agencies or firms involved in this lawsuit, reached out to any of the Defendants prior to filing this lawsuit to even discuss their goals for the improvements to the Kansas Foster Care System although it was widely disseminated in the press that the Governor was committed to making improvements.

8. Defendants immediately agreed to participate in mediation and willingly entered into the Settlement Agreement. They are committed to reaching the improvements and outcomes outlined in the Agreement. Defendants' quickness to agree to enter into this particular Settlement Agreement was achievable because the terms are consistent with the goals that my administration already identified and were beginning to implement.

9. The items listed in the Practice Improvements and the Outcomes, Parts II and III of the Settlement Agreement, were already part of the improvements that I and my team had identified and were working to improve.

10. Because of the changes that DCF had implemented prior to the Settlement Agreement, DCF had already seen measurable improvement on many of the Outcomes set forth in the Settlement Agreement before any agreement had been reached with Plaintiffs.

11. Further, because these detailed improvements already were part of my administration, I was able to able to confidently enter into the Settlement Agreement without requesting any additional funding from the State Finance Council to secure compliance with the terms.

  
\_\_\_\_\_  
LAURA HOWARD

Dated 15th day of December, 2020.

# **EXHIBIT C**

**CHILDREN'S RIGHTS DISCREPANCY**

<b>Children's Rights Breakdown</b>	<b>Fees per Summary Submitted to Court (Doc 144 and 144-2)</b>	<b>Per Itemized Stmt Submitted to Court (Doc 144-3)</b>	<b>Difference</b>	<b>Hourly rate per Itemized Stmt Submitted to Court (Doc 144-3)</b>	<b>Hourly Rate per Affidavit (Doc 144)</b>
Ira Lustbader	\$484,308.33	\$484,308.42	\$0.09	\$500.00	\$500.00
Marissa Nardi	\$460,186.33	\$393,840.53	-\$66,345.80	\$325.00	\$380.00
Jonathan King	\$242,477.50	\$228,420.84	-\$14,056.66	\$325.00	\$345.00
Claire Glasspiegel	\$73,981.50	\$71,595.00	-\$2,386.50	\$300.00	\$310.00
Nicole Taykhman	\$56,965.67	\$58,930.00	\$1,964.33	\$300.00	\$290.00
Stephen Dixon	\$145,263.00	\$132,862.50	-\$12,400.50	\$375.00	\$410.00
Erin McGuinness	\$98,128.00	\$91,995.00	-\$6,133.00	\$225.00	\$240.00
Daniel Adamek	\$126,983.33	\$95,237.50	-\$31,745.83	\$150.00	\$200.0
Clare Connaughton	\$47,873.33	\$35,905.00	-\$11,968.33	\$150.00	\$200.00
	\$1,736,166.99	\$1,593,094.79	-\$143,072.20		

# **EXHIBIT D-1**

## BACKGROUND RESEARCH

Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
Leecia Welch	NCYL	Review KS background materials from CR	2.3	\$500.00	\$1,150.00	\$500.00	\$1,150.00	145-3
Poonam Juneja	NCYL	reviewing background documents shared by CR	2.1	\$395.00	\$829.50	\$395.00	\$829.50	145-3
Leecia Welch	NCYL	Review KS background materials in prep for KS meetings with local individuals involved in foster care system	1.5	\$500.00	\$750.00	\$500.00	\$750.00	145-3
Amanda Grill	NCYL	legal research review - private right of action	1.1	\$270.00	\$297.00	\$270.00	\$297.00	145-3
Leecia Welch	NCYL	Co-counsel call re investigation and legal research	0.9	\$500.00	\$450.00	\$500.00	\$450.00	145-3
Poonam Juneja	NCYL	co-counsel call re investigation and legal research	0.9	\$395.00	\$355.50	\$395.00	\$355.50	145-3
Marissa Nardi	Children's Rights	draft legal research action items	0.57	\$325.00	\$184.17	\$380.00	\$216.60	144-3
Leecia Welch	NCYL	Emails with team re needed legal research	0.3	\$500.00	\$150.00	\$500.00	\$150.00	145-3

## BACKGROUND RESEARCH

Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
Poonam Juneja	NCYL	emailing team re needed legal research	0.6	\$395.00	\$237.00	\$395.00	\$237.00	145-3
Poonam Juneja	NCYL	legal research re education claims	0.9	\$395.00	\$355.50	\$395.00	\$355.50	145-3
Poonam Juneja	NCYL	legal research re investigation ethics question	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
Leecia Welch	NCYL	Co-counsel call including re: stakeholder updates, local counsel, legal research, and fact development	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3
Poonam Juneja	NCYL	Co-counsel call including re: stakeholder updates, local counsel, legal research, and fact development	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
Amanda Grill	NCYL	Co-counsel team meeting including re: stakeholder updates, local counsel, legal research, and fact development	1.2	\$270.00	\$324.00	\$270.00	\$324.00	145-3

## BACKGROUND RESEARCH

Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
Leecia Welch	NCYL	Talking to PJ re research needs re PDP and reviewing related docs	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
Poonam Juneja	NCYL	Talking to LW re research needs re PDP and emailing LW related docs	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
Marissa Nardi	Children's Rights	discuss legal research projects with I. Lustbader	0.08	\$325.00	\$27.08	\$380.00	\$30.40	144-3
Marissa Nardi	Children's Rights	review and correspond with P. Juneja re legal research projects	0.13	\$325.00	\$43.33	\$380.00	\$49.40	144-3
Leecia Welch	NCYL	Phone call with team re: stakeholder updates, local counsel, legal research, and fact development	0.9	\$500.00	\$450.00	\$500.00	\$450.00	145-3
Poonam Juneja	NCYL	writing list of legal research questions outstanding	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3



## BACKGROUND RESEARCH

Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
Amanda Grill	NCYL	Co-counsel team meeting re: stakeholder updates, local counsel, legal research, and fact development	0.9	\$270.00	\$243.00	\$270.00	\$243.00	145-3
Amanda Grill	NCYL	Research KS Juvenile Court structure, powers, etc. to evaluate possible abstention defense	0.9	\$270.00	\$243.00	\$270.00	\$243.00	145-3
Amanda Grill	NCYL	Research KS Juvenile Court structure, powers, etc. to evaluate possible abstention defense	3.1	\$270.00	\$837.00	\$270.00	\$837.00	145-3
Marissa Nardi	Children's Rights	review E. Fowler's research to date re SDP COA	0.28	\$325.00	\$92.08	\$380.00	\$106.40	144-3
Marissa Nardi	Children's Rights	meet with E. Fowler re Kansas legal research on deliberate indifference	0.47	\$325.00	\$151.67	\$380.00	\$178.60	144-3

## BACKGROUND RESEARCH

Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
Amanda Grill	NCYL	Further research re KS Juvenile Court structure, powers, etc. to evaluate possible abstention defense	1.8	\$270.00	\$486.00	\$270.00	\$486.00	145-3
Marissa Nardi	Children's Rights	correspond with co-counsel re legal research re SDP	0.08	\$325.00	\$27.08	\$380.00	\$30.40	144-3
Amanda Grill	NCYL	Further research re KS Juvenile Court structure, powers, etc. to evaluate possible abstention defense	0.4	\$270.00	\$108.00	\$270.00	\$108.00	145-3
Amanda Grill	NCYL	Further research re KS Juvenile Court structure, powers, etc. to evaluate possible abstention defense	5.2	\$270.00	\$1,404.00	\$270.00	\$1,404.00	145-3
Leecia Welch	NCYL	Phone call with team re investigation, including re: fact development, stakeholder updates, local counsel, and legal research	1.1	\$500.00	\$550.00	\$500.00	\$550.00	145-3

## BACKGROUND RESEARCH

Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
Poonam Juneja	NCYL	Phone call with team re investigation, including re: fact development, stakeholder updates, local counsel, and legal research	1.1	\$395.00	\$434.50	\$395.00	\$434.50	145-3
Amanda Grill	NCYL	Further research re KS Juvenile Court structure, powers, etc. to evaluate possible abstention defense	4.1	\$270.00	\$1,107.00	\$270.00	\$1,107.00	145-3
Lori Burns-Bucklew	Burns-Bucklew	Phone call with team re investigation, including re: fact development, stakeholder updates, local counsel, and legal research	1.10	\$500.00	\$550.00	\$500.00	\$550.00	147-1
Amanda Grill	NCYL	Further research re KS Juvenile Court structure, powers, etc. to evaluate possible abstention defense	0.1	\$270.00	\$27.00	\$270.00	\$27.00	145-3

## BACKGROUND RESEARCH

Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
Marissa Nardi	Children's Rights	meet with E. Fowler re deliberate indifference legal research	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
Erin G. McGuinness	Children's Rights	Research the practicability of an ESSA claim in Kansas investigation.	1.28	\$225.00	\$288.75	\$240.00	\$307.20	144-3
Leecia Welch	NCYL	Co-counsel call, including re: FOF, Kansas trip, stakeholder interviews, and legal research	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3
Poonam Juneja	NCYL	Co-counsel call, including re: FOF, Kansas trip, stakeholder interviews, and legal research	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
Leecia Welch	NCYL	Phone call with PJ re legal research	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
Poonam Juneja	NCYL	Phone call with LW re legal research	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
Marissa Nardi	Children's Rights	Advise E. Fowler re legal research re SDP	0.25	\$325.00	\$81.25	\$380.00	\$95.00	144-3
Ira Lustbader	Children's Rights	Review/analyze Medicaid research and strategy	2.67	\$500.00	\$1,333.33	\$500.00	\$1,335.00	144-3

## BACKGROUND RESEARCH

Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
Ira Lustbader	Children's Rights	Follow up review of Medicaid research	1.17	\$500.00	\$583.33	\$500.00	\$585.00	144-3
Ira Lustbader	Children's Rights	Review/edit medicaid research memo	1.75	\$500.00	\$875.00	\$500.00	\$875.00	144-3
Erin G. McGuinness	Children's Rights	Research Kansas Medicaid system and interaction between KDHE and KDADS.	1.78	\$225.00	\$401.25	\$240.00	\$427.20	144-3
Amanda Grill	NCYL	Compiling notes re legal research questions and memos	0.4	\$270.00	\$108.00	\$270.00	\$108.00	145-3
Marissa Nardi	Children's Rights	meet with I. Lustbader and J. King re Kansas legal research	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
Erin G. McGuinness	Children's Rights	Review past research re confidentiality to assist in drafting of a confidentiality memo for the 10th circuit.	0.75	\$225.00	\$168.75	\$240.00	\$180.00	144-3
Jackie Stolzenberg	NCYL	Research Kansas confidentiality laws re foster youth	3.8	\$250.00	\$950.00	\$250.00	\$950.00	145-3

## BACKGROUND RESEARCH

Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
Benet Magnuson	Kansas Appleseed	research on holding KS gov as defendant	3.5	\$300.00	\$1,050.00	\$300.00	\$1,050.00	146-2
Marissa Nardi	Children's Rights	analyze research memorandum re 10th Circuit post- Walmart class certification standards	0.47	\$325.00	\$151.67	\$380.00	\$178.60	144-3
Marissa Nardi	Children's Rights	review updated class certification legal research	0.25	\$325.00	\$81.25	\$380.00	\$95.00	144-3
Erin G. McGuinness	Children's Rights	Research into the structure of the Kansas medicaid system.	1.42	\$225.00	\$318.75	\$240.00	\$340.80	144-3
Jackie Stolzenberg	NCYL	research and drafting memo on intra-district transfer in KS	1.2	\$250.00	\$300.00	\$250.00	\$300.00	145-3
Ira Lustbader	Children's Rights	Follow review of class issues; email to pro bono firm re follow up research	2.08	\$500.00	\$1,041.67	\$500.00	\$1,040.00	144-3
Jackie Stolzenberg	NCYL	research and drafting memo on intra-district transfer in KS	1.3	\$250.00	\$325.00	\$250.00	\$325.00	145-3

## BACKGROUND RESEARCH

Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
Jackie Stolzenberg	NCYL	research and drafting memo on intra-district transfer in KS	3.7	\$250.00	\$925.00	\$250.00	\$925.00	145-3
Jackie Stolzenberg	NCYL	research on KS confidentiality laws foster youth files	1.3	\$250.00	\$325.00	\$250.00	\$325.00	145-3
Jackie Stolzenberg	NCYL	research on KS confidentiality laws, access to foster youth files	0.8	\$250.00	\$200.00	\$250.00	\$200.00	145-3
Jonathan King	Children's Rights	Draft written analysis of legal research re next friends	5.02	\$325.00	\$1,630.42	\$345.00	\$1,731.90	144-3
Jackie Stolzenberg	NCYL	research on KS confidentiality laws, access to foster youth files	1.6	\$250.00	\$400.00	\$250.00	\$400.00	145-3
Jonathan King	Children's Rights	Continue researching Tenth Circuit caselaw regarding next friends to update memorandum	1.50	\$325.00	\$487.50	\$345.00	\$517.50	144-3

## BACKGROUND RESEARCH

Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
Jonathan King	Children's Rights	Update legal research memorandum regarding analysis of adequacy of next friends	1.78	\$325.00	\$579.58	\$345.00	\$614.10	144-3
Ira Lustbader	Children's Rights	Research analyzed SDP and MH claims interrelationship, cases	5.17	\$500.00	\$2,583.33	\$500.00	\$2,585.00	144-3
Marissa Nardi	Children's Rights	discuss with I. Lustbader and J. King substantive due process research	0.45	\$325.00	\$146.25	\$380.00	\$171.00	144-3
Marissa Nardi	Children's Rights	Begin researching substantive due process re night- to-night placements	1.25	\$325.00	\$406.25	\$380.00	\$475.00	144-3
Jonathan King	Children's Rights	Research Kansas statutes and case law regarding class definition	2.75	\$325.00	\$893.75	\$345.00	\$948.75	144-3
Marissa Nardi	Children's Rights	conduct legal research re substantive due process re placements	1.92	\$325.00	\$622.92	\$380.00	\$729.60	144-3
Marissa Nardi	Children's Rights	edit draft legal research memo re night-to-nights	1.80	\$325.00	\$585.00	\$380.00	\$684.00	144-3



## BACKGROUND RESEARCH

Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
Jackie Stolzenberg	NCYL	research on J. Lungstrum class cert decisions	1.8	\$250.00	\$450.00	\$250.00	\$450.00	145-3
Jackie Stolzenberg	NCYL	research KS litigation brought on behalf of foster youth, email correspondence w L. Welch re same	3.1	\$250.00	\$775.00	\$250.00	\$775.00	145-3
Jackie Stolzenberg	NCYL	research on J. Lungstrum class cert decisions	2.8	\$250.00	\$700.00	\$250.00	\$700.00	145-3
Jonathan King	Children's Rights	Legal research re District of Kansas requirements for service and filing proof of service	3.58	\$325.00	\$1,164.58	\$345.00	\$1,235.10	144-3
Freya Pitts	NCYL	Legal research re: in camera review of child in need of care records in the District of Kansas; email L. Welch re: same	1.1	\$365.00	\$401.50	\$365.00	\$401.50	145-3
<b>TOTALS</b>			<b>105.30</b>		<b>\$35,578.49</b>		<b>\$36,446.05</b>	

# **EXHIBIT D-2**

## EPSDT RESEARCH

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
5/14/2018	Erin G. McGuinness	Children's Rights	Legal and factual research re Kansas Medicaid structure in consideration of an EPSDT claim for mental health treatment.	3.77	\$225.00	\$847.50	\$240.00	\$904.80	144-3
6/25/2018	Marissa Nardi	Children's Rights	conduct legal research re EPSDT	3.92	\$325.00	\$1,272.92	\$380.00	\$1,489.60	144-3
6/25/2018	Leecia Welch	NCYL	Research re EPSDT issues	0.7	\$500.00	\$350.00	\$500.00	\$350.00	145-3
6/29/2018	Marissa Nardi	Children's Rights	continue conducting legal research re EPSDT COA	2.15	\$325.00	\$698.75	\$380.00	\$817.00	144-3
7/1/2018	Marissa Nardi	Children's Rights	conduct EPSDT research	4.07	\$325.00	\$1,321.67	\$380.00	\$1,546.60	144-3
7/2/2018	Marissa Nardi	Children's Rights	Draft written summary of EPSDT research for circulation to team	0.88	\$325.00	\$287.08	\$380.00	\$334.40	144-3
7/2/2018	Leecia Welch	NCYL	Review memos re 10th Circuit EPSDT case law	0.8	\$500.00	\$400.00	\$500.00	\$400.00	145-3
7/2/2018	Leecia Welch	NCYL	Email to legal expert re EPSDT law in 10th Circuit	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
7/6/2018	Leecia Welch	NCYL	Emails with team re EPSDT meeting	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3

## EPSDT RESEARCH

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
7/6/2018	Poonam Juneja	NCYL	email with LW KS re call on research on EPSDT claims in 8th circuit	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
7/11/2018	Erin G. McGuinness	Children's Rights	Call with Medicaid legal expert to discuss feasibility of an EPSDT claim in Kansas.	0.50	\$225.00	\$112.50	\$240.00	\$120.00	144-3
7/11/2018	Stephen Dixon	Children's Rights	Telephone call with co-counsel team re EPSDT claims; Medicaid legal expert joined the call about 35 minutes into the call	1.23	\$375.00	\$462.50	\$410.00	\$504.30	144-3
7/11/2018	Leecia Welch	NCYL	Team Call with consulting expert re EPSDT	0.7	\$500.00	\$350.00	\$500.00	\$350.00	145-3
7/11/2018	Amanda Grill	NCYL	Team Call with consulting expert re EPSDT	0.7	\$270.00	\$189.00	\$270.00	\$189.00	145-3
7/11/2018	Amanda Grill	NCYL	Preparing EPSDT notes	0.5	\$270.00	\$135.00	\$270.00	\$135.00	145-3

## EPSDT RESEARCH

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
7/11/2018	Kira Setren	NCYL	Prepared meeting notes from team calls and call with EPSDT consulting expert with Amanda per Leecia	1.1	\$200.00	\$220.00	\$200.00	\$220.00	145-3
7/11/2018	Kira Setren	NCYL	Team Call with consulting expert re EPSDT	0.7	\$200.00	\$140.00	\$200.00	\$140.00	145-3
7/11/2018	Lori Burns-Bucklew	Burns-Bucklew	Team Call with consulting expert re EPSDT	0.70	\$500.00	\$350.00	\$500.00	\$350.00	147-1
7/12/2018	Amanda Grill	NCYL	Further preparing EPSDT notes	1.1	\$270.00	\$297.00	\$270.00	\$297.00	145-3
7/13/2018	Erin G. McGuinness	Children's Rights	Discuss Kansas EPSDT claim and legal research with IL.	0.42	\$225.00	\$93.75	\$240.00	\$100.80	144-3
7/20/2018	Erin G. McGuinness	Children's Rights	Analyze what qualifies as a mental health condition to shape EPSDT claims.	0.12	\$225.00	\$26.25	\$240.00	\$28.80	144-3
8/7/2018	Marissa Nardi	Children's Rights	review EPSDT legal research re private right of action	0.87	\$325.00	\$281.67	\$380.00	\$330.60	144-3

## EPSDT RESEARCH

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
8/8/2018	Marissa Nardi	Children's Rights	review updated draft memo by E. Fowler re EPSDT pleading requirements	0.55	\$325.00	\$178.75	\$380.00	\$209.00	144-3
8/9/2018	Ira Lustbader	Children's Rights	Cont'd review/comment on EPSDT research	1.58	\$500.00	\$791.67	\$500.00	\$790.00	144-3
8/10/2018	Marissa Nardi	Children's Rights	Edit draft EPSDT legal research memo by E. Fowler	1.57	\$325.00	\$509.17	\$380.00	\$596.60	144-3
8/15/2018	Marissa Nardi	Children's Rights	review updated EPSDT memo by E. Fowler	0.48	\$325.00	\$157.08	\$380.00	\$182.40	144-3
9/5/2018	Erin G. McGuinness	Children's Rights	Meeting with IL JK re EPSDT research.	0.67	\$225.00	\$150.00	\$240.00	\$160.80	144-3
9/5/2018	Stephen Dixon	Children's Rights	Electronic mail with potential client re potential EPSDT claim	0.03	\$375.00	\$12.50	\$410.00	\$12.30	144-3
9/5/2018	Stephen Dixon	Children's Rights	Electronic mail to co-counsel facts supporting EPSDT claim	0.05	\$375.00	\$18.75	\$410.00	\$20.50	144-3
9/6/2018	Stephen Dixon	Children's Rights	Electronic mail to co-counsel re potential EPSDT claim facts	0.03	\$375.00	\$12.50	\$410.00	\$12.30	144-3

## EPSDT RESEARCH

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
9/7/2018	Jonathan King	Children's Rights	Research case law regarding EPSDT for cause of action for complaint	1.38	\$325.00	\$449.58	\$345.00	\$476.10	144-3
9/11/2018	Jonathan King	Children's Rights	Conduct legal resaerch re EPSDT provision of Medicaid Act	0.82	\$325.00	\$265.42	\$345.00	\$282.90	144-3
9/12/2018	Jonathan King	Children's Rights	Legal research re EPSDT provision of Medicaid Act for preparation of EPSDT cause of action in complaint	3.98	\$325.00	\$1,294.58	\$345.00	\$1,373.10	144-3
9/13/2018	Jonathan King	Children's Rights	Legal research re EPSDT provision of Medicaid Act for complaint drafting purposes	4.52	\$325.00	\$1,467.92	\$345.00	\$1,559.40	144-3
9/14/2018	Jonathan King	Children's Rights	Meet with IL and MN regarding EPSDT research	1.00	\$325.00	\$325.00	\$345.00	\$345.00	144-3
9/17/2018	Jonathan King	Children's Rights	Research case law regarding potential EPSDT claim	3.20	\$325.00	\$1,040.00	\$345.00	\$1,104.00	144-3

## EPSDT RESEARCH

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
9/18/2018	Jonathan King	Children's Rights	Meet with internal CR team re updates from EPSDT research	0.58	\$325.00	\$189.58	\$345.00	\$200.10	144-3
9/18/2018	Jonathan King	Children's Rights	Research case law regarding potential EPSDT claim	2.38	\$325.00	\$774.58	\$345.00	\$821.10	144-3
9/19/2018	Jonathan King	Children's Rights	Begin drafting written analysis of legal research regarding potential EPSDT claim	7.17	\$325.00	\$2,329.17	\$345.00	\$2,473.65	144-3
9/20/2018	Jonathan King	Children's Rights	Meet with MN regarding EPSDT research	0.33	\$325.00	\$108.33	\$345.00	\$113.85	144-3
9/20/2018	Jonathan King	Children's Rights	Research case law regarding potential EPSDT claim	5.27	\$325.00	\$1,711.67	\$345.00	\$1,818.15	144-3
9/21/2018	Ira Lustbader	Children's Rights	Telephone call with Jon K regarding EPSDT research and strategy	0.33	\$500.00	\$166.67	\$500.00	\$165.00	144-3
9/21/2018	Jonathan King	Children's Rights	Call with IL regarding EPSDT research	0.33	\$325.00	\$108.33	\$345.00	\$113.85	144-3



## EPSDT RESEARCH

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
9/21/2018	Jonathan King	Children's Rights	Research case law regarding potential EPSDT claim	6.20	\$325.00	\$2,015.00	\$345.00	\$2,139.00	144-3
9/24/2018	Jonathan King	Children's Rights	Draft summary of research regarding potential EPSDT claim	0.70	\$325.00	\$227.50	\$345.00	\$241.50	144-3
9/25/2018	Jonathan King	Children's Rights	Research case law regarding potential EPSDT claim	2.87	\$325.00	\$931.67	\$345.00	\$990.15	144-3
9/26/2018	Ira Lustbader	Children's Rights	Read/analyzing research memo JK on EPSDT cases and strategy	2.83	\$500.00	\$1,416.67	\$500.00	\$1,415.00	144-3
9/26/2018	Jonathan King	Children's Rights	Research case law regarding potential EPSDT claim	2.35	\$325.00	\$763.75	\$345.00	\$810.75	144-3
9/28/2018	Jonathan King	Children's Rights	Research case law regarding potential EPSDT claim	6.43	\$325.00	\$2,090.83	\$345.00	\$2,218.35	144-3
10/1/2018	Ira Lustbader	Children's Rights	Read memo and caselaw and comment EPSDT claims, edits for JK	1.83	\$500.00	\$916.67	\$500.00	\$915.00	144-3

## EPSDT RESEARCH

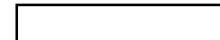
Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
10/1/2018	Jonathan King	Children's Rights	Legal research of case law regarding EPSDT claim	1.77	\$325.00	\$574.17	\$345.00	\$610.65	144-3
10/2/2018	Jonathan King	Children's Rights	Continue drafting written analysis of legal research regarding potential EPSDT claim	5.65	\$325.00	\$1,836.25	\$345.00	\$1,949.25	144-3
10/3/2018	Erin G. McGuinness	Children's Rights	Discuss EPSDT research regarding requirement to provide mental health assessments with JK and IL.	0.50	\$225.00	\$112.50	\$240.00	\$120.00	144-3
10/3/2018	Jonathan King	Children's Rights	Research case law regarding potential EPSDT claim	0.72	\$325.00	\$232.92	\$345.00	\$248.40	144-3
10/4/2018	Jonathan King	Children's Rights	Research case law regarding potential EPSDT claim	0.43	\$325.00	\$140.83	\$345.00	\$148.35	144-3
10/5/2018	Ira Lustbader	Children's Rights	Follow up review of Epsdt research to date and claims	1.92	\$500.00	\$958.33	\$500.00	\$960.00	144-3

## EPSDT RESEARCH

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
10/5/2018	Jonathan King	Children's Rights	Draft summary of research regarding potential EPSDT claim	0.72	\$325.00	\$232.92	\$345.00	\$248.40	144-3
10/16/2018	Jonathan King	Children's Rights	Research case law regarding potential EPSDT claim	4.03	\$325.00	\$1,310.83	\$345.00	\$1,390.35	144-3
10/17/2018	Jonathan King	Children's Rights	Finalize memornadum of analysis of potential EPSDT claim based on legal research	1.27	\$325.00	\$411.67	\$345.00	\$438.15	144-3
10/29/2018	Jonathan King	Children's Rights	Conduct more targetted legal research of caselaw regarding potential EPSDT claim in response to inquiry by team	8.02	\$325.00	\$2,605.42	\$345.00	\$2,766.90	144-3
11/9/2018	Jonathan King	Children's Rights	Research case law regarding potential EPSDT claim	2.47	\$325.00	\$801.67	\$345.00	\$852.15	144-3
11/13/2018	Erin G. McGuinness	Children's Rights	Email with JK re EPSDT provisions in mental health section.	0.30	\$225.00	\$67.50	\$240.00	\$72.00	144-3

## EPSDT RESEARCH

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
11/13/2018	Freya Pitts	NCYL	Legal research re: revisions to EPSDT claim	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
11/13/2018	Freya Pitts	NCYL	Legal research re: revisions to EPSDT screening claim; email correspondence with I. Lustbader, L. Welch, E. McGuinness, and J. King re: same	1.3	\$365.00	\$474.50	\$365.00	\$474.50	145-3
<b>TOTALS</b>				<b>114.09</b>		<b>\$38,280.94</b>		<b>\$40,709.35</b>	



# **EXHIBIT E**

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
2		2/8/2018	Leecia Welch		Flights to and from Kansas City 2/26-3/2 to meet with local individuals connected to foster care system	\$296.60	Flights	United Airlines	National Center for Youth Law	145-2	203
3		2/16/2018	Poonam Juneja		Flights to and from Kansas City 2/26-3/2 to meet with local individuals connected to foster care system	\$496.96	Flights	Southwest Airlines	National Center for Youth Law	145-2	204
4		2/23/2018	Poonam Juneja		Change date of flight to Kansas City to 2/28	\$109.00	Flights	Southwest Airlines	National Center for Youth Law	145-2	205
5		2/28/2018	Poonam Juneja		Travel to OAK airport from home traveling to Kansas for interviews with various stakeholders involved in foster care system	\$23.61	Taxi	Lyft	National Center for Youth Law	145-2	206

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
6		2/28/2018	Poonam Juneja		Travel from KC airport to hotel arriving in Kansas for interviews with various stakeholders involved in foster care system	\$30.90	Taxi	Lyft	National Center for Youth Law	145-2	207
7		3/2/2018	Poonam Juneja		Hotel for 2/28-3/2/18 for meetings with local individuals connected to foster care system	\$385.80	Hotel	HOTEL INDIGO	National Center for Youth Law	145-2	208
8		3/2/2018	Poonam Juneja		Travel from hotel to KC airport returning home from meetings with local stakeholders	\$28.66	Taxi	LYFT	National Center for Youth Law	145-2	209
9		3/2/2018	Poonam Juneja		Travel from OAK airport to office returning from meetings with Kansas stakeholders	\$19.21	Taxi	LYFT	National Center for Youth Law	145-2	210

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
10		3/2/2018	Leecia Welch		Hotel for 2/28-3/2/18 for meetings with local individuals connected to foster care system	\$354.56	Hotel	HOTEL INDIGO	National Center for Youth Law	145-2	211
11		3/4/2018	Leecia Welch		Flights to and from Kansas for 3/18-3/21 for meetings with various local stakeholders	\$499.60	Flights	United Airlines	National Center for Youth Law	145-2	212
12		03/14/2018			03/14/2018 Airfare: EM flight from Houston to Kansas City for investigative trip:United Airlines	\$383.30	Travel		Children's Rights	144-4	15
13		03/14/2018			03/14/2018 Airfare: EM Flight from Kansas City to NY for investigative trip:Delta Air Lines	\$327.50	Travel		Children's Rights	144-4	16
14		3/18/2018	Leecia Welch		Hotel for 3/18-21 for meetings with various local stakeholders	\$405.34	Hotel	HOTEL INDIGO	National Center for Youth Law	145-2	213



## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Documen t	Original Sort Order
15		03/19/2018			03/19/2018 Taxi: EM Uber from airport to hotel in Kansas for investigative trip 3/18/18:UBER	\$30.12	Travel		Children's Rights	144-4	17
16		03/20/2018			03/20/2018 Fuel: EM & SD Gas for Rental Car in Kansas for investigative trip 3/20/18:EASY TRIP 1	\$29.77	Travel		Children's Rights	144-4	18
17		03/21/2018			03/21/2018 Hotel: EM Hotel in Kansas City 3/18/18-3/20/18 3 Nights Stay for investigative trip:HOTEL INDIGO	\$578.15	Travel		Children's Rights	144-4	19
18		03/21/2018			03/21/2018 Hotel: EM Hotel in Wichita 3/19/18 1 Night Stay for investigative trip:DRURY PLAZA HOTEL BROADWA	\$165.54	Travel		Children's Rights	144-4	20

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
1											
19		03/21/2018			03/21/2018 Fuel: EM, SD Gas for rental car for investigative trip 3/21/18:PHILLIPS 66-CONOCO-76 CAT	\$22.61	Travel		Children's Rights	144-4	21
20		3/21/2018	Leecia Welch		Taxi from airport to home returning from Kansas for meetings with various local stakeholders	\$51.90	Taxi	SQ * YELLOW CO OP	National Center for Youth Law	145-2	214
21		03/22/2018			03/22/2018 Airfare: SD-American Airlines flight from LA (hometown) to TX (layover) to KS for investigative trip (RT)	\$615.00	Travel		Children's Rights	144-4	22
22		03/22/2018			03/22/2018 Hotel: SD-hotel in Kansas 2/28 2 nights for investigative trip	\$249.32	Travel		Children's Rights	144-4	23
23		03/22/2018			03/22/2018 Car Rental: SD-car rental 2/28 2 days for investigative trip	\$105.92	Travel		Children's Rights	144-4	24

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
24		03/22/2018			03/22/2018 Parking: SD-parking at airport 3/2 for investigative trip	\$6.00	Travel		Children's Rights	144-4	25
25		03/29/2018			03/29/2018 Airfare: SD-American Airlines flight from LA (hometown) to TX (layover) to KS for investigative trip (RT)	\$800.99	Travel		Children's Rights	144-4	26
26		03/29/2018			03/29/2018 Hotel: SD-hotel in Kansas for investigative trip 3/20	\$217.90	Travel		Children's Rights	144-4	27
27		03/29/2018			03/29/2018 Hotel: SD-hotel in Kansas for investigative trip 3/19	\$161.71	Travel		Children's Rights	144-4	28
28		03/29/2018			03/29/2018 Car Rental: SD-car rental in Kansas for 3 days for investigative trip 3/18	\$149.88	Travel		Children's Rights	144-4	29

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
29		03/29/2018			03/29/2018 Hotel: SD-hotel in Kansas for investigative trip 3/18	\$141.82	Travel		Children's Rights	144-4	30
30		03/29/2018			03/29/2018 Taxi: SD-taxi from airport to home 3/21 for investigative trip	\$40.00	Travel		Children's Rights	144-4	31
31		4/20/2018	Leecia Welch		Flights to and from Kansas for 5/14-5/16/18 for meetings with individuals connected to foster care system	\$355.40	Flights	United Airlines	National Center for Youth Law	145-2	215
32		05/04/2018			05/04/2018 Airfare: IL travel to/from Kansas with MN for investigative trip 5.15.18 - 5.16.18:DELTA AIR LINES	\$583.08	Travel		Children's Rights	144-4	32

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
33		05/14/2018			05/14/2018 Taxi: MN Investigatory trip taxi from home to airport: MALCOLM MANAGEMENT CORP	\$58.06	Travel		Children's Rights	144-4	33
34		5/14/2018	Leecia Welch		Hotel for 5/14-5/16/18 for meetings with individuals connected to foster care system	\$329.47	Hotel	HOTEL INDIGO KANSAS CITY	National Center for Youth Law	145-2	216
35		05/15/2018			05/15/2018 Taxi: MN taxi from KS airport to hotel for investigative trip 5/14/18 :UBER	\$30.71	Travel		Children's Rights	144-4	34
36		05/16/2018			05/16/2018 Hotel: MN 2 Nights in hotel room during KS investigatory trip 5/14/18 :HOTEL INDIGO	\$493.06	Travel		Children's Rights	144-4	35

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
37		5/16/2018	Leecia Welch		Taxi from airport to home returning from Kansas meetings with local individuals connected to foster care system	\$49.90	Taxi	YELLOW CAB SF 415-8394600 CA	National Center for Youth Law	145-2	217
38		05/17/2018			05/17/2018 Taxi: MN travel during KS investigatory trip 5/16/18 :UBER	\$50.88	Travel		Children's Rights	144-4	36
39		05/31/2018			05/31/2018 Hotel: SD- 2 nights in hotel in Kansas for investigation trip 5/14	\$343.88	Travel		Children's Rights	144-4	37
40		05/31/2018			05/31/2018 Airfare: SD-United Airlines flight from LA (hometown) to TX (layover) to KS for investigative trip 5/14	\$209.80	Travel		Children's Rights	144-4	38

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Documen t	Original Sort Order
41		05/31/2018			05/31/2018 Airfare: SD-American Airlines flight from KS to TX (layover) to LA (hometown) for investigative trip 5/16	\$209.80	Travel		Children's Rights	144-4	39
42		05/31/2018			05/31/2018 Car Rental: SD-car rental for 2 days for investigative trip 5/14-5/16	\$140.22	Travel		Children's Rights	144-4	40
43		05/31/2018			05/31/2018 Fuel: SD-tolls and mileage from Baton Rouge (home) to New Orleans airport for investigative trip 5/16	\$73.03	Travel		Children's Rights	144-4	41
44		05/31/2018			05/31/2018 Parking: SD-parking at airport in New Orleans for investigative trip 5/14-5/17	\$41.31	Travel		Children's Rights	144-4	42

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
45		05/31/2018			05/31/2018 Fuel: SD-gas for drive from Baton Rouge (home) to New Orleans airport for investigative trip 5/16	\$24.64	Travel		Children's Rights	144-4	43
46		6/3/2018	Leecia Welch		Flight from Kansas for 6/20/18 returning from meetings with local individuals involved in child welfare system	\$209.20	Flights	United Airlines	National Center for Youth Law	145-2	219
47		6/10/2018	Leecia Welch		Flight to Kansas on 6/17/18 for meetings with local individuals involved in child welfare system	\$552.20	Flights	United Airlines	National Center for Youth Law	145-2	218



## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
48		06/15/2018			06/15/2018 Airfare: EM round trip flight from NYC to Kansas City for investigative trip 6/17/2018-6/20/2018.:Delta Air Lines	\$798.80	Travel		Children's Rights	144-4	44
49		06/17/2018			06/17/2018 Taxi: EM Lyft to LaGuardia for flight to KC on 6/17/18 for investigative trip.:LYFT.COM	\$54.13	Travel		Children's Rights	144-4	45
50		6/19/2018	Leecia Welch		Uber from client meeting	\$23.98	Taxi	UBER	National Center for Youth Law	145-2	220
51		06/20/2018			06/20/2018 Hotel: EM-Hotel for 3 nights 6/17 for investigative trip::HOTEL INDIGO	\$751.03	Travel		Children's Rights	144-4	46

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
52		06/20/2018			06/20/2018 Taxi: EM taxi home from airport 6/20/2018 for investigative trip:NEW YORK CITY TAXI	\$48.30	Travel		Children's Rights	144-4	47
53		6/20/2018	Leecia Welch		Taxi from airport returning home from meetings with local individuals involved in child welfare system	\$50.37	Taxi		National Center for Youth Law	145-2	221
54		6/20/2018	Leecia Welch		Hotel for 6/17-6/20/18 for meetings with local individuals involved in child welfare system	\$769.12	Hotel	HOTEL INDIGO	National Center for Youth Law	145-2	222
55		6/20/2018	Leecia Welch		6/20/18 Uber from hotel to airport	\$33.10	Taxi	UBER	National Center for Youth Law	145-2	223
56		06/30/2018			06/30/2018 Hotel: SD-hotel for 3 nights in Kansas for investigative trip 6/17	\$602.00	Travel		Children's Rights	144-4	48

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Documen t	Original Sort Order
57		06/30/2018			06/30/2018 Airfare: SD-American Airlines from Louisiana to Kansas roundtrip for investigative trip 6/17	\$470.60	Travel		Children's Rights	144-4	49
58		06/30/2018			06/30/2018 Car Rental: SD-car rental in Kansas 6/17 for 3 days for investigative trip	\$157.07	Travel		Children's Rights	144-4	50
59		06/30/2018			06/30/2018 Parking: SD-parking at airport in Louisiana on 6/17 for 3 days for investigative trip	\$36.00	Travel		Children's Rights	144-4	51
60		06/30/2018			06/30/2018 Fuel: SD- gas for rental car in Kansas on 6/20 for travel for investigative trip	\$26.53	Travel		Children's Rights	144-4	52

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
61		7/13/2018	Leecia Welch		Flight from SFO to/from Kansas for 7/31-8/4/18 for meetings with local individuals involved in child welfare system	\$490.40	Flights	United	National Center for Youth Law	145-2	224
62		07/30/2018			07/30/2018 Airfare: EM Round trip flight to Kansas from NYC 7/31/18-8/3/18 for investigative trip:Delta Air Lines	\$816.40	Travel		Children's Rights	144-4	53
63		07/31/2018			07/31/2018 Taxi: EM taxi from office to LaGuardia for flight to Kansas 7/31/18 for investigative trip.:GREEN APPLE MANAGEMENT CO	\$47.75	Travel		Children's Rights	144-4	54
64		7/31/2018	Leecia Welch		Uber from home to airport	\$38.90	Taxi	UBER (\$31.90 + \$7)	National Center for Youth Law	145-2	225

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
65		08/01/2018			08/01/2018 Taxi: EM taxi from airport to hotel in Kansas City on 8/1/18 for investigative trip:KANSAS CITY TAXI	\$55.66	Travel		Children's Rights	144-4	55
66		8/2/2018	Leecia Welch		8/2/18 Uber from stakeholder meeting to hotel	\$21.18	Taxi	UBER	National Center for Youth Law	145-2	226
67		08/03/2018			08/03/2018 Hotel: EM hotel in Kansas City 8/1/18-8/2/18 for investigative trip:21C MUSEUM HOTEL	\$432.10	Travel		Children's Rights	144-4	56
68		08/03/2018			08/03/2018 Taxi:EM taxi from airport to office after Kansas trip on 8/3/18 for investigative trip:S&R MEDALLION CORP	\$47.88	Travel		Children's Rights	144-4	57

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
69		08/03/2018			08/03/2018 Fuel:EM gas for rental car in Kansas for investigative trip on 8/3/18.:SINCLAIR OIL CORPORATION	\$36.83	Travel		Children's Rights	144-4	58
70		8/3/2018	Leecia Welch		8/2/18 Uber tip from stakeholder meeting to hotel	\$2.00	Taxi	UBER	National Center for Youth Law	145-2	227
71		8/3/2018	Leecia Welch		Flights to and from Kansas for 8/29-9/2/18 for meetings with potential client and other local individuals connected with child welfare system	\$302.40	Flights	United Airlines	National Center for Youth Law	145-2	230
72		8/4/2018	Leecia Welch		Uber to airport (\$30.51 + \$6) returning home from meetings with local individuals involved in child welfare system	\$36.51	Taxi	UBER	National Center for Youth Law	145-2	228

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
73		8/4/2018	Leecia Welch		Hotel for 7/31-8/4/18 for meetings with local individuals involved in child welfare system	\$922.85	Hotel	21 C MUSEUM HOTEL KANSAS CITY MO	National Center for Youth Law	145-2	229
74		08/23/2018			08/23/2018 Airfare:EM Round trip flight to Kansas from NYC 8/28/18 - 8/31/18 for investigative trip.:American Airlines	\$992.04	Travel		Children's Rights	144-4	59
75		08/28/2018			08/28/2018 Taxi:EM Lyft to airport for flight to Kansas for investigative trip 8/28/18.:LYFT.COM	\$39.65	Travel		Children's Rights	144-4	60
76		08/29/2018			08/29/2018 Hotel:EM hotel in Wichita for investigative trip 8/28/18:DRURY PLAZA HOTEL BROADWA	\$123.56	Travel		Children's Rights	144-4	61

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
77		8/29/2018	Leecia Welch		Uber from home to airport	\$46.80	Taxi	UBER	National Center for Youth Law	145-2	231
78		08/30/2018			08/30/2018 Hotel: SD 3 Night Hotel Stay in KS for investigative trip 7.31.18: 21C Museum Hotel	\$648.15	Travel		Children's Rights	144-4	62
79		08/30/2018			08/30/2018 Airfare: SD Round trip flight to KS from Louisiana for investigative trip - 7.31.18: American Airlines	\$539.61	Travel		Children's Rights	144-4	63
80		08/30/2018			08/30/2018 Airfare: SD 3 Day Car Rental in Kansas for investigative trip - 7.31.18: Hotwire	\$203.25	Travel		Children's Rights	144-4	64



## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
81		08/30/2018			08/30/2018 Parking: SD - 2 Nights Parking in Kansas for investigative trip 7.31.18: 21C Museum Hotel	\$50.00	Travel		Children's Rights	144-4	65
82		08/30/2018			08/30/2018 Parking: SD 3 Day Parking at airport for investigative trip 7.31.18 - 8.3.18: Standard Parking	\$36.00	Travel		Children's Rights	144-4	66
83		08/30/2018			08/30/2018 Fuel: EM Gas for rental car in Kansas on 8/30/18 for investigative trip.:PHILLIPS 66- CONOCO-76 CAT	\$16.01	Travel		Children's Rights	144-4	67
84		08/31/2018			08/31/2018 Hotel: EM hotel in Kansas City from 8/29/18- 8/31/18 for investigative trip.:21C MUSEUM HOTEL	\$377.52	Travel		Children's Rights	144-4	68

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
85		08/31/2018			08/31/2018 Taxi: EM Lyft from hotel to airport in Kansas City on 8/31/18 for investigative trip.:LYFT.COM	\$22.85	Travel		Children's Rights	144-4	69
86		9/1/2018	Leecia Welch		Hotel for 8/29-9/2/18 Meetings with potential client and other local individuals connected with child welfare system	\$592.70	Hotel	21 C MUSEUM HOTEL KANSAS CITY MO	National Center for Youth Law	145-2	232
87		9/3/2018	Leecia Welch		Taxi from airport to home returning from Kansas for meetings with potential client and other local stakeholders	\$56.52	Taxi	SQ*NATIONAL CAB. VETERAN	National Center for Youth Law	145-2	233

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
88		9/10/2018	Leecia Welch		Flights to/from Kansas City for 10/6-10/11 for meetings with local foster care advocates and other stakeholders (total charge was \$246.40; 50% charged to MB)	\$123.20	Flights	United	National Center for Youth Law	145-2	234
89		09/14/2018			09/14/2018 Hotel: SD 3 Nights Stay at Kansas City hotel on 8.29.18 for investigative trip: Kansas City Hotel	\$645.04	Travel		Children's Rights	144-4	70
90		09/14/2018			09/14/2018 Car Rental: SD 4 Day car rental in KS for investigative trip	\$288.46	Travel		Children's Rights	144-4	71
91		09/14/2018			09/14/2018 Airfare: SD Flight from Baton Rouge to Wichita for investigative trip on 8.28.18 : American Airlines	\$279.80	Travel		Children's Rights	144-4	72

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
92		09/14/2018			09/14/2018 Hotel: SD 1 night hotel stay on 8.28.18 for investigative trip: Drury Hotels	\$126.24	Travel		Children's Rights	144-4	73
93		09/14/2018			09/14/2018 Parking: 3 Day Parking: Standard Parking for investigatory trip	\$45.00	Travel		Children's Rights	144-4	74
94		09/14/2018			09/14/2018 Fuel: SD - Gas for rental car on 9.1.18 for investigative trip	\$23.93	Travel		Children's Rights	144-4	75
95		9/28/2018	Freya Pitts		Flight from Oak-Kansas City on 10/6-10/11 for meetings with local foster care advocates and other stakeholders (total charge was \$524.28; 50% charged to MB)	\$262.14	Flights	Southwest Airlines	National Center for Youth Law	145-2	235

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
96		09/29/2018			09/29/2018 Airfare: IL Round trip flight from NY to Kansas City for 10/9 for investigative trip :Delta Air Lines	\$494.87	Travel		Children's Rights	144-4	76
97		09/29/2018			09/29/2018 Airfare :MN Round trip to KS from New York for investigatory trip Oct 9 - 10 2018:Delta Air Lines	\$494.87	Travel		Children's Rights	144-4	77
98		10/04/2018			10/04/2018 Airfare: EM round trip flight to Wichita 10/9/18-10/12/18 for investigative trip.:Southwest Airlines	\$745.60	Travel		Children's Rights	144-4	78
99		10/6/2018	Leecia Welch		Flights to and from Kansas on 11/4-11/8 for meetings with local foster care advocates and potential clients	\$296.40	Flights	UNITED	National Center for Youth Law	145-2	236

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
100		10/6/2018	Leecia Welch		Uber to SFO tip traveling to Kansas for meetings with local foster care advocates and co-counsel	\$8.00	Taxi	UBER	National Center for Youth Law	145-2	237
101		10/6/2018	Leecia Welch		Uber to SFO traveling to Kansas for meetings with local foster care advocates and co-counsel	\$54.53	Taxi	UBER	National Center for Youth Law	145-2	238
102		10/09/2018			10/09/2018 Taxi: IL car service from home to airport for investigative trip:DELUX TRANSPORTATION	\$84.84	Travel		Children's Rights	144-4	79
103		10/09/2018			10/09/2018 Taxi: MN travel from home to airport for 10/9 for KS investigatory trip:UBER	\$41.71	Travel		Children's Rights	144-4	80

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
104		10/09/2018			10/09/2018 Taxi: EM Lyft to airport for flight to Kansas on 0/9/2018 for investigative trip.:LYFT.COM	\$35.24	Travel		Children's Rights	144-4	81
105		10/09/2018			10/09/2018 Taxi: EM taxi from Wichita airport to hotel on 10/9/18 for investigative trip.:ABC TAXI CAB COMPANY INC	\$19.38	Travel		Children's Rights	144-4	82
106		10/9/2018	Freya Pitts		Independence, Missouri Hotel for 10/9-10/12 (total charge was \$368.68; 50% charged to MB) for meetings with local foster care advocates and co-counsel	\$184.34	Hotel	HOLIDAY INN EXPRESS	National Center for Youth Law	145-2	239

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
107		10/10/2018			10/10/2018 Hotel: IL hotel stay in Kansas on 10.9.18 - 1 Night for investigative trip :CROSSROADS HOTELS, LLC	\$410.44	Travel		Children's Rights	144-4	83
108		10/10/2018			10/10/2018 Hotel: MN hotel in Kansas for KS investigatory trip Oct 9-10 2018 1 Night Stay :CROSSROADS HOTELS, LLC	\$410.44	Travel		Children's Rights	144-4	84
109		10/10/2018			10/10/2018 Car Rental: IL 2 Day car rental in Kansas City 10.9.18 for investigative trip:Hertz	\$217.06	Travel		Children's Rights	144-4	85
110		10/10/2018			10/10/2018 Taxi: IL car service from airport for investigative trip to home:DELUX TRANSPORTATION	\$86.35	Travel		Children's Rights	144-4	86



## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
111		10/10/2018			10/10/2018 Parking: IL-parking at hotel in Kansas for investigative trip 10/9 CROSSROADS HOTELS, LLC	\$25.00	Travel		Children's Rights	144-4	87
112		10/10/2018			10/10/2018 Taxi: EM Lyft to coffee shop in Wichita to meet stakeholder for investigative trip on 10/10/18.:LYFT.COM	\$4.64	Travel		Children's Rights	144-4	88
113		10/10/2018			10/10/2018 Taxi: EM Lyft to coffee shop in Wichita to meet stakeholder for investigative trip on 10/10/18.:LYFT.COM	\$3.52	Travel		Children's Rights	144-4	89
114		10/10/2018	Leecia Welch		Uber to co-counsel meeting	\$17.94	Taxi	UBER	National Center for Youth Law	145-2	240

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
115		10/11/2018			10/11/2018 Taxi: MN travel from airport to home on 10/10 from KS investigatory trip:UBER	\$31.83	Travel		Children's Rights	144-4	90
116		10/11/2018	Leecia Welch		Hotel for 10/7-11 (total charge was \$1,473.10; 50% charged to MB) for meetings with local foster care advocates and co- counsel	\$736.55	Hotel	21C MUSEUM HOTEL	National Center for Youth Law	145-2	241
117		10/11/2018	Freya Pitts		Gas for Kansas City trip for cocounsel mtg and mtgs with local advocates (total charge was \$24.80; 50% charged to MB)	\$12.40	Gas	PILOT_00443	National Center for Youth Law	145-2	244

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
118		10/12/2018			10/12/2018 Hotel: EM hotel in Wichita 10/9/2018-10/12/2018 for investigative trip.:Drury Inn & Suites	\$558.74	Travel		Children's Rights	144-4	91
119		10/12/2018			10/12/2018 Taxi: EM taxi home from airport for investigative trip on 10/12/2018:UNITED MGMT GROUP INC	\$41.00	Travel		Children's Rights	144-4	92
120		10/12/2018	Leecia Welch		Cab from SFO returning from Kansas meetings with local foster care advocates and co-counsel (total charge was \$51; 50% charged to MB)	\$25.50	Taxi	CITYWIDE TAXI	National Center for Youth Law	145-2	242

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
121		10/12/2018	Freya Pitts		Car rental - for transportation for Freya and Leecia for meetings with local foster care advocates and co-counsel (total charge was \$185.17; 50% charged to MB)	\$92.59	Car Rental	ALAMO RENT- A-CAR	National Center for Youth Law	145-2	243
122		10/12/2018	Freya Pitts		Gas for Kansas City trip for cocounsel mtg and mtgs with local advocates (total charge was \$8.96; 50% charged to MB)	\$4.48	Gas	KCI KWIK SHOP	National Center for Youth Law	145-2	245
123		10/31/2018			10/31/2018 Hotel: SD-hotel in Kansas for 3 nights 10/7 - 10/9 for investigative trip	\$446.02	Travel		Children's Rights	144-4	93
124		10/31/2018			10/31/2018 Car Rental: SD-car rental in Kansas 10/7 through 10/12 for investigative trip	\$384.31	Travel		Children's Rights	144-4	94

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Documen t	Original Sort Order
125		10/31/2018			10/31/2018 Airfare: SD-American Airlines flights from KS for investigative trip to TX (layover) to LA (hometown) on 10/12	\$356.80	Travel		Children's Rights	144-4	95
126		10/31/2018			10/31/2018 Hotel: SD-hotel in Kansas for 2 nights 10/10- 10/11 for investigative trip	\$331.07	Travel		Children's Rights	144-4	96
127		10/31/2018			10/31/2018 Airfare: SD-United Airlines flight from LA (hometown) to TX (layover) to KS on 10/7 for investigative trip	\$268.80	Travel		Children's Rights	144-4	97
128		10/31/2018			10/31/2018 Parking: SD-parking at the airport for investigative trip 10/7-10/12	\$90.54	Travel		Children's Rights	144-4	98

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
129		10/31/2018			10/31/2018 Fuel: SD-milleage for drive from home to airport for investigative trip 10/7-10/12	\$76.30	Travel		Children's Rights	144-4	99
130		10/31/2018			10/31/2018 Fuel: SD-gas for rental car in Kansas for investigative trip on 10/11	\$28.26	Travel		Children's Rights	144-4	100
131		10/31/2018			10/31/2018 Fuel: SD-gas for rental car in Kansas for investigative trip on 10/9	\$26.76	Travel		Children's Rights	144-4	101
132		10/31/2018			10/31/2018 Tolls: SD-tolls 10/8 in Kansas for investigatory trip	\$4.50	Travel		Children's Rights	144-4	102
133		10/31/2018			10/31/2018 Tolls: SD-tolls 10/9 in Kansas for investigatory trip	\$3.50	Travel		Children's Rights	144-4	103

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
134		11/8/2018	Leecia Welch		Cab from SFO to home	\$56.50	Taxi	FLYWHEEL	National Center for Youth Law	145-2	246
135		11/11/2018	Leecia Welch		Flights to and from Kansas for 11/15-11/16/18 for client meetings	\$1,136.40	Flights	United Airlines	National Center for Youth Law	145-2	247
136		11/12/2018			11/12/2018 Airfare: JK round trip flight from NYC to Kansas City 11/14/18-11/16/18 for investigative trip:Delta Air Lines	\$959.40	Travel		Children's Rights	144-4	104
137		11/12/2018			11/12/2018 Airfare: EM round trip flight from NYC to Kansas City 11/14/18-11/16/18 for investigative trip.:Delta Air Lines	\$959.40	Travel		Children's Rights	144-4	105

## Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
1		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Document	Original Sort Order
138		11/13/2018	Leecia Welch		Flights to and from Kansas for 11/27-12/1/18 for meetings with various stakeholders re foster care issues	\$327.40	Flights	United Airlines	National Center for Youth Law	145-2	251
139		11/14/2018			11/14/2018 Taxi: JK taxi to LaGuardia airport for KS investigative trip:CARMELLIMOPASS	\$55.20	Travel		Children's Rights	144-4	106
140		11/14/2018			11/14/2018 Taxi: EM Lyft to LaGuardia for flight to Kansas City on 11/14/2018 for investigative trip.:LYFT.COM	\$33.10	Travel		Children's Rights	144-4	107
141					<b>TOTAL Pre-Litigation Expenses (airfare, hotel, taxis, parking, fuel):</b>	<b>\$33,775.19</b>					



Pre-Litigation Expenses Submitted by Plaintiffs

	A	B	C	D	E	F	G	H	I	J	K
		Date	Name	Title	Description	Amount	Category	Vendor	Entity	ECF No. of Source Documen t	Original Sort Order
1											
142					<b>CASE FILED ON 11/16/18</b>						

# **EXHIBIT F**

## N T A L C O M P L A I N T P R E P A R A T O N

Date <small>Some e p. dates ad usted to match e ent</small>	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/3/2018	Ira Lustbader	Children's Rights	Telephone call with Leecia Welch re strategy for complaint	0.58	\$500.00	\$291.67	\$500.00	\$290.00	144-3
5/24/2018	Ira Lustbader	Children's Rights	Follow up analysis on claims structure and complaint FOF outline	1.58	\$500.00	\$791.67	\$500.00	\$790.00	144-3
5/29/2018	Marissa Nardi	Children's Rights	discuss and meet with H. Cherepon re fact-gathering for complaint drafting	0.37	\$325.00	\$119.17	\$380.00	\$140.60	144-3
6/5/2018	Ira Lustbader	Children's Rights	Review analyze outline for FOF and complaint alleg	1.17	\$500.00	\$583.33	\$500.00	\$585.00	144-3
6/6/2018	Marissa Nardi	Children's Rights	participate in Kansas co-counsel team mtg re complaint drafting and investigation	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
6/7/2018	Marissa Nardi	Children's Rights	Correspond with legal intern E. Fowler re deliberate indifference research for substantive due process SDP cause of action COA for draft complaint	0.13	\$325.00	\$43.33	\$380.00	\$49.40	144-3
6/8/2018	Marissa Nardi	Children's Rights	meet with intern . Weber re policy research for complaint drafting	0.27	\$325.00	\$86.67	\$380.00	\$102.60	144-3

## N T A L C O M P L A N T P R E P A R A T O N

6/13/2018	Marissa Nardi	Children's Rights	correspond with Weber re policy research for complaint drafting	0.25	\$325.00	\$81.25	\$380.00	\$95.00	144-3
6/20/2018	Marissa Nardi	Children's Rights	participate in Kansas co-counsel team call re complaint and stakeholder strategy	1.32	\$325.00	\$427.92	\$380.00	\$501.60	144-3
6/25/2018	Marissa Nardi	Children's Rights	Meet with external co-counsel team re complaint drafting and investigatory meetings with individuals on the group	1.42	\$325.00	\$460.42	\$380.00	\$539.60	144-3
7/18/2018	Marissa Nardi	Children's Rights	participate in Kansas external co-counsel team meeting re complaint drafting and new facts	0.92	\$325.00	\$297.92	\$380.00	\$349.60	144-3
7/30/2018	Larry Rute	Kansas Appleseed	Meeting with Appleseed Executive Director, Benet Magnuson, to discuss my potential involvement in behalf of Appleseed in helping draft a Complaint and representing a Class of Foster Care Children	1.8	\$500.00	\$900.00	\$500.00	\$900.00	146-2
7/31/2018	Marissa Nardi	Children's Rights	participate in team external co-counsel agreement re FOF, complaint drafting, and collaboration	0.33	\$325.00	\$108.33	\$380.00	\$125.40	144-3

## N T A L C O M P L A N T P R E P A R A T O N

8/2/2018	Ira Lustbader	Children's Rights	Review draft FOF regarding complaint strategy	1.83	\$500.00	\$916.67	\$500.00	\$915.00	144-3
8/8/2018	Ira Lustbader	Children's Rights	Strategy conference call with co-counsel team LBB, NYCL, CR and complaint drafting	1.33	\$500.00	\$666.67	\$500.00	\$665.00	144-3
8/8/2018	Leecia Welch	NCYL	Co-counsel team meeting re investigation and complaint drafting	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3
8/8/2018	Lori Burns-Bucklew	Burns-Bucklew	Strategy conference call with co-counsel team NCYL and CR to discuss investigation, including complaint drafting	1.33	\$500.00	\$666.67	\$500.00	\$665.00	147-1
8/8/2018	Marissa Nardi	Children's Rights	help lead Kansas co-counsel team meeting re complaint drafting and fact updates from investigation and time reflects needing to leave the meeting early	0.87	\$325.00	\$281.67	\$380.00	\$330.60	144-3
8/8/2018	Poonam Juneja	NCYL	Co-counsel team meeting re investigation and complaint drafting	1.2	\$395.00	\$474.00	\$395.00	\$474.00	145-3
8/9/2018	Erin G. McGuinness	Children's Rights	Review and analyze past NCYL consent decrees as examples for complaint drafting and litigation strategy.	0.30	\$225.00	\$67.50	\$240.00	\$72.00	144-3

## N T A L C O M P L A N T P R E P A R A T O N

8/15/2018	Erin G. McGuinness	Children's Rights	Weekly team meeting to discuss everyone's updates on stakeholder outreach, complaint drafting, and upcoming trip with MN, DA, co-counsel NCYL LBB .	0.98	\$225.00	\$221.25	\$240.00	\$235.20	144-3
8/15/2018	Leecia Welch	NCYL	Co-counsel call re factual investigation updates, co-counsel partnerships, and complaint drafting	0.9	\$500.00	\$450.00	\$500.00	\$450.00	145-3
8/15/2018	Lori Burns-Bucklew	Burns-Bucklew	Weekly team meeting to discuss updates on stakeholder outreach, complaint drafting, and upcoming trip with co-counsel NCYL CR .	0.98	\$500.00	\$491.67	\$500.00	\$490.00	147-1
8/15/2018	Marissa Nardi	Children's Rights	meeting with D. Adamek and E. McGuinness re factual research for complaint EPSDT COA	0.30	\$325.00	\$97.50	\$380.00	\$114.00	144-3
8/15/2018	Marissa Nardi	Children's Rights	participate in external co-counsel team meeting re factual investigation updates, co-counsel partnerships, and complaint drafting	0.98	\$325.00	\$319.58	\$380.00	\$372.40	144-3

## N T A L C O M P L A I N T P R E P A R A T O N

8/15/2018	Poonam Juneja	NCYL	Co-counsel call re factual investigation updates, co-counsel partnerships, and complaint drafting	0.9	\$395.00	\$355.50	\$395.00	\$355.50	145-3
8/17/2018	Ira Lustbader	Children's Rights	Review/analyze FOF regarding complaint outline contd	1.42	\$500.00	\$708.33	\$500.00	\$710.00	144-3
8/20/2018	Freya Pitts	NCYL	Call with L. Welch re: outlining complaint	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
8/20/2018	Ira Lustbader	Children's Rights	Review and analyze FOF cont'd regarding framing complaint	1.92	\$500.00	\$958.33	\$500.00	\$960.00	144-3
8/20/2018	Leecia Welch	NCYL	Call with FP re: outlining complaint	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3
8/22/2018	Freya Pitts	NCYL	Co-counsel team meeting re investigation and complaint drafting	1.1	\$365.00	\$401.50	\$365.00	\$401.50	145-3
8/22/2018	Ira Lustbader	Children's Rights	Cont'd review and analysis FOF; review of status of plttf potentials; both re outlining complaint	3.67	\$500.00	\$1,833.33	\$500.00	\$1,835.00	144-3
8/22/2018	Leecia Welch	NCYL	Co-counsel team meeting re investigation and complaint drafting	1.1	\$500.00	\$550.00	\$500.00	\$550.00	145-3
8/22/2018	Lori Burns-Bucklew	Burns-Bucklew	Co-counsel team meeting re: investigation and complaint drafting	1.10	\$500.00	\$550.00	\$500.00	\$550.00	147-1
8/22/2018	Marissa Nardi	Children's Rights	help lead co-counsel team meeting re complaint drafting and investigatory updates	0.93	\$325.00	\$303.33	\$380.00	\$353.40	144-3

## N T A L C O M P L A N T P R E P A R A T O N

8/22/2018	Stephen Dixon	Children's Rights	Telephone call with team re complaint drafting, investigation strategy came late to meeting	0.35	\$375.00	\$131.25	\$410.00	\$143.50	144-3
8/23/2018	Amanda Grill	NCYL	Meet with F. Pitts re strategy for complaint drafting	0.2	\$270.00	\$54.00	\$270.00	\$54.00	145-3
8/23/2018	Freya Pitts	NCYL	Meet with A. Grill re: strategy for complaint drafting	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
8/23/2018	Freya Pitts	NCYL	Review Kansas findings of fact document to inform drafting of complaint	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
8/23/2018	Ira Lustbader	Children's Rights	Meeting with MN regarding strategy on outline for complaint	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3
8/23/2018	Ira Lustbader	Children's Rights	Analyzing FOF regarding frame for complaint outline	3.17	\$500.00	\$1,583.33	\$500.00	\$1,585.00	144-3
8/24/2018	Amanda Grill	NCYL	Strategy meeting with F. Pitts re: complaint outline and collecting evidence from findings of fact document	0.3	\$270.00	\$81.00	\$270.00	\$81.00	145-3
8/24/2018	Freya Pitts	NCYL	Call with M. Nardi, I. Lustbader, and A. Grill re: complaint outline	1.2	\$365.00	\$438.00	\$365.00	\$438.00	145-3



## N T A L C O M P L A N T P R E P A R A T O N

8/24/2018	Freya Pitts	NCYL	Review Kansas findings of fact document and sample complaints to inform drafting of complaint	0.9	\$365.00	\$328.50	\$365.00	\$328.50	145-3
8/24/2018	Freya Pitts	NCYL	Review sample complaints and file to prepare for call with M. Nardi, I. Lustbader, and A. Grill re: complaint drafting	1.0	\$365.00	\$365.00	\$365.00	\$365.00	145-3
8/24/2018	Freya Pitts	NCYL	Strategy meeting with A. Grill re: complaint outline and collecting evidence from findings of fact document	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
8/24/2018	Freya Pitts	NCYL	Update L. Welch on CR input on complaint outline	1.1	\$365.00	\$401.50	\$365.00	\$401.50	145-3
8/24/2018	Ira Lustbader	Children's Rights	Prep for strategic call with Freya and NYCL, MN regarding strategy for complaint	1.25	\$500.00	\$625.00	\$500.00	\$625.00	144-3
8/24/2018	Ira Lustbader	Children's Rights	Telephone call with Freya and NYCL, MN regarding strategy for complaint	1.25	\$500.00	\$625.00	\$500.00	\$625.00	144-3
8/24/2018	Leecia Welch	NCYL	Convo with FP re CR input on complaint outline	1.1	\$500.00	\$550.00	\$500.00	\$550.00	145-3
8/24/2018	Marissa Nardi	Children's Rights	correspond with F. Pitts re complaint drafting	0.23	\$325.00	\$75.83	\$380.00	\$87.40	144-3

## N T A L C O M P L A I N T P R E P A R A T O N

8/27/2018	Freya Pitts	NCYL	Confer with L. Welch re: complaint strategy	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
8/27/2018	Leecia Welch	NCYL	Confer with FP re: complaint strategy	0.3	\$500.00	\$150.00	\$500.00	\$150.00	145-3
8/28/2018	Freya Pitts	NCYL	Team call with cocounsel re complaint drafting	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3
8/28/2018	Leecia Welch	NCYL	Team call with cocounsel re complaint drafting	0.4	\$500.00	\$200.00	\$500.00	\$200.00	145-3
8/28/2018	Lori Burns-Bucklew	Burns-Bucklew	Team call with cocounsel re: complaint drafting	0.40	\$500.00	\$200.00	\$500.00	\$200.00	147-1
8/28/2018	Marissa Nardi	Children's Rights	participate in Kansas group call re complaint drafting	0.52	\$325.00	\$167.92	\$380.00	\$197.60	144-3
8/30/2018	Freya Pitts	NCYL	Review relevant press coverage re: deficiencies in Kansas's welfare system to inform drafting of complaint	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
9/5/2018	Freya Pitts	NCYL	Team call with cocounsel re complaint, investigation strategy, etc	1.5	\$365.00	\$547.50	\$365.00	\$547.50	145-3
9/5/2018	Leecia Welch	NCYL	Team call with cocounsel re complaint, investigation strategy, etc	1.5	\$500.00	\$750.00	\$500.00	\$750.00	145-3
9/5/2018	Stephen Dixon	Children's Rights	Telephone call with co-counsel team re complaint, investigation strategy	1.50	\$375.00	\$562.50	\$410.00	\$615.00	144-3

## N T A L C O M P L A I N T P R E P A R A T O N

9/6/2018	Ira Lustbader	Children's Rights	Analyzing FOF cont'd regarding complaint outline	1.83	\$500.00	\$916.67	\$500.00	\$915.00	144-3
9/7/2018	Erin G. McGuinness	Children's Rights	Drafted out timeline for help in drafting complaint for named plaintiff "J.M."	1.00	\$225.00	\$225.00	\$240.00	\$240.00	144-3
9/7/2018	Jonathan King	Children's Rights	Research case law regarding EPSDT for cause of action for complaint	1.38	\$325.00	\$449.58	\$345.00	\$476.10	144-3
9/11/2018	Ira Lustbader	Children's Rights	Analyzing FOF for complaint outline and strategy	2.08	\$500.00	\$1,041.67	\$500.00	\$1,040.00	144-3
9/11/2018	Marissa Nardi	Children's Rights	correspond with E. McGuinness re complaint drafting	0.10	\$325.00	\$32.50	\$380.00	\$38.00	144-3
9/12/2018	Daniel Adamek	Children's Rights	Meeting with MN, EM JK re investigation updates and complaint drafting strategy	0.25	\$150.00	\$37.50	\$200.00	\$50.00	144-3
9/12/2018	Daniel Adamek	Children's Rights	Compile and organize legal research memos to disseminate to co-counsel to inform complaint drafting strategy	0.53	\$150.00	\$80.00	\$200.00	\$106.00	144-3
9/12/2018	Freya Pitts	NCYL	Team call with cocounsel re next steps and strategy for complaint and named plaintiffs, and follow up discussion	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3

## N T A L C O M P L A N T P R E P A R A T O N

9/12/2018	Freya Pitts	NCYL	Email correspondence with M. Nardi re: complaint samples	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
9/12/2018	Jonathan King	Children's Rights	Meet with MN, EM, and DA regarding drafting complaint	0.25	\$325.00	\$81.25	\$345.00	\$86.25	144-3
9/12/2018	Jonathan King	Children's Rights	Legal research re EPSDT provision of Medicaid Act for preparation of EPSDT cause of action in complaint	3.98	\$325.00	\$1,294.58	\$345.00	\$1,373.10	144-3
9/12/2018	Leecia Welch	NCYL	Team call with cocounsel re next steps and strategy for complaint and named plaintiffs, and follow up discussion	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3
9/12/2018	Marissa Nardi	Children's Rights	meet with JK EMG and DA re legal, policy, and fact research for complaint COAs	0.25	\$325.00	\$81.25	\$380.00	\$95.00	144-3
9/13/2018	Jonathan King	Children's Rights	Legal research re EPSDT provision of Medicaid Act for complaint drafting purposes	4.52	\$325.00	\$1,467.92	\$345.00	\$1,559.40	144-3
9/13/2018	Marissa Nardi	Children's Rights	prepare for KS joint co-counsel call re complaint drafting and investigation	0.25	\$325.00	\$81.25	\$380.00	\$95.00	144-3
9/14/2018	Jonathan King	Children's Rights	Continue researching case law regarding potential EPSDT claim for complaint	2.00	\$325.00	\$650.00	\$345.00	\$690.00	144-3

## N T A L C O M P L A N T P R E P A R A T O N

9/14/2018	Larry Rute	Kansas Appleseed	Meeting with Kansas Appleseed Board of Directors to discuss potential litigation and receive approval and authorization to file complaint	1.2	\$500.00	\$600.00	\$500.00	\$600.00	146-2
9/17/2018	Ira Lustbader	Children's Rights	Continued analysis 2018 performance data regarding complaint outline	1.25	\$500.00	\$625.00	\$500.00	\$625.00	144-3
9/18/2018	Freya Pitts	NCYL	Review sample complaints and file to inform drafting of complaint	2.3	\$365.00	\$839.50	\$365.00	\$839.50	145-3
9/18/2018	Ira Lustbader	Children's Rights	Cont'd analyzing FOF and approach for complaint outline	1.83	\$500.00	\$916.67	\$500.00	\$915.00	144-3
9/19/2018	Freya Pitts	NCYL	Team call with cocounsel re: complaint, local stakeholders, potential Plaintiffs and Next Friends, call with Kansas Appleseed, and upcoming visit	0.8	\$365.00	\$292.00	\$365.00	\$292.00	145-3
9/19/2018	Freya Pitts	NCYL	Outline complaint; send to L. Welch for review	3.1	\$365.00	\$1,131.50	\$365.00	\$1,131.50	145-3
9/19/2018	Freya Pitts	NCYL	Review sample complaints and file to inform drafting of complaint	1.0	\$365.00	\$365.00	\$365.00	\$365.00	145-3

## N T A L C O M P L A N T P R E P A R A T O N

9/19/2018	Jonathan King	Children's Rights	Conference call with team regarding case status and local updates; discuss research and drafting of complaint	0.78	\$325.00	\$254.58	\$345.00	\$269.10	144-3
9/19/2018	Leecia Welch	NCYL	Team call with cocounsel re: complaint, local stakeholders, potential Plaintiffs and Next Friends, call with Kansas Appleseed, and upcoming visit	0.8	\$500.00	\$400.00	\$500.00	\$400.00	145-3
9/19/2018	Lori Burns-Bucklew	Burns-Bucklew	Team call with cocounsel re: complaint, local stakeholders, potential Plaintiffs and Next Friends, call with Kansas Appleseed, and upcoming visit	0.80	\$500.00	\$400.00	\$500.00	\$400.00	147-1
9/19/2018	Martha Hodgesmith	Kansas Appleseed	Team call re complaint, potential plaintiffs and next friends	0.8	\$345.00	\$276.00	\$345.00	\$276.00	146-2
9/19/2018	Stephen Dixon	Children's Rights	Telephone call re status of complaint drafting, investigation strategy	0.78	\$375.00	\$293.75	\$410.00	\$319.80	144-3
9/21/2018	Freya Pitts	NCYL	Confer with L. Welch re: complaint outline and next steps	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3

## N T A L C O M P L A N T P R E P A R A T O N

9/21/2018	Freya Pitts	NCYL	Review L. Welch edits to complaint outline	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3
9/21/2018	Ira Lustbader	Children's Rights	Analysis facts and data for complaint outline contd	2.33	\$500.00	\$1,166.67	\$500.00	\$1,165.00	144-3
9/21/2018	Leecia Welch	NCYL	Confer with FP re: complaint outline and next steps	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
9/21/2018	Leecia Welch	NCYL	Review and edit complaint outline	2.5	\$500.00	\$1,250.00	\$500.00	\$1,250.00	145-3
9/24/2018	Freya Pitts	NCYL	Complete and edit revised complaint outline and discussion questions for team re: same	1.5	\$365.00	\$547.50	\$365.00	\$547.50	145-3
9/24/2018	Freya Pitts	NCYL	Revise complaint outline, including legal research re: Defendants' legal duties for same	3.8	\$365.00	\$1,387.00	\$365.00	\$1,387.00	145-3
9/24/2018	Leecia Welch	NCYL	Review and edit updated complaint outline	1.6	\$500.00	\$800.00	\$500.00	\$800.00	145-3
9/25/2018	Freya Pitts	NCYL	Review I. Lustbader feedback on complaint outline; confer with L. Welch re: implementing same	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
9/25/2018	Freya Pitts	NCYL	Review L. Welch edits to complaint outline	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3

## N T A L C O M P L A I N T P R E P A R A T O N

9/25/2018	Freya Pitts	NCYL	Revise complaint outline to incorporate I. Lustbader feedback; send to L. Welch for review	1.7	\$365.00	\$620.50	\$365.00	\$620.50	145-3
9/25/2018	Leecia Welch	NCYL	Review I. Lustbader feedback on complaint outline; confer with FP re: implementing same	0.3	\$500.00	\$150.00	\$500.00	\$150.00	145-3
9/26/2018	Erin G. McGuinness	Children's Rights	Analyze and review draft complaint outline to send feedback to team.	1.03	\$225.00	\$232.50	\$240.00	\$247.20	144-3
9/26/2018	Erin G. McGuinness	Children's Rights	Review class definition and support in framing KS complaint.	1.08	\$225.00	\$243.75	\$240.00	\$259.20	144-3
9/26/2018	Erin G. McGuinness	Children's Rights	Research KDHE structure and regulations for inclusion in draft complaint.	1.28	\$225.00	\$288.75	\$240.00	\$307.20	144-3
9/26/2018	Freya Pitts	NCYL	Team call with cocounsel discussing draft complaint and next Kansas trip	1.0	\$365.00	\$365.00	\$365.00	\$365.00	145-3
9/26/2018	Jackie Stolzenberg	NCYL	Review complaint outline	0.4	\$250.00	\$100.00	\$250.00	\$100.00	145-3
9/26/2018	Larry Rute	Kansas Appleseed	Telephone conference with co-counsel re draft complaint	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2



## N T A L C O M P L A I N T P R E P A R A T O N

9/26/2018	Leecia Welch	NCYL	Team call with cocounsel discussing draft complaint and next Kansas trip	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3
9/26/2018	Leecia Welch	NCYL	Edit and review updated complaint outline	0.9	\$500.00	\$450.00	\$500.00	\$450.00	145-3
9/27/2018	Daniel Adamek	Children's Rights	Draft memo for IL re Children's Rights cases that name governor as a named defendant to use when crafting the named defendant section of our complaint	5.43	\$150.00	\$815.00	\$200.00	\$1,086.00	144-3
9/27/2018	Ira Lustbader	Children's Rights	Analyzing and editing complaint outline	6.42	\$500.00	\$3,208.33	\$500.00	\$3,210.00	144-3
9/28/2018	Ira Lustbader	Children's Rights	Cont'd analyzing draft outline for complaint, edit for co-counsel	2.83	\$500.00	\$1,416.67	\$500.00	\$1,415.00	144-3
10/1/2018	Daniel Adamek	Children's Rights	Draft complaint outline to include new factual research and team drafting assignments	0.98	\$150.00	\$147.50	\$200.00	\$196.00	144-3
10/1/2018	Ira Lustbader	Children's Rights	Contd analyze and edit complaint outline	3.25	\$500.00	\$1,625.00	\$500.00	\$1,625.00	144-3
10/1/2018	Jonathan King	Children's Rights	Revise current EPSDT draft section in draft complaint	1.00	\$325.00	\$325.00	\$345.00	\$345.00	144-3
10/1/2018	Marissa Nardi	Children's Rights	correspond with D. Adamek re sourcing for draft complaint	0.33	\$325.00	\$108.33	\$380.00	\$125.40	144-3

## N T A L C O M P L A N T P R E P A R A T O N

10/1/2018	Marissa Nardi	Children's Rights	meeting with I. Lustbader re complaint drafting	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
10/2/2018	Leecia Welch	NCYL	Review CR edits to complaint outline	1.5	\$500.00	\$750.00	\$500.00	\$750.00	145-3
10/2/2018	Marissa Nardi	Children's Rights	prepare for upcoming trip to Kansas re investigation and complaint	0.32	\$325.00	\$102.92	\$380.00	\$121.60	144-3
10/3/2018	Erin G. McGuinness	Children's Rights	Draft the J.M. named plaintiff section for Kansas complaint.	1.33	\$225.00	\$300.00	\$240.00	\$319.20	144-3
10/3/2018	Freya Pitts	NCYL	Team call, including re: complaint, named plaintiffs, and co-counsel	1.0	\$365.00	\$365.00	\$365.00	\$365.00	145-3
10/3/2018	Freya Pitts	NCYL	Follow up discussion with L. Welch and J. Stolzenberg re: claims in Kansas complaint	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
10/3/2018	Jackie Stolzenberg	NCYL	follow up discussion with L. Welch and F. Pitts re: claims in Kansas complaint	0.2	\$250.00	\$50.00	\$250.00	\$50.00	145-3
10/3/2018	Leecia Welch	NCYL	Team call, including re: complaint, named plaintiffs, and co-counsel	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3
10/3/2018	Leecia Welch	NCYL	Follow up discussion with FP and J. Stolzenberg re: claims in Kansas complaint	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3

## N T AL COMPLA NT PREPARAT ON

10/3/2018	Lori Burns-Bucklew	Burns-Bucklew	Team call, including re: complaint, named plaintiffs, and co-counsel	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1
10/3/2018	Marissa Nardi	Children's Rights	Advise E. McGuinness re research project on trauma- informed care for complaint drafting	0.33	\$325.00	\$108.33	\$380.00	\$125.40	144-3
10/3/2018	Marissa Nardi	Children's Rights	participate in Kansas co-counsel meeting re complaint drafting and selecting NPs NFs	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
10/4/2018	Erin G. McGuinness	Children's Rights	Drafted J.M. named plaintiff section for complaint.	2.00	\$225.00	\$450.00	\$240.00	\$480.00	144-3
10/4/2018	Erin G. McGuinness	Children's Rights	Continue drafting JM named plaintiff section in KS complaint.	2.18	\$225.00	\$491.25	\$240.00	\$523.20	144-3
10/8/2018	Benet Magnuson	Kansas Appleseed	email re. edits to complaint outline	0.3	\$300.00	\$90.00	\$300.00	\$90.00	146-2
10/8/2018	Jackie Stolzenberg	NCYL	review complaint outline	0.1	\$250.00	\$25.00	\$250.00	\$25.00	145-3
10/8/2018	Larry Rute	Kansas Appleseed	Review LBB's memorandum re edits to complaint outline	0.2	\$500.00	\$100.00	\$500.00	\$100.00	146-2
10/9/2018	Larry Rute	Kansas Appleseed	Analyze closely team materials re draft Complaint	3.8	\$500.00	\$1,900.00	\$500.00	\$1,900.00	146-2

## N T A L C O M P L A I N T P R E P A R A T O N

10/9/2018	Marissa Nardi	Children's Rights	travel from home in NY to NY airport to KC airport to Kansas hotel for foster care investigation fact-finding and complaint drafting trip	3.12	\$325.00	\$1,012.92	\$380.00	\$1,185.60	144-3
10/10/2018	Benet Magnuson	Kansas Appleseed	Meeting at Larry Rute's KC office with co-counsel to discuss and edit complaint	4	\$300.00	\$1,200.00	\$300.00	\$1,200.00	146-2
10/10/2018	Freya Pitts	NCYL	In person meeting with Children's Rights, Kansas Appleseed, and L. Welch re: strategy and timeline for filing complaint	4.5	\$365.00	\$1,642.50	\$365.00	\$1,642.50	145-3
10/10/2018	Leecia Welch	NCYL	In person meeting with Children's Rights, Kansas Appleseed, and FP re: strategy and timeline for filing complaint	4.5	\$500.00	\$2,250.00	\$500.00	\$2,250.00	145-3
10/10/2018	Lori Burns-Bucklew	Burns-Bucklew	participate in co-counsel in-depth strategy session re complaint including which potential clients to name, which Defs to name etc., which arguments to include, etc. with co-counsel IL, MN, LW, FP, and LR	3.67	\$500.00	\$1,833.33	\$500.00	\$1,835.00	147-1

## N T A L C O M P L A I N T P R E P A R A T O N

10/10/2018	Marissa Nardi	Children's Rights	travel from KC to KC airport to NY airport to home in NY for foster care investigation fact-finding and complaint drafting trip	2.40	\$325.00	\$780.00	\$380.00	\$912.00	144-3
10/10/2018	Marissa Nardi	Children's Rights	prepare for meeting with co-counsel re updated stakeholder outreach, complaint drafting, and new facts	0.22	\$325.00	\$70.42	\$380.00	\$83.60	144-3
10/10/2018	Marissa Nardi	Children's Rights	participate in in-depth in-person meeting with co-counsel I. Lustbader, LBB, L. Welch, F. Pitts, and L. Rute re complaint drafting, including potential NPs and NFs, COAs, key allegations, and Defendants to name	3.67	\$325.00	\$1,191.67	\$380.00	\$1,394.60	144-3
10/12/2018	Freya Pitts	NCYL	Edit complaint outline to incorporate strategy decisions made at 10/10/18 meeting	2.1	\$365.00	\$766.50	\$365.00	\$766.50	145-3
10/12/2018	Ira Lustbader	Children's Rights	Analyzing complaint outline revisions	2.33	\$500.00	\$1,166.67	\$500.00	\$1,165.00	144-3
10/15/2018	Freya Pitts	NCYL	Edit complaint outline; send to L. Welch for review	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3

## N T A L C O M P L A I N T P R E P A R A T O N

10/15/2018	Leecia Welch	NCYL	Edit and revise complaint outline based on team meeting	4.9	\$500.00	\$2,450.00	\$500.00	\$2,450.00	145-3
10/15/2018	Marissa Nardi	Children's Rights	correspond with E. McGuinness re foster care policies for complaint drafting	0.17	\$325.00	\$54.17	\$380.00	\$64.60	144-3
10/16/2018	Jonathan King	Children's Rights	Meet with MN and EM regarding ongoing legal research for complaint	0.12	\$325.00	\$37.92	\$345.00	\$41.40	144-3
10/16/2018	Marissa Nardi	Children's Rights	meet with external co-counsel team members re complaint drafting and named plaintiffs	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
10/17/2018	Daniel Adamek	Children's Rights	Meeting with IL, MN, JK, and EM re case updates and discussion of suggested complaint revisions	1.00	\$150.00	\$150.00	\$200.00	\$200.00	144-3
10/17/2018	Erin G. McGuinness	Children's Rights	Internal team meeting to discuss complaint drafting strategy.	1.00	\$225.00	\$225.00	\$240.00	\$240.00	144-3
10/17/2018	Ira Lustbader	Children's Rights	Analyze and draft revised approach to complaint outline, drafting, timeline	3.75	\$500.00	\$1,875.00	\$500.00	\$1,875.00	144-3

## N T A L C O M P L A N T P R E P A R A T O N

10/17/2018	Jonathan King	Children's Rights	Meet with IL, MN, EM and DA regarding case status and strategy, including draft complaint, ongoing research, and updates from counsel meeting	1.00	\$325.00	\$325.00	\$345.00	\$345.00	144-3
10/17/2018	Larry Rute	Kansas Appleseed	Team meeting conference call re proposed Complaint legal strategy	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
10/17/2018	Leecia Welch	NCYL	Draft EPSDT sections of complaint	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3
10/17/2018	Marissa Nardi	Children's Rights	lead internal Kansas team meeting re complaint drafting	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
10/17/2018	Marissa Nardi	Children's Rights	participate in weekly KS co-counsel call re complaint drafting	0.92	\$325.00	\$297.92	\$380.00	\$349.60	144-3
10/18/2018	Daniel Adamek	Children's Rights	Draft Children's Rights' version of the complaint outline with assignments for external co-counsel.	2.42	\$150.00	\$362.50	\$200.00	\$484.00	144-3
10/18/2018	Ira Lustbader	Children's Rights	Drafting complaint factual allegations on instability and night to night, harms	4.33	\$500.00	\$2,166.67	\$500.00	\$2,165.00	144-3

## N T A L C O M P L A N T P R E P A R A T O N

10/18/2018	Jonathan King	Children's Rights	Conduct legal research on Tenth Circuit case law regarding adequacy of next friends for purposes of complaint drafting	8.17	\$325.00	\$2,654.17	\$345.00	\$2,818.65	144-3
10/18/2018	Leecia Welch	NCYL	Draft EPSDT sections of complaint	2.4	\$500.00	\$1,200.00	\$500.00	\$1,200.00	145-3
10/18/2018	Leecia Welch	NCYL	Prepare email to team re complaint filing timeline	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
10/18/2018	Marissa Nardi	Children's Rights	meeting w l. Lustbader and E. Hyne re complaint drafting	0.55	\$325.00	\$178.75	\$380.00	\$209.00	144-3
10/19/2018	Ira Lustbader	Children's Rights	Strategic emails to team regarding additional evidence issues and strategy affecting complaint alleg	0.58	\$500.00	\$291.67	\$500.00	\$290.00	144-3
10/19/2018	Ira Lustbader	Children's Rights	Drafting complaint factual allegations on instability and night to night, harms cont'd	5.92	\$500.00	\$2,958.33	\$500.00	\$2,960.00	144-3
10/19/2018	Leecia Welch	NCYL	Review revised complaint outline with team assignments	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
10/19/2018	Marissa Nardi	Children's Rights	correspond with l. Lustbader re factual support for complaint	0.20	\$325.00	\$65.00	\$380.00	\$76.00	144-3
10/19/2018	Marissa Nardi	Children's Rights	correspond with team re strategy re complaint drafting	0.33	\$325.00	\$108.33	\$380.00	\$125.40	144-3



## N T A L C O M P L A I N T P R E P A R A T O N

10/20/2018	Ira Lustbader	Children's Rights	Drafting complaint factual allegations on instability and night to night, harms contd	6.25	\$500.00	\$3,125.00	\$500.00	\$3,125.00	144-3
10/21/2018	Ira Lustbader	Children's Rights	Drafting complaint factual allegations on instability and night to nights, harms contd	4.67	\$500.00	\$2,333.33	\$500.00	\$2,335.00	144-3
10/22/2018	Erin G. McGuinness	Children's Rights	Drafted caseloads section of the Kansas complaint.	4.43	\$225.00	\$997.50	\$240.00	\$1,063.20	144-3
10/22/2018	Ira Lustbader	Children's Rights	Revise draft complaint section re regarding replacement instability	3.25	\$500.00	\$1,625.00	\$500.00	\$1,625.00	144-3
10/22/2018	Jonathan King	Children's Rights	Draft complaint section regarding oversight of private contract providers	6.35	\$325.00	\$2,063.75	\$345.00	\$2,190.75	144-3
10/23/2018	Erin G. McGuinness	Children's Rights	Call with next friend regarding named plaintiff complaint section	0.17	\$225.00	\$37.50	\$240.00	\$40.80	144-3
10/23/2018	Erin G. McGuinness	Children's Rights	Draft caseloads section of Kansas complaint	1.58	\$225.00	\$356.25	\$240.00	\$379.20	144-3
10/23/2018	Erin G. McGuinness	Children's Rights	Drafted named plaintiff section of complaint.	2.00	\$225.00	\$450.00	\$240.00	\$480.00	144-3
10/23/2018	Jonathan King	Children's Rights	Meet with IL, MN and EG regarding potential revisions to current draft complaint sections prepared by self and EG	0.50	\$325.00	\$162.50	\$345.00	\$172.50	144-3

## N T A L C O M P L A I N T P R E P A R A T O N

10/23/2018	Jonathan King	Children's Rights	Update draft complaint section regarding oversight of private contract providers	3.87	\$325.00	\$1,256.67	\$345.00	\$1,335.15	144-3
10/23/2018	Marissa Nardi	Children's Rights	meeting with internal team re complaint outline	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
10/24/2018	Erin G. McGuinness	Children's Rights	Edit caseloads section of the Kansas Complaint draft.	2.23	\$225.00	\$502.50	\$240.00	\$535.20	144-3
10/24/2018	Ira Lustbader	Children's Rights	Draft complaint section extreme instability	7.17	\$500.00	\$3,583.33	\$500.00	\$3,585.00	144-3
10/24/2018	Jonathan King	Children's Rights	Conference call with team regarding case status, plaintiff updates, and complaint drafting	0.85	\$325.00	\$276.25	\$345.00	\$293.25	144-3
10/24/2018	Jonathan King	Children's Rights	Continue drafting complaint section regarding oversight of private contract providers	1.10	\$325.00	\$357.50	\$345.00	\$379.50	144-3
10/24/2018	Larry Rute	Kansas Appleseed	Team meeting; review draft Complaint materials	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
10/24/2018	Stephen Dixon	Children's Rights	Telephone call re client updates and complaint strategy	0.85	\$375.00	\$318.75	\$410.00	\$348.50	144-3
10/25/2018	Erin G. McGuinness	Children's Rights	Outreach to Kansas foster care advocate to inform KS complaint drafting.	0.25	\$225.00	\$56.25	\$240.00	\$60.00	144-3
10/25/2018	Erin G. McGuinness	Children's Rights	Draft and edit caseloads section of the complaint with sources	4.28	\$225.00	\$963.75	\$240.00	\$1,027.20	144-3

## N T A L C O M P L A I N T P R E P A R A T O N

10/25/2018	Jonathan King	Children's Rights	Draft complaint section regarding oversight of private contract providers	6.75	\$325.00	\$2,193.75	\$345.00	\$2,328.75	144-3
10/25/2018	Leecia Welch	NCYL	Draft EPSDT sections of complaint	2.7	\$500.00	\$1,350.00	\$500.00	\$1,350.00	145-3
10/25/2018	Marissa Nardi	Children's Rights	begin writing NP sections of draft complaint	2.92	\$325.00	\$947.92	\$380.00	\$1,109.60	144-3
10/26/2018	Daniel Adamek	Children's Rights	Draft complaint with team members' complaint sections	2.28	\$150.00	\$342.50	\$200.00	\$456.00	144-3
10/26/2018	Ira Lustbader	Children's Rights	Draft complaint section extreme instability cont'd	5.83	\$500.00	\$2,916.67	\$500.00	\$2,915.00	144-3
10/26/2018	Jonathan King	Children's Rights	Draft complaint section regarding oversight of private contract providers	2.53	\$325.00	\$823.33	\$345.00	\$872.85	144-3
10/26/2018	Leecia Welch	NCYL	Draft background sections of complaint	2.5	\$500.00	\$1,250.00	\$500.00	\$1,250.00	145-3
10/26/2018	Marissa Nardi	Children's Rights	begin drafting complaint factual allegations section	8.18	\$325.00	\$2,659.58	\$380.00	\$3,108.40	144-3
10/27/2018	Freya Pitts	NCYL	Review updated complaint outline; confer with L. Welch re: same	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
10/27/2018	Ira Lustbader	Children's Rights	Editing caseloads and provider oversight sections on complaint	2.25	\$500.00	\$1,125.00	\$500.00	\$1,125.00	144-3
10/27/2018	Ira Lustbader	Children's Rights	Drafting data section for complaint	2.58	\$500.00	\$1,291.67	\$500.00	\$1,290.00	144-3
10/27/2018	Ira Lustbader	Children's Rights	Draft intro for complaint	2.75	\$500.00	\$1,375.00	\$500.00	\$1,375.00	144-3

## N T A L C O M P L A I N T P R E P A R A T O N

10/27/2018	Ira Lustbader	Children's Rights	Drafting complaint section extreme instability contd	3.75	\$500.00	\$1,875.00	\$500.00	\$1,875.00	144-3
10/27/2018	Leecia Welch	NCYL	Draft background sections of complaint	2.2	\$500.00	\$1,100.00	\$500.00	\$1,100.00	145-3
10/27/2018	Marissa Nardi	Children's Rights	continue drafting complaint factual allegation sections	12.57	\$325.00	\$4,084.17	\$380.00	\$4,776.60	144-3
10/28/2018	Freya Pitts	NCYL	Draft complaint: harm from EPSDT deficiencies	2.9	\$365.00	\$1,058.50	\$365.00	\$1,058.50	145-3
10/28/2018	Freya Pitts	NCYL	Review draft complaint outline, samples, and factual memos	1.7	\$365.00	\$620.50	\$365.00	\$620.50	145-3
10/28/2018	Leecia Welch	NCYL	Draft background sections of complaint	4.7	\$500.00	\$2,350.00	\$500.00	\$2,350.00	145-3
10/29/2018	Daniel Adamek	Children's Rights	Draft paragraphs on named plaintiffs in order to use in complaint for factual allegations section.	0.55	\$150.00	\$82.50	\$200.00	\$110.00	144-3
10/29/2018	Daniel Adamek	Children's Rights	Draft complaint with Children's Rights' sections in order to send to co-counsel for review.	8.70	\$150.00	\$1,305.00	\$200.00	\$1,740.00	144-3
10/29/2018	Erin G. McGuinness	Children's Rights	Discuss citations and references to complaint with DA.	0.00	\$225.00	\$0.00	\$240.00	\$0.00	144-3
10/29/2018	Erin G. McGuinness	Children's Rights	Discuss complaint draft updates with MN.	0.25	\$225.00	\$56.25	\$240.00	\$60.00	144-3
10/29/2018	Erin G. McGuinness	Children's Rights	Edit caseloads section of complaint	4.08	\$225.00	\$918.75	\$240.00	\$979.20	144-3

## N T A L C O M P L A I N T P R E P A R A T O N

10/29/2018	Freya Pitts	NCYL	Draft complaint: harm from EPSDT deficiencies	1.6	\$365.00	\$584.00	\$365.00	\$584.00	145-3
10/29/2018	Freya Pitts	NCYL	Instructions to J. Stolzenberg re: drafting Kansas complaint	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
10/29/2018	Ira Lustbader	Children's Rights	Draft and editing 1 of complaint, churning, workload, oversight and data	6.67	\$500.00	\$3,333.33	\$500.00	\$3,335.00	144-3
10/29/2018	Jackie Stolzenberg	NCYL	instructions from F. Pitts re: drafting Kansas complaint	0.2	\$250.00	\$50.00	\$250.00	\$50.00	145-3
10/29/2018	Jackie Stolzenberg	NCYL	review complaint samples and draft complaint: defendants section	3.4	\$250.00	\$850.00	\$250.00	\$850.00	145-3
10/29/2018	Jonathan King	Children's Rights	Draft complaint section regarding oversight of private contract providers	2.30	\$325.00	\$747.50	\$345.00	\$793.50	144-3
10/29/2018	Marissa Nardi	Children's Rights	Advise J. King and E. McGuinness re their respective complaint draft sections	1.37	\$325.00	\$444.17	\$380.00	\$520.60	144-3
10/29/2018	Marissa Nardi	Children's Rights	draft complaint factual allegation sections	8.82	\$325.00	\$2,865.42	\$380.00	\$3,351.60	144-3
10/30/2018	Daniel Adamek	Children's Rights	Edit complaint sections in order to send to co- counsel.	4.00	\$150.00	\$600.00	\$200.00	\$800.00	144-3
10/30/2018	Daniel Adamek	Children's Rights	Edit citations and footnotes within the complaint draft in order to send to co-counsel	4.00	\$150.00	\$600.00	\$200.00	\$800.00	144-3

## N T A L C O M P L A N T P R E P A R A T O N

10/30/2018	Erin G. McGuinness	Children's Rights	Outreach to KS foster care advocate to inform complaint drafting re: placement moves.	0.07	\$225.00	\$15.00	\$240.00	\$16.80	144-3
10/30/2018	Erin G. McGuinness	Children's Rights	Review IL MN redlines of complaint to work on second round of revisions	3.68	\$225.00	\$828.75	\$240.00	\$883.20	144-3
10/30/2018	Freya Pitts	NCYL	Confer with J. Stolzenberg re: drafting section of complaint re: Defendants	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
10/30/2018	Freya Pitts	NCYL	Draft complaint: harm from EPSDT deficiencies	4.5	\$365.00	\$1,642.50	\$365.00	\$1,642.50	145-3
10/30/2018	Freya Pitts	NCYL	Instructions from L. Welch re: next steps for drafting complaint	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
10/30/2018	Freya Pitts	NCYL	Review draft Kansas complaint sections drafted by Children's Rights	3.1	\$365.00	\$1,131.50	\$365.00	\$1,131.50	145-3
10/30/2018	Ira Lustbader	Children's Rights	Draft and editing 1 of complaint, churning, workload, oversight and data contd	7.17	\$500.00	\$3,583.33	\$500.00	\$3,585.00	144-3
10/30/2018	Jackie Stolzenberg	NCYL	Confer with F. Pitts re: drafting section of complaint re: Defendants	0.2	\$250.00	\$50.00	\$250.00	\$50.00	145-3
10/30/2018	Leecia Welch	NCYL	Edit and revise Medicaid section of complaint	2.2	\$500.00	\$1,100.00	\$500.00	\$1,100.00	145-3

## N T A L C O M P L A I N T P R E P A R A T O N

10/30/2018	Leecia Welch	NCYL	Edit and revise background sections of complaint	2.5	\$500.00	\$1,250.00	\$500.00	\$1,250.00	145-3
10/30/2018	Leecia Welch	NCYL	Emails with FP re complaint drafting	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3
10/30/2018	Marissa Nardi	Children's Rights	edit complaint sections by J. King	2.78	\$325.00	\$904.58	\$380.00	\$1,056.40	144-3
10/30/2018	Marissa Nardi	Children's Rights	draft complaint factual allegation sections	5.25	\$325.00	\$1,706.25	\$380.00	\$1,995.00	144-3
10/31/2018	Daniel Adamek	Children's Rights	Work on combining, formatting, and editing CR and NCYL's sections of the complaint.	2.95	\$150.00	\$442.50	\$200.00	\$590.00	144-3
10/31/2018	Erin G. McGuinness	Children's Rights	Outreach to KS foster care advocate to inform complaint drafting re: placement moves.	0.13	\$225.00	\$30.00	\$240.00	\$31.20	144-3
10/31/2018	Erin G. McGuinness	Children's Rights	Read and analyze first fully compiled complaint draft.	1.83	\$225.00	\$412.50	\$240.00	\$439.20	144-3
10/31/2018	Erin G. McGuinness	Children's Rights	Read, edit, and redline full draft of Kansas complaint.	3.20	\$225.00	\$720.00	\$240.00	\$768.00	144-3
10/31/2018	Freya Pitts	NCYL	Team call re: complaint draft and identifying plaintiffs	0.7	\$365.00	\$255.50	\$365.00	\$255.50	145-3
10/31/2018	Ira Lustbader	Children's Rights	Telephone call with co-counsel regarding plaintiffs and investigation strategy for complaint	0.77	\$500.00	\$383.33	\$500.00	\$385.00	144-3

## N T A L C O M P L A I N T P R E P A R A T O N

10/31/2018	Ira Lustbader	Children's Rights	Draft and editing 1 of complaint, churning, workload, oversight and data cont'd	8.08	\$500.00	\$4,041.67	\$500.00	\$4,040.00	144-3
10/31/2018	Larry Rute	Kansas Appleseed	Team meeting re draft complaint	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
10/31/2018	Leecia Welch	NCYL	Team call re: complaint draft and identifying plaintiffs	0.7	\$500.00	\$350.00	\$500.00	\$350.00	145-3
10/31/2018	Lori Burns-Bucklew	Burns-Bucklew	Telephone call with co-counsel regarding plaintiffs and investigation strategy for complaint	0.77	\$500.00	\$383.33	\$500.00	\$385.00	147-1
10/31/2018	Stephen Dixon	Children's Rights	Telephone call with co-counsel re complaint strategy, clients' facts	0.77	\$375.00	\$287.50	\$410.00	\$315.70	144-3
11/1/2018	Daniel Adamek	Children's Rights	Meeting with IL and EM re complaint edits to incorporate into draft being sent to NCYL.	0.75	\$150.00	\$112.50	\$200.00	\$150.00	144-3
11/1/2018	Daniel Adamek	Children's Rights	Edit draft complaint to incorporate all changes suggested by the internal CR team and to circulate to NCYL.	4.52	\$150.00	\$677.50	\$200.00	\$904.00	144-3
11/1/2018	Erin G. McGuinness	Children's Rights	Outreach to KS foster care advocate to inform complaint drafting re: placement moves.	0.12	\$225.00	\$26.25	\$240.00	\$28.80	144-3
11/1/2018	Erin G. McGuinness	Children's Rights	Call with next friend re KS complaint draft	0.63	\$225.00	\$142.50	\$240.00	\$151.20	144-3



## N T A L C O M P L A N T P R E P A R A T O N

11/1/2018	Erin G. McGuinness	Children's Rights	Outlined narratives for two named plaintiffs in complaint draft	0.77	\$225.00	\$172.50	\$240.00	\$184.80	144-3
11/1/2018	Erin G. McGuinness	Children's Rights	Discuss with complaint drafting strategy, strategic edits with DA IL	0.75	\$225.00	\$168.75	\$240.00	\$180.00	144-3
11/1/2018	Erin G. McGuinness	Children's Rights	Edit and review recent complaint draft	1.00	\$225.00	\$225.00	\$240.00	\$240.00	144-3
11/1/2018	Erin G. McGuinness	Children's Rights	Call with next friend re KS complaint draft input, questions.	1.35	\$225.00	\$303.75	\$240.00	\$324.00	144-3
11/1/2018	Erin G. McGuinness	Children's Rights	Add redline edits to draft of Kansas Complaint.	1.72	\$225.00	\$386.25	\$240.00	\$412.80	144-3
11/1/2018	Freya Pitts	NCYL	Review and revise updated draft complaint	3.7	\$365.00	\$1,350.50	\$365.00	\$1,350.50	145-3
11/1/2018	Ira Lustbader	Children's Rights	Draft and editing 1 of complaint and process for review and fact checking	3.25	\$500.00	\$1,625.00	\$500.00	\$1,625.00	144-3
11/1/2018	Larry Rute	Kansas Appleseed	Review updated materials re draft Complaint	2.6	\$500.00	\$1,300.00	\$500.00	\$1,300.00	146-2
11/1/2018	Leecia Welch	NCYL	Review and revise updated draft complaint	3.7	\$500.00	\$1,850.00	\$500.00	\$1,850.00	145-3
11/2/2018	Erin G. McGuinness	Children's Rights	Reviewed and analyzed co-counsel's edits to the combined complaint.	1.30	\$225.00	\$292.50	\$240.00	\$312.00	144-3
11/2/2018	Erin G. McGuinness	Children's Rights	Drafted named plaintiff sections for complaint.	3.18	\$225.00	\$716.25	\$240.00	\$763.20	144-3

## N T A L C O M P L A I N T P R E P A R A T O N

11/2/2018	Freya Pitts	NCYL	Draft and revise complaint: mental health delivery system	1.8	\$365.00	\$657.00	\$365.00	\$657.00	145-3
11/2/2018	Freya Pitts	NCYL	Factual research re: MCOs to inform drafting of complaint	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
11/2/2018	Jackie Stolzenberg	NCYL	research for complaint, reviewing sources cited	4.8	\$250.00	\$1,200.00	\$250.00	\$1,200.00	145-3
11/2/2018	Jonathan King	Children's Rights	Meet with IL regarding complaint drafting and legal research	0.50	\$325.00	\$162.50	\$345.00	\$172.50	144-3
11/2/2018	Jonathan King	Children's Rights	Review current draft complaint for purposes of editing and advising team	2.42	\$325.00	\$785.42	\$345.00	\$834.90	144-3
11/2/2018	Leecia Welch	NCYL	Review and revise complaint	1.8	\$500.00	\$900.00	\$500.00	\$900.00	145-3
11/2/2018	Marissa Nardi	Children's Rights	correspond with team regarding complaint drafting	0.27	\$325.00	\$86.67	\$380.00	\$102.60	144-3
11/2/2018	Marissa Nardi	Children's Rights	Closely analyze new potential sources for complaint	2.13	\$325.00	\$693.33	\$380.00	\$809.40	144-3
11/4/2018	Freya Pitts	NCYL	Legal and factual research re: supporting evidence for Kansas complaint	5.8	\$365.00	\$2,117.00	\$365.00	\$2,117.00	145-3
11/4/2018	Leecia Welch	NCYL	Review and incorporate team comments in complaint draft	1.5	\$500.00	\$750.00	\$500.00	\$750.00	145-3

## N T A L C O M P L A I N T P R E P A R A T O N

11/4/2018	Stephen Dixon	Children's Rights	Electronic mail to co-counsel re analysis of draft complaint	0.08	\$375.00	\$31.25	\$410.00	\$32.80	144-3
11/4/2018	Stephen Dixon	Children's Rights	Electronic mail to next friend re clarifying facts for complaint	0.75	\$375.00	\$281.25	\$410.00	\$307.50	144-3
11/5/2018	Daniel Adamek	Children's Rights	Meeting re complaint drafting with EM, IL, MN and JK	0.50	\$150.00	\$75.00	\$200.00	\$100.00	144-3
11/5/2018	Daniel Adamek	Children's Rights	Edit draft complaint and add new sources to placement array facts.	5.50	\$150.00	\$825.00	\$200.00	\$1,100.00	144-3
11/5/2018	Erin G. McGuinness	Children's Rights	Meeting with IL, MN, JK, DA regarding strategy for complaint drafting.	0.50	\$225.00	\$112.50	\$240.00	\$120.00	144-3
11/5/2018	Erin G. McGuinness	Children's Rights	Research Kansas EPSDT and applicability to complaint.	1.00	\$225.00	\$225.00	\$240.00	\$240.00	144-3
11/5/2018	Freya Pitts	NCYL	Team call re: complaint draft	2.0	\$365.00	\$730.00	\$365.00	\$730.00	145-3
11/5/2018	Freya Pitts	NCYL	Confer with J. Stolzenberg re: factual research to support allegations in complaint	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
11/5/2018	Freya Pitts	NCYL	Email correspondence with K. Setren re: research literature citations in complaint	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3

## N T A L C O M P L A I N T P R E P A R A T O N

11/5/2018	Freya Pitts	NCYL	Review draft complaint and related email correspondence with D. Adamek re: research literature citations	0.8	\$365.00	\$292.00	\$365.00	\$292.00	145-3
11/5/2018	Ira Lustbader	Children's Rights	Cont'd review and edit complaint full version, all	6.25	\$500.00	\$3,125.00	\$500.00	\$3,125.00	144-3
11/5/2018	Jackie Stolzenberg	NCYL	Team call re: complaint draft	2.0	\$250.00	\$500.00	\$250.00	\$500.00	145-3
11/5/2018	Jackie Stolzenberg	NCYL	Confer with J. Stolzenberg re: factual research to support allegations in complaint	0.3	\$250.00	\$75.00	\$250.00	\$75.00	145-3
11/5/2018	Jackie Stolzenberg	NCYL	researching disclosable sources for complaint	5.8	\$250.00	\$1,450.00	\$250.00	\$1,450.00	145-3
11/5/2018	Jonathan King	Children's Rights	Conference call with team regarding draft complaint	0.50	\$325.00	\$162.50	\$345.00	\$172.50	144-3
11/5/2018	Jonathan King	Children's Rights	Revise current draft of complaint	4.57	\$325.00	\$1,484.17	\$345.00	\$1,576.65	144-3
11/5/2018	Larry Rute	Kansas Appleseed	Team meeting re Complaint draft	2	\$500.00	\$1,000.00	\$500.00	\$1,000.00	146-2
11/5/2018	Leecia Welch	NCYL	Emails re team call and complaint status	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
11/5/2018	Lori Burns-Bucklew	Burns-Bucklew	Team call re: complaint draft	2.00	\$500.00	\$1,000.00	\$500.00	\$1,000.00	147-1
11/5/2018	Marissa Nardi	Children's Rights	review draft Kansas complaint	0.85	\$325.00	\$276.25	\$380.00	\$323.00	144-3
11/5/2018	Stephen Dixon	Children's Rights	Electronic mail to child advocate re sourcing for complaint	0.03	\$375.00	\$12.50	\$410.00	\$12.30	144-3

## N T A L C O M P L A I N T P R E P A R A T O N

11/5/2018	Stephen Dixon	Children's Rights	Electronic mail to team re additional fact for complaint	0.07	\$375.00	\$25.00	\$410.00	\$28.70	144-3
11/5/2018	Stephen Dixon	Children's Rights	Electronic mail to co-counsel re feedback on draft complaint	0.17	\$375.00	\$62.50	\$410.00	\$69.70	144-3
11/6/2018	Daniel Adamek	Children's Rights	Edit draft complaint in order to incorporate new factual sources	5.88	\$150.00	\$882.50	\$200.00	\$1,176.00	144-3
11/6/2018	Erin G. McGuinness	Children's Rights	Review references and sources to complaint to inform DA's citechecking of complaint footnotes.	0.47	\$225.00	\$105.00	\$240.00	\$112.80	144-3
11/6/2018	Erin G. McGuinness	Children's Rights	Compile facts regarding named plaintiffs in Topeka and Kansas City and draft named plaintiff complaint section for each.	4.60	\$225.00	\$1,035.00	\$240.00	\$1,104.00	144-3
11/6/2018	Freya Pitts	NCYL	Confer with D. Adamek, K. Setren, and M. Nardi re: research literature citations for complaint	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
11/6/2018	Freya Pitts	NCYL	Review child welfare task force meeting materials to inform complaint	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3
11/6/2018	Ira Lustbader	Children's Rights	Follow up edits regarding complaint draft full	2.92	\$500.00	\$1,458.33	\$500.00	\$1,460.00	144-3
11/6/2018	Jackie Stolzenberg	NCYL	researching disclosable sources for complaint	0.9	\$250.00	\$225.00	\$250.00	\$225.00	145-3

## N T A L C O M P L A I N T P R E P A R A T O N

11/6/2018	Jonathan King	Children's Rights	Revise current draft of complaint	0.90	\$325.00	\$292.50	\$345.00	\$310.50	144-3
11/6/2018	Marissa Nardi	Children's Rights	discuss with F. Pitts re model complaint and complaint strategy	0.25	\$325.00	\$81.25	\$380.00	\$95.00	144-3
11/6/2018	Marissa Nardi	Children's Rights	Correspond re Kansas potential new Governor as it relates to naming Defendants in the complaint	0.80	\$325.00	\$260.00	\$380.00	\$304.00	144-3
11/7/2018	Daniel Adamek	Children's Rights	Edit and cite-check draft complaint.	5.07	\$150.00	\$760.00	\$200.00	\$1,014.00	144-3
11/7/2018	Erin G. McGuinness	Children's Rights	Outreach to KS foster care advocate to inform complaint drafting re: placement moves.	0.30	\$225.00	\$67.50	\$240.00	\$72.00	144-3
11/7/2018	Erin G. McGuinness	Children's Rights	Redline Ira's edits to the Named Plaintiff complaint section draft.	0.53	\$225.00	\$120.00	\$240.00	\$127.20	144-3
11/7/2018	Erin G. McGuinness	Children's Rights	Re-run Adoption and Foster Care Analysis and Reporting System AFCARS stats to validate data used in the complaint.	1.25	\$225.00	\$281.25	\$240.00	\$300.00	144-3
11/7/2018	Freya Pitts	NCYL	Team call re: named plaintiffs, complaint draft, and factual research	0.8	\$365.00	\$292.00	\$365.00	\$292.00	145-3
11/7/2018	Freya Pitts	NCYL	Email correspondence with L. Welch re: next steps for finalizing complaint	0.6	\$365.00	\$219.00	\$365.00	\$219.00	145-3

## N T A L C O M P L A I N T P R E P A R A T O N

11/7/2018	Freya Pitts	NCYL	Review and revise section of complaint re: named plaintiffs	1.6	\$365.00	\$584.00	\$365.00	\$584.00	145-3
11/7/2018	Ira Lustbader	Children's Rights	Draft edit complaint regarding NP allegations	4.83	\$500.00	\$2,416.67	\$500.00	\$2,415.00	144-3
11/7/2018	Jackie Stolzenberg	NCYL	Team call re: named plaintiffs, complaint draft, and factual research	0.8	\$250.00	\$200.00	\$250.00	\$200.00	145-3
11/7/2018	Jackie Stolzenberg	NCYL	researching disclosable sources for complaint	3.8	\$250.00	\$950.00	\$250.00	\$950.00	145-3
11/7/2018	Jonathan King	Children's Rights	Edit current draft of complaint	0.62	\$325.00	\$200.42	\$345.00	\$213.90	144-3
11/7/2018	Jonathan King	Children's Rights	Conference call with team regarding draft complaint	1.00	\$325.00	\$325.00	\$345.00	\$345.00	144-3
11/7/2018	Jonathan King	Children's Rights	Research Kansas statutes and case law regarding class definition for purposes of defining class in complaint	5.27	\$325.00	\$1,711.67	\$345.00	\$1,818.15	144-3
11/7/2018	Larry Rute	Kansas Appleseed	Review file documents including latest draft Complaint in preparation for team meeting	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2
11/7/2018	Leecia Welch	NCYL	Email correspondence with FP re: next steps for finalizing complaint	0.6	\$500.00	\$300.00	\$500.00	\$300.00	145-3
11/7/2018	Marissa Nardi	Children's Rights	review current draft named plaintiff section of complaint	0.17	\$325.00	\$54.17	\$380.00	\$64.60	144-3

## N T A L C O M P L A N T P R E P A R A T O N

11/7/2018	Marissa Nardi	Children's Rights	discuss complaint sources with D. Adamek	0.33	\$325.00	\$108.33	\$380.00	\$125.40	144-3
11/7/2018	Marissa Nardi	Children's Rights	Advise D. Adamek on collecting sources for draft complaint	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
11/7/2018	Marissa Nardi	Children's Rights	Edit current draft named plaintiff section of complaint	0.58	\$325.00	\$189.58	\$380.00	\$220.40	144-3
11/7/2018	Marissa Nardi	Children's Rights	Participate in co-counsel call re updated draft of complaint	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
11/8/2018	Daniel Adamek	Children's Rights	Meeting with IL, EM and MN re complaint drafting updates and stakeholder updates	0.88	\$150.00	\$132.50	\$200.00	\$176.00	144-3
11/8/2018	Daniel Adamek	Children's Rights	Edit draft complaint in order to incorporate new sources found through researching evidence gaps and conversations with confidential stakeholders.	1.00	\$150.00	\$150.00	\$200.00	\$200.00	144-3
11/8/2018	Daniel Adamek	Children's Rights	Research evidence gaps in the draft Kansas complaint in order to find sources that fit into the complaint.	2.57	\$150.00	\$385.00	\$200.00	\$514.00	144-3



## N T A L C O M P L A N T P R E P A R A T O N

11/8/2018	Freya Pitts	NCYL	Email correspondence with D. Adamek and J. Stolzenberg re: factual support for Kansas complaint	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
11/8/2018	Freya Pitts	NCYL	Review J. Stolzenberg email re: factual research for complaint; email correspondence with J. Stolzenberg and L. Welch re: same	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
11/8/2018	Ira Lustbader	Children's Rights	Drafting and editing complaint continued - full read and tightening factual allegations	6.08	\$500.00	\$3,041.67	\$500.00	\$3,040.00	144-3
11/8/2018	Jackie Stolzenberg	NCYL	researching disclosable sources for complaint	2.0	\$250.00	\$500.00	\$250.00	\$500.00	145-3
11/8/2018	Jackie Stolzenberg	NCYL	review complaint draft	2.3	\$250.00	\$575.00	\$250.00	\$575.00	145-3
11/8/2018	Jonathan King	Children's Rights	Meet with EM and MN regarding draft complaint	0.50	\$325.00	\$162.50	\$345.00	\$172.50	144-3
11/8/2018	Jonathan King	Children's Rights	Revise and edit current draft of complaint	4.17	\$325.00	\$1,354.17	\$345.00	\$1,438.65	144-3
11/8/2018	Marissa Nardi	Children's Rights	edit draft Kansas complaint allegations re night-to- night placements	0.78	\$325.00	\$254.58	\$380.00	\$296.40	144-3

## N T A L C O M P L A I N T P R E P A R A T O N

11/8/2018	Marissa Nardi	Children's Rights	meeting with D. Adamek, I. Lustbader, and E. McGuinness re complaint drafting	0.88	\$325.00	\$287.08	\$380.00	\$334.40	144-3
11/8/2018	Marissa Nardi	Children's Rights	supervise D. Adamek in factual research for new draft complaint allegations	0.80	\$325.00	\$260.00	\$380.00	\$304.00	144-3
11/9/2018	Benet Magnuson	Kansas Appleseed	review of draft complaint	2	\$300.00	\$600.00	\$300.00	\$600.00	146-2
11/9/2018	Daniel Adamek	Children's Rights	Edit and cite check the current version of the draft complaint.	3.78	\$150.00	\$567.50	\$200.00	\$756.00	144-3
11/9/2018	Daniel Adamek	Children's Rights	Draft complaint in order to incorporate new factual sources.	4.60	\$150.00	\$690.00	\$200.00	\$920.00	144-3
11/9/2018	Erin G. McGuinness	Children's Rights	Confirm citations, references, and sources to various footnotes in KS complaint draft with DA.	0.53	\$225.00	\$120.00	\$240.00	\$127.20	144-3
11/9/2018	Erin G. McGuinness	Children's Rights	Outreach to Next Friends re: upcoming complaint filing.	0.60	\$225.00	\$135.00	\$240.00	\$144.00	144-3
11/9/2018	Erin G. McGuinness	Children's Rights	Review and add revisions to updated complaint draft.	2.78	\$225.00	\$626.25	\$240.00	\$667.20	144-3
11/9/2018	Freya Pitts	NCYL	Team call re: named plaintiffs and logistics for finalizing and filing complaint	1.1	\$365.00	\$401.50	\$365.00	\$401.50	145-3

## N T A L C O M P L A N T P R E P A R A T O N

11/9/2018	Freya Pitts	NCYL	Email correspondence with D. Adamek and J. Stolzenberg re: factual support for Kansas complaint	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
11/9/2018	Freya Pitts	NCYL	Review Fifth Circuit opinion re: placement array class to inform drafting of complaint	1.4	\$365.00	\$511.00	\$365.00	\$511.00	145-3
11/9/2018	Ira Lustbader	Children's Rights	Cont'd editing complaint regarding tightening factual allegations	5.33	\$500.00	\$2,666.67	\$500.00	\$2,665.00	144-3
11/9/2018	Jackie Stolzenberg	NCYL	confer w F Pitts re complaint draft	0.1	\$250.00	\$25.00	\$250.00	\$25.00	145-3
11/9/2018	Jackie Stolzenberg	NCYL	researching disclosable sources for complaint	3.2	\$250.00	\$800.00	\$250.00	\$800.00	145-3
11/9/2018	Jonathan King	Children's Rights	Meet with IL and EM regarding editing draft complaint	0.50	\$325.00	\$162.50	\$345.00	\$172.50	144-3
11/9/2018	Larry Rute	Kansas Appleseed	Team Meeting re named plaintiffs and review of Complaint	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
11/9/2018	Larry Rute	Kansas Appleseed	Team Meeting re Complaint draft	1.1	\$500.00	\$550.00	\$500.00	\$550.00	146-2
11/9/2018	Larry Rute	Kansas Appleseed	Review and comment re draft Complaint	2.3	\$500.00	\$1,150.00	\$500.00	\$1,150.00	146-2
11/9/2018	Leecia Welch	NCYL	Team call re: named plaintiffs and logistics for finalizing and filing complaint	1.1	\$500.00	\$550.00	\$500.00	\$550.00	145-3

## N T A L C O M P L A I N T P R E P A R A T O N

11/9/2018	Leecia Welch	NCYL	Edit and revise factual section of complaint	2.5	\$500.00	\$1,250.00	\$500.00	\$1,250.00	145-3
11/9/2018	Marissa Nardi	Children's Rights	review redline of draft Kansas complaint	0.70	\$325.00	\$227.50	\$380.00	\$266.00	144-3
11/9/2018	Marissa Nardi	Children's Rights	analyze potential sources for draft complaint allegations	1.28	\$325.00	\$417.08	\$380.00	\$486.40	144-3
11/9/2018	Marissa Nardi	Children's Rights	participate in Kansas team co-counsel meeting re draft complaint and locating NPs	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
11/9/2018	Marissa Nardi	Children's Rights	edit draft complaint allegations	3.80	\$325.00	\$1,235.00	\$380.00	\$1,444.00	144-3
11/9/2018	Marissa Nardi	Children's Rights	draft memorandum analyzing night-to-night legal research to inform complaint	3.85	\$325.00	\$1,251.25	\$380.00	\$1,463.00	144-3
11/10/2018	Daniel Adamek	Children's Rights	Compile and organize sources from complaint in order to have them on file for initial disclosures.	4.00	\$150.00	\$600.00	\$200.00	\$800.00	144-3
11/10/2018	Daniel Adamek	Children's Rights	Cite-check draft complaint in order to circulate to the co-counsel group.	5.00	\$150.00	\$750.00	\$200.00	\$1,000.00	144-3
11/10/2018	Erin G. McGuinness	Children's Rights	Provide redline revisions to named plaintiff sections and EPSDT sections of complaint.	3.47	\$225.00	\$780.00	\$240.00	\$832.80	144-3

## N T A L C O M P L A I N T P R E P A R A T O N

11/10/2018	Freya Pitts	NCYL	Complete review of Fifth Circuit opinion re: placement array class to inform drafting of complaint	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3
11/10/2018	Leecia Welch	NCYL	Edit fact sections of complaint	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3
11/10/2018	Marissa Nardi	Children's Rights	Discuss with CR Kansas team draft complaint	0.63	\$325.00	\$205.83	\$380.00	\$239.40	144-3
11/10/2018	Marissa Nardi	Children's Rights	Discuss and fill gaps in complaint with F. Pitts and D. Adamek	3.13	\$325.00	\$1,018.33	\$380.00	\$1,189.40	144-3
11/10/2018	Marissa Nardi	Children's Rights	Edit draft complaint	8.32	\$325.00	\$2,702.92	\$380.00	\$3,161.60	144-3
11/11/2018	Daniel Adamek	Children's Rights	Edit and proofread complaint before circulating to co-counsel.	1.00	\$150.00	\$150.00	\$200.00	\$200.00	144-3
11/11/2018	Daniel Adamek	Children's Rights	Cite-check complaint in order to circulate to co- counsel	3.00	\$150.00	\$450.00	\$200.00	\$600.00	144-3
11/11/2018	Freya Pitts	NCYL	Cite check and add additional citations to draft complaint	2.9	\$365.00	\$1,058.50	\$365.00	\$1,058.50	145-3
11/11/2018	Freya Pitts	NCYL	Draft new language for EPSDT claim in draft complaint	1.6	\$365.00	\$584.00	\$365.00	\$584.00	145-3
11/11/2018	Freya Pitts	NCYL	Edit draft complaint	4.3	\$365.00	\$1,569.50	\$365.00	\$1,569.50	145-3
11/11/2018	Freya Pitts	NCYL	Review Children's Rights' edits to draft complaint; further edits to same	3.2	\$365.00	\$1,168.00	\$365.00	\$1,168.00	145-3
11/11/2018	Leecia Welch	NCYL	Review and incorporate team edits to draft complaint	3.2	\$500.00	\$1,600.00	\$500.00	\$1,600.00	145-3

## N T A L C O M P L A I N T P R E P A R A T O N

11/11/2018	Leecia Welch	NCYL	Draft facts section of complaint	1.6	\$500.00	\$800.00	\$500.00	\$800.00	145-3
11/11/2018	Marissa Nardi	Children's Rights	Supervise complaint allegation sourcing	1.32	\$325.00	\$427.92	\$380.00	\$501.60	144-3
11/11/2018	Marissa Nardi	Children's Rights	Edit updated draft complaint	8.73	\$325.00	\$2,838.33	\$380.00	\$3,317.40	144-3
11/11/2018	Stephen Dixon	Children's Rights	Electronic mail to child advocate re fact needed for complaint	0.03	\$375.00	\$12.50	\$410.00	\$12.30	144-3
11/11/2018	Stephen Dixon	Children's Rights	Electronic mail to client re complaint status	0.17	\$375.00	\$62.50	\$410.00	\$69.70	144-3
11/12/2018	Daniel Adamek	Children's Rights	Verify that sources used in the complaint use the most recent data available.	1.78	\$150.00	\$267.50	\$200.00	\$356.00	144-3
11/12/2018	Daniel Adamek	Children's Rights	Edit complaint draft in order to incorporate edits from the co-counsel call	6.65	\$150.00	\$997.50	\$200.00	\$1,330.00	144-3
11/12/2018	Freya Pitts	NCYL	Team call re: complaint draft	1.1	\$365.00	\$401.50	\$365.00	\$401.50	145-3
11/12/2018	Freya Pitts	NCYL	Email correspondence with team re: outstanding factual research for complaint	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
11/12/2018	Ira Lustbader	Children's Rights	Editing near final draft complaint for team, allegation on Medicaid claim	4.25	\$500.00	\$2,125.00	\$500.00	\$2,125.00	144-3
11/12/2018	Jonathan King	Children's Rights	Revise current draft of complaint	3.95	\$325.00	\$1,283.75	\$345.00	\$1,362.75	144-3
11/12/2018	Leecia Welch	NCYL	Team call re: complaint draft	1.1	\$500.00	\$550.00	\$500.00	\$550.00	145-3

## N T A L C O M P L A I N T P R E P A R A T O N

11/12/2018	Leecia Welch	NCYL	Email correspondence with team re: outstanding factual research for complaint	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
11/12/2018	Lori Burns-Bucklew	Burns-Bucklew	Team call re: complaint draft	1.10	\$500.00	\$550.00	\$500.00	\$550.00	147-1
11/12/2018	Marissa Nardi	Children's Rights	correspond with D. Adamek and I. Lustbader re follow-up tasks for complaint	0.55	\$325.00	\$178.75	\$380.00	\$209.00	144-3
11/12/2018	Marissa Nardi	Children's Rights	attend part of Kansas co-counsel team call meeting re NPs/NFs and complaint drafting left early	0.75	\$325.00	\$243.75	\$380.00	\$285.00	144-3
11/12/2018	Marissa Nardi	Children's Rights	review Sheila A. complaint documents to prepare related complaint filings here	1.83	\$325.00	\$595.83	\$380.00	\$695.40	144-3
11/12/2018	Marissa Nardi	Children's Rights	edit draft complaint	6.07	\$325.00	\$1,971.67	\$380.00	\$2,306.60	144-3
11/12/2018	Stephen Dixon	Children's Rights	Telephone call with client reviewing draft complaint	0.15	\$375.00	\$56.25	\$410.00	\$61.50	144-3
11/12/2018	Stephen Dixon	Children's Rights	Emails with clients re confirming complaint allegations	2.50	\$375.00	\$937.50	\$410.00	\$1,025.00	144-3
11/12/2018	Stephen Dixon	Children's Rights	Emails with foster care advocates, co-counsel confirming facts in draft complaint	3.47	\$375.00	\$1,300.00	\$410.00	\$1,422.70	144-3

## N T A L C O M P L A I N T P R E P A R A T O N

11/13/2018	Daniel Adamek	Children's Rights	Review sources in complaint and fix cites.	2.00	\$150.00	\$300.00	\$200.00	\$400.00	144-3
11/13/2018	Erin G. McGuinness	Children's Rights	Email with co-counsel regarding EPSDT provisions in the mental health section of the complaint.	0.33	\$225.00	\$75.00	\$240.00	\$79.20	144-3
11/13/2018	Erin G. McGuinness	Children's Rights	Telephone call with Freya re EPSDT section in complaint.	0.37	\$225.00	\$82.50	\$240.00	\$88.80	144-3
11/13/2018	Erin G. McGuinness	Children's Rights	Review updated complaint draft	0.50	\$225.00	\$112.50	\$240.00	\$120.00	144-3
11/13/2018	Erin G. McGuinness	Children's Rights	Drafted named plaintiff sections for the complaint for new named plaintiffs.	2.27	\$225.00	\$510.00	\$240.00	\$544.80	144-3
11/13/2018	Freya Pitts	NCYL	Instructions to J. Stolzenberg re: revisions to and cite checking Kansas complaint	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
11/13/2018	Freya Pitts	NCYL	Confer w L. Welch J. Stolzenberg re complaint, next steps	0.7	\$365.00	\$255.50	\$365.00	\$255.50	145-3
11/13/2018	Freya Pitts	NCYL	Revise draft complaint to incorporate edits to EPSDT screening claim	3.0	\$365.00	\$1,095.00	\$365.00	\$1,095.00	145-3
11/13/2018	Ira Lustbader	Children's Rights	Follow up editing to near final complaint draft	2.67	\$500.00	\$1,333.33	\$500.00	\$1,335.00	144-3
11/13/2018	Jackie Stolzenberg	NCYL	cite-checking complaint	1.3	\$250.00	\$325.00	\$250.00	\$325.00	145-3



## N T AL COMPLA NT PREPARAT ON

11/13/2018	Jackie Stolzenberg	NCYL	confer w L. Welch F. Pitts re complaint, next steps	0.7	\$250.00	\$175.00	\$250.00	\$175.00	145-3
11/13/2018	Leecia Welch	NCYL	Edit and revise EPSDT section of complaint	2.1	\$500.00	\$1,050.00	\$500.00	\$1,050.00	145-3
11/13/2018	Leecia Welch	NCYL	Confer w FP JS re complaint, next steps	0.7	\$500.00	\$350.00	\$500.00	\$350.00	145-3
11/13/2018	Marissa Nardi	Children's Rights	analyze Defendant's Facebook live video for incorporation into the complaint	0.53	\$325.00	\$173.33	\$380.00	\$201.40	144-3
11/13/2018	Marissa Nardi	Children's Rights	edit draft complaint COAs and introduction	7.57	\$325.00	\$2,459.17	\$380.00	\$2,876.60	144-3
11/14/2018	Daniel Adamek	Children's Rights	Edit and cite-check draft complaint.	4.10	\$150.00	\$615.00	\$200.00	\$820.00	144-3
11/14/2018	Erin G. McGuinness	Children's Rights	Meeting with JK, foster care advocate in Kansas City re problems facing foster care system, addressing factual gaps in complaint for upcoming litigation	1.50	\$225.00	\$337.50	\$240.00	\$360.00	144-3
11/14/2018	Erin G. McGuinness	Children's Rights	Meeting with JK, next friend, foster care advocate, and co-counsel in Appleseed office re remaining factual gaps in complaint.	2.50	\$225.00	\$562.50	\$240.00	\$600.00	144-3
11/14/2018	Freya Pitts	NCYL	Revise EPSDT claims in Kansas complaint; send to L. Welch for review	1.4	\$365.00	\$511.00	\$365.00	\$511.00	145-3

## N T A L C O M P L A N T P R E P A R A T O N

11/14/2018	Freya Pitts	NCYL	confer with L. Welch J. Stolzenberg re complaint draft	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
11/14/2018	Ira Lustbader	Children's Rights	Editing and finalizing complaint systemic alleg.	7.58	\$500.00	\$3,791.67	\$500.00	\$3,790.00	144-3
11/14/2018	Jackie Stolzenberg	NCYL	cite-checking complaint	5.5	\$250.00	\$1,375.00	\$250.00	\$1,375.00	145-3
11/14/2018	Jackie Stolzenberg	NCYL	confer w L. Welch F. Pitts re complaint draft	0.3	\$250.00	\$75.00	\$250.00	\$75.00	145-3
11/14/2018	Jackie Stolzenberg	NCYL	Call with F. Pitts re: cite checking complaint	0.1	\$250.00	\$25.00	\$250.00	\$25.00	145-3
11/14/2018	Larry Rute	Kansas Appleseed	Telephone conference re Complaint, including discussion of EPSDT claims	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
11/14/2018	Leecia Welch	NCYL	confer with FP JS re complaint draft	0.3	\$500.00	\$150.00	\$500.00	\$150.00	145-3
11/14/2018	Leecia Welch	NCYL	Edit and revise complaint draft	3.0	\$500.00	\$1,500.00	\$500.00	\$1,500.00	145-3
11/14/2018	Marissa Nardi	Children's Rights	correspond with co- counsel L. Rute and I. Lustbader re complaint filing plan	0.33	\$325.00	\$108.33	\$380.00	\$125.40	144-3
11/14/2018	Marissa Nardi	Children's Rights	Edit draft complaint	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
11/14/2018	Marissa Nardi	Children's Rights	Participate in call with co-counsel re edits to draft complaint	0.58	\$325.00	\$189.58	\$380.00	\$220.40	144-3
11/14/2018	Marissa Nardi	Children's Rights	Edit draft Kansas complaint sections re class and fact allegations and Defendants	6.93	\$325.00	\$2,253.33	\$380.00	\$2,633.40	144-3

## N T A L C O M P L A I N T P R E P A R A T O N

11/14/2018	Stephen Dixon	Children's Rights	Telephone call with team re complaint edits	0.58	\$375.00	\$218.75	\$410.00	\$237.80	144-3
11/15/2018	Daniel Adamek	Children's Rights	Telephone call with confidential stakeholder re sourcing in complaint.	1.17	\$150.00	\$175.00	\$200.00	\$234.00	144-3
11/15/2018	Daniel Adamek	Children's Rights	Research effects of caseworker shortages on permanency for citing in the complaint	1.23	\$150.00	\$185.00	\$200.00	\$246.00	144-3
11/15/2018	Daniel Adamek	Children's Rights	Combine edits from NCYL and CR into one consolidated complaint	2.03	\$150.00	\$305.00	\$200.00	\$406.00	144-3
11/15/2018	Daniel Adamek	Children's Rights	Edit and cite check complaint in advance of filing.	11.57	\$150.00	\$1,735.00	\$200.00	\$2,314.00	144-3
11/15/2018	Erin G. McGuinness	Children's Rights	Call with DA re complaint filing strategy.	0.25	\$225.00	\$56.25	\$240.00	\$60.00	144-3
11/15/2018	Erin G. McGuinness	Children's Rights	Call with next friend re complaint status.	0.33	\$225.00	\$75.00	\$240.00	\$79.20	144-3
11/15/2018	Erin G. McGuinness	Children's Rights	Meeting with next friend at co-counsel's office re: complaint filing.	0.58	\$225.00	\$131.25	\$240.00	\$139.20	144-3
11/15/2018	Erin G. McGuinness	Children's Rights	Read and analyze final updated complaint draft.	0.67	\$225.00	\$150.00	\$240.00	\$160.80	144-3
11/15/2018	Erin G. McGuinness	Children's Rights	Meeting with JK SD and next friend re complaint status.	2.00	\$225.00	\$450.00	\$240.00	\$480.00	144-3
11/15/2018	Freya Pitts	NCYL	Call with J. Stolzenberg re: cite checking complaint	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3

## N T A L C O M P L A N T P R E P A R A T O N

11/15/2018	Freya Pitts	NCYL	Edit complaint for filing, including cite checking	5.1	\$365.00	\$1,861.50	\$365.00	\$1,861.50	145-3
11/15/2018	Freya Pitts	NCYL	Email correspondence re: filing strategy for Kansas complaint	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
11/15/2018	Freya Pitts	NCYL	Revise complaint for filing, including integrating edits from L. Welch, M. Nardi, E. McGuinness, and I. Lustbader, and including phone conferences re: same	5.8	\$365.00	\$2,117.00	\$365.00	\$2,117.00	145-3
11/15/2018	Ira Lustbader	Children's Rights	Telephone call with team co counsel on final edits to complaint and strategy	0.83	\$500.00	\$416.67	\$500.00	\$415.00	144-3
11/15/2018	Ira Lustbader	Children's Rights	Finalizing complaint for filing per revised strategy	11.25	\$500.00	\$5,625.00	\$500.00	\$5,625.00	144-3
11/15/2018	Jackie Stolzenberg	NCYL	cite-checking complaint, reviewing sources	4.1	\$250.00	\$1,025.00	\$250.00	\$1,025.00	145-3
11/15/2018	Jonathan King	Children's Rights	Meeting with EM, SD and EB regarding Kansas complaint	1.00	\$325.00	\$325.00	\$345.00	\$345.00	144-3
11/15/2018	Kira Setren	NCYL	Helped review and prepare Complaint for filing	3.2	\$200.00	\$640.00	\$200.00	\$640.00	145-3
11/15/2018	Leecia Welch	NCYL	Meeting with client re new facts for complaint	0.7	\$500.00	\$350.00	\$500.00	\$350.00	145-3

## N T A L C O M P L A N T P R E P A R A T O N

11/15/2018	Leecia Welch	NCYL	Meeting with client re new facts for complaint	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3
11/15/2018	Leecia Welch	NCYL	Email correspondence re: filing strategy for Kansas complaint	0.3	\$500.00	\$150.00	\$500.00	\$150.00	145-3
11/15/2018	Leecia Welch	NCYL	Edit and revise complaint facts section	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3
11/15/2018	Leecia Welch	NCYL	Edit draft complaint	5.1	\$500.00	\$2,550.00	\$500.00	\$2,550.00	145-3
11/15/2018	Lori Burns-Bucklew	Burns-Bucklew	Telephone call with team co counsel on final edits to complaint and strategy	0.83	\$500.00	\$416.67	\$500.00	\$415.00	147-1
11/15/2018	Marissa Nardi	Children's Rights	call with internal teams re updated complaint draft	1.65	\$325.00	\$536.25	\$380.00	\$627.00	144-3
11/15/2018	Stephen Dixon	Children's Rights	Electronic mail with client re status of complaint	0.03	\$375.00	\$12.50	\$410.00	\$12.30	144-3
11/15/2018	Stephen Dixon	Children's Rights	Electronic mail with potential client re status of complaint	0.13	\$375.00	\$50.00	\$410.00	\$53.30	144-3
11/15/2018	Stephen Dixon	Children's Rights	Electronic mail with co-counsel team re filling in evidentiary gaps in complaint	0.17	\$375.00	\$62.50	\$410.00	\$69.70	144-3
11/15/2018	Stephen Dixon	Children's Rights	Telephone calls with foster care advocates re getting help clarifying factual point to incorporate into complaint	0.33	\$375.00	\$125.00	\$410.00	\$135.30	144-3

## N T A L C O M P L A I N T P R E P A R A T O N

11/15/2018	Stephen Dixon	Children's Rights	Meeting with client re new facts, investigation/complaint status	0.75	\$375.00	\$281.25	\$410.00	\$307.50	144-3
11/15/2018	Stephen Dixon	Children's Rights	Meeting with another client re new facts, investigation/complaint status	1.25	\$375.00	\$468.75	\$410.00	\$512.50	144-3
11/16/2018	Erin G. McGuinness	Children's Rights	Call with potential client to discuss filing of complaint.	0.42	\$225.00	\$93.75	\$240.00	\$100.80	144-3
11/16/2018	Erin G. McGuinness	Children's Rights	Call with Next Friend to discuss filing of complaint.	0.50	\$225.00	\$112.50	\$240.00	\$120.00	144-3
11/16/2018	Erin G. McGuinness	Children's Rights	Call with Kansas child welfare expert to discuss filing of complaint	0.58	\$225.00	\$131.25	\$240.00	\$139.20	144-3
11/16/2018	Freya Pitts	NCYL	Edit complaint for filing, including cite checking	5.8	\$365.00	\$2,117.00	\$365.00	\$2,117.00	145-3
11/16/2018	Freya Pitts	NCYL	Proofread final version of complaint and initial filing documents; confer with M. Nardi and D. Adamek re: same	2.2	\$365.00	\$803.00	\$365.00	\$803.00	145-3
11/16/2018	Freya Pitts	NCYL	Review formatting of complaint pre-filing	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
11/16/2018	Leecia Welch	NCYL	Edit final draft of complaint	2.2	\$500.00	\$1,100.00	\$500.00	\$1,100.00	145-3
11/16/2018	Leecia Welch	NCYL	Review final version of complaint and initial filing documents	1.8	\$500.00	\$900.00	\$500.00	\$900.00	145-3

## N T A L C O M P L A I N T P R E P A R A T O N

11/16/2018	Leecia Welch	NCYL	Meeting with client re new facts for complaint	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3
11/16/2018	Marissa Nardi	Children's Rights	Correspond with local KS law firm re complaint filing and necessary summonses	1.55	\$325.00	\$503.75	\$380.00	\$589.00	144-3
11/16/2018	Marissa Nardi	Children's Rights	Edit final complaint draft	6.27	\$325.00	\$2,036.67	\$380.00	\$2,382.60	144-3
11/16/2018	Stephen Dixon	Children's Rights	Telephone call with client re filing complaint	0.12	\$375.00	\$43.75	\$410.00	\$49.20	144-3
11/16/2018	Stephen Dixon	Children's Rights	Electronic mail with clients re filing complaint	0.42	\$375.00	\$156.25	\$410.00	\$172.20	144-3
11/16/2018	Stephen Dixon	Children's Rights	Do final review of complaint	0.75	\$375.00	\$281.25	\$410.00	\$307.50	144-3
11/16/2018	Stephen Dixon	Children's Rights	Meeting with client re final draft of complaint	1.25	\$375.00	\$468.75	\$410.00	\$512.50	144-3
11/16/2018	Stephen Dixon	Children's Rights	Electronic mail with clients re final factual edits to complaint	1.57	\$375.00	\$587.50	\$410.00	\$643.70	144-3
11/17/2018	Stephen Dixon	Children's Rights	Emails to client re complaint filing	0.08	\$375.00	\$31.25	\$410.00	\$32.80	144-3
11/19/2018	Jonathan King	Children's Rights	Review final draft Kansas complaint materials	1.12	\$325.00	\$362.92	\$345.00	\$386.40	144-3
11/19/2018	Marissa Nardi	Children's Rights	discuss service of complaint with co-counsel	1.58	\$325.00	\$514.58	\$380.00	\$600.40	144-3
11/20/2018	Larry Rute	Kansas Appleseed	Review closely drafts of all documents to be filed with complaint besides complaint	1.4	\$500.00	\$700.00	\$500.00	\$700.00	146-2
<b>TOTALS</b>				<b>896.64</b>		<b>\$317,933.29</b>		<b>\$335,007.45</b>	

# **EXHIBIT G-1**



## AMENDED COMPLAINT SUBSTANTIVE

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
11/18/2018	Stephen Dixon	Children's Rights	Research factual question for potential complaint amendment	0.75	\$375.00	\$281.25	\$410.00	\$307.50	144-3
11/19/2018	Stephen Dixon	Children's Rights	Research factual question for potential complaint amendment	0.92	\$375.00	\$343.75	\$410.00	\$377.20	144-3
11/20/2018	Marissa Nardi	Children's Rights	prepare potential edits for first amended complaint	0.42	\$325.00	\$135.42	\$380.00	\$159.60	144-3
11/26/2018	Daniel Adamek	Children's Rights	Annotate complaint with sources for allegations.	2.50	\$150.00	\$375.00	\$200.00	\$500.00	144-3
12/5/2018	Freya Pitts	NCYL	Legal research re: amending complaint and email correspondence re: same	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
12/6/2018	Erin G. McGuinness	Children's Rights	Review the KS Child Welfare Task Force documents circulated by co-counsel by potential inclusion in amended complaint.	1.27	\$225.00	\$285.00	\$240.00	\$304.80	144-3
3/6/2019	Leecia Welch	NCYL	Review memo re: potential additions to a First Amended Complaint	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
3/6/2019	Freya Pitts	NCYL	Update memo re: potential additions to a First Amended Complaint	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3

## AMENDED COMPLAINT SUBSTANTIVE

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
3/18/2019	Jonathan King	Children's Rights	Review FOIA response regarding current foster care contracts in comparison to complaint allegations to analyze potential amendment	1.05	\$325.00	\$341.25	\$345.00	\$362.25	144-3
3/20/2019	Freya Pitts	NCYL	Prepare for presentation on EPSDT claims and complaint amendment strategy in 3/20 team strategy meeting; confer with P. Juneja and L. Welch re: same	2.4	\$365.00	\$876.00	\$365.00	\$876.00	145-3
5/8/2019	Poonam Juneja	NCYL	reviewing JK memo re potential MTD the governor and possible complaint amendments re same, incl. reviewing cited case	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
5/9/2019	Freya Pitts	NCYL	Review B.K. v. Snyder decision to inform proposed amendments to complaint	1.2	\$365.00	\$438.00	\$365.00	\$438.00	145-3
5/9/2019	Freya Pitts	NCYL	Review J. King legal research memo re: possible amendments to complaint re: Governor	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3

## AMENDED COMPLAINT SUBSTANTIVE

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
5/14/2019	Leecia Welch	NCYL	Review complaint redline for amendment	1.5	\$500.00	\$750.00	\$500.00	\$750.00	145-3
5/15/2019	Poonam Juneja	NCYL	revising amended complaint and circulating to team with cover note for review	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
5/15/2019	Freya Pitts	NCYL	Review complaint redline for amendment	0.8	\$365.00	\$292.00	\$365.00	\$292.00	145-3
5/15/2019	Teresa Woody	Kansas Appleseed	Review proposed amended complaint	1.2	\$500.00	\$600.00	\$500.00	\$600.00	146-2
5/16/2019	Poonam Juneja	NCYL	incorporating edit to complaint from DLA	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
5/17/2019	Poonam Juneja	NCYL	revisions to complaint and emailing with team re same	0.8	\$395.00	\$316.00	\$395.00	\$316.00	145-3
5/19/2019	Poonam Juneja	NCYL	reviewing SD email re notes for amended complaint	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
5/20/2019	Poonam Juneja	NCYL	revising draft complaint and correspondence with team re same	1.6	\$395.00	\$632.00	\$395.00	\$632.00	145-3
5/23/2019	Freya Pitts	NCYL	Update facts for EB for amended complaint	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3
5/24/2019	Leecia Welch	NCYL	Edit memo re: Medicaid facts for amended complaint	0.6	\$500.00	\$300.00	\$500.00	\$300.00	145-3

## AMENDED COMPLAINT SUBSTANTIVE

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
5/24/2019	Freya Pitts	NCYL	Review L. Welch memo re: Medicaid facts for amended complaint	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
8/12/2019	Leecia Welch	NCYL	Edit and review new named plaintiff facts section for amended complaint	0.7	\$500.00	\$350.00	\$500.00	\$350.00	145-3
8/13/2019	Marissa Nardi	Children's Rights	edit draft addition to complaint for amended complaint	0.83	\$325.00	\$270.83	\$380.00	\$315.40	144-3
8/14/2019	Larry Rute	Kansas Appleseed	Closely review updated second amended complaint	1.4	\$500.00	\$700.00	\$500.00	\$700.00	146-2
8/14/2019	Teresa Woody	Kansas Appleseed	reviewing motion to amend complaint and memo in support	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2
8/16/2019	Stephen Dixon	Children's Rights	Perform factual research to potentially include in amended complaint	0.37	\$375.00	\$137.50	\$410.00	\$151.70	144-3
8/16/2019	Leecia Welch	NCYL	Meetings with potential client re amendments to complaint	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3
8/16/2019	Teresa Woody	Kansas Appleseed	Review 10th Cir cases re complaint amendment	0.5	\$500.00	\$250.00	\$500.00	\$250.00	146-2
8/16/2019	Pacio, Kristin A.	DLA Piper	Consideration of issues with respect to amending complaint.	0.3	\$410.00	\$123.00	\$410.00	\$123.00	148-1

## AMENDED COMPLAINT SUBSTANTIVE

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
8/21/2019	Jonathan King	Children's Rights	Review draft fact sections of complaint amendment regarding named plaintiffs	0.87	\$325.00	\$281.67	\$345.00	\$300.15	144-3
8/21/2019	Poonam Juneja	NCYL	comparing complaint to answer and creating a table of needed updates to plaintiff allegations for amendment	1.8	\$395.00	\$711.00	\$395.00	\$711.00	145-3
8/21/2019	Pacio, Kristin A.	DLA Piper	Reviewing complaint and other materials in connection with amending complaint.	7.5	\$410.00	\$3,075.00	\$410.00	\$3,075.00	148-1
8/22/2019	Jonathan King	Children's Rights	Draft summary of potential updates for amended complaint regarding named plaintiffs	1.08	\$325.00	\$352.08	\$345.00	\$372.60	144-3
8/22/2019	Pacio, Kristin A.	DLA Piper	Reviewing complaint and background materials in connection with amending complaint.	3	\$410.00	\$1,230.00	\$410.00	\$1,230.00	148-1
8/23/2019	Pacio, Kristin A.	DLA Piper	Analyzing complaint in connection with potential amendments and conferring with co-counsel regarding same.	4.4	\$410.00	\$1,804.00	\$410.00	\$1,804.00	148-1

## AMENDED COMPLAINT SUBSTANTIVE

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
8/26/2019	Erin G. McGuinness	Children's Rights	Review named plaintiff files to fact check amended complaint.	2.28	\$225.00	\$513.75	\$240.00	\$547.20	144-3
8/26/2019	Poonam Juneja	NCYL	reviewing named plaintiff fact check and incorporating into draft am complaint	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
8/26/2019	Poonam Juneja	NCYL	revising amended complaint with named plaintiff information, including checking facts against docs produced by Ds; emailing team re same	0.9	\$395.00	\$355.50	\$395.00	\$355.50	145-3
8/27/2019	Ira Lustbader	Children's Rights	Review amended complaint draft.	1.25	\$500.00	\$625.00	\$500.00	\$625.00	144-3
8/27/2019	Poonam Juneja	NCYL	revising draft amended complaint	2.9	\$395.00	\$1,145.50	\$395.00	\$1,145.50	145-3
8/28/2019	Poonam Juneja	NCYL	revising draft amended complaint	1.2	\$395.00	\$474.00	\$395.00	\$474.00	145-3
8/28/2019	Teresa Woody	Kansas Appleseed	Review and comment on updated draft amended complaint	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2

## AMENDED COMPLAINT SUBSTANTIVE

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
8/29/2019	Ira Lustbader	Children's Rights	Review/comment amended complaint.	1.33	\$500.00	\$666.67	\$500.00	\$665.00	144-3
8/29/2019	Poonam Juneja	NCYL	draft motion for leave to amend complaint	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
8/29/2019	Poonam Juneja	NCYL	draft motion for leave to amend complaint - proposed order	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
8/29/2019	Poonam Juneja	NCYL	revise proposed amended complaint	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
8/29/2019	Kira Setren	NCYL	Edited Amended Complaint per Poonam; corr. with Poonam re: same	2.8	\$200.00	\$560.00	\$200.00	\$560.00	145-3
8/30/2019	Poonam Juneja	NCYL	final revisions and review of amended complaint, motion for leave to amend, motion to use pseudonyms, proposed orders before filing	5.1	\$395.00	\$2,014.50	\$395.00	\$2,014.50	145-3
8/30/2019	Kira Setren	NCYL	Assisted Poonam and Leecia in the editing and fact-checking of the Amended Complaint	0.6	\$200.00	\$120.00	\$200.00	\$120.00	145-3

## AMENDED COMPLAINT SUBSTANTIVE

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
8/30/2019	Kira Setren	NCYL	Filed motion to amend complaint and motion to use pseudonyms; corr. re: same pj, fp	0.8	\$200.00	\$160.00	\$200.00	\$160.00	145-3
8/30/2019	Teresa Woody	Kansas Appleseed	Review and finalize motion to amend and attached first amended complaint	2.5	\$500.00	\$1,250.00	\$500.00	\$1,250.00	146-2
9/2/2019	Freya Pitts	NCYL	Review complaint redline	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
9/3/2019	Teresa Woody	Kansas Appleseed	Review notice of errata and corrected amended complaint	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2
9/6/2019	Poonam Juneja	NCYL	revising amended complaint for filing	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
9/6/2019	Poonam Juneja	NCYL	reviewing court orders re am complaint and pseudonyms	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
9/6/2019	Kira Setren	NCYL	E-filed First Amended Complaint	0.2	\$200.00	\$40.00	\$200.00	\$40.00	145-3
9/6/2019	Kira Setren	NCYL	Prepared first amended complaint filing; corr. with pj fp re: same	1.7	\$200.00	\$340.00	\$200.00	\$340.00	145-3
<b>TOTALS</b>				<b>70.62</b>		<b>\$26,682.67</b>		<b>\$27,061.90</b>	



# **EXHIBIT G-2**

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
11/21/2018	Stephen Dixon	Children's Rights	Electronic mail to team re potential complaint amendment	0.17	\$375.00	\$62.50	\$410.00	\$69.70	144-3
12/5/2018	Marissa Nardi	Children's Rights	co-counsel meeting re complaint service, preparation for first conference, and complaint amendments	1.42	\$325.00	\$460.42	\$380.00	\$539.60	144-3
12/5/2018	Leecia Welch	NCYL	Confer with FP re: timeline for amending complaint	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
12/5/2018	Leecia Welch	NCYL	Email correspondence with FP and M. Nardi re: amending complaint	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3
12/5/2018	Freya Pitts	NCYL	Confer with L. Welch re: timeline for amending complaint	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
12/5/2018	Freya Pitts	NCYL	Email correspondence with L. Welch and M. Nardi re: amending complaint	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
12/5/2018	Larry Rute	Kansas Appleseed	Team conference call to discuss litigation strategy, including experts and potential amendment of complaint	1.2	\$500.00	\$600.00	\$500.00	\$600.00	146-2

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
12/11/2018	Stephen Dixon	Children's Rights	Electronic mail with foster care advocates re new facts for potential complaint amendment	0.13	\$375.00	\$50.00	\$410.00	\$53.30	144-3
3/20/2019	Leecia Welch	NCYL	Team strategy meeting, including discussion of claims and strategy for complaint amendment, class certification, and discovery	3.0	\$500.00	\$1,500.00	\$500.00	\$1,500.00	145-3
3/20/2019	Poonam Juneja	NCYL	Team strategy meeting, including discussion of claims and strategy for complaint amendment, class certification, and discovery	3.0	\$395.00	\$1,185.00	\$395.00	\$1,185.00	145-3
3/20/2019	Larry Rute	Kansas Appleseed	Team meeting re discovery; possible complaint amendment; file certification issues; telephone conference with Terry Campbell re extension of time	3	\$500.00	\$1,500.00	\$500.00	\$1,500.00	146-2

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
3/20/2019	Teresa Woody	Kansas Appleseed	Team strategy meeting, including discussion of claims and strategy for complaint amendment, class certification, and discovery	3	\$500.00	\$1,500.00	\$500.00	\$1,500.00	146-2
3/20/2019	Fowler, Meg	DLA Piper	Attend team strategy meeting, including discussion of claims and strategy for complaint amendment, class certification, and discovery.	3	\$240.00	\$720.00	\$240.00	\$720.00	148-1
3/20/2019	Diggs, William J.	DLA Piper	Meeting with cocounsel concerning claims and strategy for complaint amendment, class certification, and discovery.	3	\$410.00	\$1,230.00	\$410.00	\$1,230.00	148-1
4/3/2019	Leecia Welch	NCYL	Team call, including re: 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
4/3/2019	Poonam Juneja	NCYL	Team call, including re: 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
4/3/2019	Teresa Woody	Kansas Appleseed	Team call, including re: 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
4/3/2019	Sager, David S.	DLA Piper	Attend weekly status call re 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint.	1	\$500.00	\$500.00	\$500.00	\$500.00	148-1
4/3/2019	Fowler, Meg	DLA Piper	Participate in the weekly strategy call, including discussion re: 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint.	1	\$240.00	\$240.00	\$240.00	\$240.00	148-1

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
4/3/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, concerning 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint 1 ; follow-up discussion with David Sager .1 .	1.1	\$410.00	\$451.00	\$410.00	\$451.00	148-1
4/9/2019	Poonam Juneja	NCYL	reviewing team emails re amendment of complaint	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
4/9/2019	Teresa Woody	Kansas Appleseed	Emails re strategy of adding additional plaintiffs and amending complaint	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2
5/2/2019	Ira Lustbader	Children's Rights	Telephone call with co-counsel team regarding Answer, settlement strategy and amending complaint	0.93	\$500.00	\$466.67	\$500.00	\$465.00	144-3
5/2/2019	Leecia Welch	NCYL	Team call, including re: Defendants' answer, possible amendments to complaint, and settlement strategy	0.9	\$500.00	\$450.00	\$500.00	\$450.00	145-3

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
5/2/2019	Poonam Juneja	NCYL	Team call, including re: Defendants' answer, possible amendments to complaint, and settlement strategy	0.9	\$395.00	\$355.50	\$395.00	\$355.50	145-3
5/2/2019	Larry Rute	Kansas Appleseed	Team meeting re possible amendment to complaint; settlement strategy; defendant's answer	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
5/2/2019	Teresa Woody	Kansas Appleseed	Team call, including re: Defendants' answer, possible amendments to complaint, and settlement strategy	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2
5/2/2019	Lori Burns-Bucklew	Burns-Bucklew	Telephone call with co-counsel team regarding Answer, settlement strategy and amending complaint	0.93	\$500.00	\$466.67	\$500.00	\$465.00	147-1
5/2/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, concerning Defendants' answer, possible amendments to complaint, and settlement strategy.	0.9	\$410.00	\$369.00	\$410.00	\$369.00	148-1

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
5/3/2019	Leecia Welch	NCYL	Confer with PJ and FP re: terms sheet, complaint amendments, and research needs	0.4	\$500.00	\$200.00	\$500.00	\$200.00	145-3
5/3/2019	Poonam Juneja	NCYL	Confer with LW FP re: terms sheet, complaint amendments, and research needs	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
5/3/2019	Freya Pitts	NCYL	Confer with L. Welch and P. Juneja re: terms sheet, complaint amendments, and research needs	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3
5/8/2019	Leecia Welch	NCYL	Team call re discussion of scheduling order, complaint amendments, terms sheet, etc.	0.9	\$500.00	\$450.00	\$500.00	\$450.00	145-3
5/8/2019	Poonam Juneja	NCYL	Team call, including discussion of scheduling order, complaint amendments, and terms sheet	0.9	\$395.00	\$355.50	\$395.00	\$355.50	145-3
5/8/2019	Larry Rute	Kansas Appleseed	Team meeting: re amendment to the Complaint; scheduling order and settlement strategy	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2



## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
5/8/2019	Teresa Woody	Kansas Appleseed	Team call, including discussion of scheduling order, complaint amendments, and terms sheet	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2
5/8/2019	Fowler, Meg	DLA Piper	Attend the weekly team call, including discussion of scheduling order, complaint amendments, and terms sheet.	1.8	\$240.00	\$432.00	\$240.00	\$432.00	148-1
5/8/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, including discussion of scheduling order, complaint amendments, and terms sheet.	0.9	\$410.00	\$369.00	\$410.00	\$369.00	148-1
5/9/2019	Poonam Juneja	NCYL	emailing with LW FP re consulting medicaid experts and amendment to complaint	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
5/13/2019	Leecia Welch	NCYL	Confer with PJ and FP re: scheduling conference, term sheet, complaint amendments, and initial disclosures	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
5/13/2019	Poonam Juneja	NCYL	phone call with EM re complaint revisions/NP updates	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
5/13/2019	Poonam Juneja	NCYL	emailing SD EM re complaint revisions	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
5/13/2019	Poonam Juneja	NCYL	Confer with LW FP re: scheduling conference, term sheet, complaint amendments, and initial disclosures	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
5/13/2019	Poonam Juneja	NCYL	Confer with FP re: complaint amendments and scheduling conference	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
5/13/2019	Freya Pitts	NCYL	Confer with L. Welch and P. Juneja re: scheduling conference, term sheet, complaint amendments, and initial disclosures	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3
5/13/2019	Freya Pitts	NCYL	Confer with P. Juneja re: complaint amendments and scheduling conference	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
5/15/2019	Leecia Welch	NCYL	Team call, including re: scheduling conference, term sheet, and complaint amendments	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
5/15/2019	Poonam Juneja	NCYL	Team call, including re: scheduling conference, term sheet, and complaint amendments	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
5/15/2019	Teresa Woody	Kansas Appleseed	Team call, including re: scheduling conference, term sheet, and complaint amendments	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
5/15/2019	Sager, David S.	DLA Piper	Prepare for and attend status/strategy call re scheduling conference, term sheet, and complaint amendments.	0.7	\$500.00	\$350.00	\$500.00	\$350.00	148-1
5/15/2019	Pacio, Kristin A.	DLA Piper	Conference call with team re: scheduling conference, term sheet, and complaint amendments.	1	\$410.00	\$410.00	\$410.00	\$410.00	148-1
5/15/2019	Fowler, Meg	DLA Piper	Participate in weekly all- hands team call, including discussion re: scheduling conference, term sheet, and complaint amendments.	0.7	\$240.00	\$168.00	\$240.00	\$168.00	148-1

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
5/15/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, concerning scheduling conference, term sheet, and complaint amendments.	1	\$410.00	\$410.00	\$410.00	\$410.00	148-1
5/17/2019	Poonam Juneja	NCYL	emailing LW re timing for amendment of complaint	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
5/18/2019	Poonam Juneja	NCYL	emailing with team re needed edits to amended complaint	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
5/20/2019	Erin G. McGuinness	Children's Rights	Call with JK, NCYL, and Appleseed with subject matter expert to discuss claims in help deciding whether to amend complaint.	1.00	\$225.00	\$225.00	\$240.00	\$240.00	144-3
5/20/2019	Leecia Welch	NCYL	Confer with next friend re plaintiff facts; edit amended complaint	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3
5/20/2019	Leecia Welch	NCYL	Confer with FP and PJ re: complaint amendment	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3
5/20/2019	Leecia Welch	NCYL	Email correspondence with team re: amending complaint	0.3	\$500.00	\$150.00	\$500.00	\$150.00	145-3
5/20/2019	Poonam Juneja	NCYL	emailing LW FP re amended complaint and our prior stip with Ds	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
5/20/2019	Poonam Juneja	NCYL	Confer with FP re: amending complaint	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
5/20/2019	Poonam Juneja	NCYL	Confer with LW FP re: complaint amendment	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
5/20/2019	Poonam Juneja	NCYL	Confer with TW FP re: complaint amendment	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
5/20/2019	Freya Pitts	NCYL	Confer with L. Welch and P. Juneja re: complaint amendment	1.0	\$365.00	\$365.00	\$365.00	\$365.00	145-3
5/20/2019	Freya Pitts	NCYL	Confer with P. Juneja re: amending complaint and simultaneously email L. Welch re: same	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3
5/20/2019	Freya Pitts	NCYL	Confer with T. Woody and P. Juneja re: complaint amendment	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
5/20/2019	Freya Pitts	NCYL	Email correspondence with team re: amending complaint	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
5/20/2019	Jackie Stolzenberg	NCYL	Confer w L. Welch, F. Pitts, P. Juneja re possible complaint amendments	0.5	\$250.00	\$125.00	\$250.00	\$125.00	145-3
5/21/2019	Pacio, Kristin A.	DLA Piper	Reviewing correspondence regarding amendment of complaint.	0.3	\$410.00	\$123.00	\$410.00	\$123.00	148-1

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
7/12/2019	Leecia Welch	NCYL	Team call re: scheduling conference order, complaint amendment, stakeholder interviews	1.3	\$500.00	\$650.00	\$500.00	\$650.00	145-3
7/12/2019	Poonam Juneja	NCYL	Team call, including re: scheduling conference order, complaint amendment, and stakeholder interviews	1.3	\$395.00	\$513.50	\$395.00	\$513.50	145-3
7/12/2019	Martha Hodgesmith	Kansas Appleseed	Team call re scheduling conference and order, complaint amendment, stakeholder interviews	1.3	\$345.00	\$448.50	\$345.00	\$448.50	146-2
7/12/2019	Teresa Woody	Kansas Appleseed	Team call, including re: scheduling conference order, complaint amendment, and stakeholder interviews	1.3	\$500.00	\$650.00	\$500.00	\$650.00	146-2

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
7/12/2019	Pacio, Kristin A.	DLA Piper	Team conference call re: scheduling conference order, complaint amendment, and stakeholder interviews.	1.4	\$410.00	\$574.00	\$410.00	\$574.00	148-1
7/12/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, including discussion re: scheduling conference order, complaint amendment, and stakeholder interviews.	1.4	\$410.00	\$574.00	\$410.00	\$574.00	148-1
8/7/2019	Leecia Welch	NCYL	Team call, including re: work plan, ADR, complaint amendment, and discovery	0.7	\$500.00	\$350.00	\$500.00	\$350.00	145-3
8/7/2019	Poonam Juneja	NCYL	Team call, including re: work plan, ADR, complaint amendment, and discovery	0.7	\$395.00	\$276.50	\$395.00	\$276.50	145-3
8/7/2019	Martha Hodgesmith	Kansas Appleseed	Team call re ADR, complaint amendment, discovery	0.7	\$345.00	\$241.50	\$345.00	\$241.50	146-2

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
8/7/2019	Teresa Woody	Kansas Appleseed	Team call, including re: work plan, ADR, complaint amendment, and discovery	0.7	\$500.00	\$350.00	\$500.00	\$350.00	146-2
8/14/2019	Ira Lustbader	Children's Rights	Weekly team strategy call--settlement, amended complaint.	0.75	\$500.00	\$375.00	\$500.00	\$375.00	144-3
8/14/2019	Stephen Dixon	Children's Rights	Electronic mail with co- counsel re facts for amending complaint	0.37	\$375.00	\$137.50	\$410.00	\$151.70	144-3
8/14/2019	Leecia Welch	NCYL	Team call, including re: ADR, discovery, and complaint amendment	0.8	\$500.00	\$400.00	\$500.00	\$400.00	145-3
8/14/2019	Poonam Juneja	NCYL	Team call, including re: ADR, discovery, and complaint amendment	0.8	\$395.00	\$316.00	\$395.00	\$316.00	145-3
8/14/2019	Martha Hodgesmith	Kansas Appleseed	Team call re ADR, complaint amendment, discovery	0.8	\$345.00	\$276.00	\$345.00	\$276.00	146-2
8/14/2019	Teresa Woody	Kansas Appleseed	Team call, including re: ADR, discovery, and complaint amendment	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2
8/14/2019	Lori Burns- Bucklew	Burns- Bucklew	Co-counsel team strategy call re: settlement, amended complaint	0.75	\$500.00	\$375.00	\$500.00	\$375.00	147-1



## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
8/14/2019	Sager, David S.	DLA Piper	Attend weekly status/strategy call re ADR, discovery, and complaint amendment.	0.7	\$500.00	\$350.00	\$500.00	\$350.00	148-1
8/15/2019	Poonam Juneja	NCYL	review IL email re complaint amendment strategy and attachments and discussing same with LW	1.1	\$395.00	\$434.50	\$395.00	\$434.50	145-3
8/15/2019	Teresa Woody	Kansas Appleseed	Review email from IL and MN re complaint amendments and review cited cases	2	\$500.00	\$1,000.00	\$500.00	\$1,000.00	146-2
8/16/2019	Diggs, William J.	DLA Piper	Reviewing electronic correspondence concerning case strategy, potential amendment to complaint.	0.3	\$410.00	\$123.00	\$410.00	\$123.00	148-1
8/17/2019	Stephen Dixon	Children's Rights	Electronic mail to co-counsel re strategy for amending complaint	0.08	\$375.00	\$31.25	\$410.00	\$32.80	144-3
8/17/2019	Poonam Juneja	NCYL	reviewing SD email re thoughts on complaint amendment	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
8/18/2019	Stephen Dixon	Children's Rights	Electronic mail to co-counsel re strategy for amending complaint	0.17	\$375.00	\$62.50	\$410.00	\$69.70	144-3

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
8/19/2019	Leecia Welch	NCYL	Confer with P. Juneja and F. Pitts re mediation statement, 30 b 6 complaint amendment, doc review	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3
8/19/2019	Leecia Welch	NCYL	Confer with F. Pitts re ADR, 30 b 6 , complaint amendment	0.8	\$500.00	\$400.00	\$500.00	\$400.00	145-3
8/19/2019	Poonam Juneja	NCYL	conferring with FP and LW re mediation statement, 30b6 complaint amendment, doc review	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
8/19/2019	Poonam Juneja	NCYL	Confer with FP re: complaint amendment	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
8/19/2019	Freya Pitts	NCYL	Confer with L. Welch re: ADR, 30 b 6 , complaint amendment	0.8	\$365.00	\$292.00	\$365.00	\$292.00	145-3
8/19/2019	Freya Pitts	NCYL	Confer with P. Juneja re: complaint amendment	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
8/19/2019	Freya Pitts	NCYL	Confer with P. Juneja and L. Welch re mediation statement, 30 b 6 complaint amendment, doc review	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
8/20/2019	Stephen Dixon	Children's Rights	Electronic mail to Kansas GAL re facts in amended complaint draft	0.03	\$375.00	\$12.50	\$410.00	\$12.30	144-3
8/20/2019	Stephen Dixon	Children's Rights	Electronic mail to co-counsel re new facts for amended complaint	0.03	\$375.00	\$12.50	\$410.00	\$12.30	144-3
8/20/2019	Leecia Welch	NCYL	Confer with FP re: complaint amendment	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
8/20/2019	Freya Pitts	NCYL	Confer with L. Welch re: complaint amendment	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
8/20/2019	Freya Pitts	NCYL	Receive and review email correspondence re: complaint amendment	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
8/20/2019	Teresa Woody	Kansas Appleseed	Emails re strategy to filing amended complaint	0.2	\$500.00	\$100.00	\$500.00	\$100.00	146-2
8/21/2019	Leecia Welch	NCYL	Team call, including re: complaint amendment, ADR, communications strategy, and discovery	0.9	\$500.00	\$450.00	\$500.00	\$450.00	145-3

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
8/21/2019	Leecia Welch	NCYL	Phone call with PJ discussing research on class definition and amendment of complaint and strategy	0.4	\$500.00	\$200.00	\$500.00	\$200.00	145-3
8/21/2019	Leecia Welch	NCYL	Internal NCYL follow-up conversation re: complaint amendment	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3
8/21/2019	Poonam Juneja	NCYL	Team call, including re: complaint amendment, ADR, communications strategy, and discovery	0.9	\$395.00	\$355.50	\$395.00	\$355.50	145-3
8/21/2019	Poonam Juneja	NCYL	phone call with LW discussing research on class definition and amendment of complaint and strategy	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
8/21/2019	Poonam Juneja	NCYL	Internal NCYL follow-up conversation re: complaint amendment	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
8/21/2019	Teresa Woody	Kansas Appleseed	Team call, including re: complaint amendment, ADR, communications strategy, and discovery	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
8/21/2019	Lori Burns-Bucklew	Burns-Bucklew	Team strategy call re: complaint amendment, potential settlement, and discovery	0.90	\$500.00	\$450.00	\$500.00	\$450.00	147-1
8/22/2019	Stephen Dixon	Children's Rights	Electronic mail with co-counsel re named plaintiff facts for amending complaint	0.08	\$375.00	\$31.25	\$410.00	\$32.80	144-3
8/22/2019	Poonam Juneja	NCYL	emailing LW re following up with next friends on am complaint and drafting emails to next friends	0.6	\$395.00	\$237.00	\$395.00	\$237.00	145-3
8/22/2019	Poonam Juneja	NCYL	Confer with FP re: complaint amendment and new Named Plaintiff facts	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
8/22/2019	Freya Pitts	NCYL	Confer with P. Juneja re: complaint amendment and new Named Plaintiff facts	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
8/22/2019	Freya Pitts	NCYL	Email correspondence re: complaint amendment	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
8/23/2019	Erin G. McGuinness	Children's Rights	Emails with KS team to discuss status of amended complaint, conversation with next friends, updated facts, and next steps.	0.20	\$225.00	\$45.00	\$240.00	\$48.00	144-3

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
8/23/2019	Stephen Dixon	Children's Rights	Electronic mail with co-counsel re named plaintiff facts for amending complaint	0.03	\$375.00	\$12.50	\$410.00	\$12.30	144-3
8/23/2019	Poonam Juneja	NCYL	reviewing emails re Katharyn McIntyre and updating related facts in Am complaint draft	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
8/23/2019	Teresa Woody	Kansas Appleseed	Emails with LW and IL re amended complaint strategy	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2
8/24/2019	Stephen Dixon	Children's Rights	Electronic mail with co-counsel re named plaintiff facts for amending complaint	0.05	\$375.00	\$18.75	\$410.00	\$20.50	144-3
8/26/2019	Erin G. McGuinness	Children's Rights	Emails to next friends regarding amended complaint.	0.35	\$225.00	\$78.75	\$240.00	\$84.00	144-3
8/26/2019	Stephen Dixon	Children's Rights	Electronic mail with co-counsel re named plaintiff facts for amending complaint	0.13	\$375.00	\$50.00	\$410.00	\$53.30	144-3
8/26/2019	Stephen Dixon	Children's Rights	Electronic mail with co-counsel re named plaintiff facts for amending complaint	0.50	\$375.00	\$187.50	\$410.00	\$205.00	144-3
8/26/2019	Leecia Welch	NCYL	Confer with FP re: ADR, complaint amendment	0.3	\$500.00	\$150.00	\$500.00	\$150.00	145-3
8/26/2019	Leecia Welch	NCYL	Confer with PJ and FP re: complaint amendment	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3

## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
8/26/2019	Poonam Juneja	NCYL	reviewing emails from next friends re amended complaint facts and emailing team re same	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
8/26/2019	Poonam Juneja	NCYL	Confer with FP re: complaint amendment for MB and SE	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
8/26/2019	Poonam Juneja	NCYL	Confer with FP LW re: complaint amendment	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
8/26/2019	Freya Pitts	NCYL	Confer with L. Welch re: ADR, complaint amendment	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
8/26/2019	Freya Pitts	NCYL	Confer with P. Juneja and L. Welch re: complaint amendment	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
8/26/2019	Freya Pitts	NCYL	Confer with P. Juneja re: complaint amendment for MB and SE	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
8/27/2019	Poonam Juneja	NCYL	Confer with FP re: complaint amendment	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
8/27/2019	Freya Pitts	NCYL	Confer with P. Juneja re: complaint amendment	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3

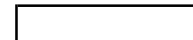
## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
8/28/2019	Leecia Welch	NCYL	Team call, including re: ADR, amended complaint, local updates	0.9	\$500.00	\$450.00	\$500.00	\$450.00	145-3
8/28/2019	Freya Pitts	NCYL	Team call, including re: ADR, amended complaint, local updates	0.9	\$365.00	\$328.50	\$365.00	\$328.50	145-3
8/28/2019	Martha Hodgesmith	Kansas Appleseed	Team call re ADR, amended complaint, local updates	0.9	\$345.00	\$310.50	\$345.00	\$310.50	146-2
8/28/2019	Teresa Woody	Kansas Appleseed	Team call, including re: ADR, amended complaint, local updates	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2
8/28/2019	Sager, David S.	DLA Piper	Attend weekly status conference re ADR, amended complaint, local updates.	0.6	\$500.00	\$300.00	\$500.00	\$300.00	148-1
8/29/2019	Leecia Welch	NCYL	Confer with PJ re motion to amend and amendments to complaint	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
8/29/2019	Poonam Juneja	NCYL	confer with LW re motion to amend and amendments to complaint	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
8/30/2019	Leecia Welch	NCYL	Confer with FP re: amended complaint	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3
8/30/2019	Freya Pitts	NCYL	Confer with L. Welch re: amended complaint	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3



## AMENDED COMPLAINT OTHER

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
8/30/2019	Diggs, William J.	DLA Piper	Reviewing electronic correspondence concerning motion to amend complaint.	0.1	\$410.00	\$41.00	\$410.00	\$41.00	148-1
9/4/2019	Erin G. McGuinness	Children's Rights	Correspond with co- counsel team re: amending complaint.	0.30	\$225.00	\$67.50	\$240.00	\$72.00	144-3
9/6/2019	Poonam Juneja	NCYL	phone call to clerks office re adding new named plaintiffs to docket in advance of filing amended complaint	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
9/6/2019	Teresa Woody	Kansas Appleseed	Emails re filing amended complaint after Court order granting motion	0.2	\$500.00	\$100.00	\$500.00	\$100.00	146-2
<b>TOTALS</b>				<b>99.00</b>		<b>\$42,097.76</b>		<b>\$42,258.30</b>	



# **EXHIBIT H**

## ALL MED AT ON AND TRA EL E PENSES

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document	E pense Amount
2/27/2019	Marissa Nardi	Children's Rights	attend team meeting with co-counsel re discovery and mediation strategy	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3	
3/22/2019	Ira Lustbader	Children's Rights	Analyzing interim consent relief approach mediation	1.83	\$500.00	\$916.67	\$500.00	\$915.00	144-3	
3/22/2019	Ira Lustbader	Children's Rights	Continued analyzing interim consent relief approach for mediation	2.17	\$500.00	\$1,083.33	\$500.00	\$1,085.00	144-3	
4/9/2019	Freya Pitts	NCYL	Confer with L. Welch, P. Juneja, and J. Stolzenberg re: cocounsel agreement, legal research tasks, and early mediation	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3	
4/9/2019	Jackie Stolzenberg	NCYL	Confer with L. Welch, P. Juneja, and F. Pitts re: cocounsel agreement, legal research tasks, and early mediation	0.4	\$250.00	\$100.00	\$250.00	\$100.00	145-3	
4/9/2019	Leecia Welch	NCYL	Confer with PJ, FP, and JS re: cocounsel agreement, legal research tasks, and early mediation	0.4	\$500.00	\$200.00	\$500.00	\$200.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

4/9/2019	Poonam Juneja	NCYL	Confer with LW FP JS re: cocounsel agreement, legal research tasks, and early mediation	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3	
5/9/2019	Clare Connaughton	Children's Rights	incorporate each of CR team's edits into operative draft term sheet for mediation	1.33	\$150.00	\$200.00	\$200.00	\$266.00	144-3	
7/12/2019	Marissa Nardi	Children's Rights	participate in KS team mtg re mediation and litigation strategy, including depositions and discovery conference	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3	
7/16/2019	Teresa Woody	Kansas Appleseed	Confer with LW re mediator and approach to mediation	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2	
7/16/2019	Teresa Woody	Kansas Appleseed	Review defendants good faith mediation counter-proposal and IL's comments	0.6	\$500.00	\$300.00	\$500.00	\$300.00	146-2	
7/17/2019	Ira Lustbader	Children's Rights	Analyzing strategic questions on settlement and mediation, response to team.	1.25	\$500.00	\$625.00	\$500.00	\$625.00	144-3	
7/17/2019	Jonathan King	Children's Rights	Conference call with team regarding Defendants' mediation counter-proposal, draft 30 b 6 notice, and local stakeholder updates	0.88	\$325.00	\$287.08	\$345.00	\$303.60	144-3	

## ALL MED AT ON AND TRA EL E PENSES

7/17/2019	Leecia Welch	NCYL	Team call, including re: mediation, 30 b 6 notice, and stakeholder conversations	0.9	\$500.00	\$450.00	\$500.00	\$450.00	145-3	
7/17/2019	Lori Burns-Bucklew	Burns-Bucklew	Team call, including re: mediation, 30 b 6 notice, and stakeholder conversations	0.90	\$500.00	\$450.00	\$500.00	\$450.00	147-1	
7/17/2019	Marissa Nardi	Children's Rights	attend KS co-counsel meeting with external team re discovery and mediation strategy	0.88	\$325.00	\$287.08	\$380.00	\$334.40	144-3	
7/17/2019	Pacio, Kristin A.	DLA Piper	Team conference call re: mediation, 30 b 6 notice, and stakeholder conversations .	1	\$410.00	\$410.00	\$410.00	\$410.00	148-1	
7/17/2019	Poonam Juneja	NCYL	Team call, including re: mediation, 30 b 6 notice, and stakeholder conversations	0.9	\$395.00	\$355.50	\$395.00	\$355.50	145-3	
7/17/2019	Teresa Woody	Kansas Appleseed	Team call, including re: mediation, 30 b 6 notice, and stakeholder conversations	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2	
7/24/2019	Leecia Welch	NCYL	Team call, including re: mediation, experts, discovery, and information from stakeholders	0.9	\$500.00	\$450.00	\$500.00	\$450.00	145-3	
7/24/2019	Lori Burns-Bucklew	Burns-Bucklew	Team call, including re: mediation, experts, discovery, and information from stakeholders	0.90	\$500.00	\$450.00	\$500.00	\$450.00	147-1	

## ALL MED AT ON AND TRA EL E PENSES

7/24/2019	Martha Hodgesmith	Kansas Appleseed	Team call re experts, mediation, discovery	0.9	\$345.00	\$310.50	\$345.00	\$310.50	146-2	
7/24/2019	Pacio, Kristin A.	DLA Piper	Conference call with team re: mediation, experts, discovery, and information from stakeholders.	0.9	\$410.00	\$369.00	\$410.00	\$369.00	148-1	
7/24/2019	Poonam Juneja	NCYL	Team call, including re: mediation, experts, discovery, and information from stakeholders	0.9	\$395.00	\$355.50	\$395.00	\$355.50	145-3	
7/24/2019	Teresa Woody	Kansas Appleseed	Team call, including re: mediation, experts, discovery, and information from stakeholders	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2	
7/29/2019	Freya Pitts	NCYL	Confer with L. Welch and P. Juneja re: discovery mediation	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	
7/29/2019	Leecia Welch	NCYL	Confer with PJ and FP re: discovery mediation	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3	
7/29/2019	Poonam Juneja	NCYL	Confer with LW FP re: discovery mediation	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3	
7/31/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, including discussion re: mediation, discovery, and Task Force.	0.7	\$410.00	\$287.00	\$410.00	\$287.00	148-1	
7/31/2019	Leecia Welch	NCYL	Team call, including re: mediation, discovery, and Task Force	0.7	\$500.00	\$350.00	\$500.00	\$350.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

7/31/2019	Lori Burns-Bucklew	Burns-Bucklew	Team call, including re: mediation, discovery, and Task Force	0.70	\$500.00	\$350.00	\$500.00	\$350.00	147-1	
7/31/2019	Pacio, Kristin A.	DLA Piper	Conference call with team re: mediation, discovery, and Task Force.	0.7	\$410.00	\$287.00	\$410.00	\$287.00	148-1	
7/31/2019	Poonam Juneja	NCYL	Team call, including re: mediation, discovery, and Task Force	0.7	\$395.00	\$276.50	\$395.00	\$276.50	145-3	
7/31/2019	Sager, David S.	DLA Piper	Attend weekly status call re: mediation, discovery, and Task Force.	0.9	\$500.00	\$450.00	\$500.00	\$450.00	148-1	
7/31/2019	Teresa Woody	Kansas Appleseed	Team call, including re: mediation, discovery, and Task Force	0.7	\$500.00	\$350.00	\$500.00	\$350.00	146-2	
8/9/2019	Ira Lustbader	Children's Rights	Follow up research re potential neutral expert for mediation.	0.92	\$500.00	\$458.33	\$500.00	\$460.00	144-3	
8/12/2019	Leecia Welch	NCYL	Receive and review email correspondence re: mediation strategy	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3	
8/13/2019	Freya Pitts	NCYL	Receive and review email correspondence re: mediation strategy	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	
8/13/2019	Marissa Nardi	Children's Rights	Analyze mediation strategy with IL in light of court order	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

8/14/2019	Ira Lustbader	Children's Rights	Telephone call with Kevin Ryan re available dates for mediation.	0.25	\$500.00	\$125.00	\$500.00	\$125.00	144-3	
8/14/2019	Marissa Nardi	Children's Rights	participate in team meeting re litigation and mediation strategy, including review of files produced by Defs	0.75	\$325.00	\$243.75	\$380.00	\$285.00	144-3	
8/14/2019	Teresa Woody	Kansas Appleseed	Emails re mediation strategy	0.2	\$500.00	\$100.00	\$500.00	\$100.00	146-2	
8/15/2019	Jonathan King	Children's Rights	Analyze correspondence regarding mediation and response to Plaintiffs' term sheet	0.55	\$325.00	\$178.75	\$345.00	\$189.75	144-3	
8/15/2019	Lori Burns-Bucklew	Burns-Bucklew	Meet with TW, SD, LW, MH re strategy re mediation and continued discovery	1.20	\$500.00	\$600.00	\$500.00	\$600.00	147-1	
8/15/2019	Teresa Woody	Kansas Appleseed	Meet with LBB, SD, LW, MH re strategy re mediation and continued discovery	1.2	\$500.00	\$600.00	\$500.00	\$600.00	146-2	
8/16/2019	Poonam Juneja	NCYL	reviewing team emails re mediation dates and ext of filing date	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3	
8/19/2019	Freya Pitts	NCYL	Email correspondence re: Kansas mediation	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	
8/19/2019	Leecia Welch	NCYL	Email correspondence re: Kansas mediation	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	



## ALL MED AT ON AND TRA EL E PENSES

8/19/2019	Leecia Welch	NCYL	Review mediation notice from opposing counsel	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	
8/19/2019	Teresa Woody	Kansas Appleseed	Review state documents re foster care initiatives on KS public websites re mediation	2.3	\$500.00	\$1,150.00	\$500.00	\$1,150.00	146-2	
8/21/2019	Ira Lustbader	Children's Rights	Telephone call with co-counsel LW and TW re mediation strategy.	0.42	\$500.00	\$208.33	\$500.00	\$210.00	144-3	
8/21/2019	Ira Lustbader	Children's Rights	Analyzing frame for mediation statement.	3.25	\$500.00	\$1,625.00	\$500.00	\$1,625.00	144-3	
8/21/2019	Marissa Nardi	Children's Rights	discuss mediation strategy with IL	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3	
8/21/2019	Marissa Nardi	Children's Rights	participate in KS co-counsel team meeting re litigation and mediation strategies	0.75	\$325.00	\$243.75	\$380.00	\$285.00	144-3	
8/21/2019	Teresa Woody	Kansas Appleseed	TCW with IL and LW re mediation strategy	0.5	\$500.00	\$250.00	\$500.00	\$250.00	146-2	
8/22/2019	Jonathan King	Children's Rights	Begin drafting first draft of Plaintiffs' initial mediation statement	3.18	\$325.00	\$1,034.58	\$345.00	\$1,097.10	144-3	
8/22/2019	Teresa Woody	Kansas Appleseed	Review and sign off on Mediation Agreement	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2	
8/23/2019	Ira Lustbader	Children's Rights	Outlining Mediation Statement and narrative.	4.08	\$500.00	\$2,041.67	\$500.00	\$2,040.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

8/23/2019	Jonathan King	Children's Rights	Conference call with IL and MN regarding strategy for mediation statement	0.42	\$325.00	\$135.42	\$345.00	\$144.90	144-3	
8/23/2019	Jonathan King	Children's Rights	Draft Plaintiffs' initial mediation statement	7.18	\$325.00	\$2,334.58	\$345.00	\$2,477.10	144-3	
8/23/2019	Marissa Nardi	Children's Rights	meeting with IL and JK re mediation statement	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3	
8/26/2019	Jonathan King	Children's Rights	Draft Plaintiffs' initial mediation statement	8.90	\$325.00	\$2,892.50	\$345.00	\$3,070.50	144-3	
8/27/2019	Ira Lustbader	Children's Rights	Review and follow up re mediation agreement, comments from co-counsel.	0.58	\$500.00	\$291.67	\$500.00	\$290.00	144-3	
8/27/2019	Jonathan King	Children's Rights	Draft Plaintiffs' initial mediation statement	8.00	\$325.00	\$2,600.00	\$345.00	\$2,760.00	144-3	
8/27/2019	Teresa Woody	Kansas Appleseed	Review and revise early draft of mediation statement	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2	
8/28/2019	Ira Lustbader	Children's Rights	Discuss status of mediation statement, strategy with JK.	0.33	\$500.00	\$166.67	\$500.00	\$165.00	144-3	
8/28/2019	Ira Lustbader	Children's Rights	Weekly team strategy call discovery, mediation .	0.83	\$500.00	\$416.67	\$500.00	\$415.00	144-3	
8/28/2019	Jonathan King	Children's Rights	Draft Plaintiffs' initial mediation statement	5.92	\$325.00	\$1,922.92	\$345.00	\$2,042.40	144-3	

## ALL MED AT ON AND TRA EL E PENSES

8/28/2019	Lori Burns-Bucklew	Burns-Bucklew	Weekly team strategy call re: discovery, mediation	0.83	\$500.00	\$416.67	\$500.00	\$415.00	147-1	
8/28/2019	Poonam Juneja	NCYL	review JS notes for portion of co-counsel call that I missed re mediation, motion to amend, etc	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3	
8/28/2019	Stephen Dixon	Children's Rights	Conference call with KS team re mediation strategy	0.83	\$375.00	\$312.50	\$410.00	\$340.30	144-3	
8/29/2019	Ira Lustbader	Children's Rights	Review/analyze draft mediation statement.	3.25	\$500.00	\$1,625.00	\$500.00	\$1,625.00	144-3	
8/29/2019	Jonathan King	Children's Rights	Draft Plaintiffs' initial mediation statement	6.63	\$325.00	\$2,155.83	\$345.00	\$2,287.35	144-3	
8/30/2019	Clare Connaughton	Children's Rights	Email factual research to MN to prepare draft mediation statement	0.12	\$150.00	\$17.50	\$200.00	\$24.00	144-3	
8/30/2019	Ira Lustbader	Children's Rights	Analyze and edit 1 mediation statement.	3.67	\$500.00	\$1,833.33	\$500.00	\$1,835.00	144-3	
8/30/2019	Marissa Nardi	Children's Rights	analyze draft sections of mediation statement by JK	1.30	\$325.00	\$422.50	\$380.00	\$494.00	144-3	
9/1/2019	Ira Lustbader	Children's Rights	Editing mediation statement cont'd .	2.25	\$500.00	\$1,125.00	\$500.00	\$1,125.00	144-3	
9/3/2019	Daniel Adamek	Children's Rights	Research and edit factual cites in mediation statement.	1.63	\$150.00	\$245.00	\$200.00	\$326.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

9/3/2019	Marissa Nardi	Children's Rights	edit draft mediation statement sections	6.38	\$325.00	\$2,074.58	\$380.00	\$2,424.40	144-3	
9/4/2019	Clare Connaughton	Children's Rights	Edit citations in mediation statement to conform to Bluebook Rules	0.52	\$150.00	\$77.50	\$200.00	\$104.00	144-3	
9/4/2019	Daniel Adamek	Children's Rights	Edit Kansas mediation statement to add factual cites.	4.42	\$150.00	\$662.50	\$200.00	\$884.00	144-3	
9/4/2019	Ira Lustbader	Children's Rights	Strategy conference call with co-counsel re discovery status, and strategy, mediation	0.92	\$500.00	\$458.33	\$500.00	\$460.00	144-3	
9/4/2019	Lori Burns-Bucklew	Burns-Bucklew	Strategy conference call with co-counsel re discovery status, next steps, and mediation	0.92	\$500.00	\$458.33	\$500.00	\$460.00	147-1	
9/4/2019	Marissa Nardi	Children's Rights	draft new sections of mediation statement	9.63	\$325.00	\$3,130.83	\$380.00	\$3,659.40	144-3	
9/4/2019	Teresa Woody	Kansas Appleseed	Emails re number of kids in office stays for mediation	0.5	\$500.00	\$250.00	\$500.00	\$250.00	146-2	
9/5/2019	Daniel Adamek	Children's Rights	Review mediation statement to ensure factual accuracy.	5.92	\$150.00	\$887.50	\$200.00	\$1,184.00	144-3	
9/5/2019	Marissa Nardi	Children's Rights	Edit draft mediation statement	2.93	\$325.00	\$953.33	\$380.00	\$1,113.40	144-3	
9/6/2019	Ira Lustbader	Children's Rights	Reading and editing mediation statement.	5.17	\$500.00	\$2,583.33	\$500.00	\$2,585.00	144-3	
9/7/2019	Marissa Nardi	Children's Rights	Discuss edits to mediation statement with IL	0.18	\$325.00	\$59.58	\$380.00	\$68.40	144-3	

## ALL MED AT ON AND TRA EL E PENSES

9/8/2019	Ira Lustbader	Children's Rights	Editing mediation statement cont'd .	2.08	\$500.00	\$1,041.67	\$500.00	\$1,040.00	144-3	
9/8/2019	Marissa Nardi	Children's Rights	Edit draft mediation statement	4.67	\$325.00	\$1,516.67	\$380.00	\$1,774.60	144-3	
9/9/2019	Clare Connaughton	Children's Rights	Identify factual support for exhibits for Kansas mediation statement	3.35	\$150.00	\$502.50	\$200.00	\$670.00	144-3	
9/9/2019	Daniel Adamek	Children's Rights	Cite-check mediation statement.	3.03	\$150.00	\$455.00	\$200.00	\$606.00	144-3	
9/9/2019	Freya Pitts	NCYL	Review draft mediation statement	0.8	\$365.00	\$292.00	\$365.00	\$292.00	145-3	
9/9/2019	Leecia Welch	NCYL	Review draft mediation statement	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3	
9/9/2019	Marissa Nardi	Children's Rights	Meeting with JK and IL re draft mediation statement	0.25	\$325.00	\$81.25	\$380.00	\$95.00	144-3	
9/9/2019	Marissa Nardi	Children's Rights	Electronic mail to internal CR team re drafting mediation statement	0.47	\$325.00	\$151.67	\$380.00	\$178.60	144-3	
9/9/2019	Marissa Nardi	Children's Rights	Edit draft mediation statement for circulation to co-counsel	7.87	\$325.00	\$2,556.67	\$380.00	\$2,990.60	144-3	
9/9/2019	Teresa Woody	Kansas Appleseed	Review, analyze, and annotate draft mediation statement and exhibits	3.1	\$500.00	\$1,550.00	\$500.00	\$1,550.00	146-2	
9/10/2019	Clare Connaughton	Children's Rights	Finalize all exhibits for Kansas mediation statement	2.25	\$150.00	\$337.50	\$200.00	\$450.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

9/10/2019	Daniel Adamek	Children's Rights	Collect sources for mediation statement.	1.87	\$150.00	\$280.00	\$200.00	\$374.00	144-3	
9/10/2019	Freya Pitts	NCYL	Confer with P. Juneja re: mediation brief	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
9/10/2019	Freya Pitts	NCYL	Review and revise draft mediation statement	0.9	\$365.00	\$328.50	\$365.00	\$328.50	145-3	
9/10/2019	Marissa Nardi	Children's Rights	Edit draft mediation statement based on suggestions by co-counsel	0.63	\$325.00	\$205.83	\$380.00	\$239.40	144-3	
9/10/2019	Marissa Nardi	Children's Rights	Continue editing draft mediation statement based on suggestions by co-counsel	2.80	\$325.00	\$910.00	\$380.00	\$1,064.00	144-3	
9/10/2019	Poonam Juneja	NCYL	Confer with FP re: mediation brief	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	
9/10/2019	Teresa Woody	Kansas Appleseed	Cont. review and annotation of mediation statement and exhibits	2.1	\$500.00	\$1,050.00	\$500.00	\$1,050.00	146-2	
9/11/2019	Diggs, William J.	DLA Piper	Reviewing draft mediation statement.	0.7	\$410.00	\$287.00	\$410.00	\$287.00	148-1	
9/11/2019	Freya Pitts	NCYL	Discuss mediation statement with P. Juneja	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	
9/11/2019	Freya Pitts	NCYL	Revise mediation statement	1.6	\$365.00	\$584.00	\$365.00	\$584.00	145-3	
9/11/2019	Leecia Welch	NCYL	Team call, including re: mediation statement, discovery, experts	0.8	\$500.00	\$400.00	\$500.00	\$400.00	145-3	
9/11/2019	Leecia Welch	NCYL	Revise mediation statement	0.7	\$500.00	\$350.00	\$500.00	\$350.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

9/11/2019	Marissa Nardi	Children's Rights	Electronic mail with internal team re finalizing mediation statement draft	0.17	\$325.00	\$54.17	\$380.00	\$64.60	144-3	
9/11/2019	Marissa Nardi	Children's Rights	discussion with external co-counsel and internal team re litigation strategy and mediation strategy, including draft mediation statement	0.80	\$325.00	\$260.00	\$380.00	\$304.00	144-3	
9/11/2019	Martha Hodgesmith	Kansas Appleseed	Team call re mediation statement, discovery, experts	0.8	\$345.00	\$276.00	\$345.00	\$276.00	146-2	
9/11/2019	Poonam Juneja	NCYL	Team call, including re: mediation statement, discovery, experts	0.8	\$395.00	\$316.00	\$395.00	\$316.00	145-3	
9/11/2019	Poonam Juneja	NCYL	Discuss mediation statement with FP	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3	
9/11/2019	Teresa Woody	Kansas Appleseed	Team call, re: mediation statement, discovery, experts	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2	
9/12/2019	Claire Glasspiegel	Children's Rights	Revise draft mediation statement	2.57	\$300.00	\$770.00	\$310.00	\$796.70	144-3	
9/12/2019	Leecia Welch	NCYL	conferring with PJ re revisions to mediation statement	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	
9/12/2019	Marissa Nardi	Children's Rights	Electronic mail with external co-counsel re mediation statement draft editing	0.22	\$325.00	\$70.42	\$380.00	\$83.60	144-3	

## ALL MED AT ON AND TRA EL E PENSES

9/12/2019	Marissa Nardi	Children's Rights	meeting with IL re case strategy re mediation	0.67	\$325.00	\$216.67	\$380.00	\$254.60	144-3	
9/12/2019	Poonam Juneja	NCYL	conferring with LW re revisions to mediation statement	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	
9/12/2019	Teresa Woody	Kansas Appleseed	Confer with LW, IL and DLA re case strategy in mediation	0.7	\$500.00	\$350.00	\$500.00	\$350.00	146-2	
9/13/2019	Freya Pitts	NCYL	Confer with P. Juneja re: mediation	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
9/13/2019	Poonam Juneja	NCYL	Confer with FP re: mediation	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	
9/13/2019	Poonam Juneja	NCYL	revising mediation statement	1.5	\$395.00	\$592.50	\$395.00	\$592.50	145-3	
9/16/2019	Freya Pitts	NCYL	Revise draft mediation statement	2.5	\$365.00	\$912.50	\$365.00	\$912.50	145-3	
9/16/2019	Freya Pitts	NCYL	Confer with P. Juneja re revisions to mediation statement draft	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	
9/16/2019	Jonathan King	Children's Rights	Read comments by co-counsel to draft mediation statement	0.50	\$325.00	\$162.50	\$345.00	\$172.50	144-3	
9/16/2019	Leecia Welch	NCYL	Revise draft mediation statement	0.4	\$500.00	\$200.00	\$500.00	\$200.00	145-3	
9/16/2019	Marissa Nardi	Children's Rights	Electronic mail with internal team re draft mediation statement	0.33	\$325.00	\$108.33	\$380.00	\$125.40	144-3	
9/16/2019	Marissa Nardi	Children's Rights	Edit draft mediation statement	2.48	\$325.00	\$807.08	\$380.00	\$942.40	144-3	
9/16/2019	Poonam Juneja	NCYL	revising mediation statement	2.3	\$395.00	\$908.50	\$395.00	\$908.50	145-3	



## ALL MED AT ON AND TRA EL E PENSES

9/16/2019	Poonam Juneja	NCYL	conferring with FP re revisions to mediation statement draft	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3	
9/17/2019	Erin G. McGuinness	Children's Rights	Discuss mediation statement and co-counsel's response with JK.	0.42	\$225.00	\$93.75	\$240.00	\$100.80	144-3	
9/17/2019	Erin G. McGuinness	Children's Rights	Read through co-counsel's edits to mediation statement	0.50	\$225.00	\$112.50	\$240.00	\$120.00	144-3	
9/17/2019	Freya Pitts	NCYL	Review L. Welch revisions to mediation statement	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
9/17/2019	Freya Pitts	NCYL	Review updated mediation draft; email M. Nardi re: same	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	
9/17/2019	Ira Lustbader	Children's Rights	Review and edit revised mediation statement.	2.17	\$500.00	\$1,083.33	\$500.00	\$1,085.00	144-3	
9/17/2019	Jonathan King	Children's Rights	Review NCYL's edits to plaintiffs' draft mediation statement	0.48	\$325.00	\$157.08	\$345.00	\$165.60	144-3	
9/17/2019	Larry Rute	Kansas Appleseed	Review closely draft mediation statement	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2	
9/17/2019	Marissa Nardi	Children's Rights	Review tracked changes by co-counsel on draft mediation statement	0.38	\$325.00	\$124.58	\$380.00	\$144.40	144-3	
9/17/2019	Marissa Nardi	Children's Rights	Edit draft mediation statement	1.52	\$325.00	\$492.92	\$380.00	\$577.60	144-3	
9/17/2019	Marissa Nardi	Children's Rights	Continue editing draft mediation statement	5.82	\$325.00	\$1,890.42	\$380.00	\$2,211.60	144-3	

## ALL MED AT ON AND TRA EL E PENSES

9/17/2019	Teresa Woody	Kansas Appleseed	Review and comment on proposed edits to mediation statement	2.3	\$500.00	\$1,150.00	\$500.00	\$1,150.00	146-2	
9/18/2019	Clare Connaughton	Children's Rights	Incorporate latest findings from file review and other factual research into new draft of KS mediation statement	3.25	\$150.00	\$487.50	\$200.00	\$650.00	144-3	
9/18/2019	Daniel Adamek	Children's Rights	Telephone call with CC re mediation statement cite-checking strategy.	0.22	\$150.00	\$32.50	\$200.00	\$44.00	144-3	
9/18/2019	Daniel Adamek	Children's Rights	Edit and cite-check mediation statement.	7.78	\$150.00	\$1,167.50	\$200.00	\$1,556.00	144-3	
9/18/2019	Freya Pitts	NCYL	Discussing draft mediation statement with P. Juneja	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	
9/18/2019	Freya Pitts	NCYL	Confer with P. Juneja re: mediation statement	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3	
9/18/2019	Freya Pitts	NCYL	Email L. Welch re: mediation statement	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
9/18/2019	Freya Pitts	NCYL	Review L. Welch revisions to mediation statement	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
9/18/2019	Freya Pitts	NCYL	Review P. Juneja edits to mediation draft	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	

## ALL MED AT ON AND TRA EL E PENSES

9/18/2019	Jonathan King	Children's Rights	Review plaintiffs' updated draft mediation statement	0.33	\$325.00	\$108.33	\$345.00	\$113.85	144-3	
9/18/2019	Leecia Welch	NCYL	Confer with PJ re draft mediation statement	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	
9/18/2019	Leecia Welch	NCYL	Review and edit updated mediation draft	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3	
9/18/2019	Marissa Nardi	Children's Rights	Discuss finalizing mediation statement with internal team	0.33	\$325.00	\$108.33	\$380.00	\$125.40	144-3	
9/18/2019	Marissa Nardi	Children's Rights	Attend strategy meeting with external co-counsel re litigation and mediation strategies	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3	
9/18/2019	Marissa Nardi	Children's Rights	Edit draft mediation statement	2.93	\$325.00	\$953.33	\$380.00	\$1,113.40	144-3	
9/18/2019	Poonam Juneja	NCYL	reviewing and revising updated draft mediation statement	1.1	\$395.00	\$434.50	\$395.00	\$434.50	145-3	
9/18/2019	Poonam Juneja	NCYL	revising draft mediation statement to incorporate FP comment	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	
9/18/2019	Poonam Juneja	NCYL	discussing draft mediation statement with FP	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3	
9/18/2019	Poonam Juneja	NCYL	discussing draft mediation statement with LW	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	
9/18/2019	Poonam Juneja	NCYL	Confer with FP re: mediation statement	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3	

## ALL MED AT ON AND TRA EL E PENSES

9/18/2019	Stephen Dixon	Children's Rights	Electronic mail with KS co-counsel re investigation, discovery, and mediation planning	0.25	\$375.00	\$93.75	\$410.00	\$102.50	144-3	
9/18/2019	Teresa Woody	Kansas Appleseed	Review NCYL's revisions to mediation statement	0.5	\$500.00	\$250.00	\$500.00	\$250.00	146-2	
9/19/2019	Clare Connaughton	Children's Rights	Edit citations in new mediation statement to conform to Bluebook Rules	2.30	\$150.00	\$345.00	\$200.00	\$460.00	144-3	
9/19/2019	Daniel Adamek	Children's Rights	Edit and cite-check mediation statement.	6.27	\$150.00	\$940.00	\$200.00	\$1,254.00	144-3	
9/19/2019	Freya Pitts	NCYL	Confer with P. Juneja re: mediation	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
9/19/2019	Freya Pitts	NCYL	Email correspondence re: mediation call with K. Ryan	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
9/19/2019	Jonathan King	Children's Rights	Review plaintiffs' draft mediation statement	0.43	\$325.00	\$140.83	\$345.00	\$148.35	144-3	
9/19/2019	Poonam Juneja	NCYL	Confer with FP re: mediation	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	
9/20/2019	Clare Connaughton	Children's Rights	Proofread KS mediation statement	1.08	\$150.00	\$162.50	\$200.00	\$216.00	144-3	
9/20/2019	Daniel Adamek	Children's Rights	Proofread mediation statement.	1.07	\$150.00	\$160.00	\$200.00	\$214.00	144-3	
9/20/2019	Freya Pitts	NCYL	Review final mediation statement	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	

## ALL MED AT ON AND TRA EL E PENSES

9/20/2019	Leecia Welch	NCYL	Review final mediation statement	0.4	\$500.00	\$200.00	\$500.00	\$200.00	145-3	
9/20/2019	Teresa Woody	Kansas Appleseed	Review final mediation statement	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2	
9/21/2019	Teresa Woody	Kansas Appleseed	TCW LW and IL re mediation strategy	0.5	\$500.00	\$250.00	\$500.00	\$250.00	146-2	
9/25/2019	Ira Lustbader	Children's Rights	Telephone call with co-counsel regarding discovery, expert and mediation strategy	0.92	\$500.00	\$458.33	\$500.00	\$460.00	144-3	
9/25/2019	Lori Burns-Bucklew	Burns-Bucklew	Strategy call with co-counsel re discovery, expert and mediation strategy	0.92	\$500.00	\$458.33	\$500.00	\$460.00	147-1	
9/30/2019	Clare Connaughton	Children's Rights	Identify key monitoring documents from GL v Sherman docket to share with IL and LBB for purposes of mediation	0.77	\$150.00	\$115.00	\$200.00	\$154.00	144-3	
10/1/2019	Teresa Woody	Kansas Appleseed	Conference with co-counsel re dates to reschedule mediation	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2	
10/2/2019	Freya Pitts	NCYL	Receive and review email correspondence re: mediation	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
10/2/2019	Leecia Welch	NCYL	Team call re: discovery letter, mediation, amended 30 b 6 , and potential experts	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

10/2/2019	Leecia Welch	NCYL	Email with team re: mediation	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3	
10/2/2019	Leecia Welch	NCYL	Email with opposing counsel re mediation issues	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	
10/2/2019	Lori Burns-Bucklew	Burns-Bucklew	Co-counsel strategy call re: discovery letter, mediation, amended 30 b 6 , and potential experts	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1	
10/2/2019	Marissa Nardi	Children's Rights	Meeting with external co-counsel team re litigation and mediation strategies, including document review and mediation statements	0.97	\$325.00	\$314.17	\$380.00	\$368.60	144-3	
10/2/2019	Martha Hodgesmith	Kansas Appleseed	Team call re discovery letter, mediation, amended 30 b 6 notice, potential experts	1	\$345.00	\$345.00	\$345.00	\$345.00	146-2	
10/2/2019	Poonam Juneja	NCYL	Team call, including re: discovery letter, mediation, amended 30 b 6 , and potential experts	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3	
10/2/2019	Teresa Woody	Kansas Appleseed	Team call, including re: discovery letter, mediation, amended 30 b 6 , and potential experts	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2	

## ALL MED AT ON AND TRA EL E PENSES

10/2/2019	Teresa Woody	Kansas Appleseed	Draft email to defense counsel re mediation; confer-co-counsel re same	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2	
10/3/2019	Marissa Nardi	Children's Rights	Discuss mediation with IL	0.17	\$325.00	\$54.17	\$380.00	\$64.60	144-3	
10/3/2019	Teresa Woody	Kansas Appleseed	Emails re rescheduling mediation for 11/12	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2	
10/7/2019	Freya Pitts	NCYL	Confer with P. Juneja re: mediation and document review	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
10/7/2019	Freya Pitts	NCYL	Email correspondence re: mediation	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3	
10/7/2019	Ira Lustbader	Children's Rights	Draft strategy memo to co counsel for first mediation	1.25	\$500.00	\$625.00	\$500.00	\$625.00	144-3	
10/7/2019	Leecia Welch	NCYL	Review email re: mediation strategy for call with monitor	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3	
10/7/2019	Leecia Welch	NCYL	Review KS hot docs in prep for mediation	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3	
10/7/2019	Marissa Nardi	Children's Rights	Prepare for mediation call with Kevin Ryan	0.77	\$325.00	\$249.17	\$380.00	\$292.60	144-3	
10/7/2019	Marissa Nardi	Children's Rights	Prepare for strategy call re mediation and discovery in similar litigation	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3	
10/7/2019	Marissa Nardi	Children's Rights	Prepare for mediation ex parte call with mediator	1.62	\$325.00	\$525.42	\$380.00	\$615.60	144-3	
10/7/2019	Poonam Juneja	NCYL	Confer with FP re: mediation and document review	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	

## ALL MED AT ON AND TRA EL E PENSES

10/7/2019	Teresa Woody	Kansas Appleseed	Review mediation materials in prep for plaintiffs' call with mediator	1.2	\$500.00	\$600.00	\$500.00	\$600.00	146-2	
10/8/2019	Freya Pitts	NCYL	Email correspondence re: mediation call prep	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
10/8/2019	Freya Pitts	NCYL	Plaintiffs-only mediation call with K. Ryan	1.3	\$365.00	\$474.50	\$365.00	\$474.50	145-3	
10/8/2019	Ira Lustbader	Children's Rights	Mediation telephone call with Kevin Ryan and plttf team	1.33	\$500.00	\$666.67	\$500.00	\$665.00	144-3	
10/8/2019	Ira Lustbader	Children's Rights	Prep for mediation ex parte mediator contd	1.92	\$500.00	\$958.33	\$500.00	\$960.00	144-3	
10/8/2019	Leecia Welch	NCYL	Email correspondence re: mediation call prep	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3	
10/8/2019	Leecia Welch	NCYL	Plaintiffs-only mediation call with K. Ryan	1.3	\$500.00	\$650.00	\$500.00	\$650.00	145-3	
10/8/2019	Lori Burns-Bucklew	Burns-Bucklew	Mediation telephone call with Kevin Ryan and plttf team	1.33	\$500.00	\$666.67	\$500.00	\$665.00	147-1	
10/8/2019	Marissa Nardi	Children's Rights	Prepare for ex parte call with mediator by reviewing mediation materials	0.83	\$325.00	\$270.83	\$380.00	\$315.40	144-3	
10/8/2019	Poonam Juneja	NCYL	Plaintiffs' only mediation phone call with mediator	1.3	\$395.00	\$513.50	\$395.00	\$513.50	145-3	
10/9/2019	Larry Rute	Kansas Appleseed	Review full mediation statement and exhibits	1.2	\$500.00	\$600.00	\$500.00	\$600.00	146-2	



## ALL MED AT ON AND TRA EL E PENSES

10/9/2019	Leecia Welch	NCYL	Review email re mediation next steps	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	
10/11/2019	Freya Pitts	NCYL	Email correspondence re: ESI and mediation next steps	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
10/11/2019	Freya Pitts	NCYL	Email correspondence re: mediation	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
10/11/2019	Poonam Juneja	NCYL	emailing with LW FP Re ESI call and mediation calls	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3	
10/15/2019	Ira Lustbader	Children's Rights	Analyzing recent settlement structures regarding mediation	2.83	\$500.00	\$1,416.67	\$500.00	\$1,415.00	144-3	
10/16/2019	Poonam Juneja	NCYL	team phone call re discovery, mediation, etc.	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3	
10/16/2019	Teresa Woody	Kansas Appleseed	Team phone call re discovery, mediation, etc.	0.5	\$500.00	\$250.00	\$500.00	\$250.00	146-2	
10/21/2019	Leecia Welch	NCYL	Prepare for in-person mediation	2.5	\$500.00	\$1,250.00	\$500.00	\$1,250.00	145-3	
10/21/2019	Marissa Nardi	Children's Rights	Prepare for upcoming mediation trip by reviewing most recent mediation materials	0.32	\$325.00	\$102.92	\$380.00	\$121.60	144-3	
10/24/2019	Freya Pitts	NCYL	Email correspondence re: mediation	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
10/24/2019	Leecia Welch	NCYL	Email correspondence re: mediation	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

10/24/2019	Poonam Juneja	NCYL	emailing team re scheduling mediation prep call and call with KR	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3	
10/25/2019	Marissa Nardi	Children's Rights	Prepare for upcoming mediation call	0.82	\$325.00	\$265.42	\$380.00	\$311.60	144-3	
10/29/2019	Erin G. McGuinness	Children's Rights	Call with consultant to discuss mediation strategies re Medicaid claims.	1.00	\$225.00	\$225.00	\$240.00	\$240.00	144-3	
10/31/2019	Clare Connaughton	Children's Rights	Research potential expert for entire co-counsel team in advance of pre-mediation meeting	0.55	\$150.00	\$82.50	\$200.00	\$110.00	144-3	
11/1/2019	Larry Rute	Kansas Appleseed	Travel to Kansas City for mediation	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2	
11/1/2019	Martha Hodgesmith	Kansas Appleseed	Mediation preparation	1	\$345.00	\$345.00	\$345.00	\$345.00	146-2	
11/4/2019	Clare Connaughton	Children's Rights	Factual research into potential expert in advance of mediation	1.95	\$150.00	\$292.50	\$200.00	\$390.00	144-3	
11/4/2019	Marissa Nardi	Children's Rights	Electronic mail with external co-counsel re mediation updates	0.35	\$325.00	\$113.75	\$380.00	\$133.00	144-3	
11/4/2019	Marissa Nardi	Children's Rights	Prepare for upcoming mediation by reviewing proposals and notes	0.80	\$325.00	\$260.00	\$380.00	\$304.00	144-3	
11/5/2019	Freya Pitts	National Center for Youth Law	Hotel 11/11-11/13 for 11/12/19 Kansas mediation							\$370.83

## ALL MED AT ON AND TRA EL E PENSES

11/05/2019	Marissa Nardi	Children's Rights	11/05/2019 Airfare: MN flight to KS for 11/11-11/13 for mediation:Delta Air Lines							\$831.40
11/6/2019	Freya Pitts	NCYL	Plaintiffs' mediation call with K. Ryan	0.6	\$365.00	\$219.00	\$365.00	\$219.00	145-3	
11/6/2019	Ira Lustbader	Children's Rights	Telephone call with mediator regarding mediation session next week	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3	
11/6/2019	Ira Lustbader	Children's Rights	Team call with co-counsel re mediation strategy	0.50	\$500.00	\$250.00	\$500.00	\$250.00	144-3	
11/6/2019	Leecia Welch	NCYL	Plaintiffs' mediation call with K. Ryan	0.6	\$500.00	\$300.00	\$500.00	\$300.00	145-3	
11/6/2019	Leecia Welch	NCYL	Call with mediator re prep for mediation	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3	
11/6/2019	Leecia Welch	NCYL	Review background materials in prep for mediation session	1.4	\$500.00	\$700.00	\$500.00	\$700.00	145-3	
11/6/2019	Lori Burns-Bucklew	Burns-Bucklew	Co-counsel team call re mediation strategy	0.50	\$500.00	\$250.00	\$500.00	\$250.00	147-1	
11/6/2019	Lori Burns-Bucklew	Burns-Bucklew	Telephone call with mediator regarding mediation	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1	
11/6/2019	Marissa Nardi	Children's Rights	Prepare for call with KR re mediation	0.33	\$325.00	\$108.33	\$380.00	\$125.40	144-3	

## ALL MED AT ON AND TRA EL E PENSES

11/6/2019	Marissa Nardi	Children's Rights	Prepare for mediation by creating talking points	0.87	\$325.00	\$281.67	\$380.00	\$330.60	144-3	
11/7/2019	Ira Lustbader	Children's Rights	Prep for mediation, alternatives re monitor, ADR	2.58	\$500.00	\$1,291.67	\$500.00	\$1,290.00	144-3	
11/7/2019	Kane, Joshua	DLA Piper	Exchange emails with J. Rotenberg and K. Pacio regarding upcoming mediation.	0.1	\$410.00	\$41.00	\$410.00	\$41.00	148-1	
11/7/2019	Leecia Welch	National Center for Youth Law	Hotel in Kansas for 11/17-11/20							\$511.12
11/7/2019	Pacio, Kristin A.	DLA Piper	Consideration of issues with respect to mediation.	1.2	\$410.00	\$492.00	\$410.00	\$492.00	148-1	
11/8/2019	Daniel Adamek	Children's Rights	Compile and create binders for IL and MN for mediation and vetting of potential expert.	6.00	\$150.00	\$900.00	\$200.00	\$1,200.00	144-3	
11/8/2019	Freya Pitts	NCYL	Confer with L. Welch re: mediation prep	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
11/8/2019	Leecia Welch	NCYL	Attend team call in preparation for mediation	0.9	\$500.00	\$450.00	\$500.00	\$450.00	145-3	
11/8/2019	Leecia Welch	NCYL	Attend call with mediator to prepare for mediation	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3	
11/8/2019	Leecia Welch	NCYL	Prepare for in-person mediation	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3	
11/8/2019	Leecia Welch	NCYL	Prepare email to next friends re mediation	0.8	\$500.00	\$400.00	\$500.00	\$400.00	145-3	
11/8/2019	Leecia Welch	NCYL	Confer with FP re mediation prep	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

11/8/2019	Lori Burns-Bucklew	Burns-Bucklew	Co-counsel strategy call re: discovery, mediation	0.90	\$500.00	\$450.00	\$500.00	\$450.00	147-1	
11/8/2019	Martha Hodgesmith	Kansas Appleseed	Mediation preparation	1	\$345.00	\$345.00	\$345.00	\$345.00	146-2	
11/8/2019	Pacio, Kristin A.	DLA Piper	Consideration of issues with respect to mediation.	0.3	\$410.00	\$123.00	\$410.00	\$123.00	148-1	
11/8/2019	Poonam Juneja	NCYL	reviewing and responding to emails re next friends at mediation	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3	
11/8/2019	Teresa Woody	Kansas Appleseed	Mediation prep call with co-counsel	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2	
11/8/2019	Tourgee, Olivia Morgan	DLA Piper	Attend team call regarding mediation.	0.8	\$240.00	\$192.00	\$240.00	\$192.00	148-1	
11/11/2019	Freya Pitts	National Center for Youth Law	Flights OAK-MCI-OAK on Nov. 11-13 for Nov. 12 mediation							\$420.96
11/11/2019	Freya Pitts	NCYL	Travel to and from co-counsel meeting re strategy for mediation	0.3	\$365.00	\$54.75	\$365.00	\$109.50	145-3	
11/11/2019	Freya Pitts	NCYL	Travel to KC for mediation	4.6	\$365.00	\$839.50	\$365.00	\$1,679.00	145-3	
11/11/2019	Freya Pitts	NCYL	Co-counsel meeting to strategize for mediation	2.5	\$365.00	\$912.50	\$365.00	\$912.50	145-3	
11/11/2019	Freya Pitts	NCYL	Review comparator settlement agreements NJ, MO, OK, FL in preparation for mediation	2.0	\$365.00	\$730.00	\$365.00	\$730.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

11/11/2019	Freya Pitts	NCYL	Review Defendants' answer in preparation for mediation	0.6	\$365.00	\$219.00	\$365.00	\$219.00	145-3	
11/11/2019	Freya Pitts	NCYL	Review mediation agreement	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
11/11/2019	Freya Pitts	NCYL	Review parties' correspondence re: settlement in preparation for mediation	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3	
11/11/2019	Freya Pitts	National Center for Youth Law	Travel from airport to hotel - 11/11 trip for 11/12/19 mediation							\$32.63
11/11/2019	Freya Pitts	National Center for Youth Law	Travel from home to airport for 11/11 trip to 11/12/19 mediation							\$24.42
11/11/2019	Ira Lustbader	Children's Rights	Prepare for mediation, including analyzing enforcement structure alternatives	1.75	\$500.00	\$875.00	\$500.00	\$875.00	144-3	
11/11/2019	Ira Lustbader	Children's Rights	11/11/2019 Hotel: IL hotel from 11-11 to 11-13 in Kansas for mediation trip: Sheraton							\$422.05
11/11/2019	Ira Lustbader	Children's Rights	11/11/2019 Taxi: IL taxi from home to airport for trip to Kansas mediation: DELU TRANSPORTATION							\$88.72

## ALL MED AT ON AND TRA EL E PENSES

11/11/2019	Ira Lustbader	Children's Rights	11/11/2019 Taxi: Uber from meeting with potential witness in Kansas to Kansas City with IL:UBER							\$17.26
11/11/2019	Leecia Welch	National Center for Youth Law	Hotel for 11/11-13/19 Mediation session and expert meeting							\$381.76
11/11/2019	Leecia Welch	NCYL	Travel to KC from SF for mediation and meeting with potential expert	5.5	\$500.00	\$1,375.00	\$500.00	\$2,750.00	145-3	
11/11/2019	Leecia Welch	National Center for Youth Law	Uber to airport for mediation							\$35.46
11/11/2019	Marissa Nardi	Children's Rights	11/11/2019 Hotel: MN hotel from 11-11 to 11-13 in Kansas for mediation trip:Sheraton							\$402.72
11/11/2019	Marissa Nardi	Children's Rights	11/11/2019 Taxi: MN Uber to meeting with potential witness in Kansas with IL:UBER							\$18.30
11/11/2019	Martha Hodgesmith	Kansas Appleseed	Mediation Preparation Kansas City	2.5	\$345.00	\$862.50	\$345.00	\$862.50	146-2	
11/11/2019	Pacio, Kristin A.	DLA Piper	Preparing for mediation and consideration of issues with respect to same.	7	\$410.00	\$2,870.00	\$410.00	\$2,870.00	148-1	

## ALL MED AT ON AND TRA EL E PENSES

11/11/2019	Schechtman, Caryn G.	DLA Piper	TRA EL TO: NEW YORK - NEWARK/KANSAS CITY, MO 11-NO -19 TICKET 0790841197							\$ 35.00
11/11/2019	Schechtman, Caryn G.	DLA Piper	TRA EL TO: NEW YORK - NEWARK/KANSAS CITY, MO 11-NO -19 TICKET 7471491457							\$ 529.00
11/11/2019	Teresa Woody	Kansas Appleseed	Meeting of plaintiffs' counsel to strategize re mediation	2.5	\$500.00	\$1,250.00	\$500.00	\$1,250.00	146-2	
11/11/2019	Teresa Woody	Kansas Appleseed	Review plaintiffs' settlement terms, mediation statement and related documents, and settlement models in prep for mediation	3.4	\$500.00	\$1,700.00	\$500.00	\$1,700.00	146-2	
11/12/2019	Freya Pitts	NCYL	In person mediation	8.2	\$365.00	\$2,993.00	\$365.00	\$2,993.00	145-3	
11/12/2019	Ira Lustbader	Children's Rights	Travel to KC for mediation	2.92	\$500.00	\$1,458.33	\$500.00	\$1,460.00	144-3	
11/12/2019	Ira Lustbader	Children's Rights	Meeting with co-counsel regarding mediation strategy and presentation	2.50	\$500.00	\$1,250.00	\$500.00	\$1,250.00	144-3	
11/12/2019	Larry Rute	Kansas Appleseed	Participate in mediation	7.8	\$500.00	\$3,900.00	\$500.00	\$3,900.00	146-2	
11/12/2019	Leecia Welch	NCYL	Team meeting to prep for mediation	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3	
11/12/2019	Leecia Welch	NCYL	Participate in mediation session	8.2	\$500.00	\$4,100.00	\$500.00	\$4,100.00	145-3	
11/12/2019	Leecia Welch	NCYL	Team debrief after mediation session	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3	



## ALL MED AT ON AND TRA EL E PENSES

11/12/2019	Leecia Welch	National Center for Youth Law	Uber from airport							\$34.98
11/12/2019	Leecia Welch	National Center for Youth Law	Uber to team meeting							\$11.24
11/12/2019	Lori Burns-Bucklew	Burns-Bucklew	Meeting with co-counsel regarding mediation strategy and presentation	2.50	\$500.00	\$1,250.00	\$500.00	\$1,250.00	147-1	
11/12/2019	Martha Hodgesmith	Kansas Appleseed	Mediation	8	\$345.00	\$2,760.00	\$345.00	\$2,760.00	146-2	
11/12/2019	Pacio, Kristin A.	DLA Piper	Preparing for and participating in mediation.	13	\$410.00	\$5,330.00	\$410.00	\$5,330.00	148-1	
11/12/2019	Poonam Juneja	NCYL	messaging with FP re remediation status	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3	
11/12/2019	Teresa Woody	Kansas Appleseed	Pre-mediation meeting of plaintiffs' counsel	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2	
11/12/2019	Teresa Woody	Kansas Appleseed	Debrief after mediation	0.6	\$500.00	\$300.00	\$500.00	\$300.00	146-2	
11/12/2019	Teresa Woody	Kansas Appleseed	Participate in mediation	8	\$500.00	\$4,000.00	\$500.00	\$4,000.00	146-2	
11/13/2019	Freya Pitts	NCYL	Travel from KC for mediation	2.5	\$365.00	\$456.25	\$365.00	\$912.50	145-3	
11/13/2019	Freya Pitts	NCYL	Email correspondence re: mediation	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
11/13/2019	Freya Pitts	National Center for Youth Law	Travel from Airport on 11/13 following 11/12/19 mediation							\$9.00
11/13/2019	Freya Pitts	National Center for Youth Law	Local travel including for co- counsel to 11/12/19 meal with team							\$8.10
11/13/2019	Freya Pitts	National Center for Youth Law	Travel from hotel to airport on 11/13 for 11/12 mediation							\$30.59

## ALL MED AT ON AND TRA EL E PENSES

11/13/2019	Ira Lustbader	Children's Rights	Follow up review of notes and next steps from mediation	1.33	\$500.00	\$666.67	\$500.00	\$665.00	144-3	
11/13/2019	Ira Lustbader	Children's Rights	Mediation in KS	7.25	\$500.00	\$3,625.00	\$500.00	\$3,625.00	144-3	
11/13/2019	Ira Lustbader	Children's Rights	11/13/2019 Taxi: IL Car from airport to home when returning back from mediation trip to Kansas:DELU TRANSPORTATION							\$88.90
11/13/2019	Leecia Welch	NCYL	Travel from KC to SFO	5.5	\$500.00	\$1,375.00	\$500.00	\$2,750.00	145-3	
11/13/2019	Leecia Welch	National Center for Youth Law	Change of flights for 11/18- 11/21/19 trip split 50 with another case; original charge was \$348.70							\$174.35
11/13/2019	Leecia Welch	National Center for Youth Law	Uber from team meeting							\$9.20
11/13/2019	Leecia Welch	National Center for Youth Law	Uber to team meeting							\$16.85
11/13/2019	Lori Burns-Bucklew	Burns-Bucklew	Mediation in KS	7.25	\$500.00	\$3,625.00	\$500.00	\$3,625.00	147-1	
11/13/2019	Pacio, Kristin A.	DLA Piper	Consideration of issues with respect to post mediation matters.	0.6	\$410.00	\$246.00	\$410.00	\$246.00	148-1	
11/13/2019	Poonam Juneja	NCYL	reviewing FP email re mediation doc review proposal and responding	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3	

## ALL MED AT ON AND TRA EL E PENSES

11/13/2019	Teresa Woody	Kansas Appleseed	Telephone call from Magistrate's clerk re mediation and response	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2	
11/13/2019	Teresa Woody	Kansas Appleseed	Review Court order re postponing mediation report	0.1	\$500.00	\$50.00	\$500.00	\$50.00	146-2	
11/14/2019	Ira Lustbader	Children's Rights	Co counsel communication regarding drafting strategy on mediation	0.33	\$500.00	\$166.67	\$500.00	\$165.00	144-3	
11/14/2019	Leecia Welch	NCYL	Emails with client re mediation issues	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3	
11/14/2019	Leecia Welch	National Center for Youth Law	Taxi from airport returning from mediation							\$51.90
11/14/2019	Marissa Nardi	Children's Rights	11/14/2019 Taxi: MN Lyft from airport to home returning from mediation:LYFT							\$71.86
11/14/2019	Marissa Nardi	Children's Rights	11/14/2019 Taxi: MN IL Uber from mediation to airport:UBER							\$29.12
11/15/2019	Fowler, Meg	DLA Piper	Attend weekly counsel call, including re: mediation, experts, and media.	0.9	\$240.00	\$216.00	\$240.00	\$216.00	148-1	
11/15/2019	Ira Lustbader	Children's Rights	Team co counsel meeting regarding mediation strategy came late	0.83	\$500.00	\$416.67	\$500.00	\$415.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

11/15/2019	Ira Lustbader	Children's Rights	Meeting with MN re drafting outcome measures for settlement per mediation	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3	
11/15/2019	Kinney, Megan E.	DLA Piper	Attend Kansas team call re: mediation, experts, and media.	0.9	\$240.00	\$216.00	\$240.00	\$216.00	148-1	
11/15/2019	Leecia Welch	NCYL	Team call re: mediation, experts, and media	0.9	\$500.00	\$450.00	\$500.00	\$450.00	145-3	
11/15/2019	Lori Burns-Bucklew	Burns-Bucklew	Team co counsel meeting re mediation strategy	0.83	\$500.00	\$416.67	\$500.00	\$415.00	147-1	
11/15/2019	Marissa Nardi	Children's Rights	Meeting w/ IL re mediation draft agreement	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3	
11/15/2019	Martha Hodgesmith	Kansas Appleseed	NLT Meeting re mediation analysis and next steps	1	\$345.00	\$345.00	\$345.00	\$345.00	146-2	
11/15/2019	Pacio, Kristin A.	DLA Piper	Consideration of issues with respect to mediation and discovery.	0.6	\$410.00	\$246.00	\$410.00	\$246.00	148-1	
11/15/2019	Poonam Juneja	NCYL	Team call, including re: mediation, experts, and media	0.9	\$395.00	\$355.50	\$395.00	\$355.50	145-3	
11/15/2019	Teresa Woody	Kansas Appleseed	Team call re: mediation, expert strategy	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2	
11/16/2019	Freya Pitts	National Center for Youth Law	Partial refund - 11/12 mediation hotel							-\$17.60
11/18/2019	Marissa Nardi	Children's Rights	Prepare talking points for upcoming mediation	0.83	\$325.00	\$270.83	\$380.00	\$315.40	144-3	

## ALL MED AT ON AND TRA EL E PENSES

11/18/2019	Marissa Nardi	Children's Rights	Analyze relevant settlement agreements in preparation for mediation	1.50	\$325.00	\$487.50	\$380.00	\$570.00	144-3	
11/19/2019	Helms, Anne Geraghty	DLA Piper	ENDOR: PUBLIC CATALYST GROUP CORPORATION MEDIATION							\$ 9,394.05
11/19/2019	Ira Lustbader	Children's Rights	11/19/2019 Airfare: IL Flight to Kansas City on 12/15 for mediation:United Airlines							\$328.12
11/19/2019	Ira Lustbader	Children's Rights	11/19/2019 Airfare: IL Flight from Kansas City to LGA on 12/16 for mediation:Delta Air Lines							\$303.10
11/19/2019	Leecia Welch	NCYL	TC with PJ re stakeholder meetings and mediation issues	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3	
11/19/2019	Marissa Nardi	Children's Rights	Continue drafting settlement outcomes for mediation	3.75	\$325.00	\$1,218.75	\$380.00	\$1,425.00	144-3	
11/19/2019	Marissa Nardi	Children's Rights	11/19/2019 Airfare: MN flight on 12/15 to KS for mediation:United Airlines							\$328.12
11/19/2019	Marissa Nardi	Children's Rights	11/19/2019 Airfare: MN flight from Kansas to NYC on 12/16 for mediation:Delta Air Lines							\$303.10

## ALL MED AT ON AND TRA EL E PENSES

11/19/2019	Poonam Juneja	NCYL	Phone call with LW re stakeholder meetings and mediation issues	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3	
11/20/2019	Freya Pitts	NCYL	Team call, including re: mediation, document production issues, and experts	0.7	\$365.00	\$255.50	\$365.00	\$255.50	145-3	
11/20/2019	Ira Lustbader	Children's Rights	Team call regarding strategy on mediation and stakeholder outreach re witnesses came late	0.50	\$500.00	\$250.00	\$500.00	\$250.00	144-3	
11/20/2019	Ira Lustbader	Children's Rights	Drafting outcomes for settlement/mediation, incl measurement, durability, validation, exit structure	6.83	\$500.00	\$3,416.67	\$500.00	\$3,415.00	144-3	
11/20/2019	Kinney, Megan E.	DLA Piper	Attend weekly team call re: mediation, document production issues, and experts.	0.7	\$240.00	\$168.00	\$240.00	\$168.00	148-1	
11/20/2019	Leecia Welch	NCYL	Prepare email to next friends re mediation update	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3	
11/20/2019	Lori Burns-Bucklew	Burns-Bucklew	Team strategy call re: mediation, discovery, and stakeholder interviews	0.50	\$500.00	\$250.00	\$500.00	\$250.00	147-1	

## ALL MED AT ON AND TRA EL E PENSES

11/20/2019	Martha Hodgesmith	Kansas Appleseed	Team call re document production issues, mediation, experts	0.7	\$345.00	\$241.50	\$345.00	\$241.50	146-2	
11/20/2019	Pacio, Kristin A.	DLA Piper	Conference call re: mediation, document production issues, and experts.	0.7	\$410.00	\$287.00	\$410.00	\$287.00	148-1	
11/20/2019	Poonam Juneja	NCYL	Team call, including re: mediation, document production issues, and experts	0.7	\$395.00	\$276.50	\$395.00	\$276.50	145-3	
11/20/2019	Teresa Woody	Kansas Appleseed	Team call, including re: mediation, document production issues, and experts	0.7	\$500.00	\$350.00	\$500.00	\$350.00	146-2	
11/20/2019	Tourgee, Olivia Morgan	DLA Piper	Participate and take notes on weekly team phone call re: mediation, document production issues, and experts.	0.6	\$240.00	\$144.00	\$240.00	\$144.00	148-1	
11/21/2019	Claire Glasspiegel	Children's Rights	Meeting to discuss settlement/mediation draft outcomes	1.50	\$300.00	\$450.00	\$310.00	\$465.00	144-3	
11/21/2019	Erin G. McGuinness	Children's Rights	Edit language for draft outcome measures in mediation	0.38	\$225.00	\$86.25	\$240.00	\$91.20	144-3	
11/21/2019	Freya Pitts	NCYL	Confer with L. Welch re: mediation draft	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
11/21/2019	Freya Pitts	NCYL	Email correspondence re: mediation-targeted document review	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	

## ALL MED AT ON AND TRA EL E PENSES

11/21/2019	Ira Lustbader	Children's Rights	Co counsel conference call arrived late regarding mediation strategy	0.42	\$500.00	\$208.33	\$500.00	\$210.00	144-3	
11/21/2019	Kinney, Megan E.	DLA Piper	Review Defendants' document production to identify documents relevant to upcoming mediation.	5.9	\$240.00	\$1,416.00	\$240.00	\$1,416.00	148-1	
11/21/2019	Leecia Welch	NCYL	Prepare mediation draft	0.6	\$500.00	\$300.00	\$500.00	\$300.00	145-3	
11/21/2019	Leecia Welch	NCYL	Research issues for mediation draft	0.3	\$500.00	\$150.00	\$500.00	\$150.00	145-3	
11/21/2019	Leecia Welch	NCYL	Confer with FP re: mediation draft	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	
11/21/2019	Pacio, Kristin A.	DLA Piper	Consideration of issues with respect to reviewing documents for mediation.	0.5	\$410.00	\$205.00	\$410.00	\$205.00	148-1	
11/22/2019	Kinney, Megan E.	DLA Piper	Review Defendants' document production to identify documents relevant to upcoming mediation.	5.5	\$240.00	\$1,320.00	\$240.00	\$1,320.00	148-1	
11/22/2019	Leecia Welch	NCYL	Prepare mediation draft	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3	
11/22/2019	Leecia Welch	NCYL	Research issues for mediation draft	5.5	\$500.00	\$2,750.00	\$500.00	\$2,750.00	145-3	
11/22/2019	Leecia Welch	National Center for Youth Law	Flights to and from Kansas 12/14-12/17 for mediation							\$361.30



## ALL MED AT ON AND TRA EL E PENSES

11/22/2019	Pacio, Kristin A.	DLA Piper	11/12/19 - TRA EL TO KANSAS CITY FOR MEDIATION - HILTON							\$ 253.27
11/22/2019	Pacio, Kristin A.	DLA Piper	CAR SER ICE/TA I - ENDOR: KRISTIN PACIO - 11/11/19 - TRA EL TO KANSAS CITY FOR MEDIATION - CAR SER ICE FROM HOME TO AIRPORT							\$ 134.99
11/22/2019	Pacio, Kristin A.	DLA Piper	CAR SER ICE/TA I - ENDOR: KRISTIN PACIO - 11/12/19 - TRA EL TO KANSAS CITY FOR MEDIATION - CAR SER ICE FROM AIRPORT TO HOME							\$ 155.49
11/22/2019	Pacio, Kristin A.	DLA Piper	CAR SER ICE/TA I - ENDOR: KRISTIN PACIO - 11/11/19 - TRA EL TO KANSAS CITY FOR MEDIATION - UBER FROM AIRPORT TO HOTEL							\$ 34.58
11/22/2019	Pacio, Kristin A.	DLA Piper	CAR SER ICE/TA I - ENDOR: KRISTIN PACIO - 11/12/19 - TRA EL TO KANSAS CITY FOR MEDIATION - UBER FROM HOTEL TO AIRPORT							\$ 30.97
11/23/2019	Leecia Welch	NCYL	Prepare mediation draft	2.5	\$500.00	\$1,250.00	\$500.00	\$1,250.00	145-3	
11/24/2019	Leecia Welch	NCYL	Prepare mediation draft	2.2	\$500.00	\$1,100.00	\$500.00	\$1,100.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

11/25/2019	Claire Glasspiegel	Children's Rights	Meeting to discuss draft mediation agreement	1.00	\$300.00	\$300.00	\$310.00	\$310.00	144-3	
11/25/2019	Claire Glasspiegel	Children's Rights	Review with concurrent analysis of documents produced by Defendants for purposes of preparing team for mediation hereinafter "review documents produced by Defs in preparation for mediation"	3.37	\$300.00	\$1,010.00	\$310.00	\$1,044.70	144-3	
11/25/2019	Clare Connaughton	Children's Rights	Closely review documents from Defs. for mediation purposes	0.37	\$150.00	\$55.00	\$200.00	\$74.00	144-3	
11/25/2019	Freya Pitts	National Center for Youth Law	12/14-12/17/19 travel for 12/15-12/16/19 mediation							\$395.98
11/25/2019	Leecia Welch	NCYL	Edit and revise mediation draft	1.5	\$500.00	\$750.00	\$500.00	\$750.00	145-3	
11/25/2019	Martha Hodgesmith	Kansas Appleseed	NLT Meeting re case strategy, including mediation	1	\$345.00	\$345.00	\$345.00	\$345.00	146-2	
11/25/2019	Tourgee, Olivia Morgan	DLA Piper	Review documents on Relativity database in preparation for mediation 2.6 ; review mediation drafts, comments, and email updates 1.1 .	3.7	\$240.00	\$888.00	\$240.00	\$888.00	148-1	

## ALL MED AT ON AND TRA EL E PENSES

11/26/2019	Clare Connaughton	Children's Rights	Closely review and summarize highlights of documents from Defs. specifically for mediation purposes	3.50	\$150.00	\$525.00	\$200.00	\$700.00	144-3	
11/26/2019	Clare Connaughton	Children's Rights	Continue closely reviewing and summarizing documents from Defs. for mediation purposes	4.17	\$150.00	\$625.00	\$200.00	\$834.00	144-3	
11/26/2019	Leecia Welch	NCYL	Edit and revise mediation draft	2.5	\$500.00	\$1,250.00	\$500.00	\$1,250.00	145-3	
11/26/2019	Leecia Welch	NCYL	Prepare email to next friends re mediation update	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3	
11/27/2019	Clare Connaughton	Children's Rights	Review and index materials produced by Defs. in preparation for mediation	1.50	\$150.00	\$225.00	\$200.00	\$300.00	144-3	
11/27/2019	Tourgee, Olivia Morgan	DLA Piper	Review final set of documents for mediation preparation.	0.5	\$240.00	\$120.00	\$240.00	\$120.00	148-1	
11/29/2019	Payment	Children's Rights	Payment to DLA Piper for 25 of mediation fee due for Kevin Ryan - August 20 through Nov. 13, 2019							\$2,348.51
12/2/2019	Kira Setren	NCYL	Assisted pj with hot docs from mediation review DCF006543 - DCF007991	0.1	\$200.00	\$20.00	\$200.00	\$20.00	145-3	
12/2/2019	Kira Setren	NCYL	Confer with pj re: doc review for mediation	0.3	\$200.00	\$60.00	\$200.00	\$60.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

12/2/2019	Kira Setren	NCYL	Document review of batch in preparation for mediation	1.8	\$200.00	\$360.00	\$200.00	\$360.00	145-3	
12/2/2019	Kira Setren	NCYL	Review complaint for mediation doc review	0.4	\$200.00	\$80.00	\$200.00	\$80.00	145-3	
12/2/2019	Martha Hodgesmith	Kansas Appleseed	NLT Meeting re litigation strategy, including experts and mediation	1	\$345.00	\$345.00	\$345.00	\$345.00	146-2	
12/2/2019	Poonam Juneja	NCYL	training KS re doc review process for mediation purposes	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3	
12/2/2019	Poonam Juneja	NCYL	Doc review of RFP1 docs supplied by Ds for mediation purposes	4.2	\$395.00	\$1,659.00	\$395.00	\$1,659.00	145-3	
12/2/2019	Teresa Woody	Kansas Appleseed	TCW co-counsel re settlement/mediation strategy	1.3	\$500.00	\$650.00	\$500.00	\$650.00	146-2	
12/3/2019	Daniel Adamek	Children's Rights	Review and index documents produced by Defendants in response to RFPs that may be useful for mediation.	1.38	\$150.00	\$207.50	\$200.00	\$276.00	144-3	
12/3/2019	Leecia Welch	National Center for Youth Law	Hotel in Kansas for 12/14-12/17							\$316.45
12/4/2019	Fowler, Meg	DLA Piper	Attend the counsel teleconference concerning the status of the case, including discussion re: mediation.	0.9	\$240.00	\$216.00	\$240.00	\$216.00	148-1	
12/4/2019	Freya Pitts	NCYL	Team call, including re: mediation partial participant	0.6	\$365.00	\$219.00	\$365.00	\$219.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

12/4/2019	Kira Setren	NCYL	Document review of batch DCF006543 - DCF007991 for mediation	1.4	\$200.00	\$280.00	\$200.00	\$280.00	145-3	
12/4/2019	Poonam Juneja	NCYL	Team call, including re: mediation	0.9	\$395.00	\$355.50	\$395.00	\$355.50	145-3	
12/4/2019	Teresa Woody	Kansas Appleseed	Team call re mediation strategy	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2	
12/4/2019	Tourgee, Olivia Morgan	DLA Piper	Participate and take notes on the team's weekly phone call re: mediation.	0.9	\$240.00	\$216.00	\$240.00	\$216.00	148-1	
12/5/2019	Freya Pitts	NCYL	Document review for mediation	2.3	\$365.00	\$839.50	\$365.00	\$839.50	145-3	
12/5/2019	Freya Pitts	NCYL	Receive and review email correspondence re: mediation	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	
12/5/2019	Freya Pitts	NCYL	Review Defendants' mediation proposal	1.4	\$365.00	\$511.00	\$365.00	\$511.00	145-3	
12/5/2019	Ira Lustbader	Children's Rights	Closely analyze potential hot docs from limited discovery production for mediation purposes	1.33	\$500.00	\$666.67	\$500.00	\$665.00	144-3	
12/5/2019	Leecia Welch	NCYL	Review Defendants' mediation proposal	1.7	\$500.00	\$850.00	\$500.00	\$850.00	145-3	
12/5/2019	Leecia Welch	NCYL	Emails re Defendants' mediation draft	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

12/6/2019	Daniel Adamek	Children's Rights	Review documents produced by Defendants for potential use during mediation / settlement.	3.50	\$150.00	\$525.00	\$200.00	\$700.00	144-3	
12/6/2019	Kira Setren	NCYL	Mediation hot doc review and circulation to team	0.5	\$200.00	\$100.00	\$200.00	\$100.00	145-3	
12/6/2019	Poonam Juneja	NCYL	doc review of KDADS production for mediation purposes	5.2	\$395.00	\$2,054.00	\$395.00	\$2,054.00	145-3	
12/6/2019	Poonam Juneja	NCYL	emailing team regarding next steps in doc review for mediation purposes	0.6	\$395.00	\$237.00	\$395.00	\$237.00	145-3	
12/6/2019	Poonam Juneja	NCYL	reviewing LW email re next steps for mediation prep and responding	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3	
12/6/2019	Teresa Woody	Kansas Appleseed	Drafting Mediation follow up to do list re drafting	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2	
12/6/2019	Teresa Woody	Kansas Appleseed	Review mediation hot docs from discovery re strategy on terms	0.5	\$500.00	\$250.00	\$500.00	\$250.00	146-2	
12/8/2019	Leecia Welch	NCYL	Review team comments to Defendants' mediation draft	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3	
12/8/2019	Leecia Welch	NCYL	Edit and revise mediation draft	1.5	\$500.00	\$750.00	\$500.00	\$750.00	145-3	
12/9/2019	Claire Glasspiegel	Children's Rights	Review documents produced by Defs in preparation for mediation	1.50	\$300.00	\$450.00	\$310.00	\$465.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

12/9/2019	Clare Connaughton	Children's Rights	Closely review documents produced by Defendants to inform aspects of mediation	5.53	\$150.00	\$830.00	\$200.00	\$1,106.00	144-3	
12/9/2019	Daniel Adamek	Children's Rights	Review documents from Defendants for possible use during mediation.	1.30	\$150.00	\$195.00	\$200.00	\$260.00	144-3	
12/9/2019	Freya Pitts	NCYL	Email correspondence re: mediation prep	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
12/9/2019	Ira Lustbader	Children's Rights	Prep for mediation contd, including finalizing draft counter to defs proposal	2.17	\$500.00	\$1,083.33	\$500.00	\$1,085.00	144-3	
12/9/2019	Kinney, Megan E.	DLA Piper	Review Defendants' document production to identify documents relevant to upcoming mediation.	4.5	\$240.00	\$1,080.00	\$240.00	\$1,080.00	148-1	
12/9/2019	Kira Setren	NCYL	Mediation review batch starting with DCF007992	1.1	\$200.00	\$220.00	\$200.00	\$220.00	145-3	
12/9/2019	Leecia Welch	NCYL	Edit and revise mediation draft	0.9	\$500.00	\$450.00	\$500.00	\$450.00	145-3	
12/9/2019	Marissa Nardi	Children's Rights	Prepare for mediation by outlining talking points	1.50	\$325.00	\$487.50	\$380.00	\$570.00	144-3	
12/10/2019	Ira Lustbader	Children's Rights	Telephone call with team regarding counter redline to defs mediation proposal	0.92	\$500.00	\$458.33	\$500.00	\$460.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

12/10/2019	Kane, Joshua	DLA Piper	Review documents produced by defendants to identify documents relevant to upcoming mediation.	0.3	\$410.00	\$123.00	\$410.00	\$123.00	148-1	
12/10/2019	Kinney, Megan E.	DLA Piper	Review documents produced by Defendants to identify key documents for mediation preparation 2.7 ; Attend settlement drafting team call .9 .	3.6	\$240.00	\$864.00	\$240.00	\$864.00	148-1	
12/10/2019	Kira Setren	NCYL	Mediation review and analysis of hot docs from section	1.2	\$200.00	\$240.00	\$200.00	\$240.00	145-3	
12/10/2019	Kira Setren	NCYL	Mediation review batch starting DCF008100 - DCF008177	0.6	\$200.00	\$120.00	\$200.00	\$120.00	145-3	
12/10/2019	Leecia Welch	NCYL	Review revised mediation draft	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3	
12/10/2019	Lori Burns-Bucklew	Burns-Bucklew	Co-counsel team strategy call re: mediation proposal	0.92	\$500.00	\$458.33	\$500.00	\$460.00	147-1	
12/10/2019	Marissa Nardi	Children's Rights	Telephone call with external co-counsel re mediation strategy	0.92	\$325.00	\$297.92	\$380.00	\$349.60	144-3	
12/10/2019	Poonam Juneja	NCYL	reviewing hot docs from mediation review flagged by KS	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3	



## ALL MED AT ON AND TRA EL E PENSES

12/10/2019	Poonam Juneja	NCYL	review email from MN re discovery task status and mediation thought	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3	
12/11/2019	Claire Glasspiegel	Children's Rights	Review documents produced by Defs in preparation for mediation	1.00	\$300.00	\$300.00	\$310.00	\$310.00	144-3	
12/11/2019	Kane, Joshua	DLA Piper	Review documents produced by defendants to identify documents relevant to upcoming mediation.	2.1	\$410.00	\$861.00	\$410.00	\$861.00	148-1	
12/11/2019	Kinney, Megan E.	DLA Piper	Review documents produced by Defendants for expedited mediation preparation; summarize key documents; disseminate key documents to the rest of the team.	4.1	\$240.00	\$984.00	\$240.00	\$984.00	148-1	
12/11/2019	Leecia Welch	NCYL	Email to defendants re mediation draft	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	
12/11/2019	Marissa Nardi	Children's Rights	Read hot documents from document review to analyze new key facts in preparation for mediation	2.75	\$325.00	\$893.75	\$380.00	\$1,045.00	144-3	
12/11/2019	Tourgee, Olivia Morgan	DLA Piper	Complete the mediation document review batches per review protocol.	0.8	\$240.00	\$192.00	\$240.00	\$192.00	148-1	

## ALL MED AT ON AND TRA EL E PENSES

12/12/2019	Claire Glasspiegel	Children's Rights	Review and summarize potential hot docs recently produced by Defendants for purposes of mediation	1.00	\$300.00	\$300.00	\$310.00	\$310.00	144-3	
12/12/2019	Freya Pitts	NCYL	Call re: experts and mediation	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
12/12/2019	Kira Setren	NCYL	Mediation doc review hot doc analysis	0.2	\$200.00	\$40.00	\$200.00	\$40.00	145-3	
12/12/2019	Kira Setren	NCYL	Mediation doc review hot doc compilation and send to team	1.2	\$200.00	\$240.00	\$200.00	\$240.00	145-3	
12/12/2019	Kira Setren	NCYL	Mediation doc review starting DCF008174	1.5	\$200.00	\$300.00	\$200.00	\$300.00	145-3	
12/12/2019	Poonam Juneja	NCYL	co-counsel call re preparing for sunday's mediation	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3	
12/12/2019	Poonam Juneja	NCYL	selecting and compiling hot docs for mediation purposes and circulating to team	1.8	\$395.00	\$711.00	\$395.00	\$711.00	145-3	
12/12/2019	Teresa Woody	Kansas Appleseed	Co-counsel call in prep for mediation	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2	
12/12/2019	Teresa Woody	Kansas Appleseed	Review portions of new DCF policy and procedures manual for mediation	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2	
12/13/2019	Daniel Adamek	Children's Rights	Review key documents from Defendants' productions for potential use during mediation.	4.50	\$150.00	\$675.00	\$200.00	\$900.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

12/13/2019	Freya Pitts	NCYL	Compile materials for mediation	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	
12/13/2019	Larry Rute	Kansas Appleseed	Review "hotdocs" relevant to mediation shared with co-counsel	1.6	\$500.00	\$800.00	\$500.00	\$800.00	146-2	
12/13/2019	Leecia Welch	NCYL	Prepare for in-person mediation	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3	
12/13/2019	Lori Burns-Bucklew	Burns-Bucklew	Email with PJ and MN re mediation plan	0.10	\$500.00	\$50.00	\$500.00	\$50.00	147-1	
12/13/2019	Marissa Nardi	Children's Rights	Discuss plan for mediation with external co-counsel team	1.50	\$325.00	\$487.50	\$380.00	\$570.00	144-3	
12/13/2019	Marissa Nardi	Children's Rights	Prepare for mediation by analyzing relevant documents	2.75	\$325.00	\$893.75	\$380.00	\$1,045.00	144-3	
12/13/2019	Poonam Juneja	NCYL	emailing with LBB MN re attendnace at mediation	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	
12/13/2019	Poonam Juneja	NCYL	locating hot docs for mediation purposes and sharing with team	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3	
12/13/2019	Stephen Dixon	Children's Rights	Electronic mail with co-counsel re settlement strategy	0.13	\$375.00	\$50.00	\$410.00	\$53.30	144-3	
12/13/2019	Teresa Woody	Kansas Appleseed	Prep for mediation and outline issues contd	1.5	\$500.00	\$750.00	\$500.00	\$750.00	146-2	
12/13/2019	Teresa Woody	Kansas Appleseed	Review defendants' redline of plaintiffs' settlement proposal	2.3	\$500.00	\$1,150.00	\$500.00	\$1,150.00	146-2	
12/13/2019	Teresa Woody	Kansas Appleseed	Review compilation of hot docs for mediation contd	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2	

## ALL MED AT ON AND TRA EL E PENSES

12/14/2019	Freya Pitts	NCYL	Travel from Oakland to Kansas City for mediation	9.4	\$365.00	\$1,715.50	\$365.00	\$3,431.00	145-3	
12/14/2019	Freya Pitts	National Center for Youth Law	12/14 ride to airport for travel to 12/15-12/16 mediation							\$23.66
12/14/2019	Kane, Joshua	DLA Piper	Exchange emails with M. Nardi, K. Pacio, and C. Schechtman regarding mediation .3 ; review background documents to mediation 1.3 .	1.6	\$410.00	\$656.00	\$410.00	\$656.00	148-1	
12/14/2019	Leecia Welch	NCYL	Travel from SF to Kansas City for mediation	5.5	\$500.00	\$1,375.00	\$500.00	\$2,750.00	145-3	
12/14/2019	Leecia Welch	National Center for Youth Law	Taxi to SFO - KS mediation							\$44.47
12/14/2019	Marissa Nardi	Children's Rights	Electronic mail with co-counsel from DLA re mediation plan	0.17	\$325.00	\$54.17	\$380.00	\$64.60	144-3	
12/15/2019	Freya Pitts	NCYL	Mediation	7.1	\$365.00	\$2,591.50	\$365.00	\$2,591.50	145-3	
12/15/2019	Freya Pitts	NCYL	Revise draft settlement agreement	0.8	\$365.00	\$292.00	\$365.00	\$292.00	145-3	
12/15/2019	Freya Pitts	National Center for Youth Law	12/14 ride from airport to hotel for 12/15-12/16 mediation							\$29.65
12/15/2019	Freya Pitts	National Center for Youth Law	Lyft to 12/15 mediation							\$7.36
12/15/2019	Ira Lustbader	Children's Rights	Travel to Kansas City for mediation delays	3.58	\$500.00	\$1,791.67	\$500.00	\$1,790.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

12/15/2019	Ira Lustbader	Children's Rights	Mediation drafting with co-counsel	2.00	\$500.00	\$1,000.00	\$500.00	\$1,000.00	144-3	
12/15/2019	Ira Lustbader	Children's Rights	Mediation session in KCK with parties and K. Ryan	5.00	\$500.00	\$2,500.00	\$500.00	\$2,500.00	144-3	
12/15/2019	Ira Lustbader	Children's Rights	12/15/2019 Taxi: IL Car from home to airport for mediation trip:DELU TRANSPORTATION							\$227.21
12/15/2019	Kane, Joshua	DLA Piper	Review draft settlement proposals 1.9 ; attend mediation via telephone 1.8 .	3.7	\$410.00	\$1,517.00	\$410.00	\$1,517.00	148-1	
12/15/2019	Larry Rute	Kansas Appleseed	Participate in mediation	6	\$500.00	\$3,000.00	\$500.00	\$3,000.00	146-2	
12/15/2019	Larry Rute	Kansas Appleseed	Travel to Kansas City for mediation	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2	
12/15/2019	Leecia Welch	NCYL	Attend mediation	7.1	\$500.00	\$3,550.00	\$500.00	\$3,550.00	145-3	
12/15/2019	Leecia Welch	NCYL	Edit and revise mediation draft	1.1	\$500.00	\$550.00	\$500.00	\$550.00	145-3	
12/15/2019	Leecia Welch	NCYL	Email to defendants re mediation draft	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	
12/15/2019	Lori Burns-Bucklew	Burns-Bucklew	Draft pieces of proposed settlement with co-counsel	2.00	\$500.00	\$1,000.00	\$500.00	\$1,000.00	147-1	
12/15/2019	Lori Burns-Bucklew	Burns-Bucklew	Mediation session with parties and mediator	5.00	\$500.00	\$2,500.00	\$500.00	\$2,500.00	147-1	
12/15/2019	Marissa Nardi	Children's Rights	Travel from home in NYC to NYC airport to KC airport to Kansas City office of Lathrop Gage for mediation	3.50	\$325.00	\$1,137.50	\$380.00	\$1,330.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

12/15/2019	Marissa Nardi	Children's Rights	Prepare and participate in all-day mediation	7.50	\$325.00	\$2,437.50	\$380.00	\$2,850.00	144-3	
12/15/2019	Marissa Nardi	Children's Rights	12/15/2019 Taxi: MN Uber from Kansas airport to mediation on 12/15:UBER							\$72.09
12/15/2019	Marissa Nardi	Children's Rights	12/15/2019 Taxi: MN Lyft from home to airport on 12/15:LYFT							\$68.17
12/15/2019	Martha Hodgesmith	Kansas Appleseed	Mediation	7.5	\$345.00	\$2,587.50	\$345.00	\$2,587.50	146-2	
12/15/2019	Teresa Woody	Kansas Appleseed	Debrief re mediation	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2	
12/15/2019	Teresa Woody	Kansas Appleseed	attend mediation	7.5	\$500.00	\$3,750.00	\$500.00	\$3,750.00	146-2	
12/15/2019	Teresa Woody	Kansas Appleseed	Mediation and revised drating w co-counsel	7	\$500.00	\$3,500.00	\$500.00	\$3,500.00	146-2	
12/16/2019	Freya Pitts	NCYL	Mediation	6.3	\$365.00	\$2,299.50	\$365.00	\$2,299.50	145-3	
12/16/2019	Ira Lustbader	Children's Rights	Return travel	3.62	\$500.00	\$1,808.33	\$500.00	\$1,810.00	144-3	
12/16/2019	Ira Lustbader	Children's Rights	Mediation session in KCK with parties and mediator	6.50	\$500.00	\$3,250.00	\$500.00	\$3,250.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

12/16/2019	Ira Lustbader	Children's Rights	12/16/2019 Hotel: IL Hotel in Kansas on 12/15-12/16 for mediation:CROSSROADS HOTELS, LLC							\$230.66
12/16/2019	Ira Lustbader	Children's Rights	12/16/2019 Taxi: IL Car from airport to home from mediation trip:DELU TRANSPORTATION							\$88.90
12/16/2019	Kane, Joshua	DLA Piper	Attend mediation via telephone.	2.1	\$410.00	\$861.00	\$410.00	\$861.00	148-1	
12/16/2019	Larry Rute	Kansas Appleseed	Participate in mediation	3.5	\$500.00	\$1,750.00	\$500.00	\$1,750.00	146-2	
12/16/2019	Larry Rute	Kansas Appleseed	Travel to Kansas City for mediation	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2	
12/16/2019	Leecia Welch	NCYL	Attend mediation	6.3	\$500.00	\$3,150.00	\$500.00	\$3,150.00	145-3	
12/16/2019	Lori Burns-Bucklew	Burns-Bucklew	Mediation session with parties and mediator	6.50	\$500.00	\$3,250.00	\$500.00	\$3,250.00	147-1	
12/16/2019	Marissa Nardi	Children's Rights	Travel from KC office of Lathrop Gage to airport in Kansas to airport in NY to home in NYC from mediation trip to KS	3.25	\$325.00	\$1,056.25	\$380.00	\$1,235.00	144-3	
12/16/2019	Marissa Nardi	Children's Rights	Prepare and participate in all-day mediation	8.00	\$325.00	\$2,600.00	\$380.00	\$3,040.00	144-3	
12/16/2019	Marissa Nardi	Children's Rights	12/16/2019 Hotel: MN hotel in Kansas on 12/15 for 1 night for mediation trip:CROSSROADS HOTELS, LLC							\$199.66
12/16/2019	Martha Hodgesmith	Kansas Appleseed	Mediation	7	\$345.00	\$2,415.00	\$345.00	\$2,415.00	146-2	

## ALL MED AT ON AND TRA EL E PENSES

12/16/2019	Pacio, Kristin A.	DLA Piper	Reviewing updated settlement agreement and notes regarding mediation.	1	\$410.00	\$410.00	\$410.00	\$410.00	148-1	
12/16/2019	Poonam Juneja	NCYL	exchanging messages with FP re possible settlement provisions	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3	
12/16/2019	Teresa Woody	Kansas Appleseed	Mediation and revised drating w co-counsel	7	\$500.00	\$3,500.00	\$500.00	\$3,500.00	146-2	
12/17/2019	Freya Pitts	NCYL	Travel from Kansas City to Oakland for mediation	4.6	\$365.00	\$839.50	\$365.00	\$1,679.00	145-3	
12/17/2019	Freya Pitts	NCYL	Mediation follow-up, including revisions to settlement draft, notes, and determining next steps	2.4	\$365.00	\$876.00	\$365.00	\$876.00	145-3	
12/17/2019	Freya Pitts	National Center for Youth Law	Hotel from 12/14-12/17 for 12/15-12/16 mediation							\$430.62
12/17/2019	Freya Pitts	National Center for Youth Law	12/17 Lyft from airport to home after 12/15-12/16 mediation							\$23.40
12/17/2019	Freya Pitts	National Center for Youth Law	12/17 travel from hotel to airport after 12/15-12/16 mediation							\$35.62
12/17/2019	Ira Lustbader	Children's Rights	Finalize current draft of settlement structures for mediation	4.75	\$500.00	\$2,375.00	\$500.00	\$2,375.00	144-3	



## ALL MED AT ON AND TRA EL E PENSES

12/17/2019	Leecia Welch	NCYL	Travel to SF from KC returning from stakeholder meetings	5.5	\$500.00	\$1,375.00	\$500.00	\$2,750.00	145-3	
12/17/2019	Leecia Welch	NCYL	Edit and revise mediation draft	2.2	\$500.00	\$1,100.00	\$500.00	\$1,100.00	145-3	
12/17/2019	Leecia Welch	National Center for Youth Law	12.17.19 taxi home from SFO - mediation							\$51.24
12/17/2019	Marissa Nardi	Children's Rights	12/17/2019 Taxi: MN taxi from home to airport on 12/15:LYFT							\$60.04
12/17/2019	Marissa Nardi Ira Lustbader	Children's Rights	12/17/2019 Taxi: MN IL taxi from KS mediation to airport on 12/16:UBER							\$65.62
12/18/2019	Ira Lustbader	Children's Rights	Telephone call with team regarding discovery and mediation strategy	0.92	\$500.00	\$458.33	\$500.00	\$460.00	144-3	
12/18/2019	Leecia Welch	NCYL	Team call re: mediation, discovery, and motion to stay	0.8	\$500.00	\$400.00	\$500.00	\$400.00	145-3	
12/18/2019	Leecia Welch	NCYL	Email to defendants re mediation draft	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	
12/18/2019	Leecia Welch	National Center for Youth Law	12.17.19 Uber to MCI airport - mediation							\$28.70
12/18/2019	Lori Burns-Bucklew	Burns-Bucklew	Co-counsel team strategy call re: discovery and mediation strategy	0.92	\$500.00	\$458.33	\$500.00	\$460.00	147-1	
12/18/2019	Martha Hodgesmith	Kansas Appleseed	NLT Meeting re litigation strategy including mediation	1	\$345.00	\$345.00	\$345.00	\$345.00	146-2	

## ALL MED AT ON AND TRA EL E PENSES

12/18/2019	Pacio, Kristin A.	DLA Piper	Conference call with team re: mediation, discovery, and motion to stay.	0.8	\$410.00	\$328.00	\$410.00	\$328.00	148-1	
12/18/2019	Poonam Juneja	NCYL	Team call, including re: mediation, discovery, and motion to stay	0.8	\$395.00	\$316.00	\$395.00	\$316.00	145-3	
12/18/2019	Teresa Woody	Kansas Appleseed	Team call, including re: mediation, discovery, and motion to stay	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2	
12/18/2019	Tourgee, Olivia Morgan	DLA Piper	Attend weekly team phone call re: mediation, discovery, and motion to stay, and take notes.	0.8	\$240.00	\$192.00	\$240.00	\$192.00	148-1	
12/20/2019	Pacio, Kristin A.	DLA Piper	TRA EL TO: NEW YORK - NEWARK/KANSAS CITY, MO 11-NO -19 TICKET 0791235231							\$ 35.00
12/20/2019	Pacio, Kristin A.	DLA Piper	TRA EL TO: NEW YORK - NEWARK/KANSAS CITY, MO 11-NO -19 TICKET 7473745886							\$ 734.75
12/27/2019	Freya Pitts	NCYL	Email correspondence re: mediation	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
12/27/2019	Marissa Nardi	Children's Rights	Discuss mediation plan with IL	0.42	\$325.00	\$135.42	\$380.00	\$159.60	144-3	
12/27/2019	Poonam Juneja	NCYL	reviewing KR email re mediation scheduling	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	

## ALL MED AT ON AND TRA EL E PENSES

12/31/2019	Payment	Children's Rights	Payment to DLA Piper for 25 of mediation fee due for Kevin Ryan - Nov. 14 through Dec. 28, 2019							\$2,315.88
1/7/2020	Pacio, Kristin A.	DLA Piper	Reviewing correspondence regarding settlement negotiations and mediation.	0.6	\$410.00	\$246.00	\$410.00	\$246.00	148-1	
1/8/2020	Freya Pitts	NCYL	Confer with P. Juneja re: mediation dates	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
1/8/2020	Freya Pitts	NCYL	Receive and review email correspondence re: mediation strategy	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	
1/8/2020	Leecia Welch	NCYL	Email with team re: mediation strategy	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	
1/8/2020	Poonam Juneja	NCYL	Meeting with FP re mediation dates	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	
1/8/2020	Poonam Juneja	NCYL	meeting with FP re settlement draft revisions and mediation dates	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3	
1/13/2020	Freya Pitts	NCYL	Confer with L. Welch and P. Juneja re: mediation status	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
1/13/2020	Freya Pitts	NCYL	Receive and review email correspondence re: mediation strategy	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
1/13/2020	Leecia Welch	NCYL	Confer with FP and PJ re: mediation status	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	
1/13/2020	Poonam Juneja	NCYL	Confer with FP and LW re: mediation status	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	

## ALL MED AT ON AND TRA EL E PENSES

1/14/2020	Freya Pitts	NCYL	Email correspondence re: mediation schedule and strategy	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	
1/14/2020	Poonam Juneja	NCYL	reviewing and responding to team emails re mediation strategy	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3	
1/14/2020	Teresa Woody	Kansas Appleseed	Analyzing emails corr on logistics of mediation and neutral role	0.6	\$500.00	\$300.00	\$500.00	\$300.00	146-2	
1/15/2020	Freya Pitts	NCYL	Review parties' correspondence re: mediation and draft email to J.P. Bradshaw re: progress to date and neutral issue; send to L. Welch for review	0.9	\$365.00	\$328.50	\$365.00	\$328.50	145-3	
1/15/2020	Ira Lustbader	Children's Rights	Team co counsel call regarding mediation strategy and discovery	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3	
1/15/2020	Leecia Welch	NCYL	Team call, including re: mediation strategy, jurisdictional discovery, and discovery planning in advance of stay pending settlement discussions	1.1	\$500.00	\$550.00	\$500.00	\$550.00	145-3	
1/15/2020	Lori Burns-Bucklew	Burns-Bucklew	Team co counsel call regarding mediation strategy and discovery	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1	

## ALL MED AT ON AND TRA EL E PENSES

1/15/2020	Marissa Nardi	Children's Rights	meeting with external co-counsel team re litigation strategy and discovery, including mediation and opposition draft	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3	
1/15/2020	Poonam Juneja	NCYL	Team call, including re: mediation strategy, jurisdictional discovery, and discovery planning in advance of stay pending settlement discussions	1.1	\$395.00	\$434.50	\$395.00	\$434.50	145-3	
1/15/2020	Teresa Woody	Kansas Appleseed	Team call, including re: mediation strategy, jurisdictional discovery, and discovery planning in advance of stay pending settlement discussions partial	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2	

## ALL MED AT ON AND TRA EL E PENSES

1/15/2020	Tourgee, Olivia Morgan	DLA Piper	Review team correspondence regarding strategizing mediation plans and responses to opposing counsel's emails and review related articles to the case .4 ; attend weekly team phone call discussing mediation, discovery requests, discovery plan, class certification motion plan, and local updates 1 .	1.4	\$240.00	\$336.00	\$240.00	\$336.00	148-1	
1/16/2020	Teresa Woody	Kansas Appleseed	Review Email form LW to defendants re postponing mediation and defendants' renegeing on neutral agreement	0.1	\$500.00	\$50.00	\$500.00	\$50.00	146-2	
1/18/2020	Leecia Welch	National Center for Youth Law	Flights to and from Kansas for 2/6-2/8 for mediation							\$411.60
1/21/2020	Freya Pitts	NCYL	Confer with L. Welch and P. Juneja re: neutrals, mediation, and discovery planning	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	
1/21/2020	Leecia Welch	NCYL	Confer with FP and PJ re: neutrals, mediation, and discovery planning	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

1/21/2020	Poonam Juneja	NCYL	Confer with LW FP re: neutrals, mediation, and discovery planning	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3	
1/22/2020	Freya Pitts	National Center for Youth Law	Flight for 2/7/20 KS mediation							\$396.96
1/22/2020	Freya Pitts	National Center for Youth Law	Flights to and from Kansas for mediation on 2/25-2/26							\$336.96
1/23/2020	Freya Pitts	NCYL	Email correspondence with team re: mediation	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
1/23/2020	Freya Pitts	NCYL	Receive and review email correspondence re: settlement draft and mediation	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
1/23/2020	Ira Lustbader	Children's Rights	Team co-counsel strategy call regarding mediation and discovery strategy	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3	
1/23/2020	Kinney, Megan E.	DLA Piper	Attend weekly team call re: mediation and discovery planning.	1.1	\$240.00	\$264.00	\$240.00	\$264.00	148-1	
1/23/2020	Leecia Welch	NCYL	Team call re: mediation and discovery planning	1.1	\$500.00	\$550.00	\$500.00	\$550.00	145-3	
1/23/2020	Leecia Welch	NCYL	Email correspondence with team re: mediation	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

1/23/2020	Leecia Welch	NCYL	Review email correspondence re: settlement draft and mediation	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	
1/23/2020	Lori Burns-Bucklew	Burns-Bucklew	Team co-counsel strategy call regarding mediation and discovery strategy	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1	
1/23/2020	Marissa Nardi	Children's Rights	Meeting with external co-counsel team re mediation strategy	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3	
1/23/2020	Pacio, Kristin A.	DLA Piper	Conference call with team re: mediation and discovery planning.	1.1	\$410.00	\$451.00	\$410.00	\$451.00	148-1	
1/23/2020	Poonam Juneja	NCYL	Team call, including re: mediation and discovery planning	1.1	\$395.00	\$434.50	\$395.00	\$434.50	145-3	
1/23/2020	Teresa Woody	Kansas Appleseed	Team call re: mediation and discovery planning	1.1	\$500.00	\$550.00	\$500.00	\$550.00	146-2	
1/23/2020	Teresa Woody	Kansas Appleseed	Review work guide for case responsibilities re mediation	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2	
1/24/2020	Ira Lustbader	Children's Rights	Close analysis of Def's counter to mediation	1.08	\$500.00	\$541.67	\$500.00	\$540.00	144-3	
1/25/2020	Poonam Juneja	NCYL	reviewing IL and KR emails re plaintiffs' only mediation call	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	
1/26/2020	Ira Lustbader	Children's Rights	Analyze Defs mediation counter and draft responses	3.25	\$500.00	\$1,625.00	\$500.00	\$1,625.00	144-3	



## ALL MED AT ON AND TRA EL E PENSES

1/26/2020	Ira Lustbader	Children's Rights	Follow up fact and legal research on analysis of Defs mediation position to prepare internal plaintiff team guide to mediation responses for next mediation session	4.92	\$500.00	\$2,458.33	\$500.00	\$2,460.00	144-3	
1/27/2020	Daniel Adamek	Children's Rights	Meeting with IL re mediation guide.	0.33	\$150.00	\$50.00	\$200.00	\$66.00	144-3	
1/27/2020	Ira Lustbader	Children's Rights	Continue drafting mediation guide internal of plaintiffs positions on all items	4.42	\$500.00	\$2,208.33	\$500.00	\$2,210.00	144-3	
1/27/2020	Poonam Juneja	NCYL	reviewing iL email re internal guide for mediation call with Kevin and with Ds	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	
1/28/2020	Ira Lustbader	Children's Rights	Continue drafting mediation guide internal of all plaintiffs positions on all items contd	3.33	\$500.00	\$1,666.67	\$500.00	\$1,665.00	144-3	
1/28/2020	Marissa Nardi	Children's Rights	Edit comments visible to Defs to draft mediation proposal	0.92	\$325.00	\$297.92	\$380.00	\$349.60	144-3	
1/28/2020	Poonam Juneja	NCYL	reviewing IL's mediation guide	0.7	\$395.00	\$276.50	\$395.00	\$276.50	145-3	
1/28/2020	Teresa Woody	Kansas Appleseed	Review IL memo re mediation positions	0.7	\$500.00	\$350.00	\$500.00	\$350.00	146-2	
1/29/2020	Freya Pitts	NCYL	Confer with P. Juneja re: mediation strategy	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
1/29/2020	Freya Pitts	NCYL	Review I. Lustbader memo re: mediation positions	0.7	\$365.00	\$255.50	\$365.00	\$255.50	145-3	

## ALL MED AT ON AND TRA EL E PENSES

1/29/2020	Ira Lustbader	Children's Rights	Telephone call with co counsel team regarding mediation strategy left early	0.50	\$500.00	\$250.00	\$500.00	\$250.00	144-3	
1/29/2020	Leecia Welch	NCYL	Review IL mediation strategy memo	0.6	\$500.00	\$300.00	\$500.00	\$300.00	145-3	
1/29/2020	Lori Burns-Bucklew	Burns-Bucklew	Telephone call with co counsel team regarding mediation strategy	0.50	\$500.00	\$250.00	\$500.00	\$250.00	147-1	
1/29/2020	Marissa Nardi	Children's Rights	Telephone call with external co-counsel and mediator re upcoming mediation	0.42	\$325.00	\$135.42	\$380.00	\$159.60	144-3	
1/29/2020	Marissa Nardi	Children's Rights	Telephone call with external co-counsel re mediation and litigation strategy	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3	
1/29/2020	Poonam Juneja	NCYL	Confer with FP re: mediation strategy	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	
1/30/2020	Marissa Nardi	Children's Rights	Advise internal CR team re mediation and litigation updates	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3	
2/3/2020	Teresa Woody	Kansas Appleseed	review email from mediator re status of mediation;	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2	
2/4/2020	Clare Connaughton	Children's Rights	Identify new factual materials to prepare attorney team in advance of mediation sessions	0.42	\$150.00	\$62.50	\$200.00	\$84.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

2/4/2020	Clare Connaughton	Children's Rights	Conduct close review of documents produced by Defendants for attorney team's preparation in advance of 2/7 mediation session with Defendants	1.07	\$150.00	\$160.00	\$200.00	\$214.00	144-3	
2/4/2020	Freya Pitts	NCYL	Review Defendants' mediation guides	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3	
2/4/2020	Freya Pitts	NCYL	Review language in draft settlement and settlements in other jurisdictions re: role of the neutral in preparation for 2/7/20 mediation	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3	
2/4/2020	Leecia Welch	NCYL	Review Defendants' mediation guides	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3	
2/4/2020	Leecia Welch	NCYL	Review settlements from other cases in prep for mediation	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3	
2/4/2020	Marissa Nardi	Children's Rights	02/04/2020 Airfare: MN roundtrip flight on 2-6 to 2-7 from NYC to Kansas for mediation:Delta Air Lines							\$822.59
2/5/2020	Daniel Adamek	Children's Rights	Compile key documents and create binder for MN to use in mediation.	2.00	\$150.00	\$300.00	\$200.00	\$400.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

2/5/2020	Ira Lustbader	Children's Rights	Telephone call with co counsel L Welch and T Woody regarding mediation strategy	0.42	\$500.00	\$208.33	\$500.00	\$210.00	144-3	
2/5/2020	Leecia Welch	NCYL	Email to defendants re mediation issues	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	
2/5/2020	Marissa Nardi	Children's Rights	Meeting with IL re upcoming mediation	0.67	\$325.00	\$216.67	\$380.00	\$254.60	144-3	
2/5/2020	Teresa Woody	Kansas Appleseed	TCW LW and IL re mediation strategy	0.5	\$500.00	\$250.00	\$500.00	\$250.00	146-2	
2/5/2020	Teresa Woody	Kansas Appleseed	Review docs in mediation zip drive in prep for mediation	0.5	\$500.00	\$250.00	\$500.00	\$250.00	146-2	
2/6/2020	Freya Pitts	NCYL	Travel to Kansas City for mediation	6.4	\$365.00	\$1,168.00	\$365.00	\$2,336.00	145-3	
2/6/2020	Freya Pitts	National Center for Youth Law	2/6/20 ride home-OAK for 2/7/20 mediation							\$21.66
2/6/2020	Leecia Welch	NCYL	Travel to Kansas City for mediation	5.5	\$500.00	\$1,375.00	\$500.00	\$2,750.00	145-3	
2/6/2020	Marissa Nardi	Children's Rights	Travel from home in NYC to NYC airport to KC airport to KS hotel for mediation	3.50	\$325.00	\$1,137.50	\$380.00	\$1,330.00	144-3	
2/6/2020	Marissa Nardi	Children's Rights	02/06/2020 Taxi: MN Lyft from home to airport on 2/6 for mediation trip:LYFT							\$62.65
2/6/2020	Teresa Woody	Kansas Appleseed	Review and analyze defendants' guides re where the parties are in agreement and where not in prep for mediation	1.6	\$500.00	\$800.00	\$500.00	\$800.00	146-2	
2/7/2020	Freya Pitts	NCYL	In person mediation	7.5	\$365.00	\$2,737.50	\$365.00	\$2,737.50	145-3	

## ALL MED AT ON AND TRA EL E PENSES

2/7/2020	Freya Pitts	NCYL	Correspondence with PJ re mediation updates	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3	
2/7/2020	Freya Pitts	National Center for Youth Law	2/6/20 ride from airport to hotel for 2/7/20 mediation							\$28.99
2/7/2020	Freya Pitts	National Center for Youth Law	2/8/20 OAK-home for 2/7/20 med. - also used 5.50 no show refund							\$16.48
2/7/2020	Freya Pitts	National Center for Youth Law	2/8/20 cancel fee; credited back no-show ; used for 2/8 airport							\$5.50
2/7/2020	Ira Lustbader	Children's Rights	Prep for mediation	1.42	\$500.00	\$708.33	\$500.00	\$710.00	144-3	
2/7/2020	Ira Lustbader	Children's Rights	Mediation, KC phone dial in remote	7.17	\$500.00	\$3,583.33	\$500.00	\$3,585.00	144-3	
2/7/2020	Larry Rute	Kansas Appleseed	Participate in mediations and breakout sessions with team	8.5	\$500.00	\$4,250.00	\$500.00	\$4,250.00	146-2	
2/7/2020	Leecia Welch	NCYL	In person mediation	7.5	\$500.00	\$3,750.00	\$500.00	\$3,750.00	145-3	
2/7/2020	Lori Burns-Bucklew	Burns-Bucklew	Mediation, KC phone dial in remote	7.17	\$500.00	\$3,583.33	\$500.00	\$3,585.00	147-1	
2/7/2020	Marissa Nardi	Children's Rights	Travel from KS office of Lathrop to KC airport to NYC airport to home in NYC from mediation	3.62	\$325.00	\$1,175.42	\$380.00	\$1,375.60	144-3	
2/7/2020	Marissa Nardi	Children's Rights	Meeting with external co-counsel in preparation for mediation in KS	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3	
2/7/2020	Marissa Nardi	Children's Rights	Mediation with opposing counsel in KS at Lathrop	6.00	\$325.00	\$1,950.00	\$380.00	\$2,280.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

2/7/2020	Martha Hodgesmith	Kansas Appleseed	Mediation	8.5	\$345.00	\$2,932.50	\$345.00	\$2,932.50	146-2	
2/7/2020	Poonam Juneja	NCYL	reviewing team emails re mediation updates and notes	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3	
2/7/2020	Poonam Juneja	NCYL	correspondence with FP re mediation updates	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3	
2/7/2020	Poonam Juneja	NCYL	reviewing public data on DCF website flagged during mediation, including re sibling placements	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3	
2/7/2020	Teresa Woody	Kansas Appleseed	Meet with co-counsel re mediation prep	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2	
2/7/2020	Teresa Woody	Kansas Appleseed	Mediation with mediator and defendants	7.5	\$500.00	\$3,750.00	\$500.00	\$3,750.00	146-2	
2/7/2020	Teresa Woody	Kansas Appleseed	Email R and review stats on crossover youth or mediation	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2	
2/8/2020	Freya Pitts	NCYL	Travel from Kansas City for mediation	8.4	\$365.00	\$1,533.00	\$365.00	\$3,066.00	145-3	
2/8/2020	Leecia Welch	NCYL	Travel from Kansas City to SF	5.5	\$500.00	\$1,375.00	\$500.00	\$2,750.00	145-3	
2/8/2020	Leecia Welch	National Center for Youth Law	Parking for mediation							\$72.00
2/8/2020	Leecia Welch	National Center for Youth Law	Uber to airport							\$30.79
2/8/2020	Marissa Nardi	Children's Rights	02/08/2020 Hotel: MN hotel in Kansas on 2/6-2/7 for mediation:21C MUSEUM HOTEL							\$273.40

## ALL MED AT ON AND TRA EL E PENSES

2/8/2020	Marissa Nardi	Children's Rights	02/08/2020 Taxi: MN taxi from airport to home on 2/7 from mediation trip:UBER							\$50.92
2/8/2020	Marissa Nardi	Children's Rights	02/08/2020 Taxi: MN taxi on 2/7 from mediation to airport:UBER							\$27.92
2/8/2020	Poonam Juneja	NCYL	reviewing team emails re mediation strategy	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3	
2/9/2020	Freya Pitts	National Center for Youth Law	2/6/20-2/8/20 stay for 2/7/20 mediation							\$372.01
2/9/2020	Freya Pitts	National Center for Youth Law	2/8/20 ride from hotel to airport after 2/7/20 mediation							\$24.71
2/9/2020	Leecia Welch	National Center for Youth Law	Hotel for mediation							\$387.49
2/10/2020	Marissa Nardi	Children's Rights	Discuss strategy for mediation with IL	0.33	\$325.00	\$108.33	\$380.00	\$125.40	144-3	
2/10/2020	Poonam Juneja	NCYL	reviewing team emails re timing for next mediation session	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	
2/10/2020	Teresa Woody	Kansas Appleseed	review Email from mediator re recap and additional mediation dates	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2	
2/11/2020	Claire Glasspiegel	Children's Rights	Draft RFPs for other additional documents requested during mediation	3.00	\$300.00	\$900.00	\$310.00	\$930.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

2/11/2020	Ira Lustbader	Children's Rights	Review and edit draft updates to settlement for mediation	2.08	\$500.00	\$1,041.67	\$500.00	\$1,040.00	144-3	
2/12/2020	Ira Lustbader	Children's Rights	Review/finalizing single mediation draft of all positions	2.17	\$500.00	\$1,083.33	\$500.00	\$1,085.00	144-3	
2/12/2020	Leecia Welch	National Center for Youth Law	Hotel for 2/25-26 Mediation							\$354.80
2/12/2020	Marissa Nardi	Children's Rights	Telephone call with external co-counsel group re opp and mediation strategy	0.92	\$325.00	\$297.92	\$380.00	\$349.60	144-3	
2/12/2020	Teresa Woody	Kansas Appleseed	Team call, including re: mediation strategy, jurisdictional discovery, and discovery planning in advance of stay pending settlement discussions	1.1	\$500.00	\$550.00	\$500.00	\$550.00	146-2	
2/13/2020	Christina Ostmeyer	Kansas Appleseed	internal meeting to discuss mediation progress	1	\$200.00	\$200.00	\$200.00	\$200.00	146-2	
2/13/2020	Freya Pitts	NCYL	Email correspondence re: mediation strategy	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
2/13/2020	Ira Lustbader	Children's Rights	02/13/2020 Airfare: IL roundtrip flight on 2-24 to 2-26 for mediation:Delta Air Lines							\$519.00
2/13/2020	Marissa Nardi	Children's Rights	02/13/2020 Airfare: MN roundtrip flight on 2-24 to 2-26 for mediation:Delta Air Lines							\$519.00



## ALL MED AT ON AND TRA EL E PENSES

2/13/2020	Payment	National Center for Youth Law	Payment to DLA Piper for 25 of mediation fee due for Kevin Ryan							\$4,664.39
2/13/2020	Teresa Woody	Kansas Appleseed	Confer with CO and R re studies of crossover youth in prep for mediation	0.6	\$500.00	\$300.00	\$500.00	\$300.00	146-2	
2/17/2020	Poonam Juneja	NCYL	reviewing JP Bradshaw email re dates for mediation	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3	
2/19/2020	Kane, Joshua	DLA Piper	Review notes from team call regarding discovery and mediation.	0.3	\$410.00	\$123.00	\$410.00	\$123.00	148-1	
2/19/2020	Leecia Welch	NCYL	Team call re: mediation, discovery, budget process, and potential witnesses	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3	
2/19/2020	Lori Burns-Bucklew	Burns-Bucklew	Team call re: mediation, discovery, budget process, and potential witnesses	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1	
2/19/2020	Martha Hodgesmith	Kansas Appleseed	Team call re discovery, mediation, budget process, potential witnesses	1	\$345.00	\$345.00	\$345.00	\$345.00	146-2	
2/19/2020	Poonam Juneja	NCYL	Team call, including re: mediation, discovery, budget process, and potential witnesses	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3	
2/19/2020	Teresa Woody	Kansas Appleseed	Team call, including re: mediation, discovery, budget process, and potential witnesses	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2	

## ALL MED AT ON AND TRA EL E PENSES

2/20/2020	Freya Pitts	NCYL	Email correspondence with L. Welch re: preparation for mediation	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	
2/20/2020	Freya Pitts	NCYL	Review mediation notes re: juvenile justice/crossover issue and practice improvement 6; email P. Juneja re: same	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3	
2/20/2020	Ira Lustbader	Children's Rights	Telephone call with Leecia Welch regarding mediation strategy	0.67	\$500.00	\$333.33	\$500.00	\$335.00	144-3	
2/20/2020	Ira Lustbader	Children's Rights	Prep for mediation	2.75	\$500.00	\$1,375.00	\$500.00	\$1,375.00	144-3	
2/21/2020	Daniel Adamek	Children's Rights	Review and evaluate documents produced by Defendants for the purpose of mediation.	1.00	\$150.00	\$150.00	\$200.00	\$200.00	144-3	
2/21/2020	Daniel Adamek	Children's Rights	Create and assemble binder for MN and IL to use at mediation.	4.42	\$150.00	\$662.50	\$200.00	\$884.00	144-3	
2/21/2020	Ira Lustbader	Children's Rights	Team co-counsel strategy call regarding mediation issues	0.92	\$500.00	\$458.33	\$500.00	\$460.00	144-3	
2/21/2020	Ira Lustbader	Children's Rights	Prep for mediation cont'd and draft follow up alternatives	4.83	\$500.00	\$2,416.67	\$500.00	\$2,415.00	144-3	

## ALL MED AT ON AND TRA EL E PENSES

2/21/2020	Leecia Welch	NCYL	Team call re mediation strategy	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3	
2/21/2020	Lori Burns-Bucklew	Burns-Bucklew	Team co-counsel strategy call re: mediation analysis and next steps	0.92	\$500.00	\$458.33	\$500.00	\$460.00	147-1	
2/21/2020	Martha Hodgesmith	Kansas Appleseed	NLT Meeting re mediation strategy	1	\$345.00	\$345.00	\$345.00	\$345.00	146-2	
2/21/2020	Teresa Woody	Kansas Appleseed	Pre-mediation strategy team call	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2	
2/23/2020	Freya Pitts	NCYL	Review email correspondence re: mediation strategy	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	
2/23/2020	Leecia Welch	NCYL	Review email correspondence re: mediation strategy	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3	
2/24/2020	Freya Pitts	NCYL	Travel from DC to Kansas City for mediation time was reduced by 50 to share with another case; originally billed 4.8	2.4	\$365.00	\$438.00	\$365.00	\$876.00	145-3	
2/24/2020	Freya Pitts	NCYL	Review D. Adamek notes from mediation prep call	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	
2/24/2020	Ira Lustbader	Children's Rights	Travel to KC for mediation delays	3.53	\$500.00	\$1,766.67	\$500.00	\$1,765.00	144-3	
2/24/2020	Ira Lustbader	Children's Rights	Prepare for mediation	2.25	\$500.00	\$1,125.00	\$500.00	\$1,125.00	144-3	
2/24/2020	Ira Lustbader	Children's Rights	02/24/2020 Taxi: IL Taxi from home to airport for mediation trip to Kansas:DELU TRANSPORTATION							\$88.72

## ALL MED AT ON AND TRA EL E PENSES

2/24/2020	Leecia Welch	National Center for Youth Law	Flight to and from Kansas for 2/24/20-2/27/20 trip total charge was \$1,071.60; 50 charged to MB							\$535.80
2/24/2020	Leecia Welch	NCYL	Travel from DC to Kansas City for mediation	3.5	\$500.00	\$875.00	\$500.00	\$1,750.00	145-3	
2/24/2020	Leecia Welch	NCYL	Review mediation draft proposal	0.8	\$500.00	\$400.00	\$500.00	\$400.00	145-3	
2/24/2020	Marissa Nardi	Children's Rights	Travel from home in NYC to LGA to Kansas City airport to hotel in Kansas City for mediation	2.75	\$325.00	\$893.75	\$380.00	\$1,045.00	144-3	
2/24/2020	Marissa Nardi	Children's Rights	Prepare for mediation by creating talking points	2.42	\$325.00	\$785.42	\$380.00	\$919.60	144-3	
2/24/2020	Marissa Nardi	Children's Rights	02/24/2020 Taxi: MN taxi from home to airport for mediation in Kansas:UBER							\$30.47
2/24/2020	Martha Hodgesmith	Kansas Appleseed	Pre mediation meeting to discuss plan for mediation and talking points	1.8	\$345.00	\$621.00	\$345.00	\$621.00	146-2	
2/24/2020	Poonam Juneja	NCYL	reviewign notes from Friday's pre-mediation prep call	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3	
2/24/2020	Teresa Woody	Kansas Appleseed	Review alternatives presented by IL, outline thoughts re same in prep for mediation	2.3	\$500.00	\$1,150.00	\$500.00	\$1,150.00	146-2	

## ALL MED AT ON AND TRA EL E PENSES

2/25/2020	Erin G. McGuinness	Children's Rights	Call with EGH MN to discuss CFSR review instrument and measurement metrics for mediation.	0.20	\$225.00	\$45.00	\$240.00	\$48.00	144-3	
2/25/2020	Erin G. McGuinness	Children's Rights	Discuss potential measurement metrics for Kansas mediation	0.50	\$225.00	\$112.50	\$240.00	\$120.00	144-3	
2/25/2020	Freya Pitts	National Center for Youth Law	2/27/20 MCI-OAK after 2/25- 2/26/20 mediation							\$204.00
2/25/2020	Freya Pitts	NCYL	Mediation	9.5	\$365.00	\$3,467.50	\$365.00	\$3,467.50	145-3	
2/25/2020	Freya Pitts	National Center for Youth Law	2/24/20 ride from airport to hotel for 2/25-2/26/20 mediation							\$30.47
2/25/2020	Freya Pitts	National Center for Youth Law	Ride from hotel to 2/25/20 mediation							\$7.59
2/25/2020	Ira Lustbader	Children's Rights	Discuss mediation strategy with full co-counsel team	1.25	\$500.00	\$625.00	\$500.00	\$625.00	144-3	
2/25/2020	Ira Lustbader	Children's Rights	Mediation with parties KC	8.00	\$500.00	\$4,000.00	\$500.00	\$4,000.00	144-3	
2/25/2020	Ira Lustbader	Children's Rights	02/25/2020 Taxi: IL Taxi from mediation to hotel in Kansas:UBER							\$11.76
2/25/2020	Larry Rute	Kansas Appleseed	Participate in mediation and corresponding team face-to-face breakout meetings	8.8	\$500.00	\$4,400.00	\$500.00	\$4,400.00	146-2	
2/25/2020	Leecia Welch	NCYL	Attend mediation	9.5	\$500.00	\$4,750.00	\$500.00	\$4,750.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

2/25/2020	Lori Burns-Bucklew	Burns-Bucklew	Co-counsel full strategy meeting re mediation	1.25	\$500.00	\$625.00	\$500.00	\$625.00	147-1	
2/25/2020	Lori Burns-Bucklew	Burns-Bucklew	Participate in mediation	8.00	\$500.00	\$4,000.00	\$500.00	\$4,000.00	147-1	
2/25/2020	Marissa Nardi	Children's Rights	Mediation session at Lathrop Gage with opposing counsel and mediator	6.50	\$325.00	\$2,112.50	\$380.00	\$2,470.00	144-3	
2/25/2020	Marissa Nardi	Children's Rights	02/25/2020 Taxi: MN taxi from home to airport for mediation in Kansas:UBER							\$66.00
2/25/2020	Martha Hodgesmith	Kansas Appleseed	Mediation	9	\$345.00	\$3,105.00	\$345.00	\$3,105.00	146-2	
2/25/2020	Poonam Juneja	NCYL	reviewing and responding to team communications and questions re mediation issues	1.1	\$395.00	\$434.50	\$395.00	\$434.50	145-3	
2/25/2020	Teresa Woody	Kansas Appleseed	Confer with co-counsel in prep for mediation	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2	
2/25/2020	Teresa Woody	Kansas Appleseed	Mediation with defendants and mediator	8	\$500.00	\$4,000.00	\$500.00	\$4,000.00	146-2	
2/26/2020	Daniel Adamek	Children's Rights	Research factual issues raised during mediation for MN.	0.68	\$150.00	\$102.50	\$200.00	\$136.00	144-3	
2/26/2020	Freya Pitts	NCYL	Email correspondence with M. Nardi and P. Juneja re: data shared in mediation	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

2/26/2020	Freya Pitts	NCYL	Mediation	5.4	\$365.00	\$1,971.00	\$365.00	\$1,971.00	145-3	
2/26/2020	Freya Pitts	NCYL	Review documents provided by Defendants to inform mediation	0.9	\$365.00	\$328.50	\$365.00	\$328.50	145-3	
2/26/2020	Ira Lustbader	Children's Rights	Return travel mediation delays	3.62	\$500.00	\$1,808.33	\$500.00	\$1,810.00	144-3	
2/26/2020	Ira Lustbader	Children's Rights	Mediation - strategy debrief with co counsel regarding dual track discovery	1.50	\$500.00	\$750.00	\$500.00	\$750.00	144-3	
2/26/2020	Ira Lustbader	Children's Rights	Meeting with co counsel regarding analyzing defs last offer and draft counter mediation comprehensive package proposal	2.50	\$500.00	\$1,250.00	\$500.00	\$1,250.00	144-3	
2/26/2020	Ira Lustbader	Children's Rights	Mediation cont'd with parties and monitors	3.00	\$500.00	\$1,500.00	\$500.00	\$1,500.00	144-3	
2/26/2020	Ira Lustbader	Children's Rights	02/26/2020 Taxi: IL Taxi from airport to home mediation trip:DELU TRANSPORTATION							\$88.90
2/26/2020	Larry Rute	Kansas Appleseed	Participate in mediation and corresponding team face-to-face breakout meetings	5.2	\$500.00	\$2,600.00	\$500.00	\$2,600.00	146-2	
2/26/2020	Leecia Welch	NCYL	Travel from KC to SF	5.5	\$500.00	\$1,375.00	\$500.00	\$2,750.00	145-3	
2/26/2020	Leecia Welch	NCYL	Mediation partial attendance	2.5	\$500.00	\$1,250.00	\$500.00	\$1,250.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

2/26/2020	Leecia Welch	NCYL	Review mediation materials from defendants	0.6	\$500.00	\$300.00	\$500.00	\$300.00	145-3	
2/26/2020	Leecia Welch	NCYL	Email re mediation provisions; research issues re same	1.1	\$500.00	\$550.00	\$500.00	\$550.00	145-3	
2/26/2020	Leecia Welch	National Center for Youth Law	Parking at SFO for mediation							\$108.00
2/26/2020	Leecia Welch	National Center for Youth Law	Uber from mediation							\$7.84
2/26/2020	Leecia Welch	National Center for Youth Law	Uber to airport							\$35.71
2/26/2020	Lori Burns-Bucklew	Burns-Bucklew	Mediation discussion with co counsel regarding dual track discovery	1.50	\$500.00	\$750.00	\$500.00	\$750.00	147-1	
2/26/2020	Lori Burns-Bucklew	Burns-Bucklew	Meeting with co counsel re: offer from Defendants and draft counter proposal package	2.50	\$500.00	\$1,250.00	\$500.00	\$1,250.00	147-1	
2/26/2020	Lori Burns-Bucklew	Burns-Bucklew	Participate in mediation	3.00	\$500.00	\$1,500.00	\$500.00	\$1,500.00	147-1	
2/26/2020	Marissa Nardi	Children's Rights	Travel from KC mediation to KC airport to NY airport to NY home from mediation	3.08	\$325.00	\$1,002.08	\$380.00	\$1,170.40	144-3	
2/26/2020	Marissa Nardi	Children's Rights	Meeting with external co-counsel to debrief on mediation	1.50	\$325.00	\$487.50	\$380.00	\$570.00	144-3	



## ALL MED AT ON AND TRA EL E PENSES

2/26/2020	Marissa Nardi	Children's Rights	Meeting with external co-counsel team to prepare for mediation	1.75	\$325.00	\$568.75	\$380.00	\$665.00	144-3	
2/26/2020	Marissa Nardi	Children's Rights	Mediation session with mediator and opposing counsel	3.00	\$325.00	\$975.00	\$380.00	\$1,140.00	144-3	
2/26/2020	Marissa Nardi	Children's Rights	02/26/2020 Taxi: MN travel to airport during mediation trip:UBER							\$44.38
2/26/2020	Marissa Nardi	Children's Rights	02/26/2020 Taxi: MN travel from mediation to hotel:UBER							\$9.79
2/26/2020	Martha Hodgesmith	Kansas Appleseed	Mediation	7.2	\$345.00	\$2,484.00	\$345.00	\$2,484.00	146-2	
2/26/2020	Poonam Juneja	NCYL	reviewing email communications with Ds re settlement	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3	
2/26/2020	Poonam Juneja	NCYL	emailing with MN FP re: data shared in mediation	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3	
2/26/2020	Poonam Juneja	NCYL	reviewing team internal mediation proposal re outcome 10 and communicating thoughts to FP	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3	
2/26/2020	Poonam Juneja	NCYL	reviewing notes from FP re mediation	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3	
2/26/2020	Teresa Woody	Kansas Appleseed	Analyzing counter-proposal for mediation	2.5	\$500.00	\$1,250.00	\$500.00	\$1,250.00	146-2	

## ALL MED AT ON AND TRA EL E PENSES

2/26/2020	Teresa Woody	Kansas Appleseed	Debrief mediation with co-counsel and review discovery strategy	1.7	\$500.00	\$850.00	\$500.00	\$850.00	146-2	
2/26/2020	Teresa Woody	Kansas Appleseed	Confer with co-counsel and mediator re deadline to keep proposal open	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2	
2/26/2020	Teresa Woody	Kansas Appleseed	Mediation with defendants and mediator	3	\$500.00	\$1,500.00	\$500.00	\$1,500.00	146-2	
2/27/2020	Claire Glasspiegel	Children's Rights	Meeting with Kansas team meeting to discuss mediation	0.50	\$300.00	\$150.00	\$310.00	\$155.00	144-3	
2/27/2020	Clare Connaughton	Children's Rights	Meeting with IL MN JK EPG JK NT DA CG re mediation and next steps re strategy	0.50	\$150.00	\$75.00	\$200.00	\$100.00	144-3	
2/27/2020	Daniel Adamek	Children's Rights	Meeting with JK, EPG, NT, CC, IL, CG and MN re mediation updates and discovery strategy.	0.50	\$150.00	\$75.00	\$200.00	\$100.00	144-3	
2/27/2020	Erin G. McGuinness	Children's Rights	Review updated Kansas mediation package	0.97	\$225.00	\$217.50	\$240.00	\$232.80	144-3	
2/27/2020	Freya Pitts	NCYL	Travel from Kansas City for mediation	4.2	\$365.00	\$766.50	\$365.00	\$1,533.00	145-3	
2/27/2020	Freya Pitts	National Center for Youth Law	Hotel 2/24/20-2/27/20 for 2/25 and 2/26 mediation							\$528.39

## ALL MED AT ON AND TRA EL E PENSES

2/27/2020	Freya Pitts	National Center for Youth Law	2/27/20 ride OAK-home following 2/25-26/20 mediation							\$22.82
2/27/2020	Freya Pitts	National Center for Youth Law	2/27/20 ride from hotel to MCI following 2/25-26/20 mediation							\$26.52
2/27/2020	Ira Lustbader	Children's Rights	02/27/2020 Hotel: IL Hotel for Kansas mediation trip on 2/23-2/25:21C MUSEUM HOTEL							\$357.84
2/27/2020	Ira Lustbader	Children's Rights	02/27/2020 Taxi: IL Uber to airport in Kansas during mediation trip:UBER							\$26.06
2/27/2020	Jonathan King	Children's Rights	Meeting with team regarding status of mediation and next steps	0.50	\$325.00	\$162.50	\$345.00	\$172.50	144-3	
2/27/2020	Leecia Welch	NCYL	Edit and revise mediation draft	1.1	\$500.00	\$550.00	\$500.00	\$550.00	145-3	
2/27/2020	Leecia Welch	NCYL	Email to defendants re mediation draft	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	
2/27/2020	Marissa Nardi	Children's Rights	Meeting with CR internal team re updates and follow-up from mediation sessions	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3	
2/27/2020	Marissa Nardi	Children's Rights	02/27/2020 Hotel: MN hotel in KS for 2/24-2/26 during mediation trip:21C MUSEUM HOTEL							\$385.49
2/27/2020	Marissa Nardi	Children's Rights	02/27/2020 Taxi: MN travel from airport to home from mediation trip:UBER							\$50.11

## ALL MED AT ON AND TRA EL E PENSES

2/27/2020	Nicole Taykhman	Children's Rights	Meet with case team to discuss status of mediation and discovery and next steps.	0.50	\$300.00	\$150.00	\$290.00	\$145.00	144-3	
2/28/2020	Stephen Dixon	Children's Rights	Updating clients on mediation, settlement	0.58	\$375.00	\$218.75	\$410.00	\$237.80	144-3	
3/4/2020	Kane, Joshua	DLA Piper	Attend co-counsel status call re mediation, ESI, third party discovery, stakeholder/local updates.	0.8	\$410.00	\$328.00	\$410.00	\$328.00	148-1	
3/4/2020	Leecia Welch	NCYL	Co-counsel meeting re mediation, ESI, third party discovery, stakeholder/local updates	0.8	\$500.00	\$400.00	\$500.00	\$400.00	145-3	
3/4/2020	Marissa Nardi	Children's Rights	Meeting with external co-counsel team to discuss litigation strategy, including written discovery, ESI, and mediation	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3	
3/4/2020	Martha Hodgesmith	Kansas Appleseed	Co-counsel meeting re mediation, ESI, third party discovery, stakeholder/local updates	0.8	\$345.00	\$276.00	\$345.00	\$276.00	146-2	
3/4/2020	Poonam Juneja	NCYL	co-counsel meeting re mediation, ESI, third party discovery, stakeholder/local updates	0.8	\$395.00	\$316.00	\$395.00	\$316.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

3/4/2020	Teresa Woody	Kansas Appleseed	Co-counsel meeting re mediation, ESI, third party discovery, stakeholder/local updates	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2	
3/4/2020	Tourgee, Olivia Morgan	DLA Piper	Attend weekly team phone call to discuss mediation, upcoming discovery priorities, and stakeholder/local outreach.	0.7	\$240.00	\$168.00	\$240.00	\$168.00	148-1	
3/5/2020	Payment	Children's Rights	Payment to DLA Piper for 25 of mediation fee due for Kevin Ryan - Jan 03 through Feb. 13, 2020							\$4,344.64
3/11/2020	Helms, Anne Geraghty	DLA Piper	MEDIATION FEE - ENDOR: PUBLIC CATALYST GROUP CORPORATION KANSAS DCF MEDIATION: DECEMBER 29, 2019 TO FEBRUARY 20, 2020							
3/25/2020	Stephen Dixon	Children's Rights	Electronic mail to all clients re mediation, settlement	0.33	\$375.00	\$125.00	\$410.00	\$135.30	144-3	
4/1/2020	Teresa Woody	Kansas Appleseed	Review hot docs summary for mediation	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2	
4/3/2020	Martha Hodgesmith	Kansas Appleseed	NLT Meeting re litigation strategy, including experts, mediation, and discovery	1	\$345.00	\$345.00	\$345.00	\$345.00	146-2	

## ALL MED AT ON AND TRA EL E PENSES

4/13/2020	Leecia Welch	NCYL	Emails with opposing counsel re mediation draft	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3	
5/4/2020	Marissa Nardi	Children's Rights	Electronic email with IL re mediation	0.27	\$325.00	\$86.67	\$380.00	\$102.60	144-3	
5/14/2020	Erin G. McGuinness	Children's Rights	Highlight and circulate CFSR syntax to Kansas mediation team for integration into settlement agreement.	0.37	\$225.00	\$82.50	\$240.00	\$88.80	144-3	
5/20/2020	Leecia Welch	NCYL	Team call re: discovery, mediation, and experts	1.1	\$500.00	\$550.00	\$500.00	\$550.00	145-3	
5/20/2020	Lori Burns-Bucklew	Burns-Bucklew	Team call re: discovery, mediation, and experts	1.10	\$500.00	\$550.00	\$500.00	\$550.00	147-1	
5/20/2020	Marissa Nardi	Children's Rights	meeting with external co-counsel re litigation strategy, including 30 b 6 depositions, subpoenas, NPs, mediation, and experts	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3	
5/20/2020	Martha Hodgesmith	Kansas Appleseed	Team call re discovery, mediation, experts	1.1	\$345.00	\$379.50	\$345.00	\$379.50	146-2	
5/20/2020	Poonam Juneja	NCYL	Team call, including re: discovery, mediation, and experts	1.1	\$395.00	\$434.50	\$395.00	\$434.50	145-3	
5/20/2020	Teresa Woody	Kansas Appleseed	Call with co-counsel re discovery, mediation, and experts	1.1	\$500.00	\$550.00	\$500.00	\$550.00	146-2	

## ALL MED AT ON AND TRA EL E PENSES

5/20/2020	Tourgee, Olivia Morgan	DLA Piper	Create DLA weekly call schedule for June and July and circulate to DLA team .3 ; attend and take notes on weekly team call re: discovery, mediation, and experts 1.1 ; draft notes of weekly call and circulate to DLA team .7 .	2.1	\$240.00	\$504.00	\$240.00	\$504.00	148-1	
5/21/2020	Freya Pitts	NCYL	Instructions to K. Setren re: mediation logistics	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3	
6/3/2020	Ira Lustbader	Children's Rights	Mediation prep	2.67	\$500.00	\$1,333.33	\$500.00	\$1,335.00	144-3	
6/3/2020	Leecia Welch	NCYL	Review materials and new data in prep for mediation session	2.2	\$500.00	\$1,100.00	\$500.00	\$1,100.00	145-3	
6/3/2020	Marissa Nardi	Children's Rights	meeting with external co-counsel team to discuss mediation strategy	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3	
6/3/2020	Marissa Nardi	Children's Rights	meeting with internal KS team re mediation updates, Kline deposition, review of materials produced by Defs, ESI and discovery responses	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3	
6/4/2020	Freya Pitts	NCYL	Participate in settlement discussions	5.0	\$365.00	\$1,825.00	\$365.00	\$1,825.00	145-3	

## ALL MED AT ON AND TRA EL E PENSES

6/4/2020	Ira Lustbader	Children's Rights	Settlement negotiations w Defs	3.75	\$500.00	\$1,875.00	\$500.00	\$1,875.00	144-3	
6/4/2020	Larry Rute	Kansas Appleseed	Prepare for and participate in oom settlement discussions	5	\$500.00	\$2,500.00	\$500.00	\$2,500.00	146-2	
6/4/2020	Leecia Welch	NCYL	Review settlement materials in prep for mediation	0.4	\$500.00	\$200.00	\$500.00	\$200.00	145-3	
6/4/2020	Leecia Welch	NCYL	Attend settlement mediation	5.0	\$500.00	\$2,500.00	\$500.00	\$2,500.00	145-3	
6/4/2020	Lori Burns-Bucklew	Burns-Bucklew	Settlement talks with Defendants	3.75	\$500.00	\$1,875.00	\$500.00	\$1,875.00	147-1	
6/4/2020	Marissa Nardi	Children's Rights	meeting with Defs re settlement	5.00	\$325.00	\$1,625.00	\$380.00	\$1,900.00	144-3	
6/4/2020	Martha Hodgesmith	Kansas Appleseed	mediation	5	\$345.00	\$1,725.00	\$345.00	\$1,725.00	146-2	
6/4/2020	Stephen Dixon	Children's Rights	Discuss with co-counsel strategy on client updating for mediation	0.03	\$375.00	\$12.50	\$410.00	\$12.30	144-3	
6/4/2020	Teresa Woody	Kansas Appleseed	Settlement conference with defendants	5	\$500.00	\$2,500.00	\$500.00	\$2,500.00	146-2	
6/4/2020	Teresa Woody	Kansas Appleseed	Review settlement proposals and prior mediation notes in prep for mediation	1.3	\$500.00	\$650.00	\$500.00	\$650.00	146-2	
6/5/2020	Nicole Taykhman	Children's Rights	Communicate with JK re status of mediation.	0.03	\$300.00	\$10.00	\$290.00	\$8.70	144-3	
6/9/2020	Leecia Welch	NCYL	Prep for mediation session	0.8	\$500.00	\$400.00	\$500.00	\$400.00	145-3	



## ALL MED AT ON AND TRA EL E PENSES

6/10/2020	Freya Pitts	NCYL	Participate in settlement discussions	2.9	\$365.00	\$1,058.50	\$365.00	\$1,058.50	145-3	
6/10/2020	Ira Lustbader	Children's Rights	Settlement negotiations w defs	3.00	\$500.00	\$1,500.00	\$500.00	\$1,500.00	144-3	
6/10/2020	Leecia Welch	NCYL	Attend mediation session	2.9	\$500.00	\$1,450.00	\$500.00	\$1,450.00	145-3	
6/10/2020	Lori Burns-Bucklew	Burns-Bucklew	Settlement session with Defendants	3.00	\$500.00	\$1,500.00	\$500.00	\$1,500.00	147-1	
6/10/2020	Marissa Nardi	Children's Rights	Settlement negotiation meetings with Defendants and co-counsel	3.00	\$325.00	\$975.00	\$380.00	\$1,140.00	144-3	
6/10/2020	Martha Hodgesmith	Kansas Appleseed	mediation	3	\$345.00	\$1,035.00	\$345.00	\$1,035.00	146-2	
6/10/2020	Poonam Juneja	NCYL	Participate in settlement discussions	2.9	\$395.00	\$1,145.50	\$395.00	\$1,145.50	145-3	
6/10/2020	Stephen Dixon	Children's Rights	Electronic mail with clients and counsel with case update on mediation and fact inquiry	0.75	\$375.00	\$281.25	\$410.00	\$307.50	144-3	
6/10/2020	Teresa Woody	Kansas Appleseed	Settlement conference with Defendants	3	\$500.00	\$1,500.00	\$500.00	\$1,500.00	146-2	
6/11/2020	Freya Pitts	NCYL	Participate in settlement discussions	2.8	\$365.00	\$1,022.00	\$365.00	\$1,022.00	145-3	
6/11/2020	Leecia Welch	NCYL	Attend mediation session	2.8	\$500.00	\$1,400.00	\$500.00	\$1,400.00	145-3	
6/11/2020	Lori Burns-Bucklew	Burns-Bucklew	Settlement session	2.80	\$500.00	\$1,400.00	\$500.00	\$1,400.00	147-1	

## ALL MED AT ON AND TRA EL E PENSES

6/11/2020	Marissa Nardi	Children's Rights	Settlement negotiation meetings and breakout sessions with Defs and Pls for settlement purposes	3.00	\$325.00	\$975.00	\$380.00	\$1,140.00	144-3	
6/11/2020	Martha Hodgesmith	Kansas Appleseed	Mediation	3	\$345.00	\$1,035.00	\$345.00	\$1,035.00	146-2	
6/11/2020	Poonam Juneja	NCYL	Participate in settlement discussions	2.8	\$395.00	\$1,106.00	\$395.00	\$1,106.00	145-3	
6/11/2020	Teresa Woody	Kansas Appleseed	Settlement conference with defendants	3	\$500.00	\$1,500.00	\$500.00	\$1,500.00	146-2	
6/17/2020	Martha Hodgesmith	Kansas Appleseed	NLT Meeting re ongoing mediation	1	\$345.00	\$345.00	\$345.00	\$345.00	146-2	
6/18/2020	Martha Hodgesmith	Kansas Appleseed	Mediation	1	\$345.00	\$345.00	\$345.00	\$345.00	146-2	
<b>TOTALS</b>				<b>1276.95</b>		<b>\$493,869.07</b>		<b>\$527,026.60</b>		<b>\$57,890.54</b>

# **EXHIBIT I**

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
11/20/2018	Marissa Nardi	Children's Rights	review J. King's legal research re D. Kan. and MTDs	0.32	\$325.00	\$102.92	\$380.00	\$121.60	144-3
12/20/2018	Freya Pitts	NCYL	Review federal rules, local rules, and standing orders relevant to deadlines for filing, briefing, and arguing a possible motion to dismiss; email L. Welch re: same, and protective order	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3
3/20/2019	Marissa Nardi	Children's Rights	attend in-person co-counsel strategy meeting at DLA office re discovery and MTD	3.00	\$325.00	\$975.00	\$380.00	\$1,140.00	144-3
3/20/2019	Teresa Woody	Kansas Appleseed	Emails re defendants' anticipated motion to dismiss	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2
3/21/2019	Ira Lustbader	Children's Rights	Meeting with JK and MN regarding research on MTD issues and opp strat	0.32	\$500.00	\$158.33	\$500.00	\$160.00	144-3
3/21/2019	Jonathan King	Children's Rights	Meeting with IL and MN regarding legal research for opposition to potential motion to dismiss	0.32	\$325.00	\$102.92	\$345.00	\$110.40	144-3
3/21/2019	Marissa Nardi	Children's Rights	internal CR legal research meeting re MTD	0.32	\$325.00	\$102.92	\$380.00	\$121.60	144-3
3/21/2019	Larry Rute	Kansas Appleseed	Review legal research on bifircuation and MTD	1.3	\$500.00	\$650.00	\$500.00	\$650.00	146-2

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
3/27/2019	Jonathan King	Children's Rights	Meeting with IL regarding research for opposition to potential motion to dismiss	0.17	\$325.00	\$54.17	\$345.00	\$58.65	144-3
3/27/2019	Jonathan King	Children's Rights	Research Tenth Circuit case law regarding Younger abstention in preparation for potential motion to dismiss	3.67	\$325.00	\$1,191.67	\$345.00	\$1,266.15	144-3
3/27/2019	Jonathan King	Children's Rights	Research Tenth Circuit case law regarding MTDs re substantive due process claims in preparation for potential motion to dismiss	4.13	\$325.00	\$1,343.33	\$345.00	\$1,424.85	144-3
3/28/2019	Larry Rute	Kansas Appleseed	research possible MTD	1.8	\$500.00	\$900.00	\$500.00	\$900.00	146-2
3/28/2019	Teresa Woody	Kansas Appleseed	Additional research to counter defendants' anticipated motion to dismiss	1.2	\$500.00	\$600.00	\$500.00	\$600.00	146-2
3/29/2019	Ira Lustbader	Children's Rights	Telephone call with Def counsel and co-counsel regarding MTD, answer, discovery	0.50	\$500.00	\$250.00	\$500.00	\$250.00	144-3
3/29/2019	Lori Burns-Bucklew	Burns-Bucklew	Telephone call with Def counsel and co-counsel regarding MTD, answer, and discovery	0.50	\$500.00	\$250.00	\$500.00	\$250.00	147-1

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
4/15/2019	Marissa Nardi	Children's Rights	attend team meeting with co-counsel re litigation strategy, including discovery and MTD and fact updates from stakeholders	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
5/2/2019	Poonam Juneja	NCYL	reviewing past MTD briefing in NCYL cases involving governor and circulating to team	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
5/3/2019	Jonathan King	Children's Rights	Meeting with IL regarding research for potential forthcoming motion to dismiss the governor	0.20	\$325.00	\$65.00	\$345.00	\$69.00	144-3
5/8/2019	Poonam Juneja	NCYL	reviewing JK memo re potential MTD the governor and possible complaint amendments re same, incl. reviewing cited case	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
5/8/2019	Teresa Woody	Kansas Appleseed	Review legal research re opposition to MTD	0.7	\$500.00	\$350.00	\$500.00	\$350.00	146-2
5/8/2019	Diggs, William J.	DLI Piper	Reviewing memorandum concerning research regarding motion to dismiss governor.	0.2	\$410.00	\$82.00	\$410.00	\$82.00	148-1
7/1/2019	Freya Pitts	NCYL	Email correspondence with M. Nardi re: MTD deadline	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
7/24/2019	Marissa Nardi	Children's Rights	attend KS external co-counsel team meeting re discovery strategy, including document review and MTD	0.72	\$325.00	\$232.92	\$380.00	\$273.60	144-3
7/24/2019	Stephen Dixon	Children's Rights	Conference call with KS team re discovery review and motion to dismiss	0.72	\$375.00	\$268.75	\$410.00	\$295.20	144-3
9/24/2019	Poonam Juneja	NCYL	reviewing and emailing LW FP re upcoming answer/MTD deadlines	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
10/15/2019	Marissa Nardi	Children's Rights	telephone call with external co-counsel team re preparation of opposition to Defs' MTD	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
10/15/2019	Marissa Nardi	Children's Rights	Prepare summary of recent MTD caselaw for co-counsel team	1.03	\$325.00	\$335.83	\$380.00	\$391.40	144-3
10/16/2019	Jonathan King	Children's Rights	Conference call with MN and EG regarding strategy for drafting opposition to potential MTD	0.50	\$325.00	\$162.50	\$345.00	\$172.50	144-3
10/16/2019	Marissa Nardi	Children's Rights	Telephone call with EPG and JK re preparing opposition to MTD filed by Defs	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
10/25/2019	Jonathan King	Children's Rights	Read Defendants' filed 12b1 motion to dismiss	0.37	\$325.00	\$119.17	\$345.00	\$127.65	144-3
10/25/2019	Marissa Nardi	Children's Rights	Discuss Defs' motion to dismiss with external co-counsel team	0.38	\$325.00	\$124.58	\$380.00	\$144.40	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
10/25/2019	Marissa Nardi	Children's Rights	Read Defendants' motion to dismiss motion and brief	0.67	\$325.00	\$216.67	\$380.00	\$254.60	144-3
10/25/2019	Poonam Juneja	NCYL	reviewing Defs' motion to dismiss	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
10/25/2019	Poonam Juneja	NCYL	Confer with FP re: MTD and 10/28 co-counsel meeting	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
10/25/2019	Freya Pitts	NCYL	Confer with P. Juneja re: MTD and 10/28 co- counsel meeting	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
10/26/2019	Marissa Nardi	Children's Rights	Email with IL SS SB HF CRW AF re MTD	0.17	\$325.00	\$54.17	\$380.00	\$64.60	144-3
10/26/2019	Stephen Dixon	Children's Rights	Electronic mail to co- counsel re motion to dismiss	0.03	\$375.00	\$12.50	\$410.00	\$12.30	144-3
10/26/2019	Teresa Woody	Kansas Appleseed	Review defendants' motion to dismiss governor for lack of jurisdiction and memo in support and review specific case law	2.1	\$500.00	\$1,050.00	\$500.00	\$1,050.00	146-2
10/27/2019	Marissa Nardi	Children's Rights	Begin reading legal opinions cited in Defs' brief ISO its MTD	2.32	\$325.00	\$752.92	\$380.00	\$881.60	144-3
10/28/2019	Jonathan King	Children's Rights	Begin reading caselaw cited in Defendants' motion to dismiss	1.93	\$325.00	\$628.33	\$345.00	\$665.85	144-3
10/28/2019	Marissa Nardi	Children's Rights	Prepare for MTD opp meeting	0.20	\$325.00	\$65.00	\$380.00	\$76.00	144-3
10/28/2019	Marissa Nardi	Children's Rights	Discuss MTD opp drafting with EG and JK	0.65	\$325.00	\$211.25	\$380.00	\$247.00	144-3



## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
10/28/2019	Marissa Nardi	Children's Rights	Begin drafting outline for opposition to Defs' MTD	1.33	\$325.00	\$433.33	\$380.00	\$505.40	144-3
10/28/2019	Marissa Nardi	Children's Rights	Meeting with external co-counsel team re litigation strategy, including discovery and opposition to Defs' MTD	1.67	\$325.00	\$541.67	\$380.00	\$634.60	144-3
10/28/2019	Stephen Dixon	Children's Rights	Electronic mails to clients re motion to dismiss	0.58	\$375.00	\$218.75	\$410.00	\$237.80	144-3
10/28/2019	Leecia Welch	NCYL	Confer with PJ and FP re: DLA Piper meeting prep, document review, opposition to MTD	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3
10/28/2019	Poonam Juneja	NCYL	Confer with FP re: opposition to MTD	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
10/28/2019	Poonam Juneja	NCYL	Confer with LW FP re: DLA Piper meeting prep, document review, opposition to MTD	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
10/28/2019	Freya Pitts	NCYL	Confer with L. Welch and P. Juneja re: DLA Piper meeting prep, document review, opposition to MTD	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3
10/28/2019	Freya Pitts	NCYL	Confer with P. Juneja re: opposition to MTD	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
10/29/2019	Jonathan King	Children's Rights	Continue review of caselaw cited by Defendants in their motion to dismiss	1.85	\$325.00	\$601.25	\$345.00	\$638.25	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
10/29/2019	Marissa Nardi	Children's Rights	Telephone call with EG and JK re MTD opp	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
10/29/2019	Marissa Nardi	Children's Rights	Meeting with IL re opp to Defs' MTD and motion for extension	0.75	\$325.00	\$243.75	\$380.00	\$285.00	144-3
10/30/2019	Jonathan King	Children's Rights	Call with EG regarding strategy for opposition to Defendants' motion to dismiss	0.33	\$325.00	\$108.33	\$345.00	\$113.85	144-3
10/30/2019	Jonathan King	Children's Rights	Research case law to support Plaintiffs' opposition to Defendants' motion to dismiss	4.97	\$325.00	\$1,614.17	\$345.00	\$1,714.65	144-3
10/30/2019	Marissa Nardi	Children's Rights	meeting with external co- counsel team re discovery strategy, including opposition to Defs' 12b1 MTD	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
10/30/2019	Poonam Juneja	NCYL	Team call, including re: motion to dismiss, discovery, and ADR	1.3	\$395.00	\$513.50	\$395.00	\$513.50	145-3
10/30/2019	Poonam Juneja	NCYL	Confer with FP re: MTD and expedited discovery strategy	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
10/30/2019	Freya Pitts	NCYL	Team call, including re: motion to dismiss, discovery, and ADR partial participant	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
10/30/2019	Freya Pitts	NCYL	Confer with P. Juneja re: MTD and expedited discovery strategy	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
10/30/2019	Martha Hodgesmith	Kansas Appleseed	Team call re motion to dismiss, discovery, ADR	1.3	\$345.00	\$448.50	\$345.00	\$448.50	146-2
10/30/2019	Teresa Woody	Kansas Appleseed	Call with co-counsel re MTD, discovery and ADR	1.3	\$500.00	\$650.00	\$500.00	\$650.00	146-2
10/30/2019	Fowler, Meg	DLI Piper	Attend the counsel teleconference concerning the status of the case, including re: motion to dismiss, discovery, and ADR.	1.3	\$240.00	\$312.00	\$240.00	\$312.00	148-1
10/31/2019	Jonathan King	Children's Rights	Conference call with MN and EG regarding strategy for opposition to Defendants' motion to dismiss	0.67	\$325.00	\$216.67	\$345.00	\$231.15	144-3
10/31/2019	Jonathan King	Children's Rights	Research case law regarding opposition to Defendants' motion to dismiss	8.05	\$325.00	\$2,616.25	\$345.00	\$2,777.25	144-3
10/31/2019	Marissa Nardi	Children's Rights	Telephone call with EG and JK re MTD opp	0.67	\$325.00	\$216.67	\$380.00	\$254.60	144-3
10/31/2019	Poonam Juneja	NCYL	Confer with FP re: discovery and motion to dismiss strategy	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
10/31/2019	Freya Pitts	NCYL	Confer with P. Juneja re: discovery and motion to dismiss strategy	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
11/1/2019	Jonathan King	Children's Rights	Research case law regarding opposition to Defendants' motion to dismiss	4.85	\$325.00	\$1,576.25	\$345.00	\$1,673.25	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
11/1/2019	Teresa Woody	Kansas Appleseed	Review of draft motion for extension re MTD	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2
11/3/2019	Freya Pitts	NCYL	Research re: MTDs by governors	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
11/3/2019	Teresa Woody	Kansas Appleseed	Review alternative drafts of extension for resposne to MTD	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2
11/4/2019	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	0.40	\$325.00	\$130.00	\$345.00	\$138.00	144-3
11/5/2019	Freya Pitts	NCYL	Review motion to dismiss	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
11/6/2019	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	1.43	\$325.00	\$465.83	\$345.00	\$493.35	144-3
11/6/2019	Marissa Nardi	Children's Rights	Draft email to Defs re MTD Opp extension and share with external co- counsel	0.33	\$325.00	\$108.33	\$380.00	\$125.40	144-3
11/6/2019	Leecia Welch	NCYL	Team call re: ADR, MTD, discovery, experts	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3
11/6/2019	Freya Pitts	NCYL	Team call, including re: ADR, MTD, discovery, experts	1.0	\$365.00	\$365.00	\$365.00	\$365.00	145-3
11/6/2019	Freya Pitts	NCYL	Email correspondence re: requesting extension for MTD opposition	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
11/6/2019	Teresa Woody	Kansas Appleseed	Team call re: ADR, MTD, discovery, experts	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
11/6/2019	Kane, Joshua	DLI Piper	Attend weekly team conference call, including discussion re: ADR, MTD, discovery, experts.	1	\$410.00	\$410.00	\$410.00	\$410.00	148-1
11/7/2019	Clare Connaught on	Children's Rights	Meeting with MN and DA re collecting factual support in opposition to Defs' MTD	0.20	\$150.00	\$30.00	\$200.00	\$40.00	144-3
11/7/2019	Clare Connaught on	Children's Rights	Review and finalize drafts of motion to extend deadline to respond to Defs' MTD governor	1.65	\$150.00	\$247.50	\$200.00	\$330.00	144-3
11/7/2019	Jonathan King	Children's Rights	Review motions for extension of time regarding discovery and Defendants' MTD	0.77	\$325.00	\$249.17	\$345.00	\$265.65	144-3
11/7/2019	Jonathan King	Children's Rights	Research case law regarding opposition to Defendants' motion to dismiss	2.75	\$325.00	\$893.75	\$345.00	\$948.75	144-3
11/11/2019	Jonathan King	Children's Rights	Research case law regarding opposition to Defendants' motion to dismiss	0.40	\$325.00	\$130.00	\$345.00	\$138.00	144-3
11/14/2019	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	1.80	\$325.00	\$585.00	\$345.00	\$621.00	144-3
11/15/2019	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	1.73	\$325.00	\$563.33	\$345.00	\$596.85	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
11/15/2019	Marissa Nardi	Children's Rights	Meeting with external co-counsel re litigation strategy, including discussion of experts and MTD opp and discovery	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
11/19/2019	Jonathan King	Children's Rights	Call with EG regarding draft opposition to MTD	0.47	\$325.00	\$151.67	\$345.00	\$162.15	144-3
11/19/2019	Jonathan King	Children's Rights	Research case law regarding opposition to Defendants' motion to dismiss	0.65	\$325.00	\$211.25	\$345.00	\$224.25	144-3
11/20/2019	Jonathan King	Children's Rights	Research case law regarding opposition to Defendants' motion to dismiss	1.67	\$325.00	\$541.67	\$345.00	\$576.15	144-3
11/21/2019	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	1.25	\$325.00	\$406.25	\$345.00	\$431.25	144-3
11/25/2019	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	2.25	\$325.00	\$731.25	\$345.00	\$776.25	144-3
11/27/2019	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	2.50	\$325.00	\$812.50	\$345.00	\$862.50	144-3
11/27/2019	Marissa Nardi	Children's Rights	Discuss draft standards section of brief in opposition to Defs' 12b1 MTD with EPG	0.65	\$325.00	\$211.25	\$380.00	\$247.00	144-3
12/2/2019	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	2.85	\$325.00	\$926.25	\$345.00	\$983.25	144-3

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Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
12/3/2019	Jonathan King	Children's Rights	Call with EG regarding draft opposition to motion to dismiss	0.23	\$325.00	\$75.83	\$345.00	\$79.35	144-3
12/3/2019	Jonathan King	Children's Rights	Research case law regarding opposition to Defendants' motion to dismiss	0.75	\$325.00	\$243.75	\$345.00	\$258.75	144-3
12/4/2019	Jonathan King	Children's Rights	Calls with EG regarding draft opposition to motion to dismiss	0.65	\$325.00	\$211.25	\$345.00	\$224.25	144-3
12/4/2019	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	6.77	\$325.00	\$2,199.17	\$345.00	\$2,335.65	144-3
12/5/2019	Ira Lustbader	Children's Rights	Edit draft MTD opp	3.25	\$500.00	\$1,625.00	\$500.00	\$1,625.00	144-3
12/5/2019	Jonathan King	Children's Rights	Draft motion regarding extension of deadline to oppose MTD	1.02	\$325.00	\$330.42	\$345.00	\$351.90	144-3
12/5/2019	Poonam Juneja	NCYL	reviewing IL email re strategy for mdiation and mtd opp	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
12/6/2019	Jonathan King	Children's Rights	Call with EG regarding draft opposition to motion to dismiss	0.25	\$325.00	\$81.25	\$345.00	\$86.25	144-3
12/6/2019	Jonathan King	Children's Rights	Meeting with IL regarding draft opposition to motion to dismiss	0.68	\$325.00	\$222.08	\$345.00	\$234.60	144-3
12/6/2019	Jonathan King	Children's Rights	Revise and edit motion regarding second extension of deadline to oppose MTD	0.75	\$325.00	\$243.75	\$345.00	\$258.75	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
12/8/2019	Jonathan King	Children's Rights	Research case law regarding opposition to Defendants' motion to dismiss	4.00	\$325.00	\$1,300.00	\$345.00	\$1,380.00	144-3
12/9/2019	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	3.28	\$325.00	\$1,067.08	\$345.00	\$1,131.60	144-3
12/9/2019	Marissa Nardi	Children's Rights	Discuss draft motion for extension re Oppn to Defs' 12b1 MTD with IL and JK	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
12/9/2019	Marissa Nardi	Children's Rights	Discuss draft opposition to Defs' 12b1 MTD with JK and EPG	0.83	\$325.00	\$270.83	\$380.00	\$315.40	144-3
12/9/2019	Marissa Nardi	Children's Rights	Review and edit draft opposition brief to Defs' 12b1 MTD	3.92	\$325.00	\$1,272.92	\$380.00	\$1,489.60	144-3
12/9/2019	Marissa Nardi	Children's Rights	Edit current draft opposition to Defs' 12b1 MTD	8.65	\$325.00	\$2,811.25	\$380.00	\$3,287.00	144-3
12/10/2019	Jonathan King	Children's Rights	Meeting with MN regarding opposition to motion to dismiss	0.42	\$325.00	\$135.42	\$345.00	\$144.90	144-3
12/10/2019	Marissa Nardi	Children's Rights	Prepare written analysis of oppn to Defs' 12b1 MTD	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
12/10/2019	Marissa Nardi	Children's Rights	Discuss with internal team strategy re mediation and brief in oppn to Defs' 12b1 MTD	0.75	\$325.00	\$243.75	\$380.00	\$285.00	144-3
12/10/2019	Marissa Nardi	Children's Rights	Telephone call with re JK drafting opp to 12b1 MTD	0.42	\$325.00	\$135.42	\$380.00	\$159.60	144-3



## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
12/10/2019	Marissa Nardi	Children's Rights	Edit draft brief in oppn to Defs' 12b1 MTD	2.50	\$325.00	\$812.50	\$380.00	\$950.00	144-3
12/13/2019	Poonam Juneja	NCYL	Confer with FP re: discovery correspondence and MTD	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
12/13/2019	Poonam Juneja	NCYL	reviwing draft letter re targeted discovery on MTD	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
12/13/2019	Freya Pitts	NCYL	Confer with P. Juneja re: discovery correspondence and MTD	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
12/17/2019	Poonam Juneja	NCYL	Confer with FP re: letter re: targeted discovery for motion to dismiss	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
12/17/2019	Freya Pitts	NCYL	Confer with P. Juneja re: letter re: targeted discovery for motion to dismiss	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
12/17/2019	Freya Pitts	NCYL	Review and revise draft letter re: targeted discovery for motion to dismiss	0.6	\$365.00	\$219.00	\$365.00	\$219.00	145-3
12/17/2019	Teresa Woody	Kansas Appleseed	Draft letter to defendants' re targeted discovery re MTD	1.8	\$500.00	\$900.00	\$500.00	\$900.00	146-2
12/31/2019	Marissa Nardi	Children's Rights	Edit current draft opposition to Defs' 12b1 MTD	4.75	\$325.00	\$1,543.75	\$380.00	\$1,805.00	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
1/2/2020	Marissa Nardi	Children's Rights	Draft introductory sections to draft opposition to Defs' 12b1 motion to dismiss	8.75	\$325.00	\$2,843.75	\$380.00	\$3,325.00	144-3
1/3/2020	Marissa Nardi	Children's Rights	Continue drafting sections in draft opposition to Defs' 12b1 motion to dismiss	12.92	\$325.00	\$4,197.92	\$380.00	\$4,909.60	144-3
1/4/2020	Marissa Nardi	Children's Rights	Edit draft oppn to Defs' 12b1 MTD	5.80	\$325.00	\$1,885.00	\$380.00	\$2,204.00	144-3
1/5/2020	Marissa Nardi	Children's Rights	Edit draft opposition to Defs' 12b1 MTD	10.88	\$325.00	\$3,537.08	\$380.00	\$4,134.40	144-3
1/6/2020	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	6.87	\$325.00	\$2,231.67	\$345.00	\$2,370.15	144-3
1/7/2020	Ira Lustbader	Children's Rights	Conference call with team regarding strategy on Gov. discovery and MTD opp	1.50	\$500.00	\$750.00	\$500.00	\$750.00	144-3
1/7/2020	Jonathan King	Children's Rights	Call with EG regarding opposition to motion to dismiss governor	0.17	\$325.00	\$54.17	\$345.00	\$58.65	144-3
1/7/2020	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	5.15	\$325.00	\$1,673.75	\$345.00	\$1,776.75	144-3
1/7/2020	Marissa Nardi	Children's Rights	Edit draft opposition to Defs' 12b1 MTD	3.42	\$325.00	\$1,110.42	\$380.00	\$1,299.60	144-3
1/7/2020	Leecia Welch	NCYL	Confer with PJ and FP re: mediation draft and correspondence re: jurisdictional discovery and motion to dismiss	0.4	\$500.00	\$200.00	\$500.00	\$200.00	145-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
1/7/2020	Leecia Welch	NCYL	Email correspondence with Children's Rights re: correspondence re: jurisdictional discovery and motion to dismiss	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3
1/7/2020	Poonam Juneja	NCYL	Meeting with LW and FP re: mediation draft and correspondence re: jurisdictional discovery and motion to dismiss	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
1/7/2020	Freya Pitts	NCYL	Confer with L. Welch and P. Juneja re: mediation draft and correspondence re: jurisdictional discovery and motion to dismiss	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3
1/7/2020	Freya Pitts	NCYL	Email correspondence with Children's Rights re: correspondence re: jurisdictional discovery and motion to dismiss	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
1/7/2020	Teresa Woody	Kansas Appleseed	TCW MN re defendants' docs re MTD and further steps	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2
1/7/2020	Lori Burns-Bucklew	Burns-Bucklew	Conference call with team regarding strategy on Gov. discovery and MTD opp	1.50	\$500.00	\$750.00	\$500.00	\$750.00	147-1
1/8/2020	Jonathan King	Children's Rights	Call with EG regarding edits to opposition to MTD	0.25	\$325.00	\$81.25	\$345.00	\$86.25	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
1/8/2020	Jonathan King	Children's Rights	Meetings with MN regarding edits to opposition to MTD	0.33	\$325.00	\$108.33	\$345.00	\$113.85	144-3
1/8/2020	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	7.32	\$325.00	\$2,377.92	\$345.00	\$2,525.40	144-3
1/8/2020	Marissa Nardi	Children's Rights	Edit draft opp to MTD	2.83	\$325.00	\$920.83	\$380.00	\$1,075.40	144-3
1/9/2020	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	7.78	\$325.00	\$2,529.58	\$345.00	\$2,684.10	144-3
1/9/2020	Marissa Nardi	Children's Rights	Edit draft opp to MTD	9.50	\$325.00	\$3,087.50	\$380.00	\$3,610.00	144-3
1/9/2020	Poonam Juneja	NCYL	phone call with EG re MTD and discovery	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
1/10/2020	Jonathan King	Children's Rights	Meeting with MN regarding draft opposition to Defendants' motion to dismiss	0.42	\$325.00	\$135.42	\$345.00	\$144.90	144-3
1/10/2020	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	7.83	\$325.00	\$2,545.83	\$345.00	\$2,701.35	144-3
1/10/2020	Marissa Nardi	Children's Rights	Edit draft opp to Defs' 12b1 MTD	1.45	\$325.00	\$471.25	\$380.00	\$551.00	144-3
1/10/2020	Marissa Nardi	Children's Rights	Edit draft opp to Defs 12b1 MTD	4.50	\$325.00	\$1,462.50	\$380.00	\$1,710.00	144-3
1/11/2020	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	6.50	\$325.00	\$2,112.50	\$345.00	\$2,242.50	144-3
1/11/2020	Marissa Nardi	Children's Rights	Discuss edits to mtd opp with internal team	0.25	\$325.00	\$81.25	\$380.00	\$95.00	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
1/12/2020	Marissa Nardi	Children's Rights	Edit draft mtd opp	4.50	\$325.00	\$1,462.50	\$380.00	\$1,710.00	144-3
1/13/2020	Erin G. McGuinness	Children's Rights	Find source in Named Plaintiff file for use in response to Defendant's motion to dismiss.	0.07	\$225.00	\$15.00	\$240.00	\$16.80	144-3
1/13/2020	Jonathan King	Children's Rights	Research case law regarding opposition to Defendants' motion to dismiss	7.17	\$325.00	\$2,329.17	\$345.00	\$2,473.65	144-3
1/14/2020	Ira Lustbader	Children's Rights	Review, analyze and edit draft MTD opp regarding Gov.	3.42	\$500.00	\$1,708.33	\$500.00	\$1,710.00	144-3
1/14/2020	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	4.00	\$325.00	\$1,300.00	\$345.00	\$1,380.00	144-3
1/14/2020	Marissa Nardi	Children's Rights	Edit draft opp to MTD	3.60	\$325.00	\$1,170.00	\$380.00	\$1,368.00	144-3
1/15/2020	Ira Lustbader	Children's Rights	Follow up edits on MTD draft	2.67	\$500.00	\$1,333.33	\$500.00	\$1,335.00	144-3
1/15/2020	Jonathan King	Children's Rights	Draft opposition to Defendants' motion to dismiss	1.00	\$325.00	\$325.00	\$345.00	\$345.00	144-3
1/15/2020	Marissa Nardi	Children's Rights	Edit draft opposition to Defs' 12b1 MTD	5.22	\$325.00	\$1,695.42	\$380.00	\$1,983.60	144-3
1/16/2020	Marissa Nardi	Children's Rights	Edit opposition to Defs' 12b1 MTD	9.30	\$325.00	\$3,022.50	\$380.00	\$3,534.00	144-3
1/16/2020	Stephen Dixon	Children's Rights	Electronic mail to co counsel re motion to dismiss opposition strategy	0.17	\$375.00	\$62.50	\$410.00	\$69.70	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
1/17/2020	Marissa Nardi	Children's Rights	Discussion with internal CR team JK and EPG re draft opp to MTD	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
1/17/2020	Marissa Nardi	Children's Rights	Edit draft opp to MTD	6.75	\$325.00	\$2,193.75	\$380.00	\$2,565.00	144-3
1/18/2020	Marissa Nardi	Children's Rights	Edit draft opp to MTD	5.17	\$325.00	\$1,679.17	\$380.00	\$1,964.60	144-3
1/19/2020	Marissa Nardi	Children's Rights	Edit opposition brief to Kansas Defs' MTD	4.50	\$325.00	\$1,462.50	\$380.00	\$1,710.00	144-3
1/20/2020	Marissa Nardi	Children's Rights	Telephone call with EPG re edits to draft opp to Defs' MTD	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
1/20/2020	Marissa Nardi	Children's Rights	Edit draft MTD opp	6.75	\$325.00	\$2,193.75	\$380.00	\$2,565.00	144-3
1/21/2020	Marissa Nardi	Children's Rights	Edit opposition to Defs' MTD	7.67	\$325.00	\$2,491.67	\$380.00	\$2,914.60	144-3
1/21/2020	Poonam Juneja	NCYL	reviewing CR timeline for MTD opp	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
1/22/2020	Ira Lustbader	Children's Rights	Read, analysis and MTD opp draft	2.92	\$500.00	\$1,458.33	\$500.00	\$1,460.00	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
1/23/2020	Tourgee, Olivia Morgan	DLI Piper	Attend and take notes on the team weekly phone call addressing: mediation and the settlement draft from Defendants; the opposition to Defendants' motion to dismiss; discovery plan; plan for class certification motion; ongoing research needs; and local/stakeholder updates.	1.1	\$240.00	\$264.00	\$240.00	\$264.00	148-1
1/24/2020	Marissa Nardi	Children's Rights	Edit draft MTD opp brief	4.75	\$325.00	\$1,543.75	\$380.00	\$1,805.00	144-3
1/24/2020	Teresa Woody	Kansas Appleseed	Review draft of plaintiffs' opposition to MTD	1.1	\$500.00	\$550.00	\$500.00	\$550.00	146-2
1/27/2020	Leecia Welch	NCYL	Confer with FP and PJ re: MTD opposition and mediation strategy	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
1/27/2020	Poonam Juneja	NCYL	emailing with MN re motion to seal for MTD opp	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
1/27/2020	Poonam Juneja	NCYL	Confer with FP re: motion to seal for MTD opposition	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
1/27/2020	Poonam Juneja	NCYL	reviewing and revising draft opp to MTD	1.6	\$395.00	\$632.00	\$395.00	\$632.00	145-3

## MOT ON TO D SM SS REFERENCES N FEES

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1/27/2020	Freya Pitts	NCYL	Confer with P. Juneja and L. Welch re: MTD opposition and mediation strategy	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
1/27/2020	Freya Pitts	NCYL	Confer with P. Juneja re: motion to seal for MTD opposition	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
1/28/2020	Nicole Taykhan	Children's Rights	Review current draft opposition to motion to dismiss	0.53	\$300.00	\$160.00	\$290.00	\$153.70	144-3
1/28/2020	Poonam Juneja	NCYL	reviewing and revising draft opp to MTD	0.8	\$395.00	\$316.00	\$395.00	\$316.00	145-3
1/28/2020	Pacio, Kristin A.	DLI Piper	Reviewing brief in opposition to motion to dismiss.	1	\$410.00	\$410.00	\$410.00	\$410.00	148-1
1/29/2020	Leecia Welch	NCYL	Team call, including re: mediation and opposition to motion to dismiss	0.8	\$500.00	\$400.00	\$500.00	\$400.00	145-3
1/29/2020	Leecia Welch	NCYL	Review and edit opposition to motion to dismiss	1.1	\$500.00	\$550.00	\$500.00	\$550.00	145-3
1/29/2020	Poonam Juneja	NCYL	Team call, including re: mediation and opposition to motion to dismiss	0.8	\$395.00	\$316.00	\$395.00	\$316.00	145-3
1/29/2020	Poonam Juneja	NCYL	Confer with FP re: opposition to motion to dismiss	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
1/29/2020	Poonam Juneja	NCYL	reviewing and revising draft opp to MTD	2.2	\$395.00	\$869.00	\$395.00	\$869.00	145-3
1/29/2020	Poonam Juneja	NCYL	reviewing emails re MTD opp exhibits	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3



## MOT ON TO D SM SS REFERENCES N FEES

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1/29/2020	Freya Pitts	NCYL	Confer with P. Juneja re: opposition to motion to dismiss	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
1/29/2020	Freya Pitts	NCYL	Email correspondence with M. Nardi re: exhibits for opposition to MTD	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
1/29/2020	Freya Pitts	NCYL	Review and revise draft opposition to motion to dismiss	2.8	\$365.00	\$1,022.00	\$365.00	\$1,022.00	145-3
1/29/2020	Freya Pitts	NCYL	Review exhibit list for opposition to MTD; email correspondence with P. Juneja re: same	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
1/29/2020	Teresa Woody	Kansas Appleseed	Team call, including re: mediation and opposition to motion to dismiss	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2
1/29/2020	Kinney, Megan E.	DLI Piper	Attend weekly team call re: mediation and opposition to motion to dismiss .8 ; Attend call with mediator .9 .	1.7	\$240.00	\$408.00	\$240.00	\$408.00	148-1
1/30/2020	Daniel Adamek	Children's Rights	Edits and cite-check motion to dismiss opposition exhibits.	4.00	\$150.00	\$600.00	\$200.00	\$800.00	144-3
1/30/2020	Stephen Dixon	Children's Rights	Research and emails with co-counsel re motion to dismiss opposition strategy	0.08	\$375.00	\$31.25	\$410.00	\$32.80	144-3
1/30/2020	Poonam Juneja	NCYL	reviewing emails re MTD opp exhibits	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3

## MOT ON TO D SM SS REFERENCES N FEES

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1/31/2020	Leecia Welch	NCYL	Edit opposition to MTD draft	2.2	\$500.00	\$1,100.00	\$500.00	\$1,100.00	145-3
1/31/2020	Freya Pitts	NCYL	Edit opposition to MTD - introduction and background sections	4.3	\$365.00	\$1,569.50	\$365.00	\$1,569.50	145-3
2/1/2020	Leecia Welch	NCYL	Edit opposition to MTD draft	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3
2/1/2020	Poonam Juneja	NCYL	reviewing feedback on MTD opp circulated by LW	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
2/1/2020	Freya Pitts	NCYL	Revise introduction to opposition to MTD	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3
2/2/2020	Freya Pitts	NCYL	Review L. Welch edits to opposition to MTD draft	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
2/3/2020	Marissa Nardi	Children's Rights	Analyze suggested edits to draft opp to MTD from external co-counsel team	0.92	\$325.00	\$297.92	\$380.00	\$349.60	144-3
2/3/2020	Leecia Welch	NCYL	Confer with PJ and FP re: mediation strategy, opposition to motion to dismiss, and discovery planning	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3
2/3/2020	Poonam Juneja	NCYL	Confer with LW FP re: mediation strategy, opposition to motion to dismiss, and discovery planning	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3

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Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
2/3/2020	Freya Pitts	NCYL	Confer with L. Welch and P. Juneja re: mediation strategy, opposition to motion to dismiss, and discovery planning	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3
2/3/2020	Teresa Woody	Kansas Appleseed	Review NCYL's edits to opposition to MTD and draft comments re same	1.4	\$500.00	\$700.00	\$500.00	\$700.00	146-2
2/4/2020	Daniel Adamek	Children's Rights	Telephone call with EPG re motion to dismiss opposition legal section.	0.33	\$150.00	\$50.00	\$200.00	\$66.00	144-3
2/4/2020	Daniel Adamek	Children's Rights	Cite-check and edit motion to dismiss opposition legal section.	1.75	\$150.00	\$262.50	\$200.00	\$350.00	144-3
2/4/2020	Daniel Adamek	Children's Rights	Proofread motion to dismiss opposition draft before circulating to co-counsel.	2.00	\$150.00	\$300.00	\$200.00	\$400.00	144-3
2/4/2020	Jonathan King	Children's Rights	Review updates to current draft opposition to motion to dismiss and corresponding factual materials	3.30	\$325.00	\$1,072.50	\$345.00	\$1,138.50	144-3
2/5/2020	Clare Connaughton	Children's Rights	KS internal meeting re MTD opp and discovery/workplan with IL MN EPG JK CG and NT DA	0.33	\$150.00	\$50.00	\$200.00	\$66.00	144-3
2/5/2020	Ira Lustbader	Children's Rights	Internal CR lawyer meeting on Motion to Dismiss finalizing	0.50	\$500.00	\$250.00	\$500.00	\$250.00	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
2/5/2020	Jonathan King	Children's Rights	Review updated draft opposition to motion to dismiss and corresponding exhibits	1.00	\$325.00	\$325.00	\$345.00	\$345.00	144-3
2/5/2020	Jonathan King	Children's Rights	Revise draft opposition to motion to dismiss and corresponding exhibits	2.75	\$325.00	\$893.75	\$345.00	\$948.75	144-3
2/5/2020	Marissa Nardi	Children's Rights	Meeting with external co-counsel team re litigation strategy, including discovery and opposition to Defs' MTD and mediation	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
2/5/2020	Marissa Nardi	Children's Rights	Edit new draft opp to MTD	5.25	\$325.00	\$1,706.25	\$380.00	\$1,995.00	144-3
2/5/2020	Nicole Taykhman	Children's Rights	Draft motion to seal exhibits in support of opposition to motion to dismiss.	1.32	\$300.00	\$395.00	\$290.00	\$382.80	144-3
2/5/2020	Leecia Welch	NCYL	Team call re: mediation, discovery, and oppositon to motion to dismiss	0.7	\$500.00	\$350.00	\$500.00	\$350.00	145-3
2/5/2020	Poonam Juneja	NCYL	Team call, including re: mediation, discovery, and oppositon to motion to dismiss	0.7	\$395.00	\$276.50	\$395.00	\$276.50	145-3
2/5/2020	Teresa Woody	Kansas Appleseed	Team call, including re: mediation, discovery, and oppositon to motion to dismiss	0.7	\$500.00	\$350.00	\$500.00	\$350.00	146-2

## MOT ON TO D SM SS REFERENCES N FEES

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2/5/2020	Lori Burns-Bucklew	Burns-Bucklew	Team call re: mediation, discovery, and opposition to motion to dismiss	0.70	\$500.00	\$350.00	\$500.00	\$350.00	147-1
2/5/2020	Pacio, Kristin A.	DLI Piper	Conference call with team re: mediation, discovery, and oppositon to motion to dismiss.	0.7	\$410.00	\$287.00	\$410.00	\$287.00	148-1
2/6/2020	Daniel Adamek	Children's Rights	Edit motion to dismiss opposition.	4.37	\$150.00	\$655.00	\$200.00	\$874.00	144-3
2/6/2020	Ira Lustbader	Children's Rights	Review and edit near final MTD opp draft	2.83	\$500.00	\$1,416.67	\$500.00	\$1,415.00	144-3
2/6/2020	Marissa Nardi	Children's Rights	Edit draft opposition to MTD to circulate to co-counsel	3.33	\$325.00	\$1,083.33	\$380.00	\$1,265.40	144-3
2/6/2020	Nicole Taykhman	Children's Rights	Discuss status of exhibits for purpose of motion to seal and opposition to motion to dismiss with DA.	0.03	\$300.00	\$10.00	\$290.00	\$8.70	144-3
2/6/2020	Nicole Taykhman	Children's Rights	Draft transmittal declaration for opposition to motion to dismiss.	0.43	\$300.00	\$130.00	\$290.00	\$124.70	144-3
2/7/2020	Daniel Adamek	Children's Rights	Organize exhibits for motion to dismiss opposition.	2.32	\$150.00	\$347.50	\$200.00	\$464.00	144-3
2/7/2020	Daniel Adamek	Children's Rights	Edit motion to dismiss opposition transmittal declaration.	3.08	\$150.00	\$462.50	\$200.00	\$616.00	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
2/7/2020	Nicole Taykman	Children's Rights	Email with DA and MN re draft transmittal declaration and motion to seal filings for opposition to motion to dismiss.	0.03	\$300.00	\$10.00	\$290.00	\$8.70	144-3
2/7/2020	Nicole Taykman	Children's Rights	Discuss transmittal declaration and sealing documents for opposition to motion to dismiss with DA.	0.15	\$300.00	\$45.00	\$290.00	\$43.50	144-3
2/7/2020	Nicole Taykman	Children's Rights	Work on declaration for exhibits to opposition to motion to dismiss and motion to seal exhibits	0.93	\$300.00	\$280.00	\$290.00	\$269.70	144-3
2/10/2020	Daniel Adamek	Children's Rights	Cite-check motion to dismiss opposition.	7.27	\$150.00	\$1,090.00	\$200.00	\$1,454.00	144-3
2/10/2020	Jonathan King	Children's Rights	Edit draft opposition to motion to dismiss and corresponding exhibits	8.45	\$325.00	\$2,746.25	\$345.00	\$2,915.25	144-3
2/11/2020	Daniel Adamek	Children's Rights	Quality check and add covers to exhibits to motion to dismiss exhibits.	2.13	\$150.00	\$320.00	\$200.00	\$426.00	144-3
2/11/2020	Daniel Adamek	Children's Rights	Integrate MN's edits and follow-up into motion to dismiss opposition draft.	2.38	\$150.00	\$357.50	\$200.00	\$476.00	144-3
2/11/2020	Daniel Adamek	Children's Rights	Cite-check motion to dismiss opposition.	4.30	\$150.00	\$645.00	\$200.00	\$860.00	144-3
2/11/2020	Jonathan King	Children's Rights	Revise draft opposition to motion to dismiss and corresponding exhibits	2.33	\$325.00	\$758.33	\$345.00	\$803.85	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
2/11/2020	Marissa Nardi	Children's Rights	Edit draft opposition to Defs 12b1 MTD	10.50	\$325.00	\$3,412.50	\$380.00	\$3,990.00	144-3
2/11/2020	Leecia Welch	NCYL	Edit and revise opp to MTD	1.7	\$500.00	\$850.00	\$500.00	\$850.00	145-3
2/11/2020	Poonam Juneja	NCYL	calling MN and leaving voicemail re MTD opp	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
2/11/2020	Poonam Juneja	NCYL	reviewing draft MTD opp, reading underlying cases, revising, and emailing LW FP with thoughts and revisions	2.3	\$395.00	\$908.50	\$395.00	\$908.50	145-3
2/11/2020	Poonam Juneja	NCYL	phone call with EG re feedback on draft MTD opp	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
2/12/2020	Clare Connaught on	Children's Rights	Call with DA re refining factual materials for opp to Defs' MTD	0.87	\$150.00	\$130.00	\$200.00	\$174.00	144-3
2/12/2020	Clare Connaught on	Children's Rights	Update factual materials in support of Pls' MTD Governor	3.00	\$150.00	\$450.00	\$200.00	\$600.00	144-3
2/12/2020	Daniel Adamek	Children's Rights	Meeting with CC re discovery review for MTD	0.87	\$150.00	\$130.00	\$200.00	\$174.00	144-3
2/12/2020	Daniel Adamek	Children's Rights	Cite-check and edit motion to dismiss opposition.	12.27	\$150.00	\$1,840.00	\$200.00	\$2,454.00	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
2/12/2020	Ira Lustbader	Children's Rights	Telephone call with team regarding finalizing MTD opp and mediation strategy, issue for single mediation draft, possible alternatives for next mediation sessions	0.92	\$500.00	\$458.33	\$500.00	\$460.00	144-3
2/12/2020	Ira Lustbader	Children's Rights	Review/Finalizing MTD opp final review/edits	2.83	\$500.00	\$1,416.67	\$500.00	\$1,415.00	144-3
2/12/2020	Jonathan King	Children's Rights	Revise and edit draft opposition to motion to dismiss and corresponding exhibits	5.43	\$325.00	\$1,765.83	\$345.00	\$1,873.35	144-3
2/12/2020	Marissa Nardi	Children's Rights	Edit draft opposition to MTD	11.82	\$325.00	\$3,840.42	\$380.00	\$4,491.60	144-3
2/12/2020	Nicole Taykhman	Children's Rights	Email with co-counsel, IL, and MN re updated filing for opposition to motion to dismiss.	0.08	\$300.00	\$25.00	\$290.00	\$23.20	144-3
2/12/2020	Nicole Taykhman	Children's Rights	Review local rules re declarations re declaration to be submitted with opposition to Defs' motion to dismiss	0.08	\$300.00	\$25.00	\$290.00	\$23.20	144-3
2/12/2020	Nicole Taykhman	Children's Rights	Discuss with MN status of opposition to motion to dismiss, motion to seal, declaration, and golden rule letter.	0.17	\$300.00	\$50.00	\$290.00	\$49.30	144-3



## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
2/12/2020	Nicole Taykman	Children's Rights	Further revise motion to seal exhibits in support of opposition to motion to dismiss.	0.23	\$300.00	\$70.00	\$290.00	\$66.70	144-3
2/12/2020	Nicole Taykman	Children's Rights	Meet with MN, CG, JK, and CC to discuss updates to opposition to motion to dismiss and discovery.	0.23	\$300.00	\$70.00	\$290.00	\$66.70	144-3
2/12/2020	Nicole Taykman	Children's Rights	Email with DA and MN re draft declaration and motion to seal corresponding to opposition to motion to dismiss.	0.33	\$300.00	\$100.00	\$290.00	\$95.70	144-3
2/12/2020	Poonam Juneja	NCYL	co-counsel call re opp to MTD, mediation updates and next steps	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
2/12/2020	Poonam Juneja	NCYL	conferring with FP re agenda for team call, discovery schedule, MTD opp	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
2/12/2020	Poonam Juneja	NCYL	reviewing FP/LW edits on MTD opp and emailing with FP re same	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
2/12/2020	Poonam Juneja	NCYL	reviewing and responding to team email re media on opp to MTD	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
2/12/2020	Freya Pitts	NCYL	Confer with P. Juneja re: agenda for team call, discovery schedule, and opposition to MTD	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
2/12/2020	Freya Pitts	NCYL	Email correspondence re: revisions to opposition to MTD	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
2/12/2020	Freya Pitts	NCYL	Revise opposition to MTD	1.5	\$365.00	\$547.50	\$365.00	\$547.50	145-3
2/12/2020	Teresa Woody	Kansas Appleseed	Review clean draft of opposition to motion to dismiss	0.5	\$500.00	\$250.00	\$500.00	\$250.00	146-2
2/12/2020	Lori Burns-Bucklew	Burns-Bucklew	Telephone call with team regarding finalizing MTD opp and mediation strategy, issue for single mediation draft, possible alternatives for next mediation sessions	0.92	\$500.00	\$458.33	\$500.00	\$460.00	147-1
2/12/2020	Kane, Joshua	DLI Piper	Review draft motion to dismiss and mediation documents 1.5 ; attend status call with plaintiff team re opposition to Governor's MTD, mediation updates and next steps 1 .	2.5	\$410.00	\$1,025.00	\$410.00	\$1,025.00	148-1
2/12/2020	Kinney, Megan E.	DLI Piper	Attend weekly team call re opposition to Governor's motion to dismiss, mediation updates and next steps.	1	\$240.00	\$240.00	\$240.00	\$240.00	148-1

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
2/13/2020	Clare Connaughton	Children's Rights	Edit cites in MTD opposition	2.50	\$150.00	\$375.00	\$200.00	\$500.00	144-3
2/13/2020	Daniel Adamek	Children's Rights	Proofread and edit motion to dismiss opposition.	3.28	\$150.00	\$492.50	\$200.00	\$656.00	144-3
2/13/2020	Daniel Adamek	Children's Rights	Cite-check tables of authorities and contents for motion to dismiss opposition.	3.58	\$150.00	\$537.50	\$200.00	\$716.00	144-3
2/13/2020	Jonathan King	Children's Rights	Revise and edit draft opposition to motion to dismiss and corresponding exhibits	4.42	\$325.00	\$1,435.42	\$345.00	\$1,524.90	144-3
2/13/2020	Marissa Nardi	Children's Rights	Edit draft transmittal decl for opp to mtd	1.17	\$325.00	\$379.17	\$380.00	\$444.60	144-3
2/13/2020	Nicole Taykman	Children's Rights	Email with MN re updates to opposition to motion to dismiss.	0.08	\$300.00	\$25.00	\$290.00	\$23.20	144-3
2/13/2020	Nicole Taykman	Children's Rights	Edit transmittal declaration with list of exhibits for opposition to motion to dismiss.	0.73	\$300.00	\$220.00	\$290.00	\$211.70	144-3
2/13/2020	Nicole Taykman	Children's Rights	Proofread and propose final edits to opposition to motion to dismiss for finalizing.	2.00	\$300.00	\$600.00	\$290.00	\$580.00	144-3
2/13/2020	Leecia Welch	NCYL	Edit opposition to MTD draft	0.7	\$500.00	\$350.00	\$500.00	\$350.00	145-3
2/13/2020	Poonam Juneja	NCYL	reviewing and responding to team emails re finalizing MTD opp	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
2/13/2020	Poonam Juneja	NCYL	reviewing MN email re MTD opp and updated draft settlement agreement and team responses	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
2/13/2020	Freya Pitts	NCYL	Review declaration in support of opposition to MTD and filing plan	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
2/13/2020	Freya Pitts	NCYL	Review final pre-filing version of opposition to MTD	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
2/13/2020	Freya Pitts	NCYL	Review L. Welch further edits to opposition to MTD draft	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
2/17/2020	Teresa Woody	Kansas Appleseed	Email from JPB re request for extension to file defendants' reply to MTD	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2
2/18/2020	Nicole Taykhman	Children's Rights	Email with MN re opposition to motion to dismiss.	0.03	\$300.00	\$10.00	\$290.00	\$8.70	144-3
3/12/2020	Nicole Taykhman	Children's Rights	Review reply filed by defendants in further support of motion to dismiss.	0.18	\$300.00	\$55.00	\$290.00	\$52.20	144-3
3/12/2020	Teresa Woody	Kansas Appleseed	Review defendants' reply in support of MTD and comments re same	0.6	\$500.00	\$300.00	\$500.00	\$300.00	146-2
3/13/2020	Jonathan King	Children's Rights	Read Defendants' reply brief in support of Governor's motion to dismiss for discussion with MN and EG	0.95	\$325.00	\$308.75	\$345.00	\$327.75	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
3/13/2020	Nicole Taykhman	Children's Rights	Review and analyze evidentiary arguments made in reply brief in further support of motion to dismiss.	0.93	\$300.00	\$280.00	\$290.00	\$269.70	144-3
6/3/2020	Jonathan King	Children's Rights	Review and analyze decision granting governor's MTD to advise team re same	1.97	\$325.00	\$639.17	\$345.00	\$679.65	144-3
6/3/2020	Leecia Welch	NCYL	Team call re: MTD order, settlement prep, and discovery	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3
6/3/2020	Leecia Welch	NCYL	Review MTD order	0.3	\$500.00	\$150.00	\$500.00	\$150.00	145-3
6/3/2020	Poonam Juneja	NCYL	Team call, including re: MTD order, settlement prep, and discovery	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
6/3/2020	Poonam Juneja	NCYL	reviewing Judge's order re motion to dismiss	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
6/3/2020	Freya Pitts	NCYL	Review order on MTD governor Kelly	0.6	\$365.00	\$219.00	\$365.00	\$219.00	145-3
6/3/2020	Teresa Woody	Kansas Appleseed	Team call re MTD order, settlement prep, and discovery	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
6/3/2020	Teresa Woody	Kansas Appleseed	Review order granting motion to dismiss; co- counsel call re same	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2
6/4/2020	Pacio, Kristin A.	DLI Piper	Reviewing order on motion to dismiss.	0.5	\$410.00	\$205.00	\$410.00	\$205.00	148-1
6/5/2020	Nicole Taykhman	Children's Rights	Read order on motion to dismiss.	0.53	\$300.00	\$160.00	\$290.00	\$153.70	144-3

## MOT ON TO D SM SS REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
6/11/2020	Poonam Juneja	NCYL	reviewing sample motion to dismiss from MN	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
<b>TOTALS</b>				<b>534.15</b>		<b>\$174,754.29</b>		<b>\$191,830.80</b>	

# **EXHIBIT J**

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
12/15/2017	Leecia Welch	NCYL	Co-counsel call re issues in Kansas and case development strategy	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3
12/15/2017	Poonam Juneja	NCYL	co-counsel call re issues in Kansas and case development strategy	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
12/21/2017	Leecia Welch	NCYL	Co-counsel call re investigation	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3
12/21/2017	Poonam Juneja	NCYL	team co-counsel call re investigation	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
3/7/2018	Ira Lustbader	Children's Rights	Team call with co counsel and CR team regarding investing strategy and next steps left call early	0.67	\$500.00	\$333.33	\$500.00	\$335.00	144-3
3/7/2018	Ira Lustbader	Children's Rights	Prep for team call on investigation priorities and strategy	1.08	\$500.00	\$541.67	\$500.00	\$540.00	144-3
3/7/2018	Leecia Welch	NCYL	TC with co-counsel re KS next steps	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3
3/7/2018	Lori Burns- Bucklew	Burns- Bucklew	Team call with full CR team and NCYL team regarding investing strategy and next steps	0.67	\$500.00	\$333.33	\$500.00	\$335.00	147-1
3/28/2018	Ira Lustbader	Children's Rights	Team strategy call with co counsel, including discussion of investigation strategy and pot. claims	1.07	\$500.00	\$533.33	\$500.00	\$535.00	144-3



## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match e ent	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
3/28/2018	Lori Burns- Bucklew	Burns- Bucklew	Team strategy call with co counsel, including discussion of investigation strategy and pot. claims	1.07	\$500.00	\$533.33	\$500.00	\$535.00	147-1
3/28/2018	Stephen Dixon	Children's Rights	Telephone call with co- counsel re investigation strategy, factual findings	1.07	\$375.00	\$400.00	\$410.00	\$438.70	144-3
4/11/2018	Erin G. McGuinnes s	Children's Rights	Full team telephone call to discuss strategy for upcoming investigation trip, next steps for factual investigation	1.00	\$225.00	\$225.00	\$240.00	\$240.00	144-3
4/11/2018	Ira Lustbader	Children's Rights	Telephone call with co- counsel team regarding investigation strategy and next steps	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3
4/11/2018	Ira Lustbader	Children's Rights	Prep for team call regarding status and strategy regarding investigation	1.17	\$500.00	\$583.33	\$500.00	\$585.00	144-3
4/11/2018	Lori Burns- Bucklew	Burns- Bucklew	Telephone call with co- counsel team regarding investigation strategy and next steps	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1
5/9/2018	Ira Lustbader	Children's Rights	Conference call with counsel team regarding investigation strategy	1.08	\$500.00	\$541.67	\$500.00	\$540.00	144-3
5/9/2018	Lori Burns- Bucklew	Burns- Bucklew	Conference call with counsel team regarding investigation strategy	1.08	\$500.00	\$541.67	\$500.00	\$540.00	147-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e.p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/9/2018	Stephen Dixon	Children's Rights	Telephone call with team re strategy for next investigation trip left early	0.57	\$375.00	\$212.50	\$410.00	\$233.70	144-3
5/21/2018	Leecia Welch	NCYL	Team phone call re investigation, including strategy and timeline	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3
5/21/2018	Poonam Juneja	NCYL	Team phone call re investigation, including strategy and timeline	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
5/23/2018	Ira Lustbader	Children's Rights	Team meeting regarding strategy for investigation and claims left early	0.58	\$500.00	\$291.67	\$500.00	\$290.00	144-3
5/23/2018	Lori Burns- Bucklew	Burns- Bucklew	Team meeting regarding strategy for investigation and claims	0.58	\$500.00	\$291.67	\$500.00	\$290.00	147-1
5/23/2018	Stephen Dixon	Children's Rights	Telephone call with team to discuss investigation strategy, potential clients.	0.88	\$375.00	\$331.25	\$410.00	\$360.80	144-3
5/30/2018	Ira Lustbader	Children's Rights	Team counsel call regarding strategy for claims	0.75	\$500.00	\$375.00	\$500.00	\$375.00	144-3
5/30/2018	Lori Burns- Bucklew	Burns- Bucklew	Team counsel call regarding strategy for claims	0.75	\$500.00	\$375.00	\$500.00	\$375.00	147-1
6/6/2018	Ira Lustbader	Children's Rights	Team meeting regarding strategy and claims, investigation tasks	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3
6/6/2018	Ira Lustbader	Children's Rights	Prep for team meeting and next steps strategy on claims	1.83	\$500.00	\$916.67	\$500.00	\$915.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
6/6/2018	Lori Burns- Bucklew	Burns- Bucklew	Team meeting regarding strategy for claims as well as investigation tasks	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1
6/13/2018	Ira Lustbader	Children's Rights	Telephone call with full co- counsel team regarding claims and investigation strategy	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3
6/20/2018	Marissa Nardi	Children's Rights	participate in Kansas co- counsel team call re complaint and stakeholder strategy	1.32	\$325.00	\$427.92	\$380.00	\$501.60	144-3
6/25/2018	Ira Lustbader	Children's Rights	Telephone call with team and co-counsel regarding investigation strategy and drafting FOF / cloaks	1.42	\$500.00	\$708.33	\$500.00	\$710.00	144-3
6/25/2018	Lori Burns- Bucklew	Burns- Bucklew	Telephone call with team and co-counsel re: investigative strategy and findings of fact "FOF"	1.42	\$500.00	\$708.33	\$500.00	\$710.00	147-1
6/27/2018	Marissa Nardi	Children's Rights	Strategy conference call with co-counsel team	0.25	\$325.00	\$81.25	\$380.00	\$95.00	144-3
7/12/2018	Ira Lustbader	Children's Rights	Draft summary of strategy meeting and follow up tasks for team	1.17	\$500.00	\$583.33	\$500.00	\$585.00	144-3
7/18/2018	Ira Lustbader	Children's Rights	Strategy conference call with co counsel team on investigations status	0.92	\$500.00	\$458.33	\$500.00	\$460.00	144-3
7/18/2018	Lori Burns- Bucklew	Burns- Bucklew	Strategy conference call with co counsel team on investigations status	0.92	\$500.00	\$458.33	\$500.00	\$460.00	147-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
8/8/2018	Ira Lustbader	Children's Rights	Strategy conference call with co-counsel team LBB, NYCL, CR and complaint drafting	1.33	\$500.00	\$666.67	\$500.00	\$665.00	144-3
8/8/2018	Lori Burns- Bucklew	Burns- Bucklew	Strategy conference call with co-counsel team NCYL and CR to discuss investigation, including complaint drafting	1.33	\$500.00	\$666.67	\$500.00	\$665.00	147-1
8/15/2018	Erin G. McGuinness	Children's Rights	Weekly team meeting to discuss everyone's updates on stakeholder outreach, complaint drafting, and upcoming trip with MN, DA, co-counsel NCYL LBB .	0.98	\$225.00	\$221.25	\$240.00	\$235.20	144-3
8/15/2018	Lori Burns- Bucklew	Burns- Bucklew	Weekly team meeting to discuss updates on stakeholder outreach, complaint drafting, and upcoming trip with co- counsel NCYL CR .	0.98	\$500.00	\$491.67	\$500.00	\$490.00	147-1
8/22/2018	Martha Hodgesmith	Kansas Appleseed	National Litigation Team NLT litigation strategy meeting re Foster Care Litigation Topeka	1	\$345.00	\$345.00	\$345.00	\$345.00	146-2
8/22/2018	Stephen Dixon	Children's Rights	Telephone call with team re complaint drafting, investigation strategy came late to meeting	0.35	\$375.00	\$131.25	\$410.00	\$143.50	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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9/5/2018	Freya Pitts	NCYL	Team call with cocounsel re complaint, investigation strategy, etc	1.5	\$365.00	\$547.50	\$365.00	\$547.50	145-3
9/5/2018	Ira Lustbader	Children's Rights	Telephone conference with co- counsel team regarding investigation and compl strategy	1.50	\$500.00	\$750.00	\$500.00	\$750.00	144-3
9/5/2018	Leecia Welch	NCYL	Team call with cocounsel re complaint, investigation strategy, etc	1.5	\$500.00	\$750.00	\$500.00	\$750.00	145-3
9/5/2018	Lori Burns- Bucklew	Burns- Bucklew	Telephone conference with co- counsel team regarding investigation and compl strategy	1.50	\$500.00	\$750.00	\$500.00	\$750.00	147-1
9/5/2018	Stephen Dixon	Children's Rights	Telephone call with co- counsel team re complaint, investigation strategy	1.50	\$375.00	\$562.50	\$410.00	\$615.00	144-3
9/12/2018	Freya Pitts	NCYL	Team call with cocounsel re next steps and strategy for complaint and named plaintiffs, and follow up discussion	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3
9/12/2018	Ira Lustbader	Children's Rights	Telephone call with team co- counsel regarding next steps and strategy for compl and plttfs	0.58	\$500.00	\$291.67	\$500.00	\$290.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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9/12/2018	Leecia Welch	NCYL	Team call with cocounsel re next steps and strategy for complaint and named plaintiffs, and follow up discussion	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3
9/12/2018	Lori Burns- Bucklew	Burns- Bucklew	Telephone call with team co- counsel regarding next steps and strategy for compl and plttfs	0.58	\$500.00	\$291.67	\$500.00	\$290.00	147-1
9/26/2018	Ira Lustbader	Children's Rights	Telephone call with co- counsel team regarding the timing and strategy for filing	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3
9/26/2018	Lori Burns- Bucklew	Burns- Bucklew	Telephone call with co- counsel team regarding the timing and strategy for filing	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1
10/10/2018	Ira Lustbader	Children's Rights	Meeting with full co-counsel team regarding the filing strategy, tasks	3.67	\$500.00	\$1,833.33	\$500.00	\$1,835.00	144-3
10/10/2018	Larry Rute	Kansas Appleseed	Co-Counsel in person team strategy meeting re class structure, mental health services, placement array, systemic failures, remedies and anticipated experts	4.5	\$500.00	\$2,250.00	\$500.00	\$2,250.00	146-2
10/17/2018	Larry Rute	Kansas Appleseed	Team meeting conference call re proposed Complaint legal strategy	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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10/17/2018	Marissa Nardi	Children's Rights	participate in weekly KS co-counsel call re complaint drafting	0.92	\$325.00	\$297.92	\$380.00	\$349.60	144-3
11/9/2018	Ira Lustbader	Children's Rights	Telephone call with co counsel team named plaintiff investigation and filing timing and strategy	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3
11/9/2018	Lori Burns- Bucklew	Burns- Bucklew	Telephone call with co counsel team re: named plaintiff investigation and filing timing and strategy	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1
11/15/2018	Ira Lustbader	Children's Rights	Telephone call with team co counsel on final edits to complaint and strategy	0.83	\$500.00	\$416.67	\$500.00	\$415.00	144-3
11/15/2018	Lori Burns- Bucklew	Burns- Bucklew	Telephone call with team co counsel on final edits to complaint and strategy	0.83	\$500.00	\$416.67	\$500.00	\$415.00	147-1
11/21/2018	Stephen Dixon	Children's Rights	Telephone call with team re litigation strategy after complaint filing	0.83	\$375.00	\$312.50	\$410.00	\$340.30	144-3
11/28/2018	Ira Lustbader	Children's Rights	Team conf call regarding litigation strategy stakeholder/witness engagement	1.08	\$500.00	\$541.67	\$500.00	\$540.00	144-3
11/28/2018	Lori Burns- Bucklew	Burns- Bucklew	Team conf call regarding litigation strategy stakeholder/witness engagement	1.08	\$500.00	\$541.67	\$500.00	\$540.00	147-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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12/5/2018	Larry Rute	Kansas Appleseed	Team conference call to discuss litigation strategy, including experts and potential amendment of complaint	1.2	\$500.00	\$600.00	\$500.00	\$600.00	146-2
12/12/2018	Ira Lustbader	Children's Rights	Team strategy call with co- counsel re post filing litigation strategy including class cert	0.50	\$500.00	\$250.00	\$500.00	\$250.00	144-3
12/12/2018	Larry Rute	Kansas Appleseed	Team conference call re litigation strategy	1.1	\$500.00	\$550.00	\$500.00	\$550.00	146-2
12/12/2018	Lori Burns- Bucklew	Burns- Bucklew	Team strategy call with co- counsel re post filing litigation strategy including class cert	0.50	\$500.00	\$250.00	\$500.00	\$250.00	147-1
1/2/2019	Ira Lustbader	Children's Rights	Team conference call regarding status of litigation and strategy on next steps regarding amendments, experts	0.93	\$500.00	\$466.67	\$500.00	\$465.00	144-3
1/2/2019	Lori Burns- Bucklew	Burns- Bucklew	Team conference call regarding status of litigation and strategy on next steps regarding amendments, experts	0.93	\$500.00	\$466.67	\$500.00	\$465.00	147-1
1/2/2019	Marissa Nardi	Children's Rights	attend weekly co-counsel team meeting re litigation strategy	0.93	\$325.00	\$303.33	\$380.00	\$353.40	144-3



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1/9/2019	Jonathan King	Children's Rights	Conference call with team regarding case status, strategy for status conference with court, expert updates, and litigation hold	0.77	\$325.00	\$249.17	\$345.00	\$265.65	144-3
1/9/2019	Marissa Nardi	Children's Rights	attend weekly co-counsel telephonic meeting re strategy for litigation and upcoming conference and left early	0.38	\$325.00	\$124.58	\$380.00	\$144.40	144-3
1/10/2019	Larry Rute	Kansas Appleseed	Team conference call re litigation strategy with respect to discovery and motion	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
1/16/2019	Freya Pitts	NCYL	Team call, including discussion of litigation strategy, protective order, and motion for leave to use pseudonyms	1.0	\$365.00	\$365.00	\$365.00	\$365.00	145-3
1/16/2019	Leecia Welch	NCYL	Team call, including discussion of litigation strategy, protective order, and motion for leave to use pseudonyms	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3
1/16/2019	Lori Burns- Bucklew	Burns- Bucklew	Team call, including discussion of litigation strategy, protective order, and motion for leave to use pseudonyms	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1

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1/16/2019	Marissa Nardi	Children's Rights	participate in Kansas weekly co-counsel team telephonic meeting re litigation strategy, including litigation hold and initial discovery	0.92	\$325.00	\$297.92	\$380.00	\$349.60	144-3
1/16/2019	Martha Hodgesmith	Kansas Appleseed	Team call re litigation strategy, protective order, use of pseudonyms	1	\$345.00	\$345.00	\$345.00	\$345.00	146-2
1/29/2019	Ira Lustbader	Children's Rights	Telephone call with team regarding expert strategy - vetting and engagement	2.17	\$500.00	\$1,083.33	\$500.00	\$1,085.00	144-3
1/29/2019	Lori Burns- Bucklew	Burns- Bucklew	Telephone call with team regarding expert strategy - vetting and engagement	2.17	\$500.00	\$1,083.33	\$500.00	\$1,085.00	147-1
1/30/2019	Stephen Dixon	Children's Rights	Telephone call with team re strategy for discovery	0.38	\$375.00	\$143.75	\$410.00	\$155.80	144-3
2/20/2019	Marissa Nardi	Children's Rights	attend weekly co-counsel meeting re NP/NF updates and discovery strategy	0.60	\$325.00	\$195.00	\$380.00	\$228.00	144-3
2/27/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, including discussion of staffing, named plaintiffs, and case management 1 ; follow- up discussion with David Sager, Meg Fowler .1 .	1.1	\$410.00	\$451.00	\$410.00	\$451.00	148-1

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2/27/2019	Ira Lustbader	Children's Rights	Team meeting with full counsel team, next steps regarding discovery, strategy regarding settlement potential	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3
2/27/2019	Ira Lustbader	Children's Rights	Prep for team meeting with new co-counsel, tasks and strategy	1.08	\$500.00	\$541.67	\$500.00	\$540.00	144-3
2/27/2019	Lori Burns- Bucklew	Burns- Bucklew	Team meeting with full counsel team, next steps regarding discovery, strategy regarding settlement potential	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1
2/27/2019	Marissa Nardi	Children's Rights	attend team meeting with co- counsel re discovery and mediation strategy	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
3/6/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, including discussion of: gathering named plaintiff files and litigation timeline/strategy.	0.7	\$410.00	\$287.00	\$410.00	\$287.00	148-1
3/6/2019	Freya Pitts	NCYL	Team call, including discussion of: gathering named plaintiff files and litigation timeline/strategy	0.8	\$365.00	\$292.00	\$365.00	\$292.00	145-3
3/6/2019	Ira Lustbader	Children's Rights	Team call regarding settlement and litigation strategy	0.75	\$500.00	\$375.00	\$500.00	\$375.00	144-3

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3/6/2019	Larry Rute	Kansas Appleseed	Team meeting re: named plaintiff files; litigation timeline; litigation strategy	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2
3/6/2019	Lori Burns- Bucklew	Burns- Bucklew	Team call regarding settlement and litigation strategy	0.75	\$500.00	\$375.00	\$500.00	\$375.00	147-1
3/6/2019	Poonam Juneja	NCYL	Team call, including discussion of: gathering named plaintiff files and litigation timeline/strategy	0.8	\$395.00	\$316.00	\$395.00	\$316.00	145-3
3/6/2019	Teresa Woody	Kansas Appleseed	Team call, including discussion of: gathering named plaintiff files and litigation timeline/strategy	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2
3/13/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, including discussion of file management and prospective additional named plaintiffs .9 ; follow- up discussion with David Sager .1 .	1	\$410.00	\$410.00	\$410.00	\$410.00	148-1
3/13/2019	Fowler, Meg	DLA Piper	Participate in weekly conference call, including discussion of file management and prospective additional named plaintiffs.	0.9	\$240.00	\$216.00	\$240.00	\$216.00	148-1
3/13/2019	Ira Lustbader	Children's Rights	Team strategy call with co- counsel; initial disclosures, settlement, NP files	0.83	\$500.00	\$416.67	\$500.00	\$415.00	144-3

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3/13/2019	Lori Burns- Bucklew	Burns- Bucklew	Team strategy call with co-counsel re: initial disclosures, settlement, NP files	0.83	\$500.00	\$416.67	\$500.00	\$415.00	147-1
3/15/2019	Ira Lustbader	Children's Rights	Prep for teamwide strategy meeting regarding experts	1.67	\$500.00	\$833.33	\$500.00	\$835.00	144-3
3/19/2019	Fowler, Meg	DLA Piper	Organize and review documents and emails in preparation for the next day's all-hands meeting.	0.7	\$240.00	\$168.00	\$240.00	\$168.00	148-1
3/19/2019	Freya Pitts	NCYL	Instructions to J. Stolzenberg re: logistics for team strategy meeting on 3/20	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
3/19/2019	Jackie Stolzenberg	NCYL	Instructions from F. Pitts re: logistics for team strategy meeting on 3/20	0.2	\$250.00	\$50.00	\$250.00	\$50.00	145-3
3/19/2019	Marissa Nardi	Children's Rights	email team in preparation for upcoming co-counsel meeting re case strategy	0.30	\$325.00	\$97.50	\$380.00	\$114.00	144-3
3/20/2019	Fowler, Meg	DLA Piper	Attend team strategy meeting, including discussion of claims and strategy for complaint amendment, class certification, and discovery.	3	\$240.00	\$720.00	\$240.00	\$720.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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3/20/2019	Freya Pitts	NCYL	Prepare for presentation on EPSDT claims and complaint amendment strategy in 3/20 team strategy meeting; confer with P. Juneja and L. Welch re: same	2.4	\$365.00	\$876.00	\$365.00	\$876.00	145-3
3/20/2019	Ira Lustbader	Children's Rights	Meeting with entire co-counsel team regarding strategy on discovery, class cert, plan for next 90 days	3.00	\$500.00	\$1,500.00	\$500.00	\$1,500.00	144-3
3/20/2019	Leecia Welch	NCYL	Team strategy meeting, including discussion of claims and strategy for complaint amendment, class certification, and discovery	3.0	\$500.00	\$1,500.00	\$500.00	\$1,500.00	145-3
3/20/2019	Lori Burns-Bucklew	Burns-Bucklew	Meeting with entire co-counsel team regarding strategy on discovery, class cert, and litigation for next 90 days	3.00	\$500.00	\$1,500.00	\$500.00	\$1,500.00	147-1
3/20/2019	Marissa Nardi	Children's Rights	meet with internal Kansas team re case strategy	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
3/20/2019	Poonam Juneja	NCYL	Team strategy meeting, including discussion of claims and strategy for complaint amendment, class certification, and discovery	3.0	\$395.00	\$1,185.00	\$395.00	\$1,185.00	145-3

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3/20/2019	Sager, David S.	DLA Piper	Prepare for and attend strategy meeting in NYC with national litigation team.	5.3	\$500.00	\$2,650.00	\$500.00	\$2,650.00	148-1
3/20/2019	Teresa Woody	Kansas Appleseed	Team strategy meeting, including discussion of claims and strategy for complaint amendment, class certification, and discovery	3	\$500.00	\$1,500.00	\$500.00	\$1,500.00	146-2
3/27/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, including discussion of Defendants' proposed stay and client updates.	0.4	\$410.00	\$164.00	\$410.00	\$164.00	148-1
3/27/2019	Fowler, Meg	DLA Piper	Attend weekly strategy meeting, including discussion of Defendants' proposed stay and client updates.	0.9	\$240.00	\$216.00	\$240.00	\$216.00	148-1
3/27/2019	Stephen Dixon	Children's Rights	Telephone call with team, settlement strategy	0.90	\$375.00	\$337.50	\$410.00	\$369.00	144-3
4/3/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, concerning 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint 1 ; follow-up discussion with David Sager .1 .	1.1	\$410.00	\$451.00	\$410.00	\$451.00	148-1

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4/3/2019	Fowler, Meg	DLA Piper	Participate in the weekly strategy call, including discussion re: 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint.	1	\$240.00	\$240.00	\$240.00	\$240.00	148-1
4/3/2019	Ira Lustbader	Children's Rights	Team counsel call regarding strategy on discovery, experts, settlement	0.98	\$500.00	\$491.67	\$500.00	\$490.00	144-3
4/3/2019	Larry Rute	Kansas Appleseed	Team meeting re litigation and settlement strategy	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
4/3/2019	Leecia Welch	NCYL	Team call, including re: 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3
4/3/2019	Lori Burns- Bucklew	Burns- Bucklew	Team counsel call regarding strategy on discovery, experts, settlement	0.98	\$500.00	\$491.67	\$500.00	\$490.00	147-1
4/3/2019	Poonam Juneja	NCYL	Team call, including re: 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
4/3/2019	Sager, David S.	DLA Piper	Attend weekly status call re 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint.	1	\$500.00	\$500.00	\$500.00	\$500.00	148-1



## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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4/3/2019	Stephen Dixon	Children's Rights	Telephone call with team, settlement strategy	0.98	\$375.00	\$368.75	\$410.00	\$401.80	144-3
4/3/2019	Teresa Woody	Kansas Appleseed	Team call, including re: 4/19 meeting with defendants, settlement strategy, and possible amendments to complaint	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
4/10/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, including discussion of 4/19/19 meeting with defendants, proposed additional substantive due process claim, and document management.	0.6	\$410.00	\$246.00	\$410.00	\$246.00	148-1
4/10/2019	Ira Lustbader	Children's Rights	Full plttf team litigation strategy call re settlement, disc	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3
4/10/2019	Lori Burns- Bucklew	Burns- Bucklew	Full plttf team litigation strategy call re settlement, disc	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1
4/10/2019	Marissa Nardi	Children's Rights	prepare for weekly call by reading relevant documents	0.27	\$325.00	\$86.67	\$380.00	\$102.60	144-3
4/10/2019	Marissa Nardi	Children's Rights	attend weekly KS team meeting re discovery and legal research	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3

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4/10/2019	Sager, David S.	DLA Piper	Attend weekly status call re 4/19/19 meeting with defendants, proposed additional substantive due process claim, and document management.	1	\$500.00	\$500.00	\$500.00	\$500.00	148-1
4/15/2019	Marissa Nardi	Children's Rights	attend team meeting with co-counsel re litigation strategy, including discovery and MTD and fact updates from stakeholders	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
4/17/2019	Fowler, Meg	DLA Piper	Participate in the weekly all-hands conference call, including discussion of 4/19/19 meeting with defendants and early settlement strategy.	0.8	\$240.00	\$192.00	\$240.00	\$192.00	148-1
4/17/2019	Freya Pitts	NCYL	Team call, including discussion of 4/19/19 meeting with defendants and early settlement strategy	0.8	\$365.00	\$292.00	\$365.00	\$292.00	145-3
4/17/2019	Ira Lustbader	Children's Rights	Prep for team strategy call regarding settlement strategy	0.75	\$500.00	\$375.00	\$500.00	\$375.00	144-3
4/17/2019	Ira Lustbader	Children's Rights	Team strategy call regarding settlement meeting	0.82	\$500.00	\$408.33	\$500.00	\$410.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/17/2019	Jonathan King	Children's Rights	Conference call with team regarding strategy for upcoming meeting with defendants' counsel	0.82	\$325.00	\$265.42	\$345.00	\$282.90	144-3
4/17/2019	Larry Rute	Kansas Appleseed	Team Meeting re: preparing talking points and strategy for mtg with Defs; settlement strategy; discovery	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2
4/17/2019	Lori Burns- Bucklew	Burns- Bucklew	Team strategy call regarding settlement meeting	0.82	\$500.00	\$408.33	\$500.00	\$410.00	147-1
4/17/2019	Martha Hodgesmit h	Kansas Appleseed	Team call re discussion of meeting with defendants, early settlement strategy	0.8	\$345.00	\$276.00	\$345.00	\$276.00	146-2
4/17/2019	Poonam Juneja	NCYL	Team call, including discussion of 4/19/19 meeting with defendants and early settlement strategy	0.8	\$395.00	\$316.00	\$395.00	\$316.00	145-3
4/17/2019	Sager, David S.	DLA Piper	Prepare for and attend team status call re 4/19/19 meeting with defendants and early settlement strategy.	0.8	\$500.00	\$400.00	\$500.00	\$400.00	148-1
4/17/2019	Teresa Woody	Kansas Appleseed	Team call, including discussion of 4/19/19 meeting with defendants and early settlement strategy	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match e ent	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/24/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel including discussion of local/stakeholder updates .6 ; follow-up discussion with David Sager .1 .	0.7	\$410.00	\$287.00	\$410.00	\$287.00	148-1
4/24/2019	Fowler, Meg	DLA Piper	Participate in the weekly all- hands conference call, including discussion of local/stakeholder updates .6 ; confer with DLA team members about the motion for class certification 1 .	1.6	\$240.00	\$384.00	\$240.00	\$384.00	148-1
4/24/2019	Jonathan King	Children's Rights	Conference call with team regarding initial meeting with Defendants' counsel and local stakeholder updates	0.50	\$325.00	\$162.50	\$345.00	\$172.50	144-3
4/24/2019	Sager, David S.	DLA Piper	Prepare for and attend weekly status call re local/stakeholder updates .6 ; follow up call regarding strategy .7 .	1.3	\$500.00	\$650.00	\$500.00	\$650.00	148-1
5/2/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, concerning Defendants' answer, possible amendments to complaint, and settlement strategy.	0.9	\$410.00	\$369.00	\$410.00	\$369.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/2/2019	Ira Lustbader	Children's Rights	Telephone call with co- counsel team regarding Answer, settlement strategy and amending complaint	0.93	\$500.00	\$466.67	\$500.00	\$465.00	144-3
5/2/2019	Larry Rute	Kansas Appleseed	Team meeting re possible amendment to complaint; settlement strategy; defendant's answer	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
5/2/2019	Leecia Welch	NCYL	Team call, including re: Defendants' answer, possible amendments to complaint, and settlement strategy	0.9	\$500.00	\$450.00	\$500.00	\$450.00	145-3
5/2/2019	Lori Burns- Bucklew	Burns- Bucklew	Telephone call with co- counsel team regarding Answer, settlement strategy and amending complaint	0.93	\$500.00	\$466.67	\$500.00	\$465.00	147-1
5/2/2019	Poonam Juneja	NCYL	Team call, including re: Defendants' answer, possible amendments to complaint, and settlement strategy	0.9	\$395.00	\$355.50	\$395.00	\$355.50	145-3
5/2/2019	Teresa Woody	Kansas Appleseed	Team call, including re: Defendants' answer, possible amendments to complaint, and settlement strategy	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/8/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, including discussion of scheduling order, complaint amendments, and terms sheet.	0.9	\$410.00	\$369.00	\$410.00	\$369.00	148-1
5/8/2019	Fowler, Meg	DLA Piper	Attend the weekly team call, including discussion of scheduling order, complaint amendments, and terms sheet.	1.8	\$240.00	\$432.00	\$240.00	\$432.00	148-1
5/8/2019	Larry Rute	Kansas Appleseed	Team meeting: re amendment to the Complaint; scheduling order and settlement strategy	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2
5/8/2019	Stephen Dixon	Children's Rights	Telephone call with team re litigation strategy	0.92	\$375.00	\$343.75	\$410.00	\$377.20	144-3
5/15/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, concerning scheduling conference, term sheet, and complaint amendments.	1	\$410.00	\$410.00	\$410.00	\$410.00	148-1
5/15/2019	Fowler, Meg	DLA Piper	Participate in weekly all- hands team call, including discussion re: scheduling conference, term sheet, and complaint amendments.	0.7	\$240.00	\$168.00	\$240.00	\$168.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/15/2019	Ira Lustbader	Children's Rights	Telephone call with team co counsel re: amendment and discovery strategy, terms sheet for settlement	0.93	\$500.00	\$466.67	\$500.00	\$465.00	144-3
5/15/2019	Lori Burns- Bucklew	Burns- Bucklew	Telephone call with team co counsel re: amendment and discovery strategy, terms sheet for settlement	0.93	\$500.00	\$466.67	\$500.00	\$465.00	147-1
5/20/2019	Larry Rute	Kansas Appleseed	Team mtg re litigation strategy and next steps	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
5/21/2019	Teresa Woody	Kansas Appleseed	Email to defendants with agenda for meet and confer	0.2	\$500.00	\$100.00	\$500.00	\$100.00	146-2
5/22/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, including discussion of new clients, term sheet, and Medicaid claim.	1	\$410.00	\$410.00	\$410.00	\$410.00	148-1
5/22/2019	Fowler, Meg	DLA Piper	Participate in weekly all- hands team call, including discussion of new clients, term sheet, and Medicaid claim.	1.1	\$240.00	\$264.00	\$240.00	\$264.00	148-1
5/22/2019	Lori Burns- Bucklew	Burns- Bucklew	Co-counsel team strategy call re: discussion of new clients, term sheet, and Medicaid claim	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/22/2019	Marissa Nardi	Children's Rights	attend 30 minutes of KS weekly co-counsel meeting re investigation, terms sheet needed to leave early	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
5/23/2019	Teresa Woody	Kansas Appleseed	Email defendants' re recap of 4/21 meet and confer	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2
5/29/2019	Ira Lustbader	Children's Rights	Team strategy meeting regarding initial discovery and 26f documents	0.72	\$500.00	\$358.33	\$500.00	\$360.00	144-3
5/29/2019	Leecia Welch	NCYL	Team call, including re: case scheduling, adding plaintiffs, and discovery strategy	0.8	\$500.00	\$400.00	\$500.00	\$400.00	145-3
5/29/2019	Lori Burns- Bucklew	Burns- Bucklew	Team strategy meeting regarding initial discovery and 26f documents	0.72	\$500.00	\$358.33	\$500.00	\$360.00	147-1
5/29/2019	Poonam Juneja	NCYL	Team call, including re: case scheduling, adding plaintiffs, and discovery strategy	0.8	\$395.00	\$316.00	\$395.00	\$316.00	145-3
5/29/2019	Teresa Woody	Kansas Appleseed	Team call, including re: case scheduling, adding plaintiffs, and discovery strategy	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2
6/5/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, including discussion re: term sheet, initial disclosures, RFPs, and case file reviews.	0.5	\$410.00	\$205.00	\$410.00	\$205.00	148-1



## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match e ent	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
6/5/2019	Fowler, Meg	DLA Piper	Attend the weekly team conference call, including discussion re: term sheet, initial disclosures, RFPs, and case file reviews.	0.5	\$240.00	\$120.00	\$240.00	\$120.00	148-1
6/5/2019	Lori Burns- Bucklew	Burns- Bucklew	Team strategy call re: term sheet, initial disclosures, RFPs, and case file reviews	0.50	\$500.00	\$250.00	\$500.00	\$250.00	147-1
6/5/2019	Sager, David S.	DLA Piper	Weekly status call re: term sheet, initial disclosures, RFPs, and case file reviews.	0.5	\$500.00	\$250.00	\$500.00	\$250.00	148-1
6/5/2019	Teresa Woody	Kansas Appleseed	Weekly call with counsel re strategy on discovery request planning	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
6/5/2019	Teresa Woody	Kansas Appleseed	Team call re medicaid issues, discovery strategy	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2
6/12/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, including discussion of possible preliminary injunction motion and discovery management.	0.7	\$410.00	\$287.00	\$410.00	\$287.00	148-1
6/12/2019	Ira Lustbader	Children's Rights	Team meeting regarding discovery strategy	0.67	\$500.00	\$333.33	\$500.00	\$335.00	144-3
6/12/2019	Lori Burns- Bucklew	Burns- Bucklew	Team strategy meeting, including discovery and settlement strategy	0.67	\$500.00	\$333.33	\$500.00	\$335.00	147-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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6/12/2019	Teresa Woody	Kansas Appleseed	Emails re delinquency of production of files and potential meet and confer	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2
6/19/2019	Ira Lustbader	Children's Rights	Team co counsel strategy call on initial discovery and settlement follow up	0.67	\$500.00	\$333.33	\$500.00	\$335.00	144-3
6/19/2019	Lori Burns- Bucklew	Burns- Bucklew	Team co counsel strategy call on initial discovery and settlement follow up	0.67	\$500.00	\$333.33	\$500.00	\$335.00	147-1
6/19/2019	Stephen Dixon	Children's Rights	Telephone call with KS team re settlement and discovery strategy	0.67	\$375.00	\$250.00	\$410.00	\$274.70	144-3
6/26/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, including discussion re: 26 f conference and statement, prospective mediators, and discovery 1 ; follow-up discussion with Judy Calderon regarding document production .3 .	1.3	\$410.00	\$533.00	\$410.00	\$533.00	148-1
6/26/2019	Fowler, Meg	DLA Piper	Attend weekly call to plan for the 26 f conference.	1.5	\$240.00	\$360.00	\$240.00	\$360.00	148-1
6/26/2019	Ira Lustbader	Children's Rights	Telephone call with team co- counsel regarding strategy for meet and conference.	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
6/26/2019	Leecia Welch	NCYL	Review materials for Rule 26 meet and confer	2.2	\$500.00	\$1,100.00	\$500.00	\$1,100.00	145-3
6/26/2019	Lori Burns- Bucklew	Burns- Bucklew	Telephone call with team co- counsel regarding strategy for meet and conference.	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1
6/26/2019	Marissa Nardi	Children's Rights	participate in KS co-counsel group meeting re discovery strategy, including initial disclosures and rule 26 M C	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
6/26/2019	Sager, David S.	DLA Piper	Attend weekly team call re 26 f conference and statement, prospective mediators, and discovery.	1.3	\$500.00	\$650.00	\$500.00	\$650.00	148-1
7/3/2019	Marissa Nardi	Children's Rights	follow-up with external co- counsel re rule 26 M C	0.40	\$325.00	\$130.00	\$380.00	\$152.00	144-3
7/12/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, including discussion re: scheduling conference order, complaint amendment, and stakeholder interviews.	1.4	\$410.00	\$574.00	\$410.00	\$574.00	148-1
7/12/2019	Ira Lustbader	Children's Rights	Team co-counsel strategy meeting re: discovery next steps.	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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7/12/2019	Lori Burns- Bucklew	Burns- Bucklew	Team co-counsel strategy meeting re: discovery next steps.	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1
7/12/2019	Marissa Nardi	Children's Rights	participate in KS team mtg re remediation and litigation strategy, including depositions and discovery conference	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
7/17/2019	Diggs, William J.	DLA Piper	Coordinating with team concerning case strategy.	0.1	\$410.00	\$41.00	\$410.00	\$41.00	148-1
7/17/2019	Marissa Nardi	Children's Rights	attend KS co-counsel meeting with external team re discovery and mediation strategy	0.88	\$325.00	\$287.08	\$380.00	\$334.40	144-3
7/24/2019	Marissa Nardi	Children's Rights	attend KS external co-counsel team meeting re discovery strategy, including document review and MTD	0.72	\$325.00	\$232.92	\$380.00	\$273.60	144-3
7/31/2019	Diggs, William J.	DLA Piper	Weekly strategy call with cocounsel, including discussion re: mediation, discovery, and Task Force.	0.7	\$410.00	\$287.00	\$410.00	\$287.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
7/31/2019	Marissa Nardi	Children's Rights	attend co-counsel weekly call with external co- counsel re litigation strategy, including updated litigation plan and document review of files produced by Defs	0.67	\$325.00	\$216.67	\$380.00	\$254.60	144-3
7/31/2019	Sager, David S.	DLA Piper	Attend weekly status call re: mediation, discovery, and Task Force.	0.9	\$500.00	\$450.00	\$500.00	\$450.00	148-1
7/31/2019	Stephen Dixon	Children's Rights	Conference call with KS team re document review, litigation strategy	0.67	\$375.00	\$250.00	\$410.00	\$274.70	144-3
8/7/2019	Ira Lustbader	Children's Rights	Team co-counsel meeting re discovery strategy-- amending compl, Settlement.	0.63	\$500.00	\$316.67	\$500.00	\$315.00	144-3
8/7/2019	Lori Burns- Bucklew	Burns- Bucklew	Team co-counsel meeting re discovery strategy--amending compl, Settlement.	0.63	\$500.00	\$316.67	\$500.00	\$315.00	147-1
8/7/2019	Stephen Dixon	Children's Rights	Conference call with KS team re discovery and settlement strategy	0.63	\$375.00	\$237.50	\$410.00	\$258.30	144-3
8/14/2019	Ira Lustbader	Children's Rights	Weekly team strategy call-- settlement, amended complaint.	0.75	\$500.00	\$375.00	\$500.00	\$375.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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8/14/2019	Lori Burns- Bucklew	Burns- Bucklew	Co-counsel team strategy call re: settlement, amended complaint	0.75	\$500.00	\$375.00	\$500.00	\$375.00	147-1
8/14/2019	Marissa Nardi	Children's Rights	participate in team meeting re litigation and mediation strategy, including review of files produced by Defs	0.75	\$325.00	\$243.75	\$380.00	\$285.00	144-3
8/14/2019	Sager, David S.	DLA Piper	Attend weekly status/strategy call re ADR, discovery, and complaint amendment.	0.7	\$500.00	\$350.00	\$500.00	\$350.00	148-1
8/21/2019	Larry Rute	Kansas Appleaseed	Team meeting re litigation and settlement strategy	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2
8/21/2019	Leecia Welch	NCYL	Team call, including re: complaint amendment, ADR, communications strategy, and discovery	0.9	\$500.00	\$450.00	\$500.00	\$450.00	145-3
8/21/2019	Lori Burns- Bucklew	Burns- Bucklew	Team strategy call re: complaint amendment, potential settlement, and discovery	0.90	\$500.00	\$450.00	\$500.00	\$450.00	147-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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8/21/2019	Poonam Juneja	NCYL	Team call, including re: complaint amendment, ADR, communications strategy, and discovery	0.9	\$395.00	\$355.50	\$395.00	\$355.50	145-3
8/21/2019	Stephen Dixon	Children's Rights	Conference call with Kansas team re litigation strategy, mediator	0.75	\$375.00	\$281.25	\$410.00	\$307.50	144-3
8/21/2019	Teresa Woody	Kansas Appleseed	Team call, including re: complaint amendment, ADR, communications strategy, and discovery	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2
8/28/2019	Ira Lustbader	Children's Rights	Weekly team strategy call discovery, mediation .	0.83	\$500.00	\$416.67	\$500.00	\$415.00	144-3
8/28/2019	Lori Burns- Bucklew	Burns- Bucklew	Weekly team strategy call re: discovery, mediation	0.83	\$500.00	\$416.67	\$500.00	\$415.00	147-1
8/28/2019	Sager, David S.	DLA Piper	Attend weekly status conference re ADR, amended complaint, local updates.	0.6	\$500.00	\$300.00	\$500.00	\$300.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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8/28/2019	Stephen Dixon	Children's Rights	Conference call with KS team re mediation strategy	0.83	\$375.00	\$312.50	\$410.00	\$340.30	144-3
9/4/2019	Marissa Nardi	Children's Rights	meeting with external co- counsel team re discovery strategy and updates	0.92	\$325.00	\$297.92	\$380.00	\$349.60	144-3
9/11/2019	Ira Lustbader	Children's Rights	Team conference call with co- counsel re settlement and discovery strategy.	0.80	\$500.00	\$400.00	\$500.00	\$400.00	144-3
9/11/2019	Lori Burns- Bucklew	Burns- Bucklew	Team conference call with co- counsel re settlement and discovery strategy.	0.80	\$500.00	\$400.00	\$500.00	\$400.00	147-1
9/18/2019	Stephen Dixon	Children's Rights	Telephone call with team re legal strategy	1.00	\$375.00	\$375.00	\$410.00	\$410.00	144-3
9/25/2019	Stephen Dixon	Children's Rights	Telephone call with team re legal strategy, experts	0.92	\$375.00	\$343.75	\$410.00	\$377.20	144-3
10/1/2019	Ira Lustbader	Children's Rights	Co-counsel telephone call regarding prep for call with new counsel of record for Defs	0.25	\$500.00	\$125.00	\$500.00	\$125.00	144-3
10/1/2019	Ira Lustbader	Children's Rights	Telephone call with new Def counsel regarding discovery and mediation	0.75	\$500.00	\$375.00	\$500.00	\$375.00	144-3
10/1/2019	Leecia Welch	NCYL	Call with Lathrop, new counsel for Defendants, re: discovery and deadlines	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3



## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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10/1/2019	Lori Burns- Bucklew	Burns- Bucklew	Co-counsel strategy call primarily to prepare for mtg with new counsel of record for Defs	0.25	\$500.00	\$125.00	\$500.00	\$125.00	147-1
10/1/2019	Lori Burns- Bucklew	Burns- Bucklew	Telephone call with new Def counsel regarding discovery and mediation	0.75	\$500.00	\$375.00	\$500.00	\$375.00	147-1
10/1/2019	Marissa Nardi	Children's Rights	Meeting with external co- counsel team in preparation for M C re discovery	0.25	\$325.00	\$81.25	\$380.00	\$95.00	144-3
10/1/2019	Poonam Juneja	NCYL	co-counsel call re new opposing counsel and upcoming call	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
10/1/2019	Teresa Woody	Kansas Appleseed	TCW co-counsel in prep for discovery call with new defense counsel	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2
10/1/2019	Teresa Woody	Kansas Appleseed	TCW with new defense counsel and co-counsel	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
10/1/2019	Teresa Woody	Kansas Appleseed	Emails with co-counsel re call with new defense counsel	0.2	\$500.00	\$100.00	\$500.00	\$100.00	146-2
10/2/2019	Stephen Dixon	Children's Rights	Telephone call with team re legal strategy	0.97	\$375.00	\$362.50	\$410.00	\$397.70	144-3
10/9/2019	Marissa Nardi	Children's Rights	Strategy mtg with external Kansas co-counsel team re discovery efforts	0.70	\$325.00	\$227.50	\$380.00	\$266.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
10/9/2019	Stephen Dixon	Children's Rights	Legal team call re discovery strategy	0.70	\$375.00	\$262.50	\$410.00	\$287.00	144-3
10/16/2019	Daniel Adamek	Children's Rights	Meeting with MN, CC, and JK to debrief on outstanding tasks from meet and confer with defendants.	0.28	\$150.00	\$42.50	\$200.00	\$56.00	144-3
10/16/2019	Daniel Adamek	Children's Rights	Draft list of outstanding discovery issues that have not yet been addressed by Defendants in order to raise on meet and confer with defendants.	0.30	\$150.00	\$45.00	\$200.00	\$60.00	144-3
10/16/2019	Ira Lustbader	Children's Rights	Team strategy call regarding ESI and RFP deficiency strategy	0.58	\$500.00	\$291.67	\$500.00	\$290.00	144-3
10/16/2019	Kinney, Megan E.	DLA Piper	Attend weekly team call re: ADR and stakeholders.	0.3	\$240.00	\$72.00	\$240.00	\$72.00	148-1
10/16/2019	Lori Burns- Bucklew	Burns- Bucklew	Team strategy call regarding ESI and RFP deficiency strategy	0.58	\$500.00	\$291.67	\$500.00	\$290.00	147-1
10/16/2019	Marissa Nardi	Children's Rights	Prepare for weekly Kansas call by reviewing relevant correspondence	0.17	\$325.00	\$54.17	\$380.00	\$64.60	144-3
10/16/2019	Pacio, Kristin A.	DLA Piper	Participating in weekly team conference call re: ADR and stakeholders.	0.4	\$410.00	\$164.00	\$410.00	\$164.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match e ent	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
10/16/2019	Teresa Woody	Kansas Appleseed	Confer with co-counsel in prep for ESI meeting	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2
10/16/2019	Tourgee, Olivia Morgan	DLA Piper	Attend weekly team phone call re: ADR and stakeholders.	0.5	\$240.00	\$120.00	\$240.00	\$120.00	148-1
10/21/2019	Marissa Nardi	Children's Rights	Discuss with internal team strategy and preparation for expert meetings	0.40	\$325.00	\$130.00	\$380.00	\$152.00	144-3
10/23/2019	Claire Glasspiegel	Children's Rights	team meeting with co-counsel and CR KS team re discovery strategy	0.68	\$300.00	\$205.00	\$310.00	\$210.80	144-3
10/28/2019	Marissa Nardi	Children's Rights	Meeting with external co- counsel team re litigation strategy, including discovery and opposition to Defs' MTD	1.67	\$325.00	\$541.67	\$380.00	\$634.60	144-3
10/30/2019	Marissa Nardi	Children's Rights	Prepare for meeting with external co-counsel by reviewing weekly correspondence	0.23	\$325.00	\$75.83	\$380.00	\$87.40	144-3
10/30/2019	Marissa Nardi	Children's Rights	meeting with external co- counsel team re discovery strategy, including opposition to Defs' 12b1 MTD	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
10/30/2019	Teresa Woody	Kansas Appleseed	Draft email to JPB regarding defendants' failure to respond to plaintiffs' request for a meet and confer re discovery issues	0.7	\$500.00	\$350.00	\$500.00	\$350.00	146-2

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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10/31/2019	Teresa Woody	Kansas Appleseed	Email to JPB re meet and confer	0.6	\$500.00	\$300.00	\$500.00	\$300.00	146-2
11/1/2019	Freya Pitts	NCYL	Confer with P. Juneja re: meet and confer and discovery next steps	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3
11/1/2019	Freya Pitts	NCYL	Email correspondence with P. Juneja re: meet and confer	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
11/1/2019	Freya Pitts	NCYL	Follow up conversation with L. Welch re: meet and confer	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
11/1/2019	Ira Lustbader	Children's Rights	Team strategy discussion regarding meet and confer	0.25	\$500.00	\$125.00	\$500.00	\$125.00	144-3
11/1/2019	Ira Lustbader	Children's Rights	Prep for meet and confer	1.08	\$500.00	\$541.67	\$500.00	\$540.00	144-3
11/1/2019	Ira Lustbader	Children's Rights	Meet and confer with Def counsel	1.42	\$500.00	\$708.33	\$500.00	\$710.00	144-3
11/1/2019	Kane, Joshua	DLA Piper	Attend prep session for meet- and-confer with opposing counsel .3 ; attend meet-and- confer with opposing counsel regarding discovery issues .7 .	1	\$410.00	\$410.00	\$410.00	\$410.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e.p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
11/1/2019	Leecia Welch	NCYL	Prep call for meet and confer re: discovery and motion to dismiss	0.3	\$500.00	\$150.00	\$500.00	\$150.00	145-3
11/1/2019	Leecia Welch	NCYL	Meet and confer call re: motion to dismiss and discovery	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3
11/1/2019	Leecia Welch	NCYL	Follow up conversation with FP re: meet and confer	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
11/1/2019	Lori Burns- Bucklew	Burns- Bucklew	Team strategy discussion re meet and confer	0.25	\$500.00	\$125.00	\$500.00	\$125.00	147-1
11/1/2019	Poonam Juneja	NCYL	Confer with FP re: meet and confer and discovery next steps	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
11/1/2019	Poonam Juneja	NCYL	reviewing notes from meet and confer call re: motion to dismiss and discovery	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
11/1/2019	Poonam Juneja	NCYL	Email correspondence with FP re: meet and confer	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
11/1/2019	Teresa Woody	Kansas Appleseed	Confer with co-counsel in prep for meet and confer	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2
11/1/2019	Teresa Woody	Kansas Appleseed	Debrief of meet and confer with co-counsel	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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11/1/2019	Teresa Woody	Kansas Appleseed	Meeting with LR in prop for meet and confer with defendants	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2
11/1/2019	Teresa Woody	Kansas Appleseed	Meet and confer with defendants' counsel	1.5	\$500.00	\$750.00	\$500.00	\$750.00	146-2
11/1/2019	Teresa Woody	Kansas Appleseed	Review discovery and outline issues for meet and confer	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
11/3/2019	Teresa Woody	Kansas Appleseed	Draft email to JPB re commitments made in meet and confer	1.6	\$500.00	\$800.00	\$500.00	\$800.00	146-2
11/4/2019	Teresa Woody	Kansas Appleseed	Revise and finalize email re meet and confer	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2
11/6/2019	Ira Lustbader	Children's Rights	Team call with co-counsel re mediation strategy	0.50	\$500.00	\$250.00	\$500.00	\$250.00	144-3
11/6/2019	Lori Burns- Bucklew	Burns- Bucklew	Co-counsel team call re mediation strategy	0.50	\$500.00	\$250.00	\$500.00	\$250.00	147-1
11/6/2019	Stephen Dixon	Children's Rights	Telephone call with team of attorneys re case strategy	0.50	\$375.00	\$187.50	\$410.00	\$205.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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11/15/2019	Fowler, Meg	DLA Piper	Attend weekly counsel call, including re: mediation, experts, and media.	0.9	\$240.00	\$216.00	\$240.00	\$216.00	148-1
11/15/2019	Ira Lustbader	Children's Rights	Team co counsel meeting regarding mediation strategy came late	0.83	\$500.00	\$416.67	\$500.00	\$415.00	144-3
11/15/2019	Lori Burns- Bucklew	Burns- Bucklew	Team co counsel meeting re mediation strategy	0.83	\$500.00	\$416.67	\$500.00	\$415.00	147-1
11/15/2019	Teresa Woody	Kansas Appleseed	Team call re: mediation, expert strategy	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2
11/20/2019	Ira Lustbader	Children's Rights	Team call regarding strategy on mediation and stakeholder outreach re witnesses came late	0.50	\$500.00	\$250.00	\$500.00	\$250.00	144-3
11/20/2019	Kinney, Megan E.	DLA Piper	Attend weekly team call re: mediation, document production issues, and experts.	0.7	\$240.00	\$168.00	\$240.00	\$168.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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11/20/2019	Lori Burns- Bucklew	Burns- Bucklew	Team strategy call re: mediation, discovery, and stakeholder interviews	0.50	\$500.00	\$250.00	\$500.00	\$250.00	147-1
11/20/2019	Tourgee, Olivia Morgan	DLA Piper	Participate and take notes on weekly team phone call re: mediation, document production issues, and experts.	0.6	\$240.00	\$144.00	\$240.00	\$144.00	148-1
11/25/2019	Lori Burns- Bucklew	Burns- Bucklew	Team strategy call re: settlement draft	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1
12/4/2019	Teresa Woody	Kansas Appleseed	Team call re mediation strategy	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2
12/4/2019	Tourgee, Olivia Morgan	DLA Piper	Participate and take notes on the team's weekly phone call re: mediation.	0.9	\$240.00	\$216.00	\$240.00	\$216.00	148-1
12/10/2019	Lori Burns- Bucklew	Burns- Bucklew	Co-counsel team strategy call re: mediation proposal	0.92	\$500.00	\$458.33	\$500.00	\$460.00	147-1



## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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12/18/2019	Ira Lustbader	Children's Rights	Telephone call with team regarding discovery and mediation strategy	0.92	\$500.00	\$458.33	\$500.00	\$460.00	144-3
12/18/2019	Lori Burns- Bucklew	Burns- Bucklew	Co-counsel team strategy call re: discovery and mediation strategy	0.92	\$500.00	\$458.33	\$500.00	\$460.00	147-1
12/18/2019	Marissa Nardi	Children's Rights	Meeting with external co- counsel team re litigation team strategy re discovery and settlement	0.92	\$325.00	\$297.92	\$380.00	\$349.60	144-3
12/18/2019	Tourgee, Olivia Morgan	DLA Piper	Attend weekly team phone call re: mediation, discovery, and motion to stay, and take notes.	0.8	\$240.00	\$192.00	\$240.00	\$192.00	148-1
12/20/2019	Marissa Nardi	Children's Rights	Discuss strategy with team re settlement update and motion to expedite	0.75	\$325.00	\$243.75	\$380.00	\$285.00	144-3
1/6/2020	Ira Lustbader	Children's Rights	Team conference call regarding settlement draft strategy and 12b1 discovery	1.50	\$500.00	\$750.00	\$500.00	\$750.00	144-3
1/6/2020	Lori Burns- Bucklew	Burns- Bucklew	Team strategy call re: settlement draft depositions	1.50	\$500.00	\$750.00	\$500.00	\$750.00	147-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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1/7/2020	Ira Lustbader	Children's Rights	Conference call with team regarding strategy on Gov. discovery and MTD opp	1.50	\$500.00	\$750.00	\$500.00	\$750.00	144-3
1/7/2020	Lori Burns- Bucklew	Burns- Bucklew	Conference call with team regarding strategy on Gov. discovery and MTD opp	1.50	\$500.00	\$750.00	\$500.00	\$750.00	147-1
1/13/2020	Teresa Woody	Kansas Appleseed	Send Email re lack of response from defendants re neutral and failure to respond to request to meet and confer	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2
1/15/2020	Ira Lustbader	Children's Rights	Team co counsel call regarding mediation strategy and discovery	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3
1/15/2020	Leecia Welch	NCYL	Team call, including re: mediation strategy, jurisdictional discovery, and discovery planning in advance of stay pending settlement discussions	1.1	\$500.00	\$550.00	\$500.00	\$550.00	145-3
1/15/2020	Lori Burns- Bucklew	Burns- Bucklew	Team co counsel call regarding mediation strategy and discovery	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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1/15/2020	Marissa Nardi	Children's Rights	meeting with external co-counsel team re litigation strategy and discovery, including mediation and opposition draft	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
1/15/2020	Poonam Juneja	NCYL	Team call, including re: mediation strategy, jurisdictional discovery, and discovery planning in advance of stay pending settlement discussions	1.1	\$395.00	\$434.50	\$395.00	\$434.50	145-3
1/15/2020	Teresa Woody	Kansas Appleseed	Team call, including re: mediation strategy, jurisdictional discovery, and discovery planning in advance of stay pending settlement discussions partial	0.9	\$500.00	\$450.00	\$500.00	\$450.00	146-2
1/15/2020	Tourgee, Olivia Morgan	DLA Piper	Review team correspondence regarding strategizing mediation plans and responses to opposing counsel's emails and review related articles to the case .4 ; attend weekly team phone call discussing mediation, discovery requests, discovery plan, class certification motion plan, and local updates 1 .	1.4	\$240.00	\$336.00	\$240.00	\$336.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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1/23/2020	Ira Lustbader	Children's Rights	Team co-counsel strategy call regarding mediation and discovery strategy	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3
1/23/2020	Kinney, Megan E.	DLA Piper	Attend weekly team call re: mediation and discovery planning.	1.1	\$240.00	\$264.00	\$240.00	\$264.00	148-1
1/23/2020	Lori Burns- Bucklew	Burns- Bucklew	Team co-counsel strategy call regarding mediation and discovery strategy	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1
1/23/2020	Marissa Nardi	Children's Rights	Meeting with external co- counsel team re mediation strategy	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
1/29/2020	Ira Lustbader	Children's Rights	Telephone call with co counsel team regarding mediation strategy left early	0.50	\$500.00	\$250.00	\$500.00	\$250.00	144-3
1/29/2020	Kinney, Megan E.	DLA Piper	Attend weekly team call re: mediation and opposition to motion to dismiss .8 ; Attend call with mediator .9 .	1.7	\$240.00	\$408.00	\$240.00	\$408.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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1/29/2020	Lori Burns- Bucklew	Burns- Bucklew	Telephone call with co counsel team regarding mediation strategy	0.50	\$500.00	\$250.00	\$500.00	\$250.00	147-1
2/5/2020	Marissa Nardi	Children's Rights	Meeting with external co- counsel team re litigation strategy, including discovery and opposition to Defs' MTD and mediation	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
2/12/2020	Ira Lustbader	Children's Rights	Telephone call with team regarding finalizing MTD opp and mediation strategy, issue for single mediation draft, possible alternatives for next mediation sessions	0.92	\$500.00	\$458.33	\$500.00	\$460.00	144-3
2/12/2020	Kinney, Megan E.	DLA Piper	Attend weekly team call re opposition to Governor's motion to dismiss, mediation updates and next steps.	1	\$240.00	\$240.00	\$240.00	\$240.00	148-1
2/12/2020	Lori Burns- Bucklew	Burns- Bucklew	Telephone call with team regarding finalizing MTD opp and mediation strategy, issue for single mediation draft, possible alternatives for next mediation sessions	0.92	\$500.00	\$458.33	\$500.00	\$460.00	147-1

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2/12/2020	Teresa Woody	Kansas Appleseed	Team call, including re: mediation strategy, jurisdictional discovery, and discovery planning in advance of stay pending settlement discussions	1.1	\$500.00	\$550.00	\$500.00	\$550.00	146-2
2/21/2020	Ira Lustbader	Children's Rights	Team co-counsel strategy call regarding mediation issues	0.92	\$500.00	\$458.33	\$500.00	\$460.00	144-3
2/21/2020	Leecia Welch	NCYL	Team call re mediation strategy	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3
3/4/2020	Marissa Nardi	Children's Rights	Meeting with external co- counsel team to discuss litigation strategy, including written discovery, ESI, and mediation	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
3/4/2020	Nicole Taykhman	Children's Rights	Annotate letter response re Defendants' responses and objections to first set of RFPs for planning for meet and confer.	0.12	\$300.00	\$35.00	\$290.00	\$34.80	144-3
3/4/2020	Tourgee, Olivia Morgan	DLA Piper	Attend weekly team phone call to discuss mediation, upcoming discovery priorities, and stakeholder/local outreach.	0.7	\$240.00	\$168.00	\$240.00	\$168.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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3/10/2020	Marissa Nardi	Children's Rights	Electronic email with KP and PJ re weekly discovery calls	0.25	\$325.00	\$81.25	\$380.00	\$95.00	144-3
3/11/2020	Marissa Nardi	Children's Rights	Meeting with KS co-counsel team re litigation strategy, including written discovery, review of documents produced by Defs, experts, and ESI	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
3/13/2020	Kinney, Megan E.	DLA Piper	Attend weekly Kansas foster care discovery strategy call.	0.5	\$240.00	\$120.00	\$240.00	\$120.00	148-1
3/13/2020	Tourgee, Olivia Morgan	DLA Piper	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.	0.5	\$240.00	\$120.00	\$240.00	\$120.00	148-1
3/17/2020	Teresa Woody	Kansas Appleseed	Email re defendants' continued failure to respond to discovery; meet and confer	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2
3/18/2020	Marissa Nardi	Children's Rights	Meeting with external co- counsel team re litigation strategy, including written discovery, review of documents, and experts	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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3/20/2020	Kinney, Megan E.	DLA Piper	Attend weekly team discovery call.	0.8	\$240.00	\$192.00	\$240.00	\$192.00	148-1
3/25/2020	Ira Lustbader	Children's Rights	Telephone call with full co counsel team regarding discovery strategy, including RFPs and production holes	0.75	\$500.00	\$375.00	\$500.00	\$375.00	144-3
3/25/2020	Lori Burns- Bucklew	Burns- Bucklew	Co-counsel team strategy call re discovery issues	0.75	\$500.00	\$375.00	\$500.00	\$375.00	147-1
3/25/2020	Marissa Nardi	Children's Rights	Meeting with external KS co-counsel team re litigation strategy, including Defendants' production deficiencies, written discovery, and 30b6 depositions	0.75	\$325.00	\$243.75	\$380.00	\$285.00	144-3
3/25/2020	Tourgee, Olivia Morgan	DLA Piper	Attend weekly team phone call re: CO ID-19 response, discovery disputes, and experts, and take notes .7 ; review and analyze documents relating to one of the named plaintiffs 4.8 .	5.5	\$240.00	\$1,320.00	\$240.00	\$1,320.00	148-1
3/27/2020	Marissa Nardi	Children's Rights	Read notes from prior meeting in re forthcoming letter re discovery issues	0.32	\$325.00	\$102.92	\$380.00	\$121.60	144-3



## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/1/2020	Kinney, Megan E.	DLA Piper	Attend weekly team call re: CO ID-19 response, discovery, experts, and named plaintiffs.	0.8	\$240.00	\$192.00	\$240.00	\$192.00	148-1
4/1/2020	Lori Burns- Bucklew	Burns- Bucklew	Team strategy call re: discovery, experts, NPs, and CO ID-19 placement MH concerns	0.80	\$500.00	\$400.00	\$500.00	\$400.00	147-1
4/1/2020	Stephen Dixon	Children's Rights	Telephone call with attorney team re case strategy and fact updates	0.83	\$375.00	\$312.50	\$410.00	\$340.30	144-3
4/1/2020	Tourgee, Olivia Morgan	DLA Piper	Attend weekly team phone call to discuss CO ID-19 and our response, discovery updates and plan, and experts.	0.8	\$240.00	\$192.00	\$240.00	\$192.00	148-1
4/3/2020	Ira Lustbader	Children's Rights	Team co counsel call regarding meet and confer and enforcement, CO ID strategy	0.83	\$500.00	\$416.67	\$500.00	\$415.00	144-3
4/3/2020	Kinney, Megan E.	DLA Piper	Attend weekly team discovery call.	0.5	\$240.00	\$120.00	\$240.00	\$120.00	148-1
4/3/2020	Kinney, Megan E.	DLA Piper	Attend team call to discuss meet and confer with Defendants.	1	\$240.00	\$240.00	\$240.00	\$240.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match e ent	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/3/2020	Lori Burns- Bucklew	Burns- Bucklew	Co-counsel strategy call re: M C, CO ID discovery plan, next steps	0.83	\$500.00	\$416.67	\$500.00	\$415.00	147-1
4/3/2020	Teresa Woody	Kansas Appleseed	Email to defendants requesting meet and confer	0.7	\$500.00	\$350.00	\$500.00	\$350.00	146-2
4/3/2020	Tourgee, Olivia Morgan	DLA Piper	Attend weekly discovery check-in with P. Juneja, M. Kinney, D. Adamek, K. Pacio, F. Pitts, M. Fowler, M. Nardi, E. Gretter, K. Setren, J. King, C. Glasspiegel, N. Taykhman, and C. Connaughton .3 ; attend team call to discuss discovery strategy and moving forward after the passing of one of the Next Friends 1 ; reach out to docketing to find process servers and begin the process of preparing for service .7 .	2	\$240.00	\$480.00	\$240.00	\$480.00	148-1
4/7/2020	Freya Pitts	NCYL	Confer with L. Welch and P. Juneja re: discovery meet and confer	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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4/7/2020	Freya Pitts	NCYL	Email correspondence re: meet and confer with Kansas Defendants re: discovery	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
4/7/2020	Freya Pitts	NCYL	Review possible extension dates in preparation for discovery meet and confer	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
4/7/2020	Leecia Welch	NCYL	Confer with FP and PJ re discovery meet and confer	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3
4/7/2020	Poonam Juneja	NCYL	Confer with LW FP re: discovery meet and confer	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
4/7/2020	Teresa Woody	Kansas Appleseed	Confer with co-counsel re video conference for meet and confer	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2
4/8/2020	Fowler, Meg	DLA Piper	Participate in weekly all- counsel call re meet and confer with Defendants, discovery issues, next friend/client updates, experts, local updates.	0.9	\$240.00	\$216.00	\$240.00	\$216.00	148-1
4/8/2020	Ira Lustbader	Children's Rights	Telephone call with co- counsel regarding M C strategy and discovery left early	0.67	\$500.00	\$333.33	\$500.00	\$335.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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4/8/2020	Kane, Joshua	DLA Piper	Exchange emails with co-counsel team and DLA team regarding upcoming meet-and-confer with defendants.	0.4	\$410.00	\$164.00	\$410.00	\$164.00	148-1
4/8/2020	Leecia Welch	NCYL	Co-counsel call re meet and confer with Ds, discovery issues, next friend/client updates, experts, local updates	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3
4/8/2020	Leecia Welch	NCYL	Review response to meet and confer email	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3
4/8/2020	Lori Burns- Bucklew	Burns- Bucklew	Telephone call with co-counsel re: M C talking points and discovery	0.67	\$500.00	\$333.33	\$500.00	\$335.00	147-1
4/8/2020	Marissa Nardi	Children's Rights	Electronic email with external co-counsel re M C	0.27	\$325.00	\$86.67	\$380.00	\$102.60	144-3
4/8/2020	Marissa Nardi	Children's Rights	Meeting with external co-counsel re litigation strategy, including M C with Defs, CO ID-19 issues, third party subpoenas, NFs, and experts	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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4/8/2020	Martha Hodgesmit h	Kansas Appleseed	Team call re meet and confer with defendants, client updates, discovery issues, experts	1	\$345.00	\$345.00	\$345.00	\$345.00	146-2
4/8/2020	Poonam Juneja	NCYL	co-counsel call re meet and confer with Ds, discovery issues, next friend/client updates, experts, local updates	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
4/8/2020	Poonam Juneja	NCYL	reviewing and responding to emails re scheduling meet and confer with Defendants re discovery	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
4/8/2020	Teresa Woody	Kansas Appleseed	Call with co-counsel re meet and confer with defendants, discovery issues, next friend/client updates, experts,	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
4/8/2020	Teresa Woody	Kansas Appleseed	Prep for meet and confer	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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4/8/2020	Tourgee, Olivia Morgan	DLA Piper	Attend and take notes on Kansas weekly team call discussing meet and confer with defendants, discovery issues, Next Friends developments, experts, and local/stakeholder updates.	0.9	\$240.00	\$216.00	\$240.00	\$216.00	148-1
4/9/2020	Nicole Taykhman	Children's Rights	Review correspondence with opposing counsel re meet and confer.	0.02	\$300.00	\$5.00	\$290.00	\$5.80	144-3
4/9/2020	Teresa Woody	Kansas Appleseed	Emails with defendants' counsel re meet and confer	0.2	\$500.00	\$100.00	\$500.00	\$100.00	146-2
4/10/2020	Freya Pitts	NCYL	Confer with L. Welch and P. Juneja re: discovery next steps, including third party subpoenas, and meet and confer with Defendants	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
4/10/2020	Leecia Welch	NCYL	Confer with PJ FP re: discovery next steps, including third party subpoenas, and meet and confer with Defendants	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3
4/10/2020	Poonam Juneja	NCYL	Confer with LW FP re: discovery next steps, including third party subpoenas, and meet and confer with Defendants	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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4/13/2020	Claire Glasspiegel	Children's Rights	Review CO ID-related RFPs to preparing talking points re same for meet and confer with defendants re: CO ID-19	0.50	\$300.00	\$150.00	\$310.00	\$155.00	144-3
4/13/2020	Daniel Adamek	Children's Rights	Assemble correspondence re CO ID-19 RFPs for meet and confer.	0.27	\$150.00	\$40.00	\$200.00	\$54.00	144-3
4/13/2020	Daniel Adamek	Children's Rights	Assemble e-folder for meet and confer preparation.	3.00	\$150.00	\$450.00	\$200.00	\$600.00	144-3
4/13/2020	Freya Pitts	NCYL	Confer with L. Welch and P. Juneja re: next steps, including meet and confer on discovery issues, case schedule, experts, and next friends	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3
4/13/2020	Freya Pitts	NCYL	Confer with P. Juneja re: strategy for meet and confer re: CO ID 19	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
4/13/2020	Freya Pitts	NCYL	Review and provide feedback on M. Nardi draft email memorializing meet and confer	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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4/13/2020	Freya Pitts	NCYL	Review meet and confer notes from 2019 re: production of new NP files; email correspondence with P. Juneja re: same to inform 4/17 discovery meet and confer	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
4/13/2020	Ira Lustbader	Children's Rights	Telephone call with MN regarding follow up items and strategy for next 2 meet and confer dates	0.42	\$500.00	\$208.33	\$500.00	\$210.00	144-3
4/13/2020	Ira Lustbader	Children's Rights	Prep for M C with MN	0.50	\$500.00	\$250.00	\$500.00	\$250.00	144-3
4/13/2020	Jonathan King	Children's Rights	Advise team re CO ID-19 RFP and related documents in preparation for meet and confer re same	0.42	\$325.00	\$135.42	\$345.00	\$144.90	144-3
4/13/2020	Leecia Welch	NCYL	Confer with FP and PJ re: next steps, including meet and confer on discovery issues, case schedule, experts, and next friends	0.4	\$500.00	\$200.00	\$500.00	\$200.00	145-3
4/13/2020	Leecia Welch	NCYL	Attend meet and confer with Defs re CO ID discovery	0.7	\$500.00	\$350.00	\$500.00	\$350.00	145-3
4/13/2020	Marissa Nardi	Children's Rights	Analyze M C strategy with external co-counsel	0.42	\$325.00	\$135.42	\$380.00	\$159.60	144-3



## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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4/13/2020	Marissa Nardi	Children's Rights	Meeting with IL to prepare for M C	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
4/13/2020	Marissa Nardi	Children's Rights	Prepare talking points for M C	0.73	\$325.00	\$238.33	\$380.00	\$277.40	144-3
4/13/2020	Marissa Nardi	Children's Rights	M C with Defs re discovery disputes	1.50	\$325.00	\$487.50	\$380.00	\$570.00	144-3
4/13/2020	Nicole Taykhman	Children's Rights	Email with MN re outline for meet and confer.	0.08	\$300.00	\$25.00	\$290.00	\$23.20	144-3
4/13/2020	Nicole Taykhman	Children's Rights	Review team correspondence re named plaintiffs and upcoming meet and confers.	0.18	\$300.00	\$55.00	\$290.00	\$52.20	144-3
4/13/2020	Poonam Juneja	NCYL	Confer with LW FP re: next steps, including meet and confer on discovery issues, case schedule, experts, and next friends	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
4/13/2020	Poonam Juneja	NCYL	Confer with FP re: strategy for meet and confer re: CO ID 19	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
4/13/2020	Poonam Juneja	NCYL	Meet and confer with Defendants re: CO ID-19 RFPs	0.7	\$395.00	\$276.50	\$395.00	\$276.50	145-3

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4/13/2020	Poonam Juneja	NCYL	reviewing draft follow up email from MN re meet and confer confirmation and responding	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
4/13/2020	Poonam Juneja	NCYL	reviewing MN email re today's meet and confer, agenda, and division of labor, and responding	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
4/13/2020	Teresa Woody	Kansas Appleseed	Review and edit recap of meet and confer, send to defendants	0.2	\$500.00	\$100.00	\$500.00	\$100.00	146-2
4/13/2020	Teresa Woody	Kansas Appleseed	Meet and confer with Defendants re CO ID-19 RFPs	0.7	\$500.00	\$350.00	\$500.00	\$350.00	146-2
4/14/2020	Erin G. McGuinness	Children's Rights	Correspond with team re substitution of next friend and case strategy.	0.42	\$225.00	\$93.75	\$240.00	\$100.80	144-3
4/14/2020	Freya Pitts	NCYL	Confer with L. Welch, P. Juneja, and J. Strout re: dismissal of Named Plaintiffs who have turned 18; Named Plaintiff file review; preparing for meet confer re: discovery disputes; third party subpoena to contractors	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3
4/14/2020	Freya Pitts	NCYL	Review M. Nardi outline for discovery meet and confer	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3

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4/14/2020	Jean Strout	NCYL	Confer with LW FP PJ re: dismissal of Named Plaintiffs who have turned 18; Named Plaintiff file review; preparing for meet confer re: discovery disputes; third party subpoena to contractors	0.5	\$325.00	\$162.50	\$325.00	\$162.50	145-3
4/14/2020	Kane, Joshua	DLA Piper	Review previous discovery-related correspondence in preparation for meet and confer with opposing counsel.	0.4	\$410.00	\$164.00	\$410.00	\$164.00	148-1
4/14/2020	Leecia Welch	NCYL	Confer with PJ FP JS re: dismissal of Named Plaintiffs who have turned 18; Named Plaintiff file review; preparing for meet confer re: discovery disputes; third party subpoena to contractors	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3
4/14/2020	Marissa Nardi	Children's Rights	Draft agenda for next M C	0.63	\$325.00	\$205.83	\$380.00	\$239.40	144-3
4/14/2020	Marissa Nardi	Children's Rights	Telephone call with PJ to prepare for M C	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
4/14/2020	Marissa Nardi	Children's Rights	Review most recent letters and discovery responses to prepare for M C	1.12	\$325.00	\$362.92	\$380.00	\$425.60	144-3

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4/14/2020	Nicole Taykhman	Children's Rights	Email with MN re outline of responses for meet and confer.	0.22	\$300.00	\$65.00	\$290.00	\$63.80	144-3
4/14/2020	Nicole Taykhman	Children's Rights	Continue to draft outline response to March 25 letter on responses and objections for meet and confer.	2.72	\$300.00	\$815.00	\$290.00	\$788.80	144-3
4/14/2020	Poonam Juneja	NCYL	Confer with LW FP JS re: dismissal of Named Plaintiffs who have turned 18; Named Plaintiff file review; preparing for meet confer re: discovery disputes; third party subpoena to contractors	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
4/15/2020	Daniel Adamek	Children's Rights	Prepare e-binder for attorneys to use at meet and confer.	1.10	\$150.00	\$165.00	\$200.00	\$220.00	144-3
4/15/2020	Freya Pitts	NCYL	Create and circulate follow-up items from 4/15/20 weekly call	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
4/15/2020	Freya Pitts	NCYL	Confer with P. Juneja re: agenda for weekly cocounsel call and plan for discovery meet and confer	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3

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4/15/2020	Ira Lustbader	Children's Rights	Telephone call with team co- counsel regarding discovery strategy, enforcement	0.92	\$500.00	\$458.33	\$500.00	\$460.00	144-3
4/15/2020	Ira Lustbader	Children's Rights	Prepare for m c on noncomplaint discovery responses	1.17	\$500.00	\$583.33	\$500.00	\$585.00	144-3
4/15/2020	Kane, Joshua	DLA Piper	Review correspondence with defendants in preparation for meet and confer regarding discovery issues.	1.3	\$410.00	\$533.00	\$410.00	\$533.00	148-1
4/15/2020	Leecia Welch	NCYL	Team call re: discovery meet and confer, Named Plaintiffs aging out, Next Friends, and potential experts	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3
4/15/2020	Lori Burns- Bucklew	Burns- Bucklew	Telephone call with co- counsel team re: discovery strategy, enforcement	0.92	\$500.00	\$458.33	\$500.00	\$460.00	147-1
4/15/2020	Marissa Nardi	Children's Rights	Meeting with PJ in preparation for M C	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
4/15/2020	Marissa Nardi	Children's Rights	Meeting with external co- counsel re weekly litigation strategy issues, including depositions, case schedule, M C, NPs, NFs, and experts	0.92	\$325.00	\$297.92	\$380.00	\$349.60	144-3

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4/15/2020	Martha Hodgesmith	Kansas Appleseed	Team call re discovery meet and confer, named plaintiffs aging out, experts, local updates	1.2	\$345.00	\$414.00	\$345.00	\$414.00	146-2
4/15/2020	Pacio, Kristin A.	DLA Piper	Conferring with team regarding discovery meet and confer, Named Plaintiffs, Next Friends, and potential experts	1.2	\$410.00	\$492.00	\$410.00	\$492.00	148-1
4/15/2020	Poonam Juneja	NCYL	Team call, including re: discovery meet and confer, Named Plaintiffs aging out, Next Friends, and potential experts	1.2	\$395.00	\$474.00	\$395.00	\$474.00	145-3
4/15/2020	Poonam Juneja	NCYL	Confer with FP re: agenda for weekly cocounsel call and plan for discovery meet and confer	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
4/15/2020	Poonam Juneja	NCYL	confer with MN re division of labor re discovery and meet and confer prep	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
4/15/2020	Poonam Juneja	NCYL	email team re prep session for meet and confer	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
4/15/2020	Teresa Woody	Kansas Appleseed	Call with co-counsel re discovery meet and confer, named plaintiffs aging out, next friends, and potential experts	1.2	\$500.00	\$600.00	\$500.00	\$600.00	146-2

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4/16/2020	Daniel Adamek	Children's Rights	Email to P. Juneja and MN re meet and confer preparation.	0.12	\$150.00	\$17.50	\$200.00	\$24.00	144-3
4/16/2020	Fowler, Meg	DLA Piper	Review emails planning Friday's meet and confer.	0.2	\$240.00	\$48.00	\$240.00	\$48.00	148-1
4/16/2020	Freya Pitts	NCYL	Confer with L. Welch, P. Juneja, and J. Strout re: case schedule and meet and confer	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
4/16/2020	Freya Pitts	NCYL	Confer with P. Juneja re: Kansas case, including case schedule, discovery status and strategy, and upcoming meet and confer	0.7	\$365.00	\$255.50	\$365.00	\$255.50	145-3
4/16/2020	Jean Strout	NCYL	Confer with L. Welch, P. Juneja, and F. Pitts re: case schedule and meet and confer	0.1	\$325.00	\$32.50	\$325.00	\$32.50	145-3
4/16/2020	Leecia Welch	NCYL	Confer with FP PJ JS re: case schedule and meet and confer	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3
4/16/2020	Marissa Nardi	Children's Rights	Meeting with external co- counsel in preparation for M C	1.70	\$325.00	\$552.50	\$380.00	\$646.00	144-3
4/16/2020	Marissa Nardi	Children's Rights	Draft outline of talking points for M C	1.82	\$325.00	\$590.42	\$380.00	\$691.60	144-3

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4/16/2020	Nicole Taykhman	Children's Rights	Email with MN re outline for meet and confer.	0.03	\$300.00	\$10.00	\$290.00	\$8.70	144-3
4/16/2020	Poonam Juneja	NCYL	downloading meet and confer prep materials and reviewing	0.8	\$395.00	\$316.00	\$395.00	\$316.00	145-3
4/16/2020	Poonam Juneja	NCYL	Confer with LW FP JS re: case schedule and meet and confer	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
4/16/2020	Poonam Juneja	NCYL	Confer with FP re: Kansas case, including case schedule, discovery status and strategy, and upcoming meet and confer	0.7	\$395.00	\$276.50	\$395.00	\$276.50	145-3
4/16/2020	Poonam Juneja	NCYL	Team call to prepare for 4/17 meet and confer re: discovery issues	1.9	\$395.00	\$750.50	\$395.00	\$750.50	145-3
4/16/2020	Teresa Woody	Kansas Appleseed	Call with co-counsel to prepare for 4/17 meet and confer re discovery issues	1.9	\$500.00	\$950.00	\$500.00	\$950.00	146-2
4/16/2020	Teresa Woody	Kansas Appleseed	Email to defendants' counsel re agenda for 4/17 meet and confer	0.1	\$500.00	\$50.00	\$500.00	\$50.00	146-2
4/17/2020	Kane, Joshua	DLA Piper	Participate in meet and confer with Defendants regarding discovery.	1.2	\$410.00	\$492.00	\$410.00	\$492.00	148-1
4/17/2020	Kinney, Megan E.	DLA Piper	Attend meet and confer with Defendants to discuss outstanding discovery issues.	2	\$240.00	\$480.00	\$240.00	\$480.00	148-1



## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/17/2020	Marissa Nardi	Children's Rights	M C with Defs re discovery disputes	1.50	\$325.00	\$487.50	\$380.00	\$570.00	144-3
4/17/2020	Marissa Nardi	Children's Rights	Prepare for M C with Defs re discovery issues	2.32	\$325.00	\$752.92	\$380.00	\$881.60	144-3
4/17/2020	Nicole Taykhman	Children's Rights	Communicate with MN re prep for meet and confer on discovery issues.	0.12	\$300.00	\$35.00	\$290.00	\$34.80	144-3
4/17/2020	Nicole Taykhman	Children's Rights	Draft talking points on specific discovery issues in preparation for meet and confer.	1.08	\$300.00	\$325.00	\$290.00	\$313.20	144-3
4/17/2020	Poonam Juneja	NCYL	reviewing MN outline of meet and confer topics	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
4/17/2020	Poonam Juneja	NCYL	Meet and confer with Defendants re: outstanding discovery disputes	1.5	\$395.00	\$592.50	\$395.00	\$592.50	145-3
4/17/2020	Teresa Woody	Kansas Appleseed	Meet and confer with defendants re discovery issues	1.5	\$500.00	\$750.00	\$500.00	\$750.00	146-2
4/20/2020	Freya Pitts	NCYL	Confer with P. Juneja re: 4/21/20 meet and confer with Defendants re: case schedule	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
4/20/2020	Freya Pitts	NCYL	Confer with P. Juneja re: Kansas discovery meet and confer	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/20/2020	Freya Pitts	NCYL	Email correspondence with L. Welch and P. Juneja re: preparation, strategy, and staffing for 4/21/20 meet and confer with Defendants re: case schedule, CO ID-19, and other outstanding discovery items	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3
4/20/2020	Kane, Joshua	DLA Piper	Exchange emails with co-counsel regarding 4/17 meet-and-confer.	0.2	\$410.00	\$82.00	\$410.00	\$82.00	148-1
4/20/2020	Poonam Juneja	NCYL	Confer with FP re: Kansas discovery meet and confer	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
4/20/2020	Poonam Juneja	NCYL	Confer with FP re: 4/21/20 meet and confer with Defendants	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
4/20/2020	Poonam Juneja	NCYL	Emailing with LW FP re: preparation, strategy, and staffing for 4/21/20 meet and confer with Defendants re: case schedule, CO ID-19, and other outstanding discovery items	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
4/20/2020	Poonam Juneja	NCYL	emailing with MN re preparation for the meet and confer tomorrow	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
4/20/2020	Teresa Woody	Kansas Appleseed	Review and edit recap of 4/17 meet and confer	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/21/2020	Claire Glasspiegel	Children's Rights	Draft talking points re R Os in preparation for meet and confer	1.00	\$300.00	\$300.00	\$310.00	\$310.00	144-3
4/21/2020	Daniel Adamek	Children's Rights	Draft recap of meet and confer.	0.15	\$150.00	\$22.50	\$200.00	\$30.00	144-3
4/21/2020	Freya Pitts	NCYL	Create and circulate plan and checklist for meet and confer to team	0.8	\$365.00	\$292.00	\$365.00	\$292.00	145-3
4/21/2020	Freya Pitts	NCYL	Create chart of possible revised case schedules in preparation for meet and confer with Defendants; send to L. Welch for review	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
4/21/2020	Freya Pitts	NCYL	Create list of outstanding topics for 4/21/20 meet and confer with Defendants	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3
4/21/2020	Freya Pitts	NCYL	Confer with L. Welch and J. Strout re: follow up from last meet and confer; scheduling next meet and confer; and connecting with potential new next friend	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
4/21/2020	Freya Pitts	NCYL	Email correspondence re: scheduling next meet and confer with Defendants	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
4/21/2020	Freya Pitts	NCYL	Email M. Nardi re: prep for 4/21/20 meet and confer with Defendants re: case schedule and discovery items	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e.p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/21/2020	Freya Pitts	NCYL	Meet and confer with Defendants re: CO ID-19 RFPs	0.7	\$365.00	\$255.50	\$365.00	\$255.50	145-3
4/21/2020	Freya Pitts	NCYL	Review and revise M. Nardi email recapping 4/17/20 meet and confer with Defendants re: outstanding discovery issues; circulate to team	1.4	\$365.00	\$511.00	\$365.00	\$511.00	145-3
4/21/2020	Freya Pitts	NCYL	Review M. Nardi revised email recapping 4/17/20 meet and confer with Defendants	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
4/21/2020	Jean Strout	NCYL	Confer with F. Pitts and L. Welch re: follow up from last meet and confer; scheduling next meet and confer; and connecting with potential new next friend	0.1	\$325.00	\$32.50	\$325.00	\$32.50	145-3
4/21/2020	Kane, Joshua	DLA Piper	Discuss case schedule and discovery with co-counsel .5 ; exchange emails with Sunflower Health Plan regarding third-party subpoena .4 ; attend meet-and-confer with opposing counsel regarding discovery and case schedule 2.4 .	3.3	\$410.00	\$1,353.00	\$410.00	\$1,353.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/21/2020	Kinney, Megan E.	DLA Piper	Attend meet and confer with Defendants to discuss outstanding discovery issues.	1.5	\$240.00	\$360.00	\$240.00	\$360.00	148-1
4/21/2020	Leecia Welch	NCYL	Confer with FP and JS re: follow up from last meet and confer; scheduling next meet and confer; and connecting with potential new next friend	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3
4/21/2020	Marissa Nardi	Children's Rights	Meeting with external co- counsel PJ FP TW and JK to discuss potential arguments and strategy for M C	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
4/21/2020	Marissa Nardi	Children's Rights	Prepare talking points for M C	1.35	\$325.00	\$438.75	\$380.00	\$513.00	144-3
4/21/2020	Marissa Nardi	Children's Rights	M C with opposing counsel re discovery disputes	1.50	\$325.00	\$487.50	\$380.00	\$570.00	144-3
4/21/2020	Nicole Taykman	Children's Rights	Review correspondence among team re discovery and meet and confers.	0.20	\$300.00	\$60.00	\$290.00	\$58.00	144-3
4/21/2020	Poonam Juneja	NCYL	Team call to prepare for 4/21 meet and confer with Defendants, including re case schedule, CO ID-19-related discovery, and written discovery	0.7	\$395.00	\$276.50	\$395.00	\$276.50	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/21/2020	Poonam Juneja	NCYL	reviewing meet and confer notes	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
4/21/2020	Teresa Woody	Kansas Appleseed	Meet and confer with defendants re responses to CO ID-19 RFPs	0.7	\$500.00	\$350.00	\$500.00	\$350.00	146-2
4/21/2020	Teresa Woody	Kansas Appleseed	Prep with co-counsel for meet and confer	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
4/21/2020	Tourgee, Olivia Morgan	DLA Piper	Attend meet and confer call to discuss discovery follow-up items and schedule.	0.7	\$240.00	\$168.00	\$240.00	\$168.00	148-1
4/22/2020	Daniel Adamek	Children's Rights	Compile list of to-do items from meet and confer.	0.37	\$150.00	\$55.00	\$200.00	\$74.00	144-3
4/22/2020	Fowler, Meg	DLA Piper	Attend the weekly counsel call, including discussion re discovery, experts, next friends and take notes on the call for circulation to the DLA group.	0.9	\$240.00	\$216.00	\$240.00	\$216.00	148-1
4/22/2020	Marissa Nardi	Children's Rights	Prepare for KS co-counsel team mtg by reviewing M C notes and expert correspondence	0.32	\$325.00	\$102.92	\$380.00	\$121.60	144-3
4/22/2020	Marissa Nardi	Children's Rights	Prepare follow-up from yesterday's M C	0.83	\$325.00	\$270.83	\$380.00	\$315.40	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e.p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/22/2020	Marissa Nardi	Children's Rights	Meeting with external co-counsel re litigation strategy, including CO ID-related discovery issues, experts, M C, and updates from NFs	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
4/23/2020	Freya Pitts	NCYL	Draft email recapping 4/21/20 meet and confer with Defendants	0.9	\$365.00	\$328.50	\$365.00	\$328.50	145-3
4/23/2020	Freya Pitts	NCYL	Email correspondence re: meet and confer with Kansas Defendants re: ESI	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
4/23/2020	Freya Pitts	NCYL	Revise email recapping 4/21/20 meet and confer with Defendants to incorporate M. Nardi edits	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
4/23/2020	Kane, Joshua	DLA Piper	Review subpoena to Sunflower Health .8 ; review list of proposed search terms in preparation for meet and confer 2.1 ; exchange emails with opposing counsel and co-counsel regarding meet and confer .2 .	3.1	\$410.00	\$1,271.00	\$410.00	\$1,271.00	148-1
4/23/2020	Poonam Juneja	NCYL	reviewing revisions to follow up email on meet and confer	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e.p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/23/2020	Teresa Woody	Kansas Appleseed	Email defendants' re recap of 4/21 meet and confer	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2
4/24/2020	Freya Pitts	NCYL	Email correspondence re: meet and confer with Kansas Defendants re: ESI	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
4/24/2020	Poonam Juneja	NCYL	Emailing team re: meet and confer with Defendants re: ESI	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
4/25/2020	Kane, Joshua	DLA Piper	Review discovery requests to Defendants in preparation for meet and confer regarding ESI search terms.	0.3	\$410.00	\$123.00	\$410.00	\$123.00	148-1
4/26/2020	Kane, Joshua	DLA Piper	Review discovery requests and correspondence in preparation for meet and confer regarding ESI.	1.1	\$410.00	\$451.00	\$410.00	\$451.00	148-1
4/27/2020	Freya Pitts	NCYL	Confer with L. Welch, P. Juneja, and J. Strout re: case file review, ESI meet and confer, and call with Amerigroup re: third party subpoena	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
4/27/2020	Jean Strout	NCYL	Confer with L. Welch, P. Juneja, and F. Pitts re: case file review, ESI meet and confer, and call with Amerigroup re: third party subpoena	0.1	\$325.00	\$32.50	\$325.00	\$32.50	145-3



## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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4/27/2020	Kane, Joshua	DLA Piper	Review document requests, correspondence between parties, and ESI search terms to prepare for meet and confer regarding ESI 2.6 ; participate in meet and confer 1.1 ; exchange emails with Amerigroup Kansas regarding subpoena .4 .	4.1	\$410.00	\$1,681.00	\$410.00	\$1,681.00	148-1
4/27/2020	Leecia Welch	NCYL	Confer with PJ FP JS re: case file review, ESI meet and confer, and call with Amerigroup re: third party subpoena	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3
4/27/2020	Marissa Nardi	Children's Rights	Speak with KS co-counsel PJ TW and JK to prepare for next M C	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
4/27/2020	Marissa Nardi	Children's Rights	M C with Defs and external co-counsel re ESI issues specifically	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
4/27/2020	Poonam Juneja	NCYL	mc with defendants re ESI search terms - addressing background issues and DCF terms	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
4/27/2020	Poonam Juneja	NCYL	Confer with LW FP JS re: case file review, ESI meet and confer, and call with Amerigroup re: third party subpoena	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/27/2020	Poonam Juneja	NCYL	emailing JK MN FP re items to cover on ESI call	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
4/27/2020	Poonam Juneja	NCYL	phone call with JK to prep for ESI mc with Defs	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
4/27/2020	Teresa Woody	Kansas Appleseed	Meet and confer with defendants re ESI search terms	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
4/27/2020	Teresa Woody	Kansas Appleseed	Prep with co-counsel for meet and confer	0.5	\$500.00	\$250.00	\$500.00	\$250.00	146-2
4/28/2020	Kane, Joshua	DLA Piper	Prepare for and attend meet and confer with Amerigroup regarding third-party subpoena.	0.8	\$410.00	\$328.00	\$410.00	\$328.00	148-1
4/28/2020	Marissa Nardi	Children's Rights	Electronic email with PJ re topics for ESI M C	0.18	\$325.00	\$59.58	\$380.00	\$68.40	144-3
4/28/2020	Marissa Nardi	Children's Rights	Meeting with CG re identification of outstanding production issues for upcoming discovery M C with Defs	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
4/28/2020	Poonam Juneja	NCYL	emailing MN re agenda of items to cover on upcoming ESI meet and confer	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/29/2020	Claire Glasspiegel	Children's Rights	Meeting with Internal team re discovery items for next meet and confer	0.33	\$300.00	\$100.00	\$310.00	\$102.30	144-3
4/29/2020	Freya Pitts	NCYL	Confer with P. Juneja and J. Strout re: document review, including Named Plaintiff file review, and preparing for meet and confer with Defendants on 5/1/20	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
4/29/2020	Jean Strout	NCYL	Confer with P. Juneja and F. Pitts re: document review, including Named Plaintiff file review, and preparing for meet and confer with Defendants on 5/1/20	0.1	\$325.00	\$32.50	\$325.00	\$32.50	145-3
4/29/2020	Jonathan King	Children's Rights	Conference call with MN, NT, and CG regarding discovery issues CR will handle at upcoming meet and confer	0.33	\$325.00	\$108.33	\$345.00	\$113.85	144-3
4/29/2020	Kane, Joshua	DLA Piper	Participate in meet and confer regarding ESI terms 2.5 ; participate in case status call with co-counsel re: Defendants' productions, third party subpoenas, experts, and Next Friends 1.5 .	4	\$410.00	\$1,640.00	\$410.00	\$1,640.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/29/2020	Lori Burns- Bucklew	Burns- Bucklew	Co-counsel team strategy call re: discovery issues and experts	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1
4/29/2020	Marissa Nardi	Children's Rights	Electronic email with PJ re ESI M C prep	0.13	\$325.00	\$43.33	\$380.00	\$49.40	144-3
4/29/2020	Marissa Nardi	Children's Rights	Meeting with internal KS team re ongoing discovery issues to address in meet and confer	0.33	\$325.00	\$108.33	\$380.00	\$125.40	144-3
4/29/2020	Marissa Nardi	Children's Rights	Prepare for ESI M C by creating talking points	0.40	\$325.00	\$130.00	\$380.00	\$152.00	144-3
4/29/2020	Marissa Nardi	Children's Rights	M C with Defs re ESI	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
4/29/2020	Marissa Nardi	Children's Rights	Meeting with external co- counsel team for litigation strategy mtg, including discussion of subpoenas, M Cs, privilege and redaction logs, case schedule, experts, and new COVID-19 issues	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
4/29/2020	Poonam Juneja	NCYL	call with JK MN to prep for ESI meet and confer and discuss issues from Monday call	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/29/2020	Poonam Juneja	NCYL	continued mc with defendants re ESI search terms - addressing KDADS, KDHE, and individual plaintiff terms	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
4/29/2020	Poonam Juneja	NCYL	Confer with FP JS re: document review, including Named Plaintiff file review, and preparing for meet and confer with Defendants on 5/1/20	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
4/29/2020	Tourgee, Olivia Morgan	DLA Piper	Attend and take notes on Kansas weekly call 1.4 ; draft email summarizing notes from call to circulate to DLA Piper's internal Kansas team .8 .	2.2	\$240.00	\$528.00	\$240.00	\$528.00	148-1
4/30/2020	Freya Pitts	NCYL	Confer with L. Welch and J. Strout re: document review; prep for meet and confer on 5/1/20; filing motion for extension of time to file motions to compel.	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
4/30/2020	Freya Pitts	NCYL	Review draft agenda for meet and confer with Defendants	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/30/2020	Jean Strout	NCYL	Confer with L. Welch and F. Pitts re: document review; prep for meet and confer on 5/1/20; filing motion for extension of time to file motions to compel.	0.2	\$325.00	\$65.00	\$325.00	\$65.00	145-3
4/30/2020	Leecia Welch	NCYL	Confer with FP and JS re: document review; prep for meet and confer on 5/1/20; filing motion for extension of time to file motions to compel.	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
4/30/2020	Leecia Welch	NCYL	Review meet and confer agenda	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
4/30/2020	Marissa Nardi	Children's Rights	Analyze draft talking points re litigation holds in advance of meet and confer	0.58	\$325.00	\$189.58	\$380.00	\$220.40	144-3
4/30/2020	Marissa Nardi	Children's Rights	Draft outline of talking points for M C re discovery	2.63	\$325.00	\$855.83	\$380.00	\$999.40	144-3
4/30/2020	Nicole Taykhman	Children's Rights	Email with MN re meet and confer prep session and litigation hold issue.	0.17	\$300.00	\$50.00	\$290.00	\$49.30	144-3
4/30/2020	Poonam Juneja	NCYL	emailing team re prep session for meet and confer	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
4/30/2020	Poonam Juneja	NCYL	phone call with MN re agenda, division, and prep for upcoming discovery meet and confer with Ds	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
4/30/2020	Poonam Juneja	NCYL	drafting agenda for meet and confer and sending to MN	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
4/30/2020	Teresa Woody	Kansas Appleseed	Email defendants re agenda for meet and confer	0.1	\$500.00	\$50.00	\$500.00	\$50.00	146-2
5/1/2020	Daniel Adamek	Children's Rights	Draft list of action items to include in email to Defendants re meet and confer.	0.67	\$150.00	\$100.00	\$200.00	\$134.00	144-3
5/1/2020	Daniel Adamek	Children's Rights	Research and prepare e- binder for MN to use during meet and confer with defendants.	1.00	\$150.00	\$150.00	\$200.00	\$200.00	144-3
5/1/2020	Freya Pitts	NCYL	Confer with L. Welch, P. Juneja, and J. Strout re: meet and confer with Defendants and third party subpoena to contractors	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
5/1/2020	Freya Pitts	NCYL	Review and revise recap email from meet and confer	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3
5/1/2020	Jean Strout	NCYL	Confer with L. Welch, P. Juneja, and F. Pitts re: meet and confer with Defendants and third party subpoena to contractors	0.1	\$325.00	\$32.50	\$325.00	\$32.50	145-3
5/1/2020	Jonathan King	Children's Rights	Attend meet and confer conference call with Defendants regarding discovery	0.80	\$325.00	\$260.00	\$345.00	\$276.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/1/2020	Kane, Joshua	DLA Piper	Attend co-counsel strategy call in advance of meet and confer on discovery issues 1.3 ; review draft amended case schedule .2 ; draft email to defendants regarding production deficiencies 1.6 ; review Defendants' initial interrogatories and requests for production .1 .	3.2	\$410.00	\$1,312.00	\$410.00	\$1,312.00	148-1
5/1/2020	Leecia Welch	NCYL	Team call, including re: prep for meet and confer with Defendants and discussion of proposed revisions to case schedule	1.3	\$500.00	\$650.00	\$500.00	\$650.00	145-3
5/1/2020	Leecia Welch	NCYL	Review recap of meet and confer	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3
5/1/2020	Leecia Welch	NCYL	Confer with PJ FP and JS re: meet and confer with Defendants and third party subpoena to contractors	0.1	\$500.00	\$50.00	\$500.00	\$50.00	145-3
5/1/2020	Lori Burns- Bucklew	Burns- Bucklew	Team strategy call, including re: discovery issues to discuss with Defs during M C	1.30	\$500.00	\$650.00	\$500.00	\$650.00	147-1



## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/1/2020	Marissa Nardi	Children's Rights	Draft summary of all agreements and representations from M C for external co-counsel's review and circulation to Defs	0.53	\$325.00	\$173.33	\$380.00	\$201.40	144-3
5/1/2020	Marissa Nardi	Children's Rights	Meeting with external co- counsel re discovery during M C	0.75	\$325.00	\$243.75	\$380.00	\$285.00	144-3
5/1/2020	Marissa Nardi	Children's Rights	Meeting with internal CR co- counsel and external co- counsel PJ TW and JK DLA to prepare for M C later today	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
5/1/2020	Marissa Nardi	Children's Rights	Edit M C outline in preparation for M C	1.28	\$325.00	\$417.08	\$380.00	\$486.40	144-3
5/1/2020	Nicole Taykman	Children's Rights	Review discovery correspondence and summary of CO ID-19 related document production in preparation for meet and confer.	0.22	\$300.00	\$65.00	\$290.00	\$63.80	144-3
5/1/2020	Poonam Juneja	NCYL	Team call, including re: prep for meet and confer with Defendants and discussion of proposed revisions to case schedule	1.3	\$395.00	\$513.50	\$395.00	\$513.50	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/1/2020	Poonam Juneja	NCYL	Confer with LW FP and JS re: meet and confer with Defendants and third party subpoena to contractors	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
5/1/2020	Poonam Juneja	NCYL	Meet and confer with Defendants re: discovery issues	1.3	\$395.00	\$513.50	\$395.00	\$513.50	145-3
5/1/2020	Teresa Woody	Kansas Appleseed	Call with co-counsel re prep for meet and confer with Defendants and discussion of proposed revisions to case schedule	1.3	\$500.00	\$650.00	\$500.00	\$650.00	146-2
5/1/2020	Teresa Woody	Kansas Appleseed	Meet and confer with defendants regarding discovery issues	1.3	\$500.00	\$650.00	\$500.00	\$650.00	146-2
5/4/2020	Erin G. McGuinness	Children's Rights	Review and analyze recap of Kansas meet and confer.	0.42	\$225.00	\$93.75	\$240.00	\$100.80	144-3
5/4/2020	Freya Pitts	NCYL	Circulate proposed edits to meet and confer follow up email	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
5/4/2020	Marissa Nardi	Children's Rights	Electronic email with external co-counsel co-counsel re summary of M C to share with Defs	0.23	\$325.00	\$75.83	\$380.00	\$87.40	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/4/2020	Teresa Woody	Kansas Appleseed	Review draft and edits to email to defendants recapping meet and confer, and send	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2
5/5/2020	Claire Glasspiegel	Children's Rights	Review CO ID-19 Docs produced by Defs to advise team re content and deficiencies in preparation for meet and confer	3.17	\$300.00	\$950.00	\$310.00	\$982.70	144-3
5/5/2020	Kane, Joshua	DLA Piper	Exchange emails with co- counsel and opposing counsel regarding meet and confer on ESI.	0.9	\$410.00	\$369.00	\$410.00	\$369.00	148-1
5/5/2020	Poonam Juneja	NCYL	reviewing emails re rescheduling ESI meet and confer and resopnding	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
5/6/2020	Freya Pitts	NCYL	Confer with L. Welch, P. Juneja, and J. Strout re: settlement strategy, third party discovery, and team meeting	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
5/6/2020	Freya Pitts	NCYL	Confer with P. Juneja re: agenda for Kansas team meeting	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
5/6/2020	Jean Strout	NCYL	Confer with L. Welch, P. Juneja, and F. Pitts re: settlement strategy, third party discovery, and team meeting	0.2	\$325.00	\$65.00	\$325.00	\$65.00	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/6/2020	Kane, Joshua	DLA Piper	Revise draft ESI terms 1.8 ; attend case status call with co- counsel re: case schedule, meet and confer with Defendants, and settlement strategy 1.2 ; attend internal DLA case status call .5 .	2.5	\$410.00	\$1,025.00	\$410.00	\$1,025.00	148-1
5/6/2020	Leecia Welch	NCYL	Team call re: case schedule, meet and confer with Defendants, and settlement strategy	1.2	\$500.00	\$600.00	\$500.00	\$600.00	145-3
5/6/2020	Leecia Welch	NCYL	Confer with PJ FP JS re: settlement strategy, third party discovery, and team meeting	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
5/6/2020	Marissa Nardi	Children's Rights	Discuss with PJ review of documents produced by Defs and M Cs	0.32	\$325.00	\$102.92	\$380.00	\$121.60	144-3
5/6/2020	Marissa Nardi	Children's Rights	Meeting with external co- counsel team re litigation strategy, including discovery disputes, litigation schedule, experts, and settlement	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
5/6/2020	Marissa Nardi	Children's Rights	Edit CO ID-19 production holes summary and analysis in preparation for M C	1.45	\$325.00	\$471.25	\$380.00	\$551.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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5/6/2020	Martha Hodgesmith	Kansas Appleseed	Team call re case schedule, meet and confer, settlement strategy	1.2	\$345.00	\$414.00	\$345.00	\$414.00	146-2
5/6/2020	Pacio, Kristin A.	DLA Piper	Conferring with team re: case schedule, meet and confer with Defendants, and settlement strategy.	0.5	\$410.00	\$205.00	\$410.00	\$205.00	148-1
5/6/2020	Poonam Juneja	NCYL	Team call, including re: case schedule, meet and confer with Defendants, and settlement strategy	1.2	\$395.00	\$474.00	\$395.00	\$474.00	145-3
5/6/2020	Poonam Juneja	NCYL	Confer with L. Welch, J. Strout, and F. Pitts re: settlement strategy, third party discovery, and team meeting	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
5/6/2020	Poonam Juneja	NCYL	confer with FP re agenda for team meeting	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
5/6/2020	Teresa Woody	Kansas Appleseed	Call with co-counsel re case schedule, meet and confer with Defendants, and settlement strategy	1.2	\$500.00	\$600.00	\$500.00	\$600.00	146-2

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/6/2020	Tourgee, Olivia Morgan	DLA Piper	Attend call with C. Schechtman, K. Pacio, A. Helms, J. Kane, M. Fowler, J. Rotenberg, J. Calderon, and M. Kinney to discuss status of Kansas case and strategy moving forward .5 ; attend weekly Kansas call 1.1 .	1.6	\$240.00	\$384.00	\$240.00	\$384.00	148-1
5/7/2020	Claire Glasspiegel	Children's Rights	Draft talking points for meet and confer re: CO ID 19 production deficiencies	3.50	\$300.00	\$1,050.00	\$310.00	\$1,085.00	144-3
5/7/2020	Marissa Nardi	Children's Rights	Draft talking points and outline for upcoming discovery disputes M C	1.73	\$325.00	\$563.33	\$380.00	\$657.40	144-3
5/8/2020	Claire Glasspiegel	Children's Rights	Reviewing notes on CO ID19 production to advise MN on this topic for meet and confer re this issue	1.00	\$300.00	\$300.00	\$310.00	\$310.00	144-3
5/8/2020	Daniel Adamek	Children's Rights	Draft action items from meet and confer with defendants.	1.22	\$150.00	\$182.50	\$200.00	\$244.00	144-3
5/8/2020	Freya Pitts	NCYL	Consult files to verify that all Named Plaintiff case files have been produced in preparation for meet and confer	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/8/2020	Freya Pitts	NCYL	Review agenda for discovery meet and confer	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
5/8/2020	Marissa Nardi	Children's Rights	discuss with PJ discovery issues to address during next M C	0.23	\$325.00	\$75.83	\$380.00	\$87.40	144-3
5/8/2020	Marissa Nardi	Children's Rights	electronic mail with CC and DA re outline for M C	0.30	\$325.00	\$97.50	\$380.00	\$114.00	144-3
5/8/2020	Marissa Nardi	Children's Rights	prepare for M C by editing outline	0.83	\$325.00	\$270.83	\$380.00	\$315.40	144-3
5/8/2020	Marissa Nardi	Children's Rights	draft letter to Defs with key assertions from M C to share with external co-counsel and then Defs	0.97	\$325.00	\$314.17	\$380.00	\$368.60	144-3
5/8/2020	Marissa Nardi	Children's Rights	M C with opposing co- counsel re discovery matters	1.50	\$325.00	\$487.50	\$380.00	\$570.00	144-3
5/8/2020	Nicole Taykman	Children's Rights	Revise draft letter on litigation hold issues to account for updates from meet and confers with opposing counsel.	0.22	\$300.00	\$65.00	\$290.00	\$63.80	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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5/8/2020	Poonam Juneja	NCYL	Meet and confer with Defendants re: discovery issues	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
5/8/2020	Poonam Juneja	NCYL	Prepare and circulate agenda for meet and confer	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
5/8/2020	Teresa Woody	Kansas Appleseed	Email defendants re agenda for meet and confer	0.1	\$500.00	\$50.00	\$500.00	\$50.00	146-2
5/8/2020	Teresa Woody	Kansas Appleseed	Meet and confer with defendants re discovery issues	0.5	\$500.00	\$250.00	\$500.00	\$250.00	146-2
5/8/2020	Tourgee, Olivia Morgan	DLA Piper	Attend Meet and Confer with opposing counsel.	0.5	\$240.00	\$120.00	\$240.00	\$120.00	148-1
5/9/2020	Freya Pitts	NCYL	Review M. Nardi draft follow-up email from 5/8 meet and confer; propose edits to same	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3
5/11/2020	Nicole Taykhman	Children's Rights	Attend team strategy call re settlement proposal.	1.00	\$300.00	\$300.00	\$290.00	\$290.00	144-3
5/11/2020	Poonam Juneja	NCYL	scheduling emails with Ds regarding ESI meet and confer	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
5/12/2020	Freya Pitts	NCYL	Circulate proposed edits to meet and confer follow up email	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
5/12/2020	Teresa Woody	Kansas Appleseed	Email defendants with recap of 3/8 meet and confer	0.2	\$500.00	\$100.00	\$500.00	\$100.00	146-2



## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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5/13/2020	Fowler, Meg	DLA Piper	Attend weekly counsel call, including discussion re: settlement, depositions, and responding to Defendants' discovery requests.	1.1	\$240.00	\$264.00	\$240.00	\$264.00	148-1
5/13/2020	Ira Lustbader	Children's Rights	Team co-counsel meeting regarding settlement strategy; discovery follow up/strategy	1.00	\$500.00	\$500.00	\$500.00	\$500.00	144-3
5/13/2020	Poonam Juneja	NCYL	Confer with FP re: agenda for Kansas team meeting	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
5/13/2020	Tourgee, Olivia Morgan	DLA Piper	Attend weekly call to discuss the settlement draft; case schedule; discovery updates regarding upcoming deposition, redaction log issue, responding to defendants' discovery requests, and third party discovery; potential experts; and local updates.	1.2	\$240.00	\$288.00	\$240.00	\$288.00	148-1
5/14/2020	Freya Pitts	NCYL	Email correspondence re: settlement proposal and preparation for 5/15/20 meet and confer	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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5/14/2020	Freya Pitts	NCYL	Review memo from Children's Rights re topics to be covered in meet and confer; provide feedback to P. Juneja re: same	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3
5/14/2020	Jonathan King	Children's Rights	Advise internal CR team re privilege and redaction log in preparation for M C including that topic	0.75	\$325.00	\$243.75	\$345.00	\$258.75	144-3
5/14/2020	Marissa Nardi	Children's Rights	discuss M C prep with PJ	0.32	\$325.00	\$102.92	\$380.00	\$121.60	144-3
5/14/2020	Marissa Nardi	Children's Rights	prepare agenda for M C	0.33	\$325.00	\$108.33	\$380.00	\$125.40	144-3
5/14/2020	Marissa Nardi	Children's Rights	discuss M C strategy with internal team	0.37	\$325.00	\$119.17	\$380.00	\$140.60	144-3
5/14/2020	Marissa Nardi	Children's Rights	prepare list and analysis of CR M C topics for PJ	0.47	\$325.00	\$151.67	\$380.00	\$178.60	144-3
5/14/2020	Nicole Taykhman	Children's Rights	Email with MN re discovery status and prep for meet and confer.	0.02	\$300.00	\$5.00	\$290.00	\$5.80	144-3
5/14/2020	Nicole Taykhman	Children's Rights	Communicate with JK re case schedule and prep for meet and confer.	0.08	\$300.00	\$25.00	\$290.00	\$23.20	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/14/2020	Nicole Taykhman	Children's Rights	Compile notes on litigation holds to prepare for meet and confer and email with MN, JK, and CG re same.	0.50	\$300.00	\$150.00	\$290.00	\$145.00	144-3
5/14/2020	Poonam Juneja	NCYL	emailing with LW FP JS re preparation and leading meet and confer with Defendants	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
5/14/2020	Poonam Juneja	NCYL	exchanging text messages with MN re preparation and leading meet and confer with Defendants	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
5/14/2020	Poonam Juneja	NCYL	prepare for ESI meet and confer by reviewing current drafts and correspondence, drafting responses, etc.	0.8	\$395.00	\$316.00	\$395.00	\$316.00	145-3
5/14/2020	Poonam Juneja	NCYL	emailing team re prep for meet and confer	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
5/15/2020	Claire Glasspiegel	Children's Rights	Chat with PJ to prep for meet and confer re CO ID- 19	0.03	\$300.00	\$10.00	\$310.00	\$9.30	144-3
5/15/2020	Daniel Adamek	Children's Rights	Draft action item list from meet and confer with Defendants.	0.33	\$150.00	\$50.00	\$200.00	\$66.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

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5/15/2020	Freya Pitts	NCYL	Confer with L. Welch, P. Juneja, and J. Strout re: depositions, meet and confer, case schedule, settlement strategy, and third party subpoena	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3
5/15/2020	Jean Strout	NCYL	Confer with L. Welch, F. Pitts, and P. Juneja re: depositions, meet and confer, case schedule, settlement strategy, and third party subpoena	0.5	\$325.00	\$162.50	\$325.00	\$162.50	145-3
5/15/2020	Leecia Welch	NCYL	Confer with PJ, FP and JS re: depositions, meet and confer, case schedule, settlement strategy, and third party subpoena	0.5	\$500.00	\$250.00	\$500.00	\$250.00	145-3
5/15/2020	Marissa Nardi	Children's Rights	review notes and recap from M C	0.27	\$325.00	\$86.67	\$380.00	\$102.60	144-3
5/15/2020	Nicole Taykhman	Children's Rights	Email with IL, MN, JK, CG, CC, and DA re summary of meet and confer.	0.25	\$300.00	\$75.00	\$290.00	\$72.50	144-3
5/15/2020	Nicole Taykhman	Children's Rights	Prepare for meet and confer by reviewing outstanding discovery issues.	0.27	\$300.00	\$80.00	\$290.00	\$78.30	144-3
5/15/2020	Nicole Taykhman	Children's Rights	Attend meet and confer with defendants re discovery and schedule updates.	0.43	\$300.00	\$130.00	\$290.00	\$124.70	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/15/2020	Nicole Taykhman	Children's Rights	Draft summary email to recap meet and confer with defendants.	0.73	\$300.00	\$220.00	\$290.00	\$211.70	144-3
5/15/2020	Poonam Juneja	NCYL	preparing agenda and cover note for discovery m/c with defendants and circulating	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
5/15/2020	Poonam Juneja	NCYL	emailing LW re meet and confer with Defendants	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
5/15/2020	Poonam Juneja	NCYL	preparing for meet and confer with Ds by reviewing prior correspondence, notes from MN, etc.	1.1	\$395.00	\$434.50	\$395.00	\$434.50	145-3
5/15/2020	Poonam Juneja	NCYL	emailing team re scheduling meet and confer	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
5/15/2020	Poonam Juneja	NCYL	meet and confer re ESI	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/15/2020	Poonam Juneja	NCYL	Confer with L. Welch, F. Pitts, and J. Strout re: depositions, meet and confer, case schedule, settlement strategy, and third party subpoena	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
5/15/2020	Poonam Juneja	NCYL	Meet and confer with Defendants re: discovery issues	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
5/15/2020	Teresa Woody	Kansas Appleseed	Email defendants re agenda for meet and confer and proposed amended scheduling order	0.2	\$500.00	\$100.00	\$500.00	\$100.00	146-2
5/15/2020	Teresa Woody	Kansas Appleseed	Meet and confer with defendants re discovery issues	0.5	\$500.00	\$250.00	\$500.00	\$250.00	146-2
5/15/2020	Tourgee, Olivia Morgan	DLA Piper	Attend weekly discovery call.	0.1	\$240.00	\$24.00	\$240.00	\$24.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/18/2020	Freya Pitts	NCYL	Review and revise draft meet and confer recap email	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
5/18/2020	Marissa Nardi	Children's Rights	electronic mail with co- counsel re email letter to Defs summarizing Defs' admissions from M C	0.28	\$325.00	\$92.08	\$380.00	\$106.40	144-3
5/18/2020	Marissa Nardi	Children's Rights	edit M C summary to share with Defs	0.33	\$325.00	\$108.33	\$380.00	\$125.40	144-3
5/18/2020	Nicole Taykhman	Children's Rights	Email with co-counsel re recap email from meet and confer.	0.08	\$300.00	\$25.00	\$290.00	\$23.20	144-3
5/20/2020	Marissa Nardi	Children's Rights	prepare for co-counsel meeting with external team re litigation strategy by reviewing recent correspondence	0.20	\$325.00	\$65.00	\$380.00	\$76.00	144-3
5/20/2020	Teresa Woody	Kansas Appleseed	Email defendants' counsel re postponement of meet and confer and confirm deposition	0.1	\$500.00	\$50.00	\$500.00	\$50.00	146-2
5/20/2020	Tourgee, Olivia Morgan	DLA Piper	Create DLA weekly call schedule for June and July and circulate to DLA team .3 ; attend and take notes on weekly team call re: discovery, mediation, and experts 1.1 ; draft notes of weekly call and circulate to DLA team .7 .	2.1	\$240.00	\$504.00	\$240.00	\$504.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/21/2020	Marissa Nardi	Children's Rights	prepare list of admissions from M C	0.85	\$325.00	\$276.25	\$380.00	\$323.00	144-3
5/22/2020	Kane, Joshua	DLA Piper	Participate in ESI meet- and- confer .8 ; discuss deposition of Jason Koehn with M. Nardi and P. Juneja, including participating in remote deposition trial 2.9 .	3.7	\$410.00	\$1,517.00	\$410.00	\$1,517.00	148-1
5/22/2020	Marissa Nardi	Children's Rights	M C with opposing counsel re ESI	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
5/22/2020	Poonam Juneja	NCYL	Prepping for ESI m/c with defendants -- reviewing Carrie's correspondence and comparing against our prior versions, taking notes	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
5/22/2020	Poonam Juneja	NCYL	ESI m/c with defendants	0.7	\$395.00	\$276.50	\$395.00	\$276.50	145-3
5/22/2020	Poonam Juneja	NCYL	Debrief with MN re ESI m/c with ds and next steps re depo	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
5/27/2020	Freya Pitts	NCYL	Confer with P. Juneja and J. Strout re: team meeting agenda, depositions, response to Defendants' discovery requests, and plan for Plaintiffs who are aging out	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3



## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
5/27/2020	Jean Strout	NCYL	Confer with P. Juneja and F. Pitts re: team meeting agenda, depositions, response to Defendants' discovery requests, and plan for Plaintiffs who are aging out	0.4	\$325.00	\$130.00	\$325.00	\$130.00	145-3
5/27/2020	Marissa Nardi	Children's Rights	meeting with external co-counsel team re litigation strategy, including responding to discovery posed by Defs, third parties, depositions, aging out NPs, and experts	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
5/27/2020	Poonam Juneja	NCYL	Confer with F Pitts and J. Strout re: team meeting agenda, depositions, response to Defendants' discovery requests, and plan for Plaintiffs who are aging out	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
5/27/2020	Tourgee, Olivia Morgan	DLA Piper	Attend weekly Kansas team call re: case schedule, depositions, third party discovery, responding to Defendants' discovery requests, and experts.	1	\$240.00	\$240.00	\$240.00	\$240.00	148-1
6/1/2020	Marissa Nardi	Children's Rights	electronic mail with PJ and JK re ESI M C	0.15	\$325.00	\$48.75	\$380.00	\$57.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match e ent	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
6/1/2020	Teresa Woody	Kansas Appleseed	Email to JPB re agenda for meet and confer June 5	0.2	\$500.00	\$100.00	\$500.00	\$100.00	146-2
6/2/2020	Marissa Nardi	Children's Rights	prepare for ESI M C	0.22	\$325.00	\$70.42	\$380.00	\$83.60	144-3
6/2/2020	Marissa Nardi	Children's Rights	M C with Defs re ESI	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
6/3/2020	Fowler, Meg	DLA Piper	Attend the weekly counsel call, including discussion re: MTD order, settlement prep, and discovery.	1	\$240.00	\$240.00	\$240.00	\$240.00	148-1
6/3/2020	Marissa Nardi	Children's Rights	meeting with external co- counsel team to discuss mediation strategy	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
6/3/2020	Marissa Nardi	Children's Rights	meeting with external co- counsel team re litigation strategy, including settlement, third party subpoenas, and depositions	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
6/3/2020	Tourgee, Olivia Morgan	DLA Piper	Review and analyze named plaintiff documents 3.9 ; attend and take notes on weekly team call 1 .	4.9	\$240.00	\$1,176.00	\$240.00	\$1,176.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
6/5/2020	Kane, Joshua	DLA Piper	Attend meet and confer with opposing counsel regarding ESI.	1	\$410.00	\$410.00	\$410.00	\$410.00	148-1
6/5/2020	Marissa Nardi	Children's Rights	prepare list of relevant listserv email addresses to share with opposing counsel CJ and RD for potential ESI searches of their inboxes and outboxes	0.33	\$325.00	\$108.33	\$380.00	\$125.40	144-3
6/5/2020	Marissa Nardi	Children's Rights	electronic mail with internal CR team re deposition strategy for Kline in light of M C	0.35	\$325.00	\$113.75	\$380.00	\$133.00	144-3
6/5/2020	Marissa Nardi	Children's Rights	draft outline for KS general discovery M C	0.85	\$325.00	\$276.25	\$380.00	\$323.00	144-3
6/5/2020	Marissa Nardi	Children's Rights	M C with Defs re ESI	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
6/5/2020	Marissa Nardi	Children's Rights	M C with Defs re discovery issues including depositions and document productions	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
6/5/2020	Poonam Juneja	NCYL	ESI meet and confer with MN JK Reid Carrie	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
6/5/2020	Poonam Juneja	NCYL	meet and confer re schedule and discovery issues with Ds	0.6	\$395.00	\$237.00	\$395.00	\$237.00	145-3
6/5/2020	Teresa Woody	Kansas Appleseed	meet and confer with defendants' counsel re same	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
6/17/2020	Freya Pitts	NCYL	Team call, including re: preliminary and final approval, fees, neutral, third party discovery, and media strategy	1.2	\$365.00	\$438.00	\$365.00	\$438.00	145-3
6/17/2020	Lori Burns- Bucklew	Burns- Bucklew	Team strategy call re: settlement and discovery stay	1.00	\$500.00	\$500.00	\$500.00	\$500.00	147-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
6/17/2020	Marissa Nardi	Children's Rights	meeting with external co-counsel team re settlement and litigation strategy, including settlement revisions, settlement communications with clients, preliminary approval motion, and third party discovery	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
6/17/2020	Poonam Juneja	NCYL	Team call, including re: preliminary and final approval, fees, neutral, third party discovery, and media strategy	1.2	\$395.00	\$474.00	\$395.00	\$474.00	145-3
6/17/2020	Tourgee, Olivia Morgan	DLA Piper	Attend weekly team phone call to discuss proposed settlement revisions; dismissal of certain Named Plaintiffs; client approval and next steps; preliminary approval motion and notice; contacting chambers about the preferred schedule; third party discovery; call with Defendants tomorrow; calls with Judy and Karen on Monday; motion for attorney's fees; and the press release.	1.2	\$240.00	\$288.00	\$240.00	\$288.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
6/24/2020	Fowler, Meg	DLA Piper	Attend the weekly counsel call, including discussion re: Attorney General's proposed settlement revisions and media strategy.	1.6	\$240.00	\$384.00	\$240.00	\$384.00	148-1
6/24/2020	Marissa Nardi	Children's Rights	meeting with external co-counsel team re litigation and settlement strategy, including AG's proposed settlement changes, client approvals, and preliminary approval motion	1.17	\$325.00	\$379.17	\$380.00	\$444.60	144-3
6/24/2020	Tourgee, Olivia Morgan	DLA Piper	Attend weekly team phone call to discuss our response to the Attorney General's proposed settlement changes; client approvals; timeline for preliminary approval motion, notice, final approval motion, and fee motion; press release and local updates.	0.8	\$240.00	\$192.00	\$240.00	\$192.00	148-1
6/30/2020	Ira Lustbader	Children's Rights	Team co-counsel call regarding approval strategy with SFC	0.58	\$500.00	\$291.67	\$500.00	\$290.00	144-3
6/30/2020	Lori Burns- Bucklew	Burns- Bucklew	Team co-counsel call re strategy and concerns re SFC	0.58	\$500.00	\$291.67	\$500.00	\$290.00	147-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
7/1/2020	Ira Lustbader	Children's Rights	Co-counsel team strategy call on SFC approval, discovery	0.58	\$500.00	\$291.67	\$500.00	\$290.00	144-3
7/1/2020	Kinney, Megan E.	DLA Piper	Attend weekly team call re: next steps re: settlement approval, dismissal of certain Named Plaintiffs, preliminary approval motion, and press strategy.	1	\$240.00	\$240.00	\$240.00	\$240.00	148-1
7/1/2020	Larry Rute	Kansas Appleseed	Team meeting re litigation and settlement strategy	1.1	\$500.00	\$550.00	\$500.00	\$550.00	146-2
7/1/2020	Leecia Welch	NCYL	Team call, including re: next steps re: settlement approval, dismissal of aged out Named Plaintiffs, preliminary approval motion, and press strategy	1.1	\$500.00	\$550.00	\$500.00	\$550.00	145-3
7/1/2020	Lori Burns- Bucklew	Burns- Bucklew	Co-counsel team strategy call on SFC approval of settlement and discovery	0.58	\$500.00	\$291.67	\$500.00	\$290.00	147-1
7/1/2020	Pacio, Kristin A.	DLA Piper	Conference call with team re: next steps re: settlement approval, dismissal of certain Named Plaintiffs, preliminary approval motion, and press strategy.	1	\$410.00	\$410.00	\$410.00	\$410.00	148-1

## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match the event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
7/1/2020	Poonam Juneja	NCYL	Team call, including re: next steps re: settlement approval, dismissal of aged out Named Plaintiffs, preliminary approval motion, and press strategy	1.1	\$395.00	\$434.50	\$395.00	\$434.50	145-3
7/1/2020	Teresa Woody	Kansas Appleseed	Team call re next steps re settlement approval, dismissal of aged out Named Plaintiffs, preliminary approval motion, and press strategy	1.1	\$500.00	\$550.00	\$500.00	\$550.00	146-2
7/1/2020	Tourgee, Olivia Morgan	DLA Piper	Revise and create weekly call schedule for DLA team and circulate to the DLA team .4 ; attend weekly team call to discuss the settlement, next steps with the Attorney General, resuming litigation, discovery schedule, press release and media plan, and preliminary approval papers 1.1 .	1.5	\$240.00	\$360.00	\$240.00	\$360.00	148-1
7/8/2020	Stephen Dixon	Children's Rights	Legal team call re strategy for preliminary approval	0.83	\$375.00	\$312.50	\$410.00	\$340.30	144-3



## ALL MEET AND CONFERS AND TEAM CALLS MEET NGS

Date  Some e p. dates adjusted to match event	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document
7/8/2020	Tourgee, Olivia Morgan	DLA Piper	Attend team call discussing the settlement agreement, dismissals for aged out Named Plaintiffs, media strategy, preliminary approval motion, and discovery.	1	\$240.00	\$240.00	\$240.00	\$240.00	148-1
7/22/2020	Stephen Dixon	Children's Rights	Telephone call with legal team re preliminary approval strategy	0.58	\$375.00	\$218.75	\$410.00	\$237.80	144-3
O				573.7		229,623.29		235,570.05	

# **EXHIBIT K**

**PRO HAC VICE  
FEES**

Date	Attorney Paralegal	Entity	Description	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	Entity
8/14/2018	Poonam Juneja	NCYL	researching pro hac vice rules in D Kansas	\$395.00	\$118.50	\$395.00	\$118.50	NCYL
11/16/2018	Freya Pitts	NCYL	Review requirements for pro hac vice application; email L. Welch with next steps for same	\$365.00	\$182.50	\$365.00	\$182.50	NCYL
11/16/2018	Kira Setren	NCYL	Prepared PHV motion and exhibits per Freya	\$200.00	\$40.00	\$200.00	\$40.00	NCYL
11/19/2018	Leecia Welch	NCYL	Emails with team about PHV forms; review same	\$500.00	\$100.00	\$500.00	\$100.00	NCYL
11/19/2018	Freya Pitts	NCYL	Instructions to K. Setren re: motions for leave to appear pro hac vice and accompanying paperwork; review drafts of same	\$365.00	\$146.00	\$365.00	\$146.00	NCYL
11/19/2018	Kira Setren	NCYL	Prepared PHV motion and exhibits per Freya	\$200.00	\$620.00	\$200.00	\$620.00	NCYL
11/20/2018	Daniel Adamek	Children's Rights	Draft CR's pro hac vice applications.	\$150.00	\$675.00	\$200.00	\$900.00	Children's Rights
11/20/2018	Marissa Nardi	Children's Rights	correspond with co-counsel re pro hac vice forms	\$325.00	\$151.67	\$380.00	\$178.60	Children's Rights
11/20/2018	Marissa Nardi	Children's Rights	Advise D. Adamek on preparation on pro hac vice forms	\$325.00	\$449.58	\$380.00	\$524.40	Children's Rights
11/20/2018	Freya Pitts	NCYL	Email correspondence re: pro hac vice applications	\$365.00	\$109.50	\$365.00	\$109.50	NCYL
11/20/2018	Freya Pitts	NCYL	Phone call with court clerk re: pro hac vice applications	\$365.00	\$36.50	\$365.00	\$36.50	NCYL

**PRO HAC VICE  
FEES**

Date	Attorney Paralegal	Entity	Description	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	Entity
11/20/2018	Freya Pitts	NCYL	Phone call with W.D. Washington court clerk re: L. Welch admission for pro hac vice motion	\$365.00	\$36.50	\$365.00	\$36.50	NCYL
11/20/2018	Kira Setren	NCYL	Prepared PHV motion and exhibits per Leecia	\$200.00	\$200.00	\$200.00	\$200.00	NCYL
11/21/2018	Leecia Welch	NCYL	Team call re: post-filing logistics, including pro hac applications, pseudonyms, co- counsel, and stakeholder/community connections	\$500.00	\$500.00	\$500.00	\$500.00	NCYL
11/21/2018	Freya Pitts	NCYL	Team call re: post-filing logistics, including pro hac applications, pseudonyms, co- counsel, and stakeholder/community connections	\$365.00	\$365.00	\$365.00	\$365.00	NCYL
11/21/2018	Freya Pitts	NCYL	Call district court clerk re: service requirements for pro hac vice motions	\$365.00	\$36.50	\$365.00	\$36.50	NCYL
11/21/2018	Freya Pitts	NCYL	Finalize paperwork for pro hac vice applications; instructions to D. Adamek and K. Setren re: same	\$365.00	\$328.50	\$365.00	\$328.50	NCYL
11/21/2018	Kira Setren	NCYL	Prepared PHV motion and exhibits per Leecia	\$200.00	\$80.00	\$200.00	\$80.00	NCYL

**PRO HAC VICE  
FEES**

Date	Attorney Paralegal	Entity	Description	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	Entity
11/21/2018	Larry Rute	Kansas Appleseed	Team Meeting re pseudonyms, co-counsel, pro hac vice applications	\$500.00	\$500.00	\$500.00	\$500.00	Kansas Appleseed
11/26/2018	Daniel Adamek	Children's Rights	Draft and edit pro hac vice applications for CR team.	\$150.00	\$95.00	\$200.00	\$126.00	Children's Rights
11/26/2018	Jonathan King	Children's Rights	Review pro hac vice documents for revisions prior to filing	\$325.00	\$319.58	\$345.00	\$338.10	Children's Rights
11/26/2018	Leecia Welch	NCYL	Emails with team re PHV	\$500.00	\$50.00	\$500.00	\$50.00	NCYL
11/26/2018	Leecia Welch	NCYL	Review draft pro hac paperwork	\$500.00	\$50.00	\$500.00	\$50.00	NCYL
11/26/2018	Freya Pitts	NCYL	Email correspondence with D. Dawson re: filing and service of pro hac paperwork	\$365.00	\$109.50	\$365.00	\$109.50	NCYL
11/26/2018	Freya Pitts	NCYL	Instructions to K. Setren and D. Adamek re: pro hac applications	\$365.00	\$109.50	\$365.00	\$109.50	NCYL
11/26/2018	Freya Pitts	NCYL	Phone conference with D. Dawson re: filing and service of pro hac paperwork	\$365.00	\$36.50	\$365.00	\$36.50	NCYL
11/26/2018	Freya Pitts	NCYL	Review draft pro hac paperwork	\$365.00	\$36.50	\$365.00	\$36.50	NCYL
11/26/2018	Kira Setren	NCYL	Filed PHV motions for Leecia and Freya	\$200.00	\$160.00	\$200.00	\$160.00	NCYL
11/26/2018	Kira Setren	NCYL	Finalized PHV motions	\$200.00	\$120.00	\$200.00	\$120.00	NCYL

**PRO HAC VICE  
FEES**

Date	Attorney Paralegal	Entity	Description	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	Entity
11/26/2018	Kira Setren	NCYL	Served PHV motions for Leecia and Freya	\$200.00	\$440.00	\$200.00	\$440.00	NCYL
11/27/2018	Daniel Adamek	Children's Rights	File pro hac vice applications for CR team.	\$150.00	\$25.00	\$200.00	\$34.00	Children's Rights
11/27/2018	Freya Pitts	NCYL	Email correspondence with D. Dawson re: filing and service of pro hac paperwork	\$365.00	\$109.50	\$365.00	\$109.50	NCYL
12/11/2018	Daniel Adamek	Children's Rights	Edit pro hac vice application for Benet Magnuson.	\$150.00	\$322.50	\$200.00	\$430.00	Children's Rights
12/11/2018	Marissa Nardi	Children's Rights	discuss pro hac vice form for B. Magnuson	\$325.00	\$70.42	\$380.00	\$83.60	Children's Rights
12/11/2018	Benet Magnuson	Kansas Appleseed	emails re filing Pro Hac Vice forms	\$300.00	\$150.00	\$300.00	\$150.00	Kansas Appleseed
12/11/2018	Benet Magnuson	Kansas Appleseed	drafting Pro Hac Vice forms	\$300.00	\$300.00	\$300.00	\$300.00	Kansas Appleseed
12/12/2018	Daniel Adamek	Children's Rights	File Benet Magnuson's pro hac vice application.	\$150.00	\$75.00	\$200.00	\$100.00	Children's Rights
3/7/2019	Poonam Juneja	NCYL	reviewing and revising PHV forms	\$395.00	\$158.00	\$395.00	\$158.00	NCYL
3/7/2019	Kira Setren	NCYL	Drafted PHV application and associated materials for Poonam Juneja	\$200.00	\$200.00	\$200.00	\$200.00	NCYL
3/8/2019	Poonam Juneja	NCYL	Confer with F. Pitts re: PHV applications & DLA Piper attorneys	\$395.00	\$79.00	\$395.00	\$79.00	NCYL

**PRO HAC VICE  
FEES**

Date	Attorney Paralegal	Entity	Description	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	Entity
3/8/2019	Freya Pitts	NCYL	Compile PHV materials for DLA Piper attorneys	\$365.00	\$146.00	\$365.00	\$146.00	NCYL
3/8/2019	Freya Pitts	NCYL	Confer with P. Juneja re: PHV applications for P. Juneja & DLA Piper attorneys	\$365.00	\$73.00	\$365.00	\$73.00	NCYL
3/8/2019	Freya Pitts	NCYL	Instructions to K. Setren re: certificates of service for PHV applications	\$365.00	\$36.50	\$365.00	\$36.50	NCYL
3/8/2019	Freya Pitts	NCYL	Review P. Juneja PHV application	\$365.00	\$36.50	\$365.00	\$36.50	NCYL
3/8/2019	Freya Pitts	NCYL	Review P. Juneja PHV application; email correspondence re: filing logistics for same	\$365.00	\$109.50	\$365.00	\$109.50	NCYL
3/8/2019	Kira Setren	NCYL	Prepared Poonam's PHV; corr. re: same	\$200.00	\$140.00	\$200.00	\$140.00	NCYL
3/11/2019	Poonam Juneja	NCYL	reviewing and revising PHV forms	\$395.00	\$39.50	\$395.00	\$39.50	NCYL
3/11/2019	Freya Pitts	NCYL	Send model PHV paperwork to J. Calderon at DLA Piper	\$365.00	\$73.00	\$365.00	\$73.00	NCYL
3/11/2019	Diggs, William J.	DLI Piper	Revising pro hac vice application.	\$410.00	\$164.00	\$410.00	\$164.00	DLI Piper
3/14/2019	Diggs, William J.	DLI Piper	Revising pro hac vice application.	\$410.00	\$82.00	\$410.00	\$82.00	DLI Piper
4/25/2019	Poonam Juneja	NCYL	drafting PHV papers	\$395.00	\$118.50	\$395.00	\$118.50	NCYL
4/25/2019	Poonam Juneja	NCYL	Confer with FP and L. Rute's office re: PHV motions	\$395.00	\$39.50	\$395.00	\$39.50	NCYL

**PRO HAC VICE  
FEES**

Date	Attorney Paralegal	Entity	Description	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	Entity
4/25/2019	Poonam Juneja	NCYL	reviewing PHV drafts from DLA and emailing re same	\$395.00	\$79.00	\$395.00	\$79.00	NCYL
4/25/2019	Freya Pitts	NCYL	Confer with P. Juneja and L. Rute's office re: PHV motions	\$365.00	\$36.50	\$365.00	\$36.50	NCYL
4/25/2019	Calderon, Judy	DLI Piper	Review and revise draft pro hac vice motion papers for D. Sager and W. Diggs	\$200.00	\$340.00	\$200.00	\$340.00	DLI Piper
4/25/2019	Diggs, William J.	DLI Piper	Coordinating with team concerning applications for admission pro hac vice.	\$410.00	\$82.00	\$410.00	\$82.00	DLI Piper
4/26/2019	Poonam Juneja	NCYL	email correspondence with team re pro hac vice applications	\$395.00	\$118.50	\$395.00	\$118.50	NCYL
4/26/2019	Kira Setren	NCYL	PHV Motion for Poonam Juneja - prepare & file	\$200.00	\$100.00	\$200.00	\$100.00	NCYL
4/26/2019	Calderon, Judy	DLI Piper	Finalize and file pro hac vice admission papers for D. Sager and W. Diggs	\$200.00	\$120.00	\$200.00	\$120.00	DLI Piper
10/14/2019	Calderon, Judy	DLI Piper	Draft and revise draft pro hac vice admission forms for team review;	\$200.00	\$260.00	\$200.00	\$260.00	DLI Piper
10/15/2019	Poonam Juneja	NCYL	reviewing emails re PHV motions	\$395.00	\$79.00	\$395.00	\$79.00	NCYL
10/22/2019	Calderon, Judy	DLI Piper	Review, revise, finalize and file motion for pro hac vice admission for J. Kane; review and update case files for same	\$200.00	\$220.00	\$200.00	\$220.00	DLI Piper



**PRO HAC VICE  
FEES**

Date	Attorney Paralegal	Entity	Description	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	Entity
3/2/2020	Nicole Taykhman	Children's Rights	Review pro hac vice application.	\$300.00	\$25.00	\$290.00	\$23.20	Children's Rights
7/21/2020	Tourgee, Olivia Morgan	DLI Piper	Confer with J. Kane, B. Yang, and C. Schechtman regarding draft of declaration in support of approval motion and pro hac vice motion.	\$240.00	\$264.00	\$240.00	\$264.00	DLI Piper
7/22/2020	Kane, Joshua	DLI Piper	Exchange emails with O. Tourgee regarding pro hac vice papers and declaration in support of appointment of class counsel (.5); attend team status call (.5).	\$410.00	\$410.00	\$410.00	\$410.00	DLI Piper
7/22/2020	Tourgee, Olivia Morgan	DLI Piper	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).	\$240.00	\$744.00	\$240.00	\$744.00	DLI Piper
7/23/2020	Poonam Juneja	NCYL	emailing team re jeff and caryn PHV documents and reviewing same	\$395.00	\$118.50	\$395.00	\$118.50	NCYL
<b>TOTALS</b>			<b>44.5</b>	<b>\$11,746.25</b>		<b>\$12,275.40</b>		

# **EXHIBIT L**

## CO D REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
3/13/2020	Teresa Woody	Kansas Appleseed	Review CO ID recommendations and outline concerns re CO ID management re foster care	1.3	\$500.00	\$650.00	\$500.00	\$650.00	146-2
3/16/2020	Poonam Juneja	NCYL	reviewing D. Kan. Covid administrative order	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
3/16/2020	Teresa Woody	Kansas Appleseed	Review D. Kan. AO re CO ID procedures	0.2	\$500.00	\$100.00	\$500.00	\$100.00	146-2
3/18/2020	Jonathan King	Children's Rights	Review public materials re Defs' plans for CO ID-19 with respect to placements and mental health care relevant to litigation	0.70	\$325.00	\$227.50	\$345.00	\$241.50	144-3
3/18/2020	Martha Hodgesmith	Kansas Appleseed	Team call re discovery updates, CO ID issues, experts, local stakeholder updates	0.9	\$345.00	\$310.50	\$345.00	\$310.50	146-2
3/19/2020	Ira Lustbader	Children's Rights	Review edit and finalize CO ID 19 contingency letter to Defs	0.75	\$500.00	\$375.00	\$500.00	\$375.00	144-3
3/19/2020	Jonathan King	Children's Rights	Draft letter to defendants regarding plans for CO ID- 19 with respect to placements and mental health treatment	3.30	\$325.00	\$1,072.50	\$345.00	\$1,138.50	144-3
3/19/2020	Marissa Nardi	Children's Rights	Edit draft letter re CO ID-19	0.50	\$325.00	\$162.50	\$380.00	\$190.00	144-3
3/19/2020	Poonam Juneja	NCYL	reviewing and revising covid letter to defendants	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
3/19/2020	Teresa Woody	Kansas Appleseed	Review and comment re letter to defendants re CO ID protocols	0.2	\$500.00	\$100.00	\$500.00	\$100.00	146-2
3/20/2020	Leecia Welch	NCYL	Review CO ID letter	0.3	\$500.00	\$150.00	\$500.00	\$150.00	145-3

## CO D REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
3/20/2020	Teresa Woody	Kansas Appleseed	Finalize and send letter to defendants re CO ID protocol	0.5	\$500.00	\$250.00	\$500.00	\$250.00	146-2
3/20/2020	Teresa Woody	Kansas Appleseed	Emails re concerns about placements during CO ID and potential emergency action	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2
3/24/2020	Poonam Juneja	NCYL	reviewing team correspondence re draft email re discovery and covid delays and responding re same	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
3/24/2020	Poonam Juneja	NCYL	reviewing team emails re discovery related to covid	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
3/24/2020	Freya Pitts	NCYL	Email correspondence re: CO ID-19 response	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
3/25/2020	Nicole Taykman	Children's Rights	Review team correspondence re letter on CO ID response.	0.08	\$300.00	\$25.00	\$290.00	\$23.20	144-3
3/25/2020	Leecia Welch	NCYL	Team call, including re: CO ID-19 response, discovery disputes, and experts	0.7	\$500.00	\$350.00	\$500.00	\$350.00	145-3
3/25/2020	Leecia Welch	NCYL	Draft letter re: CO ID-19 response in Kansas	0.8	\$500.00	\$400.00	\$500.00	\$400.00	145-3
3/25/2020	Poonam Juneja	NCYL	Team call, including re: CO ID-19 response, discovery disputes, and experts	0.7	\$395.00	\$276.50	\$395.00	\$276.50	145-3
3/25/2020	Poonam Juneja	NCYL	Review LW draft letter re: CO ID-19 response and emailing re same	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3

## CO D REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
3/25/2020	Freya Pitts	NCYL	Review L. Welch draft letter re: CO ID-19 response in Kansas and email correspondence re: same	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
3/25/2020	Freya Pitts	NCYL	Review resources from stakeholders re: child welfare system responses to CO ID-19 in other states	0.6	\$365.00	\$219.00	\$365.00	\$219.00	145-3
3/25/2020	Martha Hodgesmith	Kansas Appleseed	Team call CO ID response, discovery disputes, experts	0.7	\$345.00	\$241.50	\$345.00	\$241.50	146-2
3/25/2020	Teresa Woody	Kansas Appleseed	Team call re CO ID-19 response, discovery disputes, and experts	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2
3/25/2020	Teresa Woody	Kansas Appleseed	Review and comment re letter on CO ID protocol	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2
3/25/2020	Tourgee, Olivia Morgan	DLI Piper	Attend weekly team phone call re: CO ID-19 response, discovery disputes, and experts, and take notes .7 ; review and analyze documents relating to one of the named plaintiffs 4.8 .	5.5	\$240.00	\$1,320.00	\$240.00	\$1,320.00	148-1
3/26/2020	Claire Glasspiegel	Children's Rights	Draft fourth set of RFPs based on letter re: CO ID-19	1.42	\$300.00	\$425.00	\$310.00	\$440.20	144-3
3/26/2020	Teresa Woody	Kansas Appleseed	Review and circulate memo on McKinney ento obligations re learning at home during CO ID	0.6	\$500.00	\$300.00	\$500.00	\$300.00	146-2
3/27/2020	Claire Glasspiegel	Children's Rights	Continue drafting fourth RFP set based on letter re: CO ID-19	4.00	\$300.00	\$1,200.00	\$310.00	\$1,240.00	144-3

## CO D REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
3/27/2020	Jonathan King	Children's Rights	Call with CG regarding draft document request for CO ID-19 plans	0.55	\$325.00	\$178.75	\$345.00	\$189.75	144-3
3/27/2020	Jonathan King	Children's Rights	Review guidance regarding contingency plans for CO ID-19	1.87	\$325.00	\$606.67	\$345.00	\$645.15	144-3
3/27/2020	Nicole Taykhman	Children's Rights	Review correspondence with defendants and co-counsel re discovery and CO ID protocols.	0.18	\$300.00	\$55.00	\$290.00	\$52.20	144-3
3/28/2020	Teresa Woody	Kansas Appleseed	Review HHS memo re CO ID protocols for children	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2
3/29/2020	Ira Lustbader	Children's Rights	Review/analyze plaintiff strategy on CO ID-19 protocols	0.83	\$500.00	\$416.67	\$500.00	\$415.00	144-3
3/30/2020	Ira Lustbader	Children's Rights	Follow up review and strategy on RFP for CO ID-19 materials	1.08	\$500.00	\$541.67	\$500.00	\$540.00	144-3
3/30/2020	Jonathan King	Children's Rights	Review guidance regarding contingency plans for CO ID-19	1.52	\$325.00	\$492.92	\$345.00	\$524.40	144-3
3/30/2020	Marissa Nardi	Children's Rights	Edit draft rfps re new covid-19 issues re placements and MH	1.37	\$325.00	\$444.17	\$380.00	\$520.60	144-3
3/30/2020	Leecia Welch	NCYL	Confer with L. Welch and P. Juneja re: CO ID-19 response letter, experts, and discovery	0.2	\$500.00	\$100.00	\$500.00	\$100.00	145-3
3/30/2020	Poonam Juneja	NCYL	Confer with L. Welch and P. Juneja re: CO ID-19 response letter, experts, and discovery	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3

## CO D REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
3/30/2020	Freya Pitts	NCYL	Confer with L. Welch and P. Juneja re: CO ID-19 response letter, experts, and discovery	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
3/31/2020	Jonathan King	Children's Rights	Conference call with CG regarding draft RFP relating to CO ID-19	0.18	\$325.00	\$59.58	\$345.00	\$62.10	144-3
3/31/2020	Jonathan King	Children's Rights	Revise and edit discovery request regarding contingency plans for CO ID-19	3.87	\$325.00	\$1,256.67	\$345.00	\$1,335.15	144-3
3/31/2020	Freya Pitts	NCYL	Review Children's Bureau guidance re: CO ID-19 and child welfare systems	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
3/31/2020	Freya Pitts	NCYL	Review correspondence from Defendants re: CO ID-19 and team email correspondence re: same	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
3/31/2020	Freya Pitts	NCYL	Review publicly available state guidance re: CO ID-19	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3
4/1/2020	Jonathan King	Children's Rights	Revise and edit discovery request regarding contingency plans for CO ID-19	1.17	\$325.00	\$379.17	\$345.00	\$403.65	144-3
4/1/2020	Leecia Welch	NCYL	Team call re: CO ID-19 response, discovery, experts, and named plaintiffs	0.8	\$500.00	\$400.00	\$500.00	\$400.00	145-3
4/1/2020	Leecia Welch	NCYL	Review defendants' response re CO ID discovery	0.3	\$500.00	\$150.00	\$500.00	\$150.00	145-3

## CO D REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
4/1/2020	Poonam Juneja	NCYL	Team call, including re: CO ID-19 response, discovery, experts, and named plaintiffs	0.8	\$395.00	\$316.00	\$395.00	\$316.00	145-3
4/1/2020	Poonam Juneja	NCYL	reviewing JP Bradshaw email re covid discovery delay request and team emails re same	0.4	\$395.00	\$158.00	\$395.00	\$158.00	145-3
4/1/2020	Poonam Juneja	NCYL	locating covid KDADS waiver document and sharing with JK	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
4/1/2020	Freya Pitts	NCYL	Receive and review correspondence from Defendants re: CO ID-19 and case schedule	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
4/1/2020	Freya Pitts	NCYL	Review and revise 4th RFPs re: CO ID-19	0.4	\$365.00	\$146.00	\$365.00	\$146.00	145-3
4/1/2020	Martha Hodgesmith	Kansas Appleseed	Team call reCO ID response, discovery, experts, named plaintiffs	0.8	\$345.00	\$276.00	\$345.00	\$276.00	146-2
4/1/2020	Teresa Woody	Kansas Appleseed	Email from defendants re covid discovery delay request and confer with co-counsel re same	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2
4/1/2020	Teresa Woody	Kansas Appleseed	Call with co-counsel re CO ID-19 response, discovery, experts, and named plaintiffs	0.8	\$500.00	\$400.00	\$500.00	\$400.00	146-2
4/1/2020	Lori Burns-Bucklew	Burns-Bucklew	Team strategy call re: discovery, experts, NPs, and CO ID-19 placement MH concerns	0.80	\$500.00	\$400.00	\$500.00	\$400.00	147-1



## CO D REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
4/1/2020	Kinney, Megan E.	DLI Piper	Attend weekly team call re: CO ID-19 response, discovery, experts, and named plaintiffs.	0.8	\$240.00	\$192.00	\$240.00	\$192.00	148-1
4/1/2020	Tourgee, Olivia Morgan	DLI Piper	Attend weekly team phone call to discuss CO ID-19 and our response, discovery updates and plan, and experts.	0.8	\$240.00	\$192.00	\$240.00	\$192.00	148-1
4/2/2020	Jonathan King	Children's Rights	Revise and edit discovery request regarding contingency plans for CO ID-19	2.50	\$325.00	\$812.50	\$345.00	\$862.50	144-3
4/2/2020	Freya Pitts	NCYL	Review revised fourth set of RFPs re: CO ID-19	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
4/2/2020	Teresa Woody	Kansas Appleseed	Draft response to defendants' request for CO ID delay in discovery	2.1	\$500.00	\$1,050.00	\$500.00	\$1,050.00	146-2
4/2/2020	Teresa Woody	Kansas Appleseed	Review docs from defendants' website re CO ID protocols	0.4	\$500.00	\$200.00	\$500.00	\$200.00	146-2
4/3/2020	Ira Lustbader	Children's Rights	Team co counsel call regarding meet and confer and enforcement, CO ID strategy	0.83	\$500.00	\$416.67	\$500.00	\$415.00	144-3
4/3/2020	Leecia Welch	NCYL	Team call re: CO ID-19 response, discovery, and Next Friend Kathryn Ashburn	1.0	\$500.00	\$500.00	\$500.00	\$500.00	145-3
4/3/2020	Leecia Welch	NCYL	Review Children's Bureau guidance re: CO ID-19 and child welfare systems	0.3	\$500.00	\$150.00	\$500.00	\$150.00	145-3
4/3/2020	Leecia Welch	NCYL	Review state guidance re: CO ID-19	0.4	\$500.00	\$200.00	\$500.00	\$200.00	145-3

## CO D REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
4/3/2020	Poonam Juneja	NCYL	Team call, including re: CO ID-19 response, discovery, and Next Friend Kathryn Ashburn	1.0	\$395.00	\$395.00	\$395.00	\$395.00	145-3
4/3/2020	Freya Pitts	NCYL	Receive and review email correspondence re: CO ID-19 response and case strategy	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3
4/3/2020	Teresa Woody	Kansas Appleseed	Call with co-counsel re CO ID-19 response, discovery, and next friends	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2
4/3/2020	Lori Burns-Bucklew	Burns-Bucklew	Co-counsel strategy call re: M C, CO ID discovery plan, next steps	0.83	\$500.00	\$416.67	\$500.00	\$415.00	147-1
4/6/2020	Nicole Taykhman	Children's Rights	Review relevant press on response to CO ID-19 by defendants.	0.10	\$300.00	\$30.00	\$290.00	\$29.00	144-3
4/6/2020	Nicole Taykhman	Children's Rights	Review co-counsel correspondence re discovery strategy amid CO ID-19.	0.63	\$300.00	\$190.00	\$290.00	\$182.70	144-3
4/8/2020	Marissa Nardi	Children's Rights	Meeting with external co-counsel re litigation strategy, including M C with Defs, CO ID-19 issues, third party subpoenas, NFs, and experts	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
4/8/2020	Teresa Woody	Kansas Appleseed	Telephone call to court re question re mailed service of subpoenas sufficient because of CO ID; telephone call from clerk of D. Kan. re same,	1	\$500.00	\$500.00	\$500.00	\$500.00	146-2

## CO D REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
4/13/2020	Claire Glasspiegel	Children's Rights	Review CO ID-related RFPs to preparing talking points re same for meet and confer with defendants re: CO ID-19	0.50	\$300.00	\$150.00	\$310.00	\$155.00	144-3
4/13/2020	Daniel Adamek	Children's Rights	Assemble correspondence re CO ID-19 RFPs for meet and confer.	0.27	\$150.00	\$40.00	\$200.00	\$54.00	144-3
4/13/2020	Jonathan King	Children's Rights	Advise team re CO ID-19 RFP and related documents in preparation for meet and confer re same	0.42	\$325.00	\$135.42	\$345.00	\$144.90	144-3
4/13/2020	Marissa Nardi	Children's Rights	Review new CO ID-19 placement and MH discovery	0.47	\$325.00	\$151.67	\$380.00	\$178.60	144-3
4/13/2020	Leecia Welch	NCYL	Attend meet and confer with Defs re CO ID discovery	0.7	\$500.00	\$350.00	\$500.00	\$350.00	145-3
4/13/2020	Poonam Juneja	NCYL	Confer with FP re: strategy for meet and confer re: CO ID 19	0.1	\$395.00	\$39.50	\$395.00	\$39.50	145-3
4/13/2020	Poonam Juneja	NCYL	Meet and confer with Defendants re: CO ID-19 RFPs	0.7	\$395.00	\$276.50	\$395.00	\$276.50	145-3
4/13/2020	Freya Pitts	NCYL	Confer with P. Juneja re: strategy for meet and confer re: CO ID 19	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
4/13/2020	Teresa Woody	Kansas Appleseed	Meet and confer with Defendants re CO ID-19 RFPs	0.7	\$500.00	\$350.00	\$500.00	\$350.00	146-2
4/20/2020	Claire Glasspiegel	Children's Rights	Review Def's responses and objections to Covid-19 RFPs	0.75	\$300.00	\$225.00	\$310.00	\$232.50	144-3

## CO D REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
4/20/2020	Jonathan King	Children's Rights	Analyze defendants' Responses to Plaintiffs' RFPs relating to CO ID-19	1.52	\$325.00	\$492.92	\$345.00	\$524.40	144-3
4/20/2020	Marissa Nardi	Children's Rights	Discuss targeted factual investigatory re CO ID-19 placement issues with CC	0.30	\$325.00	\$97.50	\$380.00	\$114.00	144-3
4/20/2020	Marissa Nardi	Children's Rights	Analyze case updates re CO ID-19 issues re placements and MH	0.48	\$325.00	\$157.08	\$380.00	\$182.40	144-3
4/20/2020	Poonam Juneja	NCYL	Emailing with LW FP re: preparation, strategy, and staffing for 4/21/20 meet and confer with Defendants re: case schedule, CO ID-19, and other outstanding discovery items	0.5	\$395.00	\$197.50	\$395.00	\$197.50	145-3
4/20/2020	Freya Pitts	NCYL	Email correspondence with L. Welch and P. Juneja re: preparation, strategy, and staffing for 4/21/20 meet and confer with Defendants re: case schedule, CO ID-19, and other outstanding discovery items	0.5	\$365.00	\$182.50	\$365.00	\$182.50	145-3
4/21/2020	Marissa Nardi	Children's Rights	Review CC's investigatory analysis re CO ID-19 placement issues	0.20	\$325.00	\$65.00	\$380.00	\$76.00	144-3
4/21/2020	Poonam Juneja	NCYL	Team call to prepare for 4/21 meet and confer with Defendants, including re case schedule, CO ID-19-related discovery, and written discovery	0.7	\$395.00	\$276.50	\$395.00	\$276.50	145-3

## CO D REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
4/22/2020	Marissa Nardi	Children's Rights	Meeting with external co-counsel re litigation strategy, including CO ID-related discovery issues, experts, M C, and updates from NFs	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
4/22/2020	Teresa Woody	Kansas Appleseed	TCW next friend re lack of CO ID protocols in foster placements	0.5	\$500.00	\$250.00	\$500.00	\$250.00	146-2
4/28/2020	Marissa Nardi	Children's Rights	Electronic email with internal team re CO ID-19 placement and MH doc production and doc review	0.13	\$325.00	\$43.33	\$380.00	\$49.40	144-3
4/29/2020	Marissa Nardi	Children's Rights	Meeting with external co-counsel team for litigation strategy mtg, including discussion of subpoenas, M Cs, privilege and redaction logs, case schedule, experts, and new CO ID-19 issues	1.00	\$325.00	\$325.00	\$380.00	\$380.00	144-3
4/29/2020	Freya Pitts	NCYL	Review new CO ID-19 guidance re: HCBS waivers	0.1	\$365.00	\$36.50	\$365.00	\$36.50	145-3
4/30/2020	Marissa Nardi	Children's Rights	Review most relevant CO ID-19 documents re placements MH produced by Defs as isolated by CG	0.32	\$325.00	\$102.92	\$380.00	\$121.60	144-3
4/30/2020	Freya Pitts	NCYL	Receive and review email correspondence and materials from C. Glasspiegel re: discovery deadlines in CO ID-19 pandemic	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3

## CO D REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
5/1/2020	Marissa Nardi	Children's Rights	Discuss Defs' produced CO ID-19 discovery with CG	0.37	\$325.00	\$119.17	\$380.00	\$140.60	144-3
5/1/2020	Marissa Nardi	Children's Rights	Review CO ID-19 production by Defendants	0.77	\$325.00	\$249.17	\$380.00	\$292.60	144-3
5/1/2020	Nicole Taykhman	Children's Rights	Review discovery correspondence and summary of CO ID-19 related document production in preparation for meet and confer.	0.22	\$300.00	\$65.00	\$290.00	\$63.80	144-3
5/1/2020	Freya Pitts	NCYL	Review hot documents from CO ID-19 production	0.3	\$365.00	\$109.50	\$365.00	\$109.50	145-3
5/4/2020	Claire Glasspiegel	Children's Rights	Review and analyze CO ID-19 production by Defs in response to Pls' CO ID-19 RFPs	3.00	\$300.00	\$900.00	\$310.00	\$930.00	144-3
5/5/2020	Claire Glasspiegel	Children's Rights	Review CO ID-19 Docs produced by Defs to advise team re content and deficiencies in preparation for meet and confer	3.17	\$300.00	\$950.00	\$310.00	\$982.70	144-3
5/5/2020	Marissa Nardi	Children's Rights	Analyze CO ID-19 production holes	1.32	\$325.00	\$427.92	\$380.00	\$501.60	144-3
5/6/2020	Marissa Nardi	Children's Rights	Electronic email with CC DA and CG re location of CO ID-19 files	0.18	\$325.00	\$59.58	\$380.00	\$68.40	144-3
5/6/2020	Marissa Nardi	Children's Rights	Edit CO ID-19 production holes summary and analysis in preparation for M C	1.45	\$325.00	\$471.25	\$380.00	\$551.00	144-3
5/7/2020	Claire Glasspiegel	Children's Rights	Draft talking points for meet and confer re: CO ID 19 production deficiencies	3.50	\$300.00	\$1,050.00	\$310.00	\$1,085.00	144-3

## CO D REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
5/7/2020	Marissa Nardi	Children's Rights	Electronic email with DA and CC re CO ID-19 production and updates	0.47	\$325.00	\$151.67	\$380.00	\$178.60	144-3
5/8/2020	Claire Glasspiegel	Children's Rights	Reviewing notes on CO ID19 production to advise MN on this topic for meet and confer re this issue	1.00	\$300.00	\$300.00	\$310.00	\$310.00	144-3
5/8/2020	Marissa Nardi	Children's Rights	electronic mail with CG re production deficiencies from Defendants' covid-19 production	0.22	\$325.00	\$70.42	\$380.00	\$83.60	144-3
5/8/2020	Poonam Juneja	NCYL	reviewing CG document regarding holes in covid19 production	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
5/12/2020	Claire Glasspiegel	Children's Rights	Draft email identifying Defendants' gaps in CO ID-19 production	0.95	\$300.00	\$285.00	\$310.00	\$294.50	144-3
5/14/2020	Claire Glasspiegel	Children's Rights	Read email discussing next steps on CO ID-19 production deficiencies	0.17	\$300.00	\$50.00	\$310.00	\$52.70	144-3
5/14/2020	Claire Glasspiegel	Children's Rights	Draft detailed email on recommendations for handling Defs' failures in CO ID-19 production	0.60	\$300.00	\$180.00	\$310.00	\$186.00	144-3
5/14/2020	Marissa Nardi	Children's Rights	edit CG draft letter to Pls' re CO ID-19 production issues	0.68	\$325.00	\$222.08	\$380.00	\$258.40	144-3
5/14/2020	Freya Pitts	NCYL	Receive and review draft email from C. Glasspiegel re: CO ID-19 discovery; email P. Juneja re: same	0.2	\$365.00	\$73.00	\$365.00	\$73.00	145-3

## CO D REFERENCES N FEES

Date	Attorney Paralegal	Entity	Description	Hours	Hourly Rate With CR Lower Rates Per Doc 144-2 (Fee Statement)	Amount with CR Lower Rates (Doc 144-2)	Hourly Rate With CR Higher Rates Per Doc 144 (Declaration)	Amount with CR Higher Rates (Doc 144)	ECF No. of Source Document for Fees
5/15/2020	Claire Glasspiegel	Children's Rights	Chat with PJ to prep for meet and confer re CO ID- 19	0.03	\$300.00	\$10.00	\$310.00	\$9.30	144-3
5/15/2020	Poonam Juneja	NCYL	reviewing materials re covid discovery and draft email to Ds re same and emailing team re same	0.3	\$395.00	\$118.50	\$395.00	\$118.50	145-3
5/15/2020	Poonam Juneja	NCYL	phone call with CG re covid discovery	0.2	\$395.00	\$79.00	\$395.00	\$79.00	145-3
5/15/2020	Teresa Woody	Kansas Appleseed	Email to defendants re gaps in CO ID production	0.3	\$500.00	\$150.00	\$500.00	\$150.00	146-2
5/20/2020	Claire Glasspiegel	Children's Rights	Identify additional CO ID-19 production issues	0.33	\$300.00	\$100.00	\$310.00	\$102.30	144-3
<b>TOTALS</b>				<b>94.15</b>		<b>\$34,078.71</b>		<b>\$35,301.50</b>	



# **EXHIBIT M**

## DLA P PER CLASS CERT F CAT ON FEES

Date  Some e p. dates ad usted to match e ent	Attorney Paralegal	Entity	Description	Hours	Hourly Rate	Amount	ECF No. of Source Document
3/20/2019	Diggs, William J.	DLA Piper	Meeting with cocounsel concerning claims and strategy for complaint amendment, class certification, and discovery.	3	\$410.00	\$1,230.00	148-1
3/20/2019	Fowler, Meg	DLA Piper	Attend team strategy meeting, including discussion of claims and strategy for complaint amendment, class certification, and discovery.	3	\$240.00	\$720.00	148-1
3/21/2019	Diggs, William J.	DLA Piper	Planning concerning tasks regarding brief in support of motion for class certification.	0.3	\$410.00	\$123.00	148-1
3/22/2019	Diggs, William J.	DLA Piper	Coordinating with team concerning tasks in preparation for brief in support of motion for class certification.	0.1	\$410.00	\$41.00	148-1
3/28/2019	Diggs, William J.	DLA Piper	Research concerning specificity requirement for Rule 23 b 2 certification.	2.3	\$410.00	\$943.00	148-1
3/29/2019	Diggs, William J.	DLA Piper	Research concerning specificity requirement for Rule 23 b 2 certification.	1.9	\$410.00	\$779.00	148-1
4/1/2019	Diggs, William J.	DLA Piper	Research concerning specificity requirement for Rule 23 b 2 certification.	0.4	\$410.00	\$164.00	148-1
4/4/2019	Diggs, William J.	DLA Piper	Research concerning specificity requirement for Rule 23 b 2 certification.	0.9	\$410.00	\$369.00	148-1
4/4/2019	Diggs, William J.	DLA Piper	Coordinating with team concerning tasks in preparation for class certification briefing.	0.2	\$410.00	\$82.00	148-1
4/8/2019	Diggs, William J.	DLA Piper	Coordinating with team concerning outline for brief in support of motion for class certification.	0.1	\$410.00	\$41.00	148-1
4/8/2019	Diggs, William J.	DLA Piper	Drafting template for preparation of outline for brief in support of motion for class certification.	0.2	\$410.00	\$82.00	148-1
4/8/2019	Sager, David S.	DLA Piper	Instructions to W. Diggs regarding research/class cert motion.	0.3	\$500.00	\$150.00	148-1

## DLA P PER CLASS CERT F CAT ON FEES

Date  Some e p. dates ad usted to match e ent	Attorney Paralegal	Entity	Description	Hours	Hourly Rate	Amount	ECF No. of Source Document
4/9/2019	Diggs, William J.	DLA Piper	Coordinating with team concerning outline for brief in support of motion for class certification.	0.4	\$410.00	\$164.00	148-1
4/9/2019	Fowler, Meg	DLA Piper	Research case law from District of Kansas and Tenth Circuit concerning class certification and bifurcation of discovery between merits and class certification issues.	4.1	\$240.00	\$984.00	148-1
4/9/2019	Sager, David S.	DLA Piper	Instructions to W. Diggs regarding class certification and preparation for upcoming meetings.	0.4	\$500.00	\$200.00	148-1
4/10/2019	Diggs, William J.	DLA Piper	Call with David Sager, Kristin Pacio, Meg Fowler regarding outline for brief in support of motion for class certification.	0.4	\$410.00	\$164.00	148-1
4/10/2019	Diggs, William J.	DLA Piper	Coordinating with team concerning outline for brief in support of motion for class certification.	0.4	\$410.00	\$164.00	148-1
4/12/2019	Diggs, William J.	DLA Piper	Drafting outline for brief in support of motion for class certification.	3.7	\$410.00	\$1,517.00	148-1
4/12/2019	Diggs, William J.	DLA Piper	Coordinating with team concerning outline for brief in support of motion for class certification.	0.1	\$410.00	\$41.00	148-1
4/14/2019	Fowler, Meg	DLA Piper	Conduct research for and outline a portion of the brief in support of class certification.	3.9	\$240.00	\$936.00	148-1
4/15/2019	Diggs, William J.	DLA Piper	Drafting outline for brief in support of motion for class certification.	3.4	\$410.00	\$1,394.00	148-1
4/15/2019	Fowler, Meg	DLA Piper	Conduct research for and edit a portion of an outline of the brief in support of class certification.	2.2	\$240.00	\$528.00	148-1
4/16/2019	Diggs, William J.	DLA Piper	Analyzing outline for brief in support of motion for class certification to identify primary caselaw.	0.2	\$410.00	\$82.00	148-1

## DLA P PER CLASS CERT F CAT ON FEES

Date  Some e p. dates ad usted to match e ent	Attorney Paralegal	Entity	Description	Hours	Hourly Rate	Amount	ECF No. of Source Document
4/16/2019	Diggs, William J.	DLA Piper	Drafting outline for brief in support of motion for class certification.	3.5	\$410.00	\$1,435.00	148-1
4/16/2019	Pacio, Kristin A.	DLA Piper	Reviewing memorandum regarding class certification.	1.6	\$410.00	\$656.00	148-1
4/24/2019	Diggs, William J.	DLA Piper	Call with David Sager, Meg Fowler, cocounsel concerning motion for class certification, research regarding privilege.	0.6	\$410.00	\$246.00	148-1
4/24/2019	Fowler, Meg	DLA Piper	Participate in the weekly all-hands conference call, including discussion of local/stakeholder updates .6 ; confer with DLA team members about the motion for class certification 1 .	1.6	\$240.00	\$384.00	148-1
5/2/2019	Diggs, William J.	DLA Piper	Drafting brief in support of motion for class certification.	3.1	\$410.00	\$1,271.00	148-1
5/2/2019	Fowler, Meg	DLA Piper	Draft motion for class certification.	2.5	\$240.00	\$600.00	148-1
5/3/2019	Diggs, William J.	DLA Piper	Drafting brief in support of motion for class certification.	3.1	\$410.00	\$1,271.00	148-1
5/3/2019	Fowler, Meg	DLA Piper	Draft motion for class certification.	4.6	\$240.00	\$1,104.00	148-1
5/4/2019	Fowler, Meg	DLA Piper	Draft motion for class certification.	2.7	\$240.00	\$648.00	148-1
5/5/2019	Fowler, Meg	DLA Piper	Draft motion for class certification.	12.5	\$240.00	\$3,000.00	148-1
5/6/2019	Fowler, Meg	DLA Piper	Draft motion for class certification.	12.9	\$240.00	\$3,096.00	148-1
5/7/2019	Fowler, Meg	DLA Piper	Correspond with team members concerning the motion for class certification.	0.2	\$240.00	\$48.00	148-1
5/8/2019	Diggs, William J.	DLA Piper	Drafting brief in support of motion for class certification.	3.6	\$410.00	\$1,476.00	148-1

## DLA P PER CLASS CERT F CAT ON FEES

Date  Some e p. dates ad usted to match e ent	Attorney Paralegal	Entity	Description	Hours	Hourly Rate	Amount	ECF No. of Source Document
5/9/2019	Diggs, William J.	DLA Piper	Drafting brief in support of motion for class certification.	6.3	\$410.00	\$2,583.00	148-1
5/16/2019	Pacio, Kristin A.	DLA Piper	Reviewing draft class certification brief.	2.3	\$410.00	\$943.00	148-1
1/15/2020	Tourgee, Olivia Morgan	DLA Piper	Review team correspondence regarding strategizing mediation plans and responses to opposing counsel's emails and review related articles to the case .4 ; attend weekly team phone call discussing mediation, discovery requests, discovery plan, class certification motion plan, and local updates 1 .	1.4	\$240.00	\$336.00	148-1
1/23/2020	Tourgee, Olivia Morgan	DLA Piper	Attend and take notes on the team weekly phone call addressing: mediation and the settlement draft from Defendants; the opposition to Defendants' motion to dismiss; discovery plan; plan for class certification motion; ongoing research needs; and local/stakeholder updates.	1.1	\$240.00	\$264.00	148-1
O				95.5		30,259.00	